

Section 2: Alternatives, Forest Plan, and EIS

ALTERNATIVES CONSIDERED IN DETAIL	
PC 300	The Forest should implement Alternative 1 because it leaves the current plan in place, and it provides the best balance among forest protection and forest use.
Response:	We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection.
PC 301	The Forest should not implement Alternative 1 because the restrictions it places on the ability to enjoy the natural resources are too harsh.
Response:	We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection.
PC 100	<p>The Forest should implement Alternative 2:</p> <ul style="list-style-type: none"> • To manage the Forest for multiple uses, as required by law • To benefit the many people who rely upon timber harvest for their employment • To manage the Forest as a working forest • To provide recreational opportunities • Because it limits the amount of recommended wilderness • To protect hunter access • To allow active habitat management • To protect habitat • Because hunters help manage wildlife populations • To provide a good mix of forestry, recreation, soil and water protection, endangered species protection, etc. • To allow mountain biking • Because it enhances the appeal of wilderness • Including an areas set aside for limited all-terrain vehicle use • Because it protects fish and wildlife resources • Because it shows a positive trend of putting value on timber, wildlife, recreation, a wide range of biodiversity, and better scientific forest management • Because it recognizes the importance of maintaining brook trout as a Management Indicator Species • Because it increases riparian buffer zone protection on both perennial and intermittent streams • Because it increases usage of helicopter logging to reduce road construction • Because it allows for the need for large woody debris in the cold-water fisheries • Because it provides adequate protection of Indiana Bats, Northern Flying Squirrels, and other species without curtailing the usefulness to hunters and fisherman • Because it offers the most reasonable measure of effective compromise between timber and tourism interests • To allow the harvest of mature trees • Because of its emphasis on aquatic ecosystems • Because it includes an aquatic monitoring strategy with brook trout • Because it recognizes that aquatic conditions are lagging compared to forest and riparian areas • Because it keeps the same definition of MP 6.2 as in past plans.
Response:	We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. See also responses to PC 356, PC 183, PC 22, and PC 182.
PC 182	The Forest should implement an amended Alternative 2 with areas designated as non-motorized backcountry recreation instead of wilderness, including Roaring Plains and Cranberry Expansion, in order to all for bicycle use and protect the tourism revenues from that use.
Response:	Only Congress has the authority to designate wilderness. The Forest recommended four areas for

	wilderness designation under Alternative 2 in the DEIS and Proposed Revised Plan, including Roaring Plains and the Cranberry Expansion. Under the Recommended Wilderness (5.1) Management Prescription, bicycling is allowed, so we are not limiting bicycle access to these areas through Forest Plan revision. We have been informed by District personnel and mountain bikers alike that there is relatively little mountain bike use in Roaring Plains or Cranberry Expansion at this time, although the one Roaring Plains route provides the longest descent in the State. We recognize that mountain bike use is popular in other areas on the Forest and provides tourism revenue to local communities, and biking was one of many uses or values foregone under a wilderness designation that we considered in the wilderness evaluations in Appendix C to the DEIS. Please see the Record of Decision for the final Wilderness recommendations and the rationale for their selection.
PC 356	The Forest should implement Alternative 2 with the following changes or improvements.
	We acknowledge your preferences.
PC 356a	INCLUDING MORE TIMBER PRODUCTION
Response:	Although potential timber production levels in the Revised Forest Plan are somewhat higher than the 1986 Plan, actual production amounts will likely be dependent on a number of variables, including budget and staffing levels, appeals and litigation, natural events, and shifting Forest priorities.
PC 356b	INCLUDING MORE WILDERNESS AREAS
Response:	The Forest Service does not have the authority to designate Wilderness. Congress may choose to designate any of the areas we have recommended for Wilderness under any alternative, or they could choose to designate different areas, or they could choose to designate no areas.
PC 356c	INCLUDING KEEPING ROARING PLAINS WEST IN MANAGEMENT PRESCRIPTIONS 6.1 AND 6.2 TO ALLOW NEW DEVELOPMENT AT THE ALMOST HEAVEN RESORT, WHICH WILL PROVIDE ECONOMIC BENEFITS TO THE REGION, RECREATIONAL OPPORTUNITIES, AND ALLOW FOR PROPER FIRE MANAGEMENT
Response:	Thank you for the new information regarding potential development near the Roaring Plains West area. We will add this to our Wilderness evaluation description. We believe that any economic or recreational opportunities that would result from your development would not be significantly affected by the management prescription we place on Roaring Plains West. As for fire protection, if your development proceeds as planned, it is likely that our access to the Roaring Plains area for fire suppression would be improved, as our current access ends at the communication tower, and we are not proposing to change that access under any management prescription or alternative.
PC 356d	INCLUDING NOT EXPANDING THE OTTER CREEK WILDERNESS AREA IF IT WOULD CAUSE DRY FORK TO BE DESIGNATED A TIER 3 STREAM
Response:	The Dry Fork area that is recommended for Wilderness study does not include the Dry Fork stream. Therefore, if Congress were to designate this area as Wilderness, that designation would not change Dry Fork's current stream designation by the State.
PC 356e	INCLUDING CHANGING LANDS IN MANAGEMENT PRESCRIPTION 5.1 TO MANAGEMENT PRESCRIPTION 6.2 IN THE ROARING PLAINS AND CHEAT MOUNTAIN AREAS
Response:	We acknowledge your preference. However, one of the reasons these areas were recommended for Wilderness study was the fact that WVDNR has little (Cheat Mountain) or no (Roaring Plains) active management or investments within them. See also responses to PC 784 and PC 740.
PC 356f	INCLUDING RETAINING APPROXIMATELY 428 ACRES OF THE PROPOSED CHEAT WILDERNESS AREA IN MANAGEMENT PRESCRIPTION 6.1, AND CHANGING THE MANAGEMENT PRESCRIPTIONS FOR GAUDINEER AND EAST FORK GREENBRIER FROM MP 6.2 TO MP 6.1
Response:	The roadless area inventory process required that we look at existing conditions rather than existing management prescriptions. Just because part of the area is in a 6.1 MP, or used to be in a 6.1, does not mean it cannot meet the inventory criteria for a roadless area. All of the Cheat Mountain, East Fork Greenbrier, and Gaudineer areas qualified for the roadless area inventory. Roadless area status essentially means that the areas will have restrictions on commercial timber harvest, road construction and reconstruction, and motorized use. These restrictions better fit MP 6.2 or 5.1 than a MP 6.1.
PC 356g	INCLUDING REASSIGNING RECOMMENDED WILDERNESS AREAS AS MP 6.2 AREAS, BECAUSE WILDLIFE MANAGEMENT ACTIVITIES ARE EASIER TO CARRY OUT UNDER MP 6.2, INCLUDING MITIGATION EFFORTS FOR ACID DEPOSITION SUCH AS LIMESTONE

