

January 15, 2009

Maureen Hyzer, Forest Supervisor  
George Washington Plan Revision  
GWJNF, 5162 Valleypoint Parkway  
Roanoke, Va. 24019

Dear Supervisor Hyzer:

The Skyline Chapter of the Society of American Foresters believes that the George Washington N.F. must be managed under the multiple-use mandates described in the Organic Administration Act of 1897 and the Multiple-Use Sustained Yield Act of 1960. In recent years the George Washington-Jefferson N.F. has moved away from the multiple use mandate and toward the preservation management mandate of the National Park Service. We reject this shift in management direction and recommend that scientifically based management strategy incorporated in your plans current vision statement be your future guide.

There are many issues that must be addressed in the revised plan and its implementation. We will comment on a few:

Potential Wilderness – The 372,631 acres in the potential wilderness inventory is a huge amount of national forest land. We believe few of these areas merit the quality to be recommended for wilderness. Those lands that do not merit quality wilderness should be returned to the status that best meets their multiple use roles. They should not be left in limbo as de-facto wilderness.

Roadless Areas – The RARE 11 process that inventoried roadless areas was flawed from the beginning. Many areas that had existing roads were closed for management purposes, which allowed them to be erroneously inventoried as roadless. Some roadless boundaries were drawn beside traveled roads, precluding management for timber and other multiple uses. Other boundaries were drawn to reduce or essentially eliminate entry into lands suitable for timber and wildlife management.

Habitat Management – We believe the vision for the forest is correct. The forest will be managed for a diverse mix of forest types, communities and forest successional stages. This will provide habitat for various species associated with mid- to- late successional forest conditions. To reach this vision will require:

Continued strong cooperation with the Virginia Dept. of Game and Inland Fisheries and the West Va. Dept. of Natural Resources, incorporating current scientific research into the plans standards that were not available in the last plan.

- Developing and maintaining balanced forest -age classes across the forest to enhance biological diversity and forest health. Presently the forest is well out of balance with less than 4% younger than 20 years old. The forest is moving toward an over-mature forest, vulnerable to insect and disease attacks. The large amount of mature forest is a detriment to wildlife populations that require younger habitats. Increased timber harvests are essential to meet this goal. The harvests must be distributed over the forest in a planned system.
- The 1993 plan was successful in identifying and protecting habitat for the variety of threatened or endangered species. The forest should continue to manage these areas and re-evaluate management techniques since new scientific information is available.

Vegetative Management – Currently the area harvested annually (800 acres) remains insufficient to maintain forest health and habitat needs as well as helping to control insect epidemics. The 1993 plan significantly reduced the land available for commercial timber harvesting while concentrating cutting units. This restricted the dispersion of early successional habitat. Lands reduced in the 1993 plan should be re-evaluated and, where appropriate, returned to the commercial base. The level of commercial timber harvesting is an essential component of sustainable forestry and involves local communities. It will augment a strong timber industry and provide local jobs. The use of low-grade timber may become an important product as an energy fuel not considered in the 1993 plan. Increased timber sales will add to the amount of KV funds available to carry out timber stand improvement and habitat projects that are not now funded.

Non-Native Invasive Species – The Forest Service has an overall plan for managing forest pests with recommended control. This is the Chief's high priority. The standards in the 1993 plan for Integrated Pest Management principles seem adequate. Yet budget constraints have generally not allowed for concentrated effort to carry out the strategy. Invasives such as ailanthus and autumn olive continue to spread and need to be controlled before further spread. A corps of organizations, such as, the National Wild Turkey Federation and others, might be organized to volunteer under adequate supervision and attack problem areas.

Forest pest research is actively under study and may produce new biological control measures. The forest should remain in close cooperation with state and national research to integrate findings into control measures.

- Prescribed Fire – We support the continued use of prescribed fire that has been used to create habitat. The burns should also focus on high priority lands that encourage oak regeneration and reduce shade tolerant species.

The Skyline Chapter of SAF believes the vision statement for the future management is correct and, if followed, will lead to a sustainable and scientifically based forest management that will meet multiple-use goals. Unfortunately, we see large segments of the forest being set aside as de-facto wilderness that prohibits or restrains the quest to meet this vision.

The SAF will continue to testify before Congress and state legislatures on the value of managing the National Forests through scientifically-based forest management to meet environmental, economic and social values and to encourage adequate budgets to carry out the plan. The Chapter will continue to support the George Washington National Forest with our expertise and ability to educate the public on certain forest issues. We look forward to this mutual cooperation.

Sincerely,

Charles Huppuch- GWNF Plan Task Force