



THE CITY OF LYNCHBURG, VIRGINIA

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DEPARTMENT OF UTILITIES

July 27, 2011

George Washington National Forest
Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

RE: Comment- Draft Environmental Impact Statement and Draft Forest Plan

The City of Lynchburg has withdrawn water from the Pedlar Reservoir and the James River for over 100 years. Both of these sources are essential for the welfare of 23,000 customers in the City of Lynchburg and parts of Amherst, Bedford, and Campbell counties.

We take this opportunity to express the City's concern about changes to the Forest Plan that might affect the City's drinking water quality.

The Pedlar Reservoir, Lynchburg's primary source of water, is listed in Table 2.7, Drinking Water Supplies Within or Downstream of George Washington National Forest. Its 34 square mile watershed is listed as a Priority Watershed in Appendix D. The Watershed Management Approach, in Chapter 3, assigns a priority to these watersheds for inventorying soil and water improvement needs, restoring streams and streamside systems to fully functioning systems, restoring habitat for sensitive aquatic and riparian species, addressing opportunities to reduce impacts from roads through relocation or decommissioning, and evaluating new proposals for special uses that could affect water quality. We support these general management objectives; however, the management approach does not specifically prohibit geological carbon sequestration or drilling and hydrofracturing of the Marcellus formation, both activities that could lead to contamination or degradation of the Pedlar watershed and drinking water supply. Instead, the management approach clearly leaves the door open for further consideration and administrative action. Geological carbon sequestration is still in the research stage. The safety record for Marcellus shale drilling and fracking is mixed. Regulation and enforcement are weak. Fracking uses unregulated proprietary mixtures of toxic chemicals and large quantities of water. Recovery, treatment, and disposal are uncertain.

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The City withdraws water from the James River several times each year during emergencies caused by drought, dam maintenance, or pipeline failures. These intakes are listed in Table 2.7, Drinking Water Supplies Within or Downstream of George Washington National Forest. The locations and details of these intakes are registered with the Virginia Department of Environmental Quality Office of Water Supply Planning. Many tributaries flowing from the Forest empty into the James River upstream of these intakes, exposing the intakes to the same potential for contamination and degradation.

Given the lack of effective regulation, unproven technology, and questionable safety, the City of Lynchburg supports a moratorium on these techniques for Priority Watersheds and Downstream Water Supplies. If such a moratorium is enacted, it should remain in force until repealed through the revision process and not by administrative action.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Mitchell', with a long horizontal flourish extending to the right.

Timothy A. Mitchell, P.E.
Director

Attachment (with author's permission): Hydrofracking Is **It** Worth the Risk?