	SAND TREATMENT OF HEADWATER STREAMS
Response:	We agree that wildlife and fish management activities and opportunities related to maintenance of openings or liming of streams by motorized means would likely change if MP 5.1 areas are designated as Wilderness by Congress. However, the Revised Forest Plan management direction for vegetation and wildlife/fish management and motorized access are similar for MP 5.1 and 6.2. We do not believe that a MP 5.1 allocation would further restrict the current activities that are occurring in these areas.
PC 356h	INCLUDING DESIGNATING GREEN KNOB AND HAYSTACK KNOB AS MP 4.1
Response:	The Green Knob area has been changed from 6.1 to 4.1 in Alternative 2. The Haystack Knob area should have been 5.1 instead of 6.1 in the Draft Alternative 2 but was labeled 6.1 due to a mapping error. The 6,825 acres for Roaring Plains West included the Haystack Knob area, however, so this acreage has not changed for the Final Plan.
PC 356i	INCLUDING LIMITING THE USE OF ALL-TERRAIN VEHICLES TO CERTAIN AREAS
Response:	ATV use is limited to designated routes on the Forest (see Standard RF16 in Proposed Revised Plan).
PC 356j	INCLUDING REVISING THE RIPARIAN GUIDELINES TO MAKE THE SITING OF LOGGING ACTIVITIES EASIER
Response:	Having no riparian guidelines would simplify timber management planning, but we feel that the guidance is important for riparian and aquatic ecosystem protection. We have used similar interim guidelines since 1999 without a significant impact to timber sale design and implementation.
PC 356k	INCLUDING OMITTING CHEAT MOUNTAIN AS A RECOMMENDED WILDERNESS AREA BECAUSE OF ADDITIONAL IMPACTS THAT A WILDERNESS DESIGNATION COULD BRING
Response:	We agree that Wilderness designation can increase recreational impacts to an area due to the increased popularity and visitation that a designation can bring. That is one of the trade-offs that lawmakers would need to consider with respect to the additional protection from other management-related activities that a designation would provide.
PC 356l	INCLUDING CHANGING WEISS KNOB FROM 6.1 TO 4.1, CHANGING PIKE KNOB FROM 6.1 TO 8.0, CHANGING BARLOW TOP FROM 3.0 TO 4.1, CHANGING THE AREA AROUND BIG RUN BOG FROM 6.1 TO 4.1, AND CHANGING LAUREL FORK AND NORTH MEADOW CREEK MOUNTAIN FROM 6.1 TO 6.2
Response:	We have changed Weiss Knob to 4.1, Pike Knob to 8.5, the area around Big Run Bog to 4.1, the spruce potential portion of Barlow Top to 4.1, and Lower Laurel Fork to 6.2. We kept the North Meadow Creek Mountain area in 6.1 because we believe that we can manage for both oak and white pine in this area under this prescription. See Management Prescriptions areas for Alternative 2M in the FEIS.
PC 183	The Forest should implement Alternative 2 with no additional wilderness areas.
Response:	We acknowledge your preference, and we considered your comments. We are not designating any Wilderness in plan revision. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection.
PC 183a	BECAUSE THERE ARE ALREADY SUFFICIENT WILDERNESS AREAS AND THE MAJORITY OF FOREST USERS DO NOT VISIT THEM
Response:	The need for new Wilderness was assessed as part of the Wilderness evaluations found in Appendix C to the EIS. Wilderness use is also discussed in Appendix C.
PC 183b	BECAUSE WILDERNESS AREAS PREVENT COUNTIES FROM RECEIVING TIMBER REVENUE
Response:	You are correct that timber revenues are typically not produced from Wilderness areas. However, the areas recommended for Wilderness under Alternative 2 are also on the Roadless Area Inventory and are not considered suitable for timber production, so they would not be contributing to timber revenue even if they were not recommended for Wilderness.
PC 183c	BECAUSE ALTERNATIVE 2 HAS A GOOD MIX OF COMPETING USES
Response:	We agree, although we look at the uses as being different, rather than “competing”.
PC 183d	BECAUSE NEW PLANNING REGULATIONS REQUIRE LOCAL AND STATE GOVERNMENT PARTICIPATION, AND WILDERNESS SHOULD NOT BE ADDED WITHOUT LOCAL SUPPORT, OR UNTIL THE STUDY REQUIRED BY THE NEW PLANNING REGULATIONS IS COMPLETED
Response:	The Governor noted in his comment letter that he was electing not to pursue the State Petitioning process related to roadless area management at this time.

PC 183e	BECAUSE WILDERNESS DESIGNATION LIMITS HUNTER ACCESS TO THE FOREST, AND HUNTERS HELP CONTROL WILDLIFE POPULATIONS
Response:	The areas recommended for Wilderness study under Alternative 2 are also on the Roadless Area Inventory and currently have restrictions on public motorized access. The public may still access the areas by non-motorized means, however, and hunting is allowed in both recommended and designated Wilderness areas.
PC 183f	TO ALLOW ACTIVE HABITAT MANAGEMENT
Response:	Current habitat management is allowed to continue in areas recommended for wilderness study. If Congress were to designate these areas as Wilderness, habitat management would likely have to be conducted by non-motorized and non-mechanized means.
PC 183g	TO DECREASE THE BURDEN ON TAXPAYERS
Response:	The federal government provides payments in lieu of taxes (PILT) to state counties that have federal lands within them, regardless of what management prescription these lands are assigned. See the Social and Economic Environment section in Chapter 3 of the EIS.
PC 183h	BECAUSE WILDERNESS PUTS AIR QUALITY LIMITATIONS ON NEARBY BUSINESSES
Response:	As specified in Section 162 of the Clean Air Act Amendments, only wilderness areas that were greater than 5,000 acres in size and in existence on the date of enactment of the 1977 Amendments were designated as Class I. This means that any subsequent wilderness Congressionally designated after 1977 would be a Class II area, not Class I, and would maintain the same level of air quality protection that it had prior to becoming a wilderness. Thus wilderness designation would impose no new air quality restrictions beyond what previously existed for that area.
PC 183i	BECAUSE WILDERNESS NEGATIVELY AFFECTS FOREST HEALTH
Response:	The Vegetation Management and Ecosystem Diversity sections in Chapter 3 of the EIS address many aspects of forest health within different Management Prescriptions, including Recommended Wilderness (5.1) and Designated Wilderness (5.0).
PC 183j	UNLESS THE RECOMMENDED WILDERNESS IS AN EXPANSION OF THE CRANBERRY AND OTTER CREEK WILDERNESS AREAS
Response:	The Cranberry Expansion and Dry Fork areas are included as Recommended Wilderness areas under Alternative 2.
PC 22	The Forest should not implement Alternative 2.
Response:	The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection.
PC 22a	BECAUSE IT MORE THAN TRIPLES THE AMOUNT OF LOGGING ON THE FOREST
Response:	This perception may be a misunderstanding based on information in Table TR-4 in the DEIS. This table contained a column labeled "ASQ/Target" that presented past annual accomplishment targets for timber harvest. In fact, the column heading was misleading because the numbers represented only the accomplishment target, not the higher ASQ. Reviewers compared these accomplishment targets to the projected ASQ under the Proposed Revised Plan, which led to the mistaken impression that the Proposed Revised Plan would greatly increase timber harvesting. A more appropriate comparison is ASQ under the 1986 Plan to ASQ under the Proposed Revised Plan. Therefore, we have revised Table TR-4 in the FEIS to include ASQ from the 1986 Plan instead of accomplishment targets. For the coming decade, the ASQ under the Proposed Revised Plan is only slightly higher than the ASQ for the same decade under the 1986 Plan. The ASQ under the Proposed Revised Plan stays constant in later decades, whereas the ASQ rises throughout the planning horizon under the 1986 Plan. Therefore, the ASQ for the latter part of the planning horizon is actually lower under the Proposed Revised Plan than under the 1986 Plan.
PC 22b	BECAUSE IT OPENS MANY PROTECTED AREAS TO LOGGING AND ROADS
Response:	Alternative 2 has a different Management Prescription distribution than Alternative 1. Some areas that are MP 6.2 in Alternative 1, are MP 6.1 or 4.1 MP in Alternative 2. However, some areas that are MP 6.1 or 3.0 in Alternative 1, are MP 6.2 or 5.1 in Alternative 2. Overall, there are more backcountry recreation areas that are "protected" from timber harvest and road construction in Alternative 2 than Alternative 1, as seen in the Recreation and Wilderness section analysis in Chapter 3 of the EIS.
PC 22c	BECAUSE IT RAISES THE SIZE OF CLEAR CUTS FROM 25 TO 40 ACRES
Response:	Even-aged regeneration harvests are limited in size under national direction for Alternatives 2, 3, and 4.

