



KURT D. HODGEN
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September 30, 2010

Ms. Maureen Hyzer, Forest Supervisor
United States National Forest Service
5162 Valleypointe Parkway
Roanoke, VA 24019-3050

RE: Revisions to George Washington National Forest Land and Resource
Management Plan

Dear Ms. Hyzer:

The City of Harrisonburg recognizes that the U. S. Forest Service is in the process of revising the George Washington National Forest Land and Resource Management Plan, and has a workshop scheduled for October 5 in Verona to review the status of alternative Forest Plans. Council and administrative staff will be out of town that evening and unable to attend the workshop, and as such, wanted to submit comments on behalf of the City to your office in advance of the workshop.

When adopted, the Forest Plan will govern management of resources within the George Washington National Forest for the next 15 years. As you know, the City's primary drinking water source, which serves nearly 53,000 residents, is within the planning area and thus anything that happens within the planning area potentially impacts our most important drinking water resource. In recognition of that fact, the Harrisonburg City Council passed a resolution on November 25, 2008 calling on the Forest Service to ensure and provide comprehensive management and protection of drinking water resources as part of the Forest Plan.

More recently, there has been much attention given to the issue of commercialization and development of energy sources, natural gas in particular, on both federal and private land in the area in question. Nearly all of the George Washington National Forest on the western border of Rockingham County is underlain by the Marcellus shale geological formation, a potential source of natural gas that is mined by a drilling process known as hydraulic fracturing. Hydraulic fracturing requires significant amounts of water per well, combined with sand and numerous chemicals, to break up shale and access the natural gas. This process has been linked to surface water and drinking water contamination, air pollution and soil contamination in at least a dozen states. It has also been linked to other adverse environmental impacts, including massive water withdrawals, gas migration from new and abandoned wells, the inability of public treatment plants to adequately treat millions of gallons of gas mining waste water, underground injection of brine waste water, improper erosion and sediment control, improper

cementing and casing of wells, over-pressurized wells, significant increases in truck traffic on rural roads, etc.

The U.S. Environmental Protection Agency is in the midst of a two-year study of the effects of hydraulic fracturing gas mining on water quality and other resources, to inform the development of regulations and recommendations to reduce environmental impacts. It would stand to reason that in considering revisions to the Forest Plan, that the U. S. Forest Service would act to aggressively protect drinking water resources within the area by placing a moratorium on consideration of any hydraulic fracturing natural gas wells or mining that may be considered in the area until such time as EPA has completed its report and rulemaking process on this natural gas mining process and the Forest Service has had the opportunity to utilize any new rules and regulations in completing Environmental Impact Statements for any such proposed activities. From the City's perspective, maintaining protection of our water resources is the single most significant issue associated with the Forest Plan.

We thank you for the opportunity to comment on the Plan and would be happy to provide you with additional information or answer any questions you may have.

Sincerely,

Kurt D. Hodgen
City Manager