



File Code: 2700

Date: April 2, 2009

Timothy Williamson
Freedomworks, LLC
525 Wren Lane
Harpers Ferry, WV 25425

Dear Mr. Williamson:

This letter is sent in response to your application for permit to install three Meteorological Towers (MET) on Great North Mountain, located on the Lee Ranger District of the George Washington National Forest. The purpose of the towers is to collect meteorological data. As you indicated, the data collected will aid in preparation of a future proposal to install 131 wind turbines, each with the capacity to generate 2MW and create at least 500 acres of permanent openings. After careful consideration, I have concluded we can not accept your proposal.

As I understand it, you received the screening criteria we use to review proposals. The screening criteria are in Forest Service Handbook (FSH) 2709. There are two areas of immediate concern in relation to the criteria when applied to your proposal. The first criterion of concern is compliance with the George Washington National Forest Revised Land and Resources Management Plan (Forest Plan). The second criterion is the justification to utilize national forest land.

FSH 2709.11, Chapter 10, Section 12.21(2), states the proposal must be consistent or can be made to comply with standards and guidelines in the applicable forest land and resource management plan prepared under the National Forest Management Act. Your expressed intent to install 131 commercial wind turbines on Great North Mountain, requires me to consider this proposal in relation to our Forest Plan standards and guidelines.

Your proposal is within Management Area (MA) 14- Remote Habitat for Wildlife, as identified in the Forest Plan. This portion of MA14 is approximately 11,053 acres in size and currently has 0.9 miles of open road. The Forest Plan standard could accommodate an additional 1.9 miles of road. Your proposal requires construction of at least 16 miles of road. While the roads could be closed to all but the contractor, the amount of time the roads would be used, would constitute activity at a level equivalent to an open road, thus exceeding the Forest Plan standards.

Forest Plan Standards, pg 3-75, states the area is managed to meet a visual quality objective of partial retention. In order to meet partial retention, management activities must remain visually subordinate to the characteristic landscape. It would be difficult to say a tower over 400 feet in height overlooking the Shenandoah Valley is visually subordinate to the characteristic landscape. It would be even more difficult to portray a series of 131 towers, over 400 feet, along Great North Mountain, as subordinate to the characteristic landscape.

In addition to the visual concerns, the recreation opportunity assigned to this portion of Management Area 14 is Semi-Primitive Motorized. The description of Semi-Primitive Motorized areas is: *"The area has high probability of isolation from sights of human activities, though an occasional primitive road, power line, or evidence of vegetation manipulation may be seen. Visitors perceive themselves as*



removed from human activity and experience solitude and serenity but occasional distant sounds may be heard. Motorized access by the public is highly restricted or non-existent. Existing roads are maintained and infrequently used for administrative purposes. Opportunity for self-reliance, challenge and risk exist. The area can be natural in appearance with occasional evidence of vegetation manipulation.” The towers, the access roads and the level of use on the road to maintain the towers do not meet the desired condition of Semi-Primitive Motorized Recreation.

MA14 areas are managed to maintain or enhance habitats for wildlife species by favoring a mature forest environment that provides a continuous supply of hard and soft mast and high value timber products. The area is characterized by dense vegetation cover and freedom from continued disturbance. Development of your project would permanently open-up at least 500 acres of forested land. This activity would not meet the desired conditions of providing remote habitat for wildlife as described above.

It is important to advise you of a new concern that recently emerged in Virginia and West Virginia that must be taken into account with the activities you wish to conduct; White Nose Syndrome (WNS) on bats. Within the last three months, this illness was discovered in caves in both states, south of your proposed project area. Unfortunately, WNS killed thousands of bats and has already killed hundreds in the newly discovered areas. This new discovery, combined with the history of commercial wind turbines killing bats, adds to the concerns over this project; especially when you consider the Indiana Bat, a Federally Endangered Species, are believed to be within your proposed project area and are hibernating in caves now affected by the WNS.

Also, FSH 2709.11, Chapter 10, Section 12.32a states; the proponent must explain the selection of the location of the proposed use and why use of National Forest System lands is necessary and why lands under other ownership cannot be used. Forest Service policy goes on to state *“Deny proposals for use of National Forest System lands when the request is based solely on affording the proponent with a lower cost or less restrictive location than can be obtained on non-Federal lands”*. A significant part of your rationale for the use of Great North Mountain focuses on needing to generate power within a 100 mile radius of Washington DC. A cursory look of that 100 mile radius shows numerous opportunities for your proposal in areas other than national forest. Some of these areas exist in the ocean; which is said to provide the best wind resources near D.C., other areas exist in the Chesapeake Bay, and on dozens and dozens of ridgelines in VA, MD, WV, and PA. I believe there are ample opportunities to implement your project in areas other than National Forest System lands and your proposal does not provide sufficient rationale as to why these areas can not be utilized.

If you choose to consider pursuing another wind proposal on National Forest land, the proposal must address Forest Plan compliance requirements and provide a sufficient justification for why private lands can not be utilized. Should you have any questions or concerns please contact District Ranger James Smalls at 540-984-4101.

Sincerely,

/s/Maureen T. Hyzer
MAUREEN T. HYZER
Forest Supervisor

Cc: James Smalls, District Ranger