PC 22d	BECAUSE IT POSES THE GREATEST THREATS TO FISH AND WILDLIFE, INCREASES THE RISK OF FLOODING, WEAKENS PROTECTIONS FOR RIVERS, STREAMS, FISH AND WILDLIFE HABITAT, AND IT FAILS TO PROTECT SOILS, WATERSHEDS, AND SCENIC RESOURCES
Response:	Management direction for fish, wildlife, streams, soils, watersheds, and scenic resources is the same under all action alternatives (2, 3, and 4). We believe that the combination of law, regulation, agency directives, and Forest Plan management direction would adequately protect these and all other resources, regardless of alternative or Management Prescription.
PC 22e	BECAUSE IT HARMS ROADLESS AREAS
Response:	The Forest conducted a new roadless area inventory for Forest Plan revision (see Appendix C to the EIS). All of the areas on the roadless inventory are assigned either a 5.1, 6.2 or 8.1 SPNM Management Prescription under Alternative 2. These prescriptions all provide management emphasis and direction that would maintain the roadless and undeveloped character of the roadless inventory areas.
PC 22f	BECAUSE IT WOULD LIMIT RECREATIONAL OPPORTUNITIES
Response:	As noted in part B, above, there are more backcountry recreation opportunity areas under Alternative 2 than there are under Alternative 1, which represents the 1986 Plan as amended, or the current situation.
PC 22g	BECAUSE IT WILL NEGATIVELY IMPACT TOURISM
Response:	We cannot accurately predict how any alternative will affect tourism. However, if you believe that tourism will be reduced by a loss of backcountry recreation opportunities or recommended wilderness areas, we remind you that there would be a net gain of these opportunities and areas under Alternative 2 as compared to the current situation under Alternative 1.
PC 22h	BECAUSE ADDING ROADS WOULD INVITE DAMAGE FROM OFF-ROAD VEHICLES
Response:	New roads may be constructed under all the alternatives. However, no roads or trails are designated as ORV routes under any of the alternatives, and no off-road vehicle use is allowed under any alternative.
PC 22i	BECAUSE IT FAILS TO RECOMMEND AREAS FOR WILDERNESS DESIGNATION, INCLUDING SENECA CREEK
Response:	Although Alternative 2 does not recommend Seneca Creek for wilderness study, it does recommend four other areas that comprise a total of 27,000 acres.
PC 22j	BECAUSE IT APPEARS THE FOREST SERVICE IS FAVORING INTEREST GROUPS OVER PUBLIC INTEREST
Response:	We heard from a variety of individuals and public interest groups during plan revision. Some favored Alternative 2 and some did not. Some favored more Wilderness and some did not. We considered all of the comments.
PC 2	<p>The Forest should implement Alternative 3</p> <ul style="list-style-type: none"> • Because it recommends wilderness designations for valuable wild areas • Because Alternative 2 is highly biased toward logging and runs counter to public opinion • To provide recreational opportunities • Because Alternative 2 is too ecologically destructive • To protect water resources • To limit road-building • Because it provides a good balance of extractive and conservation uses • To benefit future generations • Because the public favors it • To protect the Forest • To attract tourism • To protect wildlife and habitat • To limit logging • To prevent flooding • To protect our natural heritage • To protect roadless areas • Because it provides a better cost/benefit ratio than Alternative 2 • To protect fish populations • To protect air quality

	<ul style="list-style-type: none"> • To protect brook trout streams • To limit clearcutting • To prevent urban expansion • To protect quality of life • To provide more protection for riparian areas • To provide economic opportunities • To provide educational opportunities • To provide more roadless areas • To protect more backcountry (6.2) areas • To limit off-road vehicle use • Because it provides the least risk for non-native invasive species • Because it has the same amount of spruce restoration as Alternative 2 • To protect the non-lumber uses of trees • Because it provides the best combination of management prescriptions • To limit the use of prescribed fire • To comply with the Endangered Species Act and the Clean Water Act • To protect bogs • To protect peregrine falcons • Because increased wilderness areas allows the Forest Service to concentrate time and money in other developed locations.
Response:	We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. See also response to PC 62.
PC 62	The Forest should implement Alternative 3 with changes or improvements.
PC 62a	TO PROTECT CURRENT PUBLIC ACCESS TO THE FOREST, INCLUDING NOT RECOMMENDING MP 6.2 FOR AREAS THAT CONTAIN ROADS OPEN TO THE PUBLIC
Response:	The comments do not specify which roads in 6.2 areas are currently open to the public. The MP 6.2 and 5.1 areas in Alternative 3 came from a number of sources, most of which do not currently have roads open to the public. Wherever open roads may exist, they could be addressed in a number of ways. For example, roads could be physically closed, roads could be excluded from the 6.2 areas through boundary adjustments, or the Responsible Official could choose to reassign management prescriptions to areas that would exclude access in the Record of Decision.
PC 62b	TO PROVIDE MORE RECREATIONAL OPPORTUNITIES
Response:	Alternative 3 currently provides recreational opportunities, as do all the alternatives.
PC 62c	TO PROVIDE SOLACE
Response:	Solace is a feeling that comes from within, and beyond the scope of plan revision. Alternative 3 does provide abundant areas with the opportunity for solitude, however.
PC 62d	TO PROTECT NATURAL RESOURCES, INCLUDING SCENERY, WATER, WILDLIFE, HABITAT, AIR QUALITY, FISH, BOGS, AND SOIL
Response:	We have provided management direction for protection of these and other resources in Chapters II and III of the Revised Plan.
PC 62e	TO PROVIDE FLOOD PROTECTION
Response:	No alternative can provide absolute protection from flooding, which is a natural event and process. However, all alternatives would have management direction designed to protect riparian areas and to prevent over harvesting or road construction in riparian areas.
PC 62f	TO PROMOTE TOURISM
Response:	Promoting tourism is beyond the scope of plan revision. However, we expect that tourists will continue coming to the Forest and nearby destinations for a variety of reasons, regardless of which alternative is chosen for implementation.
PC 62g	TO PREVENT DEVELOPMENT, INCLUDING ROAD BUILDING, LOGGING, AND NATURAL GAS DEVELOPMENT
Response:	No alternative considered in detail would prevent road building, timber harvest, or natural gas development. These are all legitimate uses of national forests that are mandated by law, regulation, and

