

Executive Summary

INTRODUCTION

As a Federal agency the Forest Service is required, under the National Environmental Policy Act (NEPA), to solicit public comment on draft documents involving significant actions. Further, the agency is directed to “assess and consider comments both individually and collectively.” Comments are viewed as critical in shaping responsible management of public lands. This document contains the summary of public comment on the Monongahela National Forest Proposed Revised Forest Plan, Draft Environmental Impact Statement (DEIS), including alternatives for the management of the Forest.

The 90-day formal comment period on the Monongahela National Forest Proposed Revised Plan and DEIS ran from August 12 to November 14, 2005. The Forest received 12,852 responses, including original letters, form letters, resolutions, and petitions. An estimated 82 percent of responses were some type of form letter, e-mail form letter, or letter-generator e-mail. The responses have been analyzed using a process called content analysis, described briefly in a following section of this Executive Summary.

This Executive Summary begins with a description of the Content Analysis Process. It continues with a general overview of the public comments we received, and it concludes with a more detailed description of the public concern document organization and purpose.

CONTENT ANALYSIS PROCESS

Content analysis is a method of eliciting meanings, ideas, and other information from text, pictures, or audio or video messages. A method of content analysis designed specifically for analyzing public comment on Federal projects, plans, and policies has been developed and refined by the Content Analysis Team (CAT), a specialized Forest Service unit. This method employs both qualitative and quantitative approaches. It is a systematic process designed to provide specific demographic information and a mailing list of respondents, identify individual comments by topic in each response, evaluate similar comments from different responses, and summarize like comments as specific public concern statements. The process also provides a relational database capable of reporting various types of information while linking comments to original letters.

Through the content analysis process, analysts strive to identify all relevant issues, not just those presented by the majority of respondents. The breadth, depth, and rationale of each comment are especially important. In addition to capturing relevant factual input, analysts try to capture the relative emotion and strength of public sentiment behind particular viewpoints in order to represent the public's values and concerns as fairly as possible. Analysts then organize the concern statements to facilitate systematic review and response by decision makers.

Content analysis included logging the public respondents and letter numbers into a database, filing copies of every letter, reading the letters, and coding individual requested actions and noted concerns contained within the letters. Each public concern was entered into the database, and given an identifying number that links the specific comment back to the original comment letter. Every effort was made to keep each comment with sufficient context so that it is a stand-alone statement. Forest Service analysts looked for not only each action or change requested by the public, but also the reason(s) behind each request in order to capture the full concern of each comment.

Coded comments were then grouped and summarized into public concern statements and sub-concern statements. Because each public concern statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Concern statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim public comments. The public concerns were responded to in this Appendix. These public concern statements are not intended to replace actual comments but rather guide reviewers to comments on specific topics of interest. They also make it possible to systematically respond to large numbers of comments because similar comments have been grouped together. The full content analysis report is in the plan revision project record at the Monongahela National Forest Supervisor's Office in Elkins, West Virginia.

The comments received provided valuable input toward development of the Final EIS and Revised Forest Plan. It is important to recognize that the consideration of public comments is not a process in which the outcome is determined by the majority opinion. All comments have been treated equally. They are not weighted by organizational affiliation or status of respondents, and it does not matter if an idea was expressed by thousands of people or a single person. Emphasis is placed on the content of a comment rather than who wrote it or the number of people who agree with it. Although the relative depth of feeling and interest among the public can serve to provide a general context for decision-making, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions.

Furthermore, because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting comparative terms in the summary document. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All input has been read and evaluated, and the analysis team has attempted to capture all relevant public concerns in the content analysis process.

The Forest classified comments received as either substantive or non-substantive during the content analysis process. Only those comments considered substantive have responses in this appendix. The nature and extent of each response depends on the type of concern identified. Based on the Council of Environmental Quality's regulations implementing the NEPA, substantive comments are ones that:

- Question, with a reasonable basis, the accuracy of the information in the DEIS;
- Question, with a reasonable basis, the adequacy of environmental analysis as presented;
- Present reasonable alternatives other than those presented in the DEIS that meet the purpose and need of the proposed action and address significant issues; or
- Cause changes or revisions in the proposal.

Non-substantive comments are ones that:

- Are outside the scope of the proposed action, or are irrelevant to the decision being made;
- Raise a concern already decided by law, regulation, or policy;
- Raise an issue best addressed through other decision processes; or
- Are just opinions, general comments, or position statements.

GENERAL OVERVIEW OF PUBLIC COMMENT

Public comment on the Monongahela Proposed Revised Forest Plan and DEIS is far-reaching, often highly detailed, and represents a wide range of values and perspectives with respect to public land

management in general, and management of the Forest in particular. Given this wide range of values and perspectives, only broad generalizations are possible.

