



Virginia Forest Watch

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January 2, 2008

George Washington Plan Revision
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019

RE: National Forest Planning Process and Wind Plants

Dear Planning Team:

Virginia Forest Watch (VAFW) is a grassroots non-profit organization with members throughout the Commonwealth of Virginia. Our mission is to maintain and restore the natural ecology and biodiversity of woodlands across Virginia through education and citizen participation. Please consider this a formal comment in the process of revising the Land and Resources Management Plan for the George Washington National Forest (GWNF).

We are writing in conjunction with the group letter from the Virginia Sierra Club *et al.* concerning industrial wind development in national forests. VAFW joins the Sierra Club and others in opposing the wind energy development projects that are proposed on the GWNF. We are among the many groups referenced in that letter that find all national forest lands unsuitable for industrial wind turbines. Furthermore, we also oppose widening or other alterations of national forest roads and property to facilitate wind plants on nearby private property. We enclose with this letter a copy of our organization's wind energy development policy statement.

The Multiple-Use Sustained-Yield Act states: "It is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Wind plants on national forests threaten every one of these purposes for which national forests are maintained.

Parts of the Great Eastern Trail, established by the dedicated collaboration of many hiking groups over a number of years, would be obliterated by current proposed wind plants on the George Washington National Forest. Outdoor recreation by hunters, fishermen, mountain bikers, horse riders, picnickers, campers and Sunday drivers, all of whom contribute significantly to local economies while using the national forest, would also be highly impacted by the noise, sight, roads and disturbed ground of wind plants along the highest ridges. Current wind plant proposals on the GWNF would also destroy the integrity of several areas that are defined by the Forest Service itself as having unusual wilderness values as well as by The Wilderness Society in the recently published *Virginia's Mountain Treasures*.

With regard to range and timber, Paul State Forest in Rockingham County just east of Shenandoah Mountain provides an excellent example of the most likely ecosystem response to

the extensive clearcutting and extra wide roads necessary for wind plants. Forestry workshop participants there this past July had difficulty finding crop trees to favor due to the invasion of Ailanthus, Japanese joint grass, and other non-native species that are suppressing native tree growth after a clearcut twenty years ago.

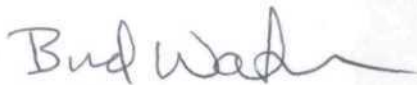
Water quality protection is a major concern to communities surrounding the national forests as evidenced by the resolutions, now being passed by many jurisdictions in western Virginia, requesting that the Forest Service better protect the watersheds that supply drinking water to more than 260,000 residents of 22 localities in western Virginia. Water quality in the GWNF is already compromised, as documented in the 2006 Virginia Department of Environmental Quality report that identifies 21 impaired streams in drinking watersheds in the GWNF. The massive roads and ground disturbance necessary in headwater areas for wind plants would compound the erosion and sedimentation of streams that are already occurring in lower areas, impacting native fish species as well as drinking water supplies

For reasons detailed in a twelve-page letter dated November 16, 2007, the U.S. Fish & Wildlife Service recommends strongly against wind turbines on Shenandoah Mountain due to the high likelihood of killing endangered species. The highest numbers of bat and bird kills in the world from wind turbines have been recently documented at wind plants just across the state line in West Virginia. The remote ridges desirable for wind plants are the most undisturbed and the highest, coolest habitat available to uncommon species and species seeking to avoid climate warming by moving to higher ground. The threat to wildlife from wind plants on national forests in Virginia is extreme.

The weight of these arguments should preclude any wind plant development on national forests in Virginia, and such massively destructive commercial projects for private profit should not be allowed in national forests anywhere. We ask that you, in the planning process, define the entirety of the GWNF as unsuitable for industrial wind development. We further request revision of the Jefferson National Forest plan to declare that Forest unsuitable as well.

Thank you for the opportunity to comment.

Sincerely,



Bud Watson
Executive Director