	policy. This request is therefore beyond the scope of plan revision.
PC 62h	TO BENEFIT FUTURE GENERATIONS AND PROTECT QUALITY OF LIFE
Response:	The Forest Plan is designed to benefit future generations in many different ways. Just a few of these ways would include providing a variety of recreational settings and wildlife habitats, providing timber for new homes and other wood products, providing natural gas development and storage to help heat homes and cook food, and providing opportunities for employment and income. We hope that these cumulative benefits will help maintain or enhance people's "quality of life" but that phrase has so many different meanings and influences for different people that we feel it is beyond the scope of this plan revision to address in any tangible way.
PC 62i	TO CREATE RECREATION JOBS
Response:	Recreation use is predicted to increase over time under all alternatives. Therefore, we expect recreation jobs to increase as well; much of that increase would likely be in the private sector and benefit local communities.
PC 62j	TO PROTECT BACKCOUNTRY AREAS
Response:	Backcountry recreation opportunities are protected by management direction and emphasis under MPs 5.0, 5.1, 6.2 and 8.1 SPNM for all alternatives. Alternative 3 would have more backcountry recreation areas than any other alternative by a wide margin.
PC 62k	TO PREVENT NON-NATIVE INVASIVE SPECIES
Response:	We have added direction in the Revised Forest Plan to address non-native invasive species. This direction includes Goal VE15, part D to develop a Forest management plan for NNIS in coordination with county, state, and federal agencies. Although ground-disturbing activities like road-building and log-skidding can contribute to NNIS establishment and spread, so can dispersed recreation when seed is carried onto the Forest in clothing and equipment. The management plan will address detection and control methods, as well as education efforts directed toward Forest users, but it is doubtful that we will ever completely prevent NNIS from occurring on the Forest.
PC 62l	INCLUDING A PROHIBITION ON ROADS AND LOGGING IN MP 6.2 AREAS
Response:	Commercial timber harvest and new road construction are generally prohibited in MP 6.2. See management direction for 6.2 in the Forest Plans.
PC 62m	INCLUDING DOUBLING THE BUFFER AREA NEAR STREAMS WHERE LOGGING, ROAD BUILDING, AND DEVELOPMENT ARE PROHIBITED
Response:	Stream buffers may be widened at the project level if there is an identified need. See Soil and Water management direction in Chapter II of the Revised Forest Plan for more information on buffer widths and associated restrictions.
PC 62n	INCLUDING NO INCREASE IN THE ALLOWABLE ACREAGE OF CLEARCUTS
Response:	The 40-acre allowable size for even-aged regeneration harvests represents a return to consistency with regional and national direction. The increase also provides more flexibility in addressing ecological concerns such as fragmentation and deer browsing impacts. Whether or not the sizes of regeneration harvests actually increase on the Forest would be decided at the project level under the NEPA process.
PC 62o	INCLUDING CLOSING THE ROADS IN LITTLE ALLEGHENY AND LAUREL RUN
Response:	Most of the roads in the Little Allegheny and Laurel Run areas are closed to the public; however, a number of them are receiving illegal ATV use.
PC 62p	INCLUDING ALLOWING THE OLD RAILROAD GRADE IN LAUREL FORK TO BECOME A TRAIL
Response:	The railroad grade could be used as a trail now. However, we are not making changes to trail-specific designations in Forest Plan revision.
PC 62q	INCLUDING PURCHASING SOME PRIVATE IN-HOLDINGS IN POTENTIAL WILDERNESS AREAS
Response:	Purchasing private land is beyond the scope of plan revision. Lands may be acquired or exchanged through normal channels outside of plan revision, but typically the Forest would need to be approached by a willing seller.
PC 62r	INCLUDING RECOMMENDING MORE AREAS FOR WILDERNESS STUDY, INCLUDING ALL POTENTIAL WILDERNESS AREAS IDENTIFIED BY LOCAL CITIZENS, AND ALL 15 WILDERNESS AREAS IDENTIFIED BY THE WEST VIRGINIA WILDERNESS COALITION

Response:	See responses to PCs 3, 66, 167, and 345.
PC 62s	INCLUDING ADDITIONAL WILDERNESS AREAS, SUCH AS NORTH FORK MOUNTAIN, LOWER LAUREL FORK, LITTLE ALLEGHENY MOUNTAIN, LAUREL RUN, UPPER SHAVERS FORK, ROARING PLAINS, BIG DRAFT, SENECA CREEK, CANAAN MOUNTAIN, TEA CREEK, AND SPICE RUN
Response:	The Forest does not have the authority to designate Wilderness. Only Congress can provide the permanent Wilderness protections that you want.
PC 62t	INCLUDING ADDITIONAL 6.2 AREAS
Response:	Alternative 3 already has by far the most 6.2 areas of any alternative as a result of many areas we added due to comments we received prior to the Draft EIS. Some of these areas did not qualify for the Roadless Area Inventory, and would likely not have the necessary size and lack of development to make good backcountry recreation areas.
PC 62u	INCLUDING NO PORTION OF SENECA CREEK MANAGED UNDER MP 8.1
Response:	Under Alternative 3, all of the Seneca Creek IRA is MP 5.1, Recommended Wilderness.
PC 62v	Including combining the existing Dolly Sods Wilderness Area with Dolly Sods Expansion, the eastern portion of Roaring Plains, and North Fork Mountain to create one large contiguous wilderness area
Response:	It is doubtful that the Dolly Sods area could ever be contiguous with North Fork Mountain because of the State Highway and private lands that separate them. However, the Dolly Sods, Dolly Sods North, and Roaring Plains areas already provide a fairly contiguous backcountry recreation area of around 27,000 acres, the second largest on the Forest.
PC 920	The Forest should limit the scope of vegetation management to a smaller suited timber base in Alternative 3, but I see no reason why it should still include essentially half the forest area.
Response:	We acknowledge your opinion. The suited timber base in Alternative 3 comprises only about 28 percent of the Forest. See Table TR-10 on page 3-336 of the DEIS.
PC 133	The Forest should implement Alternative 4: <ul style="list-style-type: none"> • To increase logging • To provide jobs and income to West Virginia • Because it offers more emphasis on wildlife management • Because it offers more hunting access through newly created roads • Because it maintains unique areas as Wilderness and Backcountry recreation without abusing these designations in a way that deter future types of forest harvest • To ensure a continued supply of goods and services to the American people.
Response:	We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection.

