

November 24, 2008

Supervisor of The George Washington and Jefferson N.F.  
5162 Valley Pointe Parkway  
Roanoke Va. 24019

Please accept these remarks made on behalf of the Skyline Chapter of The Society of American Foresters as it relates to the potential wilderness inventory for the revised George Washington National Forest Management Plan.

Wilderness preservation is a valuable resource to this nation and the world. Wilderness is clearly an important output from our public lands, one that demands serious attention and consideration by the national forest and ultimately the Congress. The present 107 million acres of wilderness in the U.S. contain some extraordinary examples of wilderness character. The 45,000 acres of designated wilderness on the GWNF are probably the best to be found given the amount of impact man has had on the eastern forests. However, while the SAF supports the concept and designation of federal wilderness, we are concerned how the 372,631 acres of inventoried potential wilderness on the GWNF will be evaluated and what future impacts to the forest and society will occur if they are recommended. Here are some of our concerns:

- Wilderness is for all intent and purposes a permanent land use designation. For this reason it is crucial that wide-ranging future impacts for wilderness designation be fully evaluated by Forest Service resource professionals for due consideration by Congress. They should not be swayed by special interest groups.
- While the GWNF has FSH 1909.13 method of screening potential wilderness, it must allow judging for unusual scenic beauty, special features and characteristics that make them worthy of designation. Ramsey's Draft might be an example of an eastern wilderness with such features as remoteness, trout waters, and large hemlock trees (before the adelgid). Some of the 37 potential wildernesses may meet some of the screens but few have characteristics to make them

special for wilderness. We will be glad to comment on individual candidates as to their wilderness quality and multiple use values.

- Wilderness designation restricts a wide range of forest management options. This includes controlling fire on national forest and adjoining private lands. No forest manipulation is allowed to benefit the forest trees and wildlife. Insect and invasive plant epidemics may not be controlled as with the adelgid and gypsy moth.
- Wilderness designation eliminates recreationists who now use some of these candidates for mountain biking, horse and jeep access. Hunters will not be able to extend their range.
- Tourists and recreational use normally will not increase significantly nor would it be desirable to cause over use.
- The Forest Service does not presently have the resources to manage the existing wilderness as required. How will they be able to manage more?

While the GWNF must evaluate these proposed wildernesses it behooves prudent land stewards to maintain management options, and not to foreclose them when the existing wilderness may be adequate in number and size (seven for 45,018 acres) to meet the present and future. Other less restrictive management designations could apply to most of these potential areas allowing a variety of multiple uses as they do today. After the evaluation, those potential wilderness that are not recommended should be returned to a multiple use designation and not remain on the inventory.

Thank you for accepting these comments on behalf of the Skyline Chapter of the Society of American Foresters.

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SAF-GWNF Plan Evaluation Committee