Many respondents express views for or against increasing backcountry or wilderness designations; supporting arguments often cite backcountry recreation opportunities versus access for other forms of recreation, respectively. A number of respondents provide additional rationale involving management philosophies that can often be broadly grouped into those who feel that the Forest is best managed by minimal or no human intervention in order to preserve the integrity of forest ecosystems, and those who prefer active management that would ensure a reliable flow of goods and services. The preservation-oriented group favors ecosystem preservation and restoration management, and they often initiate their arguments with requests for more backcountry recreation opportunities and/or designation of areas as Management Prescription 6.2. They frequently state that the emphasis of managers should be toward protecting the land and resources from what they perceive as threats from human uses and abuses. Many in this group also indicate that any resource development for economic uses be subordinate to protection of ecological communities and processes.

Those who take a more active management approach tend to favor multiple use management, including more traditional levels of timber harvest and resource development, and a variety of recreational opportunities including hunting and motorized recreation. Those in this group tend to favor less area designated under the remote backcountry management prescription and fewer wilderness recommendations. They often state that forest lands require active management to remain healthy and productive; that the lands are dynamic and resilient; and that the interests of visitors and local communities are best served by ensuring that forest resources are responsibly developed. The distinction between these two groups is not absolute. Many in the former group also value recreational access and some economic development, while the latter group often expresses concern for forest protection and acknowledge the benefits of some designated wilderness or protected areas.

These different views frame the large number of resource management recommendations and site-specific requests made by the public. Many respondents submitted suggestions or ideas regarding management approaches and prescriptions, travel and recreation allocations, and wilderness recommendations and management. The greatest number of comments involved resource management topics generally, and vegetation and timber management specifically. The numerous comments relative to specific areas or resources, in conjunction with all other concerns raised by the public, reveal how important the Forest is to people and how much they care about its management and the many benefits they derive from it. Further, as allocation decisions are at the heart of the Forest Plan, these comments and their rationale provide the planning team important feedback for use in final decision-making.

PUBLIC CONCERN DOCUMENT CONTENT AND ORGANIZATION

Following the Executive Summary is the list of public concerns identified during the content analysis process, organized topically into seven sections.

Section 1, Decision Making Process contains comments about influences on forest planning decisions. This includes concerns about public input and involvement, collaboration, and consultation with other agencies, as well as the adequacy and availability of information. Also in this chapter are comments about underlying philosophies associated with the management of national forests, concerns about agency funding and staffing, and legal considerations.

Section 2, Alternatives, Forest Plan, and EIS, includes comments on the range of alternatives and how they were developed, opinions and statements of preference for specific alternatives that were considered and evaluated, as well as suggestions for new alternatives. This section also has sections on comments and requested changes to the Proposed Revised Forest Plan, DEIS, and Appendices.

Section 3, Natural Resources Management, covers comments about how resources are or should be managed, including air, water, soils, vegetation, and wildlife, as well as commercial resource use and development. Many of the comments reference how management decisions regarding one resource may affect another, such as the effects of timber harvest or fire on wildlife, soils, or water quality.

Section 4, Transportation Management, includes comments about the analysis, construction, maintenance, and use of Forest roads and trails.

Section 5, Recreation Management, contains comments about various recreational opportunities and access for recreation, recreation management prescriptions, and concerns about how to manage specific types of recreation, including backcountry recreation.

Section 6, Lands and Special Designations, includes comments about land acquisitions and boundaries, special uses, the designation of specific management areas or other special designations, and management of existing designations such as wilderness and roadless areas. It also includes comments in support of and opposition to additional wilderness recommendations.

Section 7, Social and Economics, contains comments about the economic and social implications of activities on the Forest, as well as concerns about cultural resources.

As noted above, this appendix is organized by topic and summarizes the public comments submitted on the DEIS and Proposed Revised Forest Plan. The summarized public comments are captured as “Public Concern” (PC) statements and are numbered as such. The numbering is not sequential, but rather represents the order in which the comments were received, read, and coded into PC statements. Not all numbers are included as some PC statements were later determined to be non-substantive or duplicative, and were therefore omitted from the appendix.

Sub-concern (SC) statements are used to capture a myriad of distinct rationales, locations, or particular details that support the common PC statement. Sub-concern statements are numbered according to the PC they support and distinguished by alphabetical coding (a, b, c...aa, ab, ac...ba, bb, bc...etc.). This appendix contains the Forest Service’s responses to substantive public comments represented by each PC and SC statement.

The PC and SC statements and responses reference a number of documents. The Draft Environmental Impact Statement (DEIS) is referenced when the information was provided in that particular document but may have changed in content or management direction number in the Final EIS. The Final Environmental Impact Statement (FEIS) is referenced when there has been a change in the information provided between the DEIS and FEIS. The draft revised forest plan published in 2005 is referred to as the Proposed Revised Forest Plan or Proposed Revised Plan, and the revised forest plan that is being released coincident with this appendix is referred to as the Final Revised Forest Plan or Revised Forest Plan. References made to 36 CFR 219, National Forest Management Act (NFMA) implementing regulations, are to the 1982 NFMA regulations unless otherwise noted.