RANGE OF ALTERNATIVES	
PC 298	The Forest should consider an adequate range of alternatives.
Response:	We believe that we have considered an adequate range of alternatives, including those analyzed in detail and those that were considered but eliminated from detailed study as described in Chapter 2 of the EIS.
PC 298a	BECAUSE THE ALTERNATIVES DEVELOPED IN DETAIL AND EVALUATED IN THE DRAFT EIS ARE UNREASONABLE AND IMPROPERLY NARROW IN SCOPE
Response:	We disagree with your opinion. We describe the development of the reasonable range of alternatives on pages 2-1 and 2-2 of the EIS. Included in this description are the criteria used to determine alternatives considered for detailed study, along with the many influences that appropriately limited their range.
PC 298b	BECAUSE THE CURRENT ALTERNATIVES DO NOT ADDRESS SIGNIFICANT ISSUES RAISED BY THE PUBLIC, WHICH VIOLATES THE NATIONAL ENVIRONMENTAL POLICY ACT
Response:	The alternative descriptions in Chapter 2 of the EIS depict how each alternative address the major Need For Change issues identified in Chapter 1 of the EIS. We also analyze alternative effects on many additional issues and resources in Chapter 3 of the EIS. We describe still other issues raised by the public in Chapter 1 of the EIS, along with the rationale for why they were not analyzed in detail in Chapter 3. This is a legitimate approach for addressing issues under the National Environmental Policy

	Act.
PC 298c	INCLUDING AN EXPLANATION OF THE BENCHMARKS USED TO DEVELOP THE CURRENT RANGE OF ALTERNATIVES
Response:	We have added a discussion of the benchmarks in an Alternative Considered but Not Studied in Detail in Chapter 2 of the FEIS.
PC 298d	INCLUDING ALTERNATIVES THAT EITHER CEASE OR SIGNIFICANTLY REDUCE COMMERCIAL LOGGING ON THE MONONGAHELA NATIONAL FOREST
Response:	We have considered several alternatives that fall into this category. See the Alternatives Considered but Not Studied in Detail section in Chapter 2 of the Final Revised Plan.
PC 298e	INCLUDING AN ECOLOGICAL RESTORATION ALTERNATIVE
Response:	The ecological alternative that you requested contained a requirement for no timber management, which is covered in part D, above. All of the action alternatives considered in detail incorporate ecological concepts and components.
PC 298f	INCLUDING ALTERNATIVES THAT PROTECT LARGE BLOCKS OF HABITAT
Response:	All alternatives considered in detail would protect large blocks of habitat over time, although the amount and size of these blocks vary by alternative. See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS.
PC 298g	INCLUDING AN ALTERNATIVE WITH AN ALLOWABLE SALE QUANTITY LESS THAN PRESENT OR “NO ACTION”
Response:	Both Alternatives 2 and 3 have an ASQ that is less than the “No Action” Alternative (1) in the EIS. It is inappropriate to compare ASQ, which is a production level that we do not plan to exceed, with the current production level, which is dependent on variables such as funding, appeals and litigation, and other Forest priorities.
PC 298h	INCLUDING ALTERNATIVES AND PRESCRIPTIONS THAT ASSIGN UNSUITABLE OR QUESTIONABLE PORTIONS OF THE FOREST FOR CUSTODIAL MANAGEMENT
Response:	All alternatives have management prescriptions (5.0, 5.1, 6.2, 8.1 SPNM, 8.2, 8.3, 8.4, 8.5) that assign unsuitable timberlands to essentially custodial management. In addition, any suitable timberlands that are found to be unsuitable during project-level planning would be removed from the suited timber base. We do not have any lands on the Forest that we label or regard as “questionable”.
PC 298i	INCLUDING AN ALTERNATIVE THAT MODELS CUSTODIAL MAINTENANCE OF THE FOREST WITH AN EMPHASIS ON PROTECTING AND RESTORING NATIVE FOREST WILDLIFE AND PLANTS, WATERSHED PROTECTION, SOIL STABILIZATION, NON-MOTORIZED RECREATION, CARBON SEQUESTRATION, AND FORESTS THAT ARE 120 TO 500 YEARS OLD
Response:	All alternatives have management direction designed to protect native wildlife and plants, watershed resources, soil stability, and biodiversity (see Forest-wide direction in the 1986 and Revised Forest Plans). As far as carbon sequestration in older forest, there are relatively few stands on the Forest now that are 120 to 500 years old, but all alternatives are projected to show substantial increases in older forest over time (see the Vegetation section in Chapter 3 of the EIS, and the Old Growth Appendix B to the Revised Plan). All alternatives also have Management Prescription areas that emphasize non-motorized recreation, with Alternative 3 having the most emphasis. See also response to PC 298h.
PC 298j	TO PROTECT THE BIOLOGICAL DIVERSITY OF THE GREAT EASTERN DECIDUOUS TEMPERATE HARDWOOD FOREST ECOSYSTEM
Response:	See response to PC 298i.
PC 298k	INCLUDING AN ALTERNATIVE THAT REFLECTS THE LIKELY FUTURE BUDGET AND STAFF LEVELS AND ADDRESSES THE EXTENT TO WHICH GOALS AND OBJECTIVES CAN BE MET
Response:	This request involves providing more information about the current alternatives, rather than developing any new alternative. It is also important to remember that the Forest does not have to realize the ASQ. The ASQ represents a level of harvest that we do not plan to exceed, not a target that we must achieve.
PC 37	The Forest should provide an Alternative that increases protection for the wilderness and backcountry areas of the Forest.
Response:	No alternative can designate more wilderness or change the law under which wilderness protection is provided. Those changes can only be authorized by Congress. Both Alternatives 2 and 3 recommend

	areas for wilderness study and provide for more backcountry recreation areas than Alternative 1, which represents the 1986 Plan. In addition, we considered an alternative that would manage all of the Forest as wilderness, one that would recommend all Inventoried Roadless Areas for wilderness study, and several alternatives that would reduce active management on the Forest. See the Alternatives Considered but Not Studied in Detail section in Chapter 2 of the Final Revised Plan.
PC 37a	TO BENEFIT FUTURE GENERATIONS
Response:	We agree that wilderness and backcountry areas can benefit future generations in many ways. Active management can benefit future generations in many ways as well. Examples include providing wood products for home construction and furniture, providing natural gas and storage for home heating and cooking, providing diverse habitats for wildlife, wildlife viewing and hunting, and restoring terrestrial and aquatic ecosystems to properly functioning condition.
PC 37b	TO PROTECT WATER RESOURCES
Response:	We believe that all forest resources, including water, would be adequately protected by a combination of laws, regulations, agency directives, Forest-wide management direction, Management Prescription management direction, and project-level mitigation measures.
PC 37c	TO PROTECT WILDLIFE
Response:	Some comments equated protection of wildlife, habitats, and ecosystems with setting aside additional backcountry, wilderness, and other areas with no timber harvest or roads. While such remote and unmanaged habitats are important for a number of species, many other species do not require remote habitats, and many species benefit from the young forest and herbaceous habitats created by active management outside of backcountry and wilderness areas. The Revised Plan provides for a mix of remote, unmanaged, and non-remote, managed habitats to meet the needs of a wide variety of species. Forest-wide direction provides extensive protection for threatened, endangered, sensitive, and other wildlife and plant species. This direction applies wherever these species occur, regardless of whether the land is allocated to prescriptions emphasizing backcountry recreation or active management.
PC 37d	TO PREVENT THE TIMBER SUPPLY ACREAGE FROM EXCEEDING 29.5 PERCENT OF THE FOREST ACREAGE
Response:	Only 28 percent of the Forest is considered suitable for programmed timber harvest in Alternative 3.

