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DEPARTMENT OF THE ARMY
WASHINGTON AQUEDUCT
U.S. ARMY CORPS OF ENGINEERS, BALTIMORE DISTRICT
5900 MACARTHUR BOULEVARD, N.W.
WASHINGTON, D.C. 20016-2514

October 17, 2011

Office of the General Manager

Mr. Kenneth Landgraf
Acting Forest Supervisor
U.S. Department of Agriculture, Forest Service
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019

Re: Draft Environmental Impact Statement for the George Washington National Forest

Dear Mr. Landgraf,

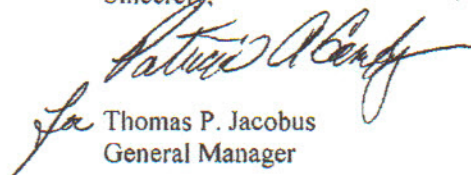
The Washington Aqueduct (WA) owns and operates two water treatment plants in the District of Columbia from which three wholesale customers – DC Water, Arlington County, VA and the City of Falls Church, VA – are provided with high-quality water. These three wholesale customers in turn distribute water to approximately one million people living in, working in and visiting the District of Columbia and Northern Virginia.

The Potomac River is the sole raw water source for water treated by Washington Aqueduct. Promoting and engaging in watershed protection efforts is as important to Washington Aqueduct as is selecting the best treatment technologies. Our needs for a safe, reliable water supply involve both issues of water quantity and quality. Long-standing interstate agreements for the Potomac River Watershed, to which we have been a signatory, have addressed water quantity and quality protection as essential to properly managing this key natural resource. As a result, any action that could vitiate the effects of these agreements would be unwelcome. Safe water supply is essential to life; the needs of the water treatment and supply utilities that rely on the Potomac River for source water must be given primary consideration.

Washington Aqueduct strongly supports the selection of an Alternative that prohibits the use of horizontal fracturing (hydrofracking) for natural gas development within the Forest. Although studies on the technique are still needed in order to fully understand the potential impacts on drinking water, enough study on the technique has been done and information has been published to give us great cause for concern about the potential for degradation of the quality of our raw water supply as well as impact to the quantity of the supply.

We appreciate the opportunity to provide comment to the Draft EIS. If you have any questions or require additional information please contact Ms. Patty Gamby by phone at 202-764-2639 or by email at patricia.a.gamby@usace.army.mil.

Sincerely,


Thomas P. Jacobus
General Manager

cc. Joe Hoffman, Interstate Commission on the Potomac River Basin
Stuart Freudberg, Metropolitan Washington Council of Government

Proudly Providing Water to the Nation's Capital Since 1853

391-450

Fairfax Water

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Fairfax, Virginia 22031-2218
www.fairfaxwater.org

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October 11, 2011

Mr. Kenneth Landgraf
Acting Forest Supervisor
U.S. Department of Agriculture, Forest Service
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019

**Re: Draft Environmental Impact Statement
for the George Washington National Forest**

Dear Mr. Landgraf:

The Fairfax County Water Authority ("Fairfax Water") appreciates the opportunity to comment on the Draft Environmental Impact Statement ("EIS") for the Revised Land and Resource Management Plan in the George Washington National Forest ("the Forest").

Fairfax Water is a public, non-profit authority that provides drinking water to nearly **1.7 million** people in Virginia, or about one in five Virginia residents. Fairfax Water seeks to operate our water supply system to provide water of the highest quality possible. Lands within the Forest comprise about 8% of the entire drainage area upstream of Fairfax Water's drinking water supply intake on the Potomac River. Consequently, we have a great interest in the management of the Forest and its impact on the Potomac River. Including Fairfax Water customers, more than 4.5 million people in the Washington, DC metropolitan area rely on the Potomac River as their primary source of drinking water.

It is well documented that forested watersheds provide an important function in protecting downstream water quality. Accordingly, we strongly concur with the statement in the EIS that "*Water continues to be one of the most important resources produced on the Forest.*" (Page 1-9). For that reason we are concerned about the potential impact of oil and gas leasing activities in the Forest within the watershed upstream of our water supply intake.

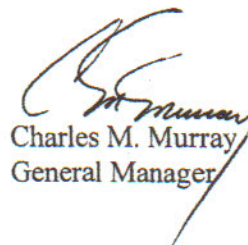
It is imperative that decisions regarding oil and gas leasing be based on sound science and that the highest-level of protection be afforded sources of drinking water supply. **The Forest Service proposal to prohibit the use of horizontal hydraulic fracturing techniques ("Hydro-Fracking") on oil and gas leases within the Forest is a sound, prudent decision given the uncertainty of water resource impacts of natural gas drilling through Marcellus shale formations.** Natural gas development activities have the potential to impact the quantity and quality of Fairfax Water's source water through consumptive use of water, generation of wastewater with high levels of Total Dissolved Solids (TDS) and often unknown chemical "fracking-fluid" additives, land-disturbing activities associated with the well pad and related features, and the disruption of natural groundwater flow pathways. As you may be aware, the U.S. Environmental Protection Agency (EPA) has initiated a study of hydraulic fracturing practices to better understand any potential impacts of hydraulic fracturing on drinking water and groundwater, with initial research results expected by the end of 2012 and a goal of completing a report by the end of 2014. The State of Maryland is also in the process of evaluating the impact of Hydro-Fracking activities on all natural resources. These studies (and others) will provide information on some of the key questions that must be addressed, including a complete evaluation of the life cycle of water used in Hydro-Fracking, from acquisition of the water to its ultimate treatment and disposal, and on the management measures that are required to protect sources of drinking water supply.

As you consider finalizing the EIS, we urge you to remember the familiar saying: "*An ounce of prevention is worth a pound of cure.*" In the absence of sound science unique to the meteorological and hydrologic characteristics of the Forest region, we applaud your decision to employ caution on this important issue, and recognize that the Forest has a distinct role in protecting the headwaters of the primary Washington, D.C. metropolitan area water supply. Downstream water users and consumers will bear the economic burden if drinking water sources are contaminated or the quality of our source water supply is degraded.

We hope that our comments will be seriously considered as you finalize the EIS.

Thank you for your attention to this important matter.

Sincerely,



Charles M. Murray
General Manager