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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 80% 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,


I. Murray
General Manager

Fairfax Water to Landgraf
October 11, 2011
Page 3

cc: Congressman Gerald Connolly
Jerry Johnson, Washington Suburban Sanitary Commission
Joe Hoffman, Interstate Commission on the Potomac River Basin
Stuart Freudberg, Metropolitan Washington Council of Governments