FOREST PLAN FOREST-WIDE MANAGEMENT DIRECTION	
PC 294	The Forest should consider that how standards are written will have an effect on forest management.
Response:	The Forest Plan revision team spent many months crafting the standards that appear in the Proposed Revised Plan, using the 1986 Plan as a starting point and making changes as a result of changed conditions, monitoring, changing national direction, and internal and public comments. The wording was designed intentionally to have certain effects on Forest management.
PC 294a	BECAUSE THERE CURRENTLY ARE FEW IF ANY STANDARDS, AND THE ONES THERE ARE APPEAR TO INTENTIONALLY REDUCE AGENCY ACCOUNTABILITY
Response:	The 1986 Forest Plan has many pieces of direction called “standard/guideline”, which could be interpreted to be either a standard or a guideline, but the 1986 Plan has no actual standards. There are 439 standards in the Proposed Revised Plan, which we would not characterize as “few if any”. We disagree with your opinion that they have been created to reduce agency accountability.
PC 294b	BECAUSE THE PRESCRIPTION STANDARDS AND GUIDELINES DO NOT ADEQUATELY ADDRESS OR SUPPORT THE STATED GOALS AND OBJECTIVES OF THE FOREST PLAN REVISION, INCLUDING DEFICIENCIES IN GUIDANCE NEEDED FOR LAND MANAGERS TO IMPLEMENT ON THE GROUND PROJECTS
Response:	The 1986 Plan has relatively few goals or desired conditions, and a surplus of general direction and standard/guidelines that describe processes, like what cutting methods to use, what species to plant, how many water holes to make per acre, who to consult, or even what type of analysis to use to determine effects. This level of detail may have made sense in 1986 when our agency believed that the Forest Plan and its EIS would address every on-the-ground situation and thereby preclude the need for site-specific planning and analysis. However, in the past 20 years we have learned that we are required to

	do project-level planning and analysis, where many of these process-type decisions are more appropriately made. We have also more rules, regulations, Manual and Handbook direction, and inter-agency agreements in place that define management parameters. Consequently, revised forest plans today are more strategic in nature than those produced in the 1980s. Our revised plan has greatly expanded the Forest's goals and desired conditions, so that it is clearer what we want the Forest to look like, how we want it to function, and what types of opportunities, settings, goods, and services we want to provide. There is less importance put on how we achieve our program goals and outcomes, because we have learned that it makes more sense to have management flexibility at the project level to make site-specific appropriate decisions. Project decisions and management practices will be monitored and evaluated, and adjustments can be made to improve those practices and make better decisions over time. Furthermore, the revised plan has better desired conditions and goals for maintaining or enhancing physical and biological resources on the Forest, and the Plan's standards and guidelines focus largely on helping to achieve those conditions. So, for instance, instead of having a standard that describes what type of mulch or seed mix will be applied to reduce erosion, we now have goals and desired conditions for soil protection, and standards and guidelines that generally describe when and where that type of soil protection is needed. But the type of seed mix or the method of application is more appropriately determined at the site-specific level. We believe that the revised plan provides appropriate goals, objectives, and desired conditions to achieve management outcomes, and appropriate standards and guidelines for resource protection. What we have tried to remove from the plan are processes and procedures that are inappropriate at the Forest-wide level and could change over time, and direction that we already have to follow due to existing law, regulation, policy, directive, or agreement.
PC 856	The Forest should not use words like “typically” when referring to leaving reserve trees because they are either left or they are not.
Response:	We have used language like “typically”, particularly in guidelines, to indicate that there may well be exceptions for safety or other reasons.
PC 858	The Forest should have disclosed whether “needed” research has taken place, as noted on page 31 of the 1986 LRMP.
Response:	When revising the Forest Plan, we did not limit ourselves to research topics outlined in the Research Needs section of the 1986 Forest plan. There is no requirement that a Forest Plan include a list of research needs. With the ever-increasing pace of information and knowledge sharing, and the increasing complexity of resource management research, any list of research needs in the Revised Forest Plan would quickly become obsolete. The Forest will continue to work with all research partners – Forest Service Research, academia, non-governmental organizations, State agencies, other federal agencies – to produce or obtain the best available information for managing the Forest and its resources. An AMS on the Research Needs listed in the 1986 Forest plan is in the project record.
PC 907	The Forest should be commended for its work to describe old growth, and its objectives for encouraging old growth conditions on a list of areas in the draft plan; however, our main concern surrounds the lack of direction in the Forest Plan to address potential future conflicts between timber management and related objectives.
Response:	The list of areas in the Proposed Revised Plan that encourage old growth conditions are essentially those areas where programmed commercial timber management is not expected to occur. Therefore, we do not see any conflicts between old growth desired conditions and timber management objectives.
Air Quality	
PC 852	The Forest should change the Air Quality Desired Future Condition on page II-7 to say that air quality in the Forest should meet all applicable air quality standards, or better yet, the goal should be to improve air quality, rather than merely meeting minimum standards, because limiting the goal to human health protection leaves the door open to abandoning many important Air Quality Related Values.
Response:	We have changed the desired condition statement in the Final Revised Forest Plan to address your concern. We also believe that Air Quality Related Values and air quality standards are fully addressed by the Forest-wide management direction (Goals AQ01 and FM08, Objective AQ02, Standards AQ03, AQ04, FM14, and FM15) in the Proposed Revised Forest Plan, along with management direction for air quality in the Designated Wilderness Management Prescription (MP 5.0).
Soil and Water Resources	

PC 987	The Forest should have management direction to address flooding because the USFS is directed by the Organic Act to “secure objectives, standards and guidelines”.
Response:	The Organic Act includes language “for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States”. There are several goals within the Proposed Forest Plan for improving watershed, floodplain and riparian conditions (SW20, SW21, SW29 and SW30) that contribute to “securing favorable conditions of water flows”. Floods are an inherent part of watershed conditions, and the potential effects of timber harvesting on flooding are discussed in the DEIS on pages 3-73 to 3-74.
PC 979	The Forest should add the following sentence to paragraph 2 on page II-8: “The addition of limestone sand to streams impaired by acid deposition can aid in the stream’s removal from the 303(d) list”.
Response:	This paragraph describes desired conditions for Soil and Water, rather than the methods used to achieve them. Stream liming is a proven method for restoring productivity of aquatic resources, and we feel that it is provided for in the Proposed Revised Plan, particularly in the Wildlife and Fish section desired conditions, and in Forest-wide Goals WF03 and WF04 on pages II-25 and II-26.
PC 898	The Forest should consider rewording Standard SW05 because the term “non-detrimentally disturbed” is undefined, and timbering should be defined as a detrimental disturbance.
Response:	We have reworded this standard in the Final Revised Plan to say, “no more than 15% is allowed to be in a detrimentally disturbed condition.” Detrimental disturbance is defined in the Glossary for the Revised Plan. It refers to specific types of soil disturbance, which may or may not occur as a result of timber harvest, depending on methods used.
PC 870	The Forest should rewrite Standard SW07 as a standard.
PC 870a	BECAUSE EACH SECTION OF THE STANDARD AS WRITTEN CONTAINS A LOOPHOLE OR OPTION FOR REVIEW AND CHANGE THAT MAKES IT READ LIKE A GUIDELINE
Response:	Standard SW07 is largely a carry over from the 1986 Forest Plan. It is currently written with the strength and commitment of a standard, with enough options to provide some flexibility to account for site-specific conditions and variations. This type of strength and flexibility is designed to contribute to successful and effective implementation.
PC 870b	INCLUDING: <ul style="list-style-type: none"> • HOW WERE THE CATEGORIES OF SLOPE STEEPNESS, AND THE MANAGEMENT RESPONSES TO EACH, DERIVED? • WHAT SOURCES, OUTSIDE EXPERTS AND MONITORING AND EVALUATION RESULTS FROM PAST PROJECTS WERE CONSULTED OR REVIEWED IN DEVELOPING THE GUIDANCE REGARDING TIMBER HARVEST AND RELATED ACTIVITIES ON SUCH STEEP SLOPES? • WHAT SPECIFIC ROLE DID ASPECT PLAY IN DETERMINING THE ABILITY TO OPERATE SAFELY ON THE SENSITIVE SOILS LISTED IN PART D?
Response:	Slope categories for soils were derived from county soil survey reports produced by the USDA-Natural Resource Conservation Service Soil Survey Division. Often the categories are based on repeating landform slope breaks and changes in soil types. These categories also match limitations of mechanized equipment and operations on such slopes. The information for this limitation can be found in the interpretations of the county soil survey reports. The management responses are also derived by the USDA-Natural Resource Conservation Service Soil Survey Division and based on soil interpretations.
PC 978	The Forest should revise Standard SW07 as follows: a. steep slopes 25 to 40 percent, b. very steep slopes more than 40 percent, because: <ul style="list-style-type: none"> • Any good soils scientist knows that there is an erosion multiplier effect between the steepness of slope X, the length of slope X, and the amount of rainfall (soil scientists did the research) • On the Monongahela Forest, where there are many rugged mountains with steep and very steep slopes in a 58-inch rainfall zone, erosion vulnerability is very severe from roads and timber developments • Experience on the Coweeta National Forest Research Station in North Carolina has shown that these slope breaks are recommended to help control impacts from roads and timber development to soils and water.
Response:	The request to change the slope management criteria is duly noted; however, the slope breaks used in

	<p>the Forest Plan are strongly tied to the soil surveys for each county and the soil interpretations for the soil map units. With today's technology, it is possible to generate interpretations through the USDA-NRCS soils database NASIS for any given set of slope breaks. This standard is applied to each project at the site-specific level, and all slope phases are looked at in the project area using digital elevation maps. Therefore, each management activity proposed is analyzed for the given slope and the effects that may potentially occur due to the slope and erosion rating of the soils.</p> <p>Also, it is not truly appropriate to compare soil types from the North Carolina National Forests to the MNF in West Virginia. The geology in that area of North Carolina is high grade metamorphic rock, grading into meta sedimentary rock in far western North Carolina. These geologies tend to be strongly dipping. The MNF is entirely underlain by level bedded sedimentary geology. Hydrologically, the soils near Coweeta are considered very deep, whereas the soils on the MNF are shallow and have much less water holding capacity. All of these factors play a large role in road building and road stability. The criteria used for the MNF is appropriate and driven by the USDA-NRCS soil interpretations, which are updated continually through the NRCS soils database.</p>
PC 910	The Forest should make Guideline SW14 (mulching severely eroded areas) a standard, not a guideline because there are no clear circumstances under which mulching should not be used.
Response:	We reworded this guideline for clarity in the Final Revised Forest Plan. However, it is still a guideline because there may be instances where mulch is not needed, or where there may be other erosion control methods that are more appropriate.
PC 981	The Forest should identify those areas that are likely to drain into an acidified stream that would benefit from limestone sand treatment in Guideline SW13.
Response:	This guideline assumes that an area with a pH of less than 5.5 is likely contributing to the acidification of the stream into which it drains. We do not know where all of these areas are located at this time, but we will be gathering more information on them through inventorying and monitoring.
PC 982	The Forest should rewrite Standard SW37 because we disagree with the use of the term "default buffer widths" (buffers) in regard to the width of riparian area on both sides of perennial, intermittent and ephemeral streams because the Plan revision approach to buffers is too restrictive in regard to wildlife habitat management and selected forest management practices.
Response:	Stream channel buffer direction within the Proposed Revised Forest Plan is intended to be flexible and allow activities similar to those described in these comments.
PC 982a	INCLUDING REPLACING THE STREAM BUFFER TERMINOLOGY WITH "STREAM MANAGEMENT ZONES" AND "SHADE STRIP ZONE," BECAUSE THE REMOVAL OF SELECTED TREES OR OTHER VEGETATION FROM A RIPARIAN ZONE DOES NOT INCREASE SEDIMENT OR NUTRIENT FLOW TO A STREAM AND CAN ACTUALLY BENEFIT AQUATIC ORGANISMS
Response:	We originally considered using the same terminology as the State but felt that our direction was different enough from West Virginia Best Management Practices that we did not want to confuse the two areas in the minds of the State or the public. Our term "channel buffer" was therefore intentionally chosen to be different than the "Streamside Management Zones", and also to indicate that there are certain restrictions on management within these areas. However, the channel buffers were never intended to be "no management" zones.
PC 982b	INCLUDING PROTECTING STREAMSIDE MANAGEMENT ZONES TO PREVENT EXPOSURE OF MINERAL SOIL AND SUBSEQUENT EROSIONS
Response:	We agree. Forest-wide direction includes many standards and guidelines designed to prevent or reduce soil exposure and subsequent erosion.
PC 982c	INCLUDING ALLOWING BUT LIMITING EQUIPMENT OPERATION IN THESE AREAS
Response:	We agree. Forest-wide direction does not prohibit equipment operation in these areas, but rather limits the activities that would require heavy equipment in order to reduce the potential for soil disturbance and sedimentation.
PC 982d	INCLUDING ALLOWING SELECTED TREE REMOVAL AND OTHER VEGETATION MANIPULATION
Response:	We agree. Forest-wide direction allows for tree removal or other vegetation manipulation designed to meet riparian or aquatic management objectives or other situations described in Standard SW34.

PC 982e	INCLUDING ALLOWING ENHANCEMENT OF STREAMSIDE MANAGEMENT ZONES, SUCH AS LIMITED TREE REMOVAL AND TREE PLANTING WITH MINIMAL TO NO SOIL DISTURBANCE, THAT WILL IMPROVE EXISTING WILDLIFE HABITATS AND TIMBER STANDS WITHIN THESE RIPARIAN AREAS
Response:	Forest-wide direction allows for tree removal or planting, but activities would be designed to meet objectives or needs described in Standard SW34.
PC 982f	INCLUDING MAINTAINING ADEQUATE STREAMSIDE MANAGEMENT ZONES AROUND ALL LAKES OR PONDS, PERENNIAL FLOWING NATURAL SPRINGS AND ALL SPRINGS AND RESERVOIRS SERVING AS DOMESTIC WATER SUPPLY
Response:	The direction in the Proposed Revised Forest Plan for stream channels would include any springs that contribute water to those channels. We also have direction for municipal watershed protection (SW24, SW25, SW27, SW28) and protection of seeps, vernal pools, bogs, fens, and other wetlands (SW51). We considered using buffers around lakes and ponds, but the four lakes we have on the Forest are recreational facilities that already have many associated development features, and the ponds on the Forest have typically been created for livestock or wildlife and also have development features around them like dams, roads, or trails.
PC 982g	INCLUDING REVISING THE TABLE LISTED UNDER THIS STANDARD AS FOLLOWS. STREAMSIDE MANAGEMENT ZONES STREAM CLASSIFICATION ZONE WIDTH PERENNIAL 100 FEET; INTERMITTENT 100 FEET; EPHEMERAL 50 FEET
Response:	The buffer widths described in Standard SW37 are very close to the Streamside Management Zone widths used by the State. The minor differences have to do with how we break out stream channels.
PC 977	The Forest should only allow Standard SW40 to be applied by experienced, natural resource personnel who know the natural processes of geology, soils, and hydrology functions; consider alternatives, and ground truth their decisions.
Response:	Standard SW40 gives sale planners general direction for laying out skid trails. The locations of the skid trails on the ground may be adjusted due to site-specific conditions, and these adjustments typically occur through an interdisciplinary process involving multiple resource specialists.
PC 984	The Forest should add to Standard SW40 that skid trail and landing locations should be inspected for presence of sink holes and/or karst fractures prior to placement.
Response:	Site-specific conditions are considered in skid road or landing placement in karst landscapes or other sensitive areas as standard operating procedure on the Forest.
PC 985	The Forest should allow road construction within channel buffers, and roads parallel to channel should be considered if delivery of limestone sand to stream is necessary to maintain biological viability in Standard SW44.
Response:	Standard SW44 allows road construction in channel buffers but limits construction to essential stream crossings and avoids construction of roads parallel to streams in order to reduce impacts to riparian vegetation, stream banks, etc. Roads that run adjacent to and parallel with streams may increase options for stream liming but they may also increase the potential for sedimentation and other long-term impacts to riparian and aquatic ecosystems.
Vegetation	
PC 899	The Forest should modify Guideline VE05 to allow planting of naturalized non-native plants, including naturalized apple, clover, blue grass, and orchard grass.
Response:	This guideline as written in the Proposed Revised Plan already allows the use of non-invasive non-natives; the term “naturalized” just confuses the issue and could facilitate the planting of invasive species. For example, three of the four examples given in the comments are potentially invasive.
PC 900	The Forest should reinstate detailed direction on revegetation from Appendix S of the 1986 Plan, including specific planting dates for specific seed mixtures, in addition to lime and fertilizer application rates and mulching guidelines.
Response:	We have incorporated some of the direction from Appendix S, but we felt that many of the details, such as specific dates relating to seeding and mulching, were better addressed at the project level, using site-specific information, than in programmatic direction.
PC 921	The Forest should include the hawthorn direction from the 1986 Plan as amended.
Response:	The hawthorn inventory requirement from Appendix P of the 1986 Forest Plan (as amended) is included in RA19. Standard RA19 also requires hawthorn management to be addressed in range allotment plans

	Forest-wide. The other two hawthorn standards in Appendix P merely list potential options to consider during allotment management planning and thus were not included in the Proposed Revised Plan. Guidelines 4126 and 6133 in the Proposed Revised Plan promote retention of trees and shrubs beneficial to wildlife, including hawthorn, during timber stand improvement in MPs 4.1 and 6.1, respectively.
PC 846	The Forest should say more about the results of the Forest Service’s no action or very little vegetation management during the past 15 years. The Forest should either be more aggressive toward interveners or increase the number of active projects in order to accomplish more.
Response:	Tables TR-4, TR-7, and TR-14 in the DEIS show a fairly consistent downward trend of vegetation management activities from 1993 through 2004. Table TR-14 also shows another downward trend from 1973 through 1980. These downward trends were the result of many factors, including changes in national policy, increased public interest in the management of national forests, Plan amendment, Forest reorganization, etc. The completion of the Revised Forest Plan should begin a more upward trend in vegetation management activities for the upcoming planning period.
PC 526	The Forest should provide adequate standards and guidelines regarding vegetation.
PC 526a	INCLUDING MAKING THE SEEDING OF SKID ROADS A GUIDELINE INSTEAD OF A STANDARD TO IMPROVE REGENERATION
Response:	Changing this standard to a guideline would have no effect on regeneration of tree species. Tree seeds will germinate and grow on both seeded and unseeded skid roads.
PC 526b	INCLUDING STANDARDS AND GUIDELINES TO DESIGN MANAGEMENT ACTIVITIES THAT WILL CONTRIBUTE TO THE SURVIVAL AND RECOVERY OF FEDERALLY LISTED PLANT SPECIES
Response:	The TEP Species and Vegetation sections in Chapter II of the Proposed Revised Plan have general direction for listed species and rare plant communities.
PC 526c	INCLUDING EXAMINING WHETHER SNAG RETENTION STANDARDS ADEQUATELY MEET THE NEEDS OF THE SPECIES FOUND IN THE REGION
Response:	The Forest-wide minimum standard of 6 snags per acre is based on the habitat needs of the Indiana bat. However, Management Prescriptions 4.1 and 6.1 require the retention of all snags in most cases. MPs 5.0, 5.1, and 6.2 prohibit timber harvest, which will result in the retention of all snags in most cases. Together, these MPs cover approximately 70 percent of the Forest. Retention of all snags across 70 percent of the Forest should be more than adequate to meet the needs of species that use snags.
PC 526d	INCLUDING REQUIREMENTS FOR SNAGS AND RETAINED VEGETATION CLUMPS
Response:	The commenter merely expressed an opinion without providing any supporting rationale.
Threatened, Endangered, and Proposed Species	
PC 998	The Forest should change the Desired Conditions for TEP species to include maintenance and enhancement of populations, because many recovery plans do not provide detailed habitat management guidelines so this statement may not contain much workable guidance.
Response:	We have modified the Desired Condition statement in the Final Revised Forest Plan has to address this comment.
PC 999	The Forest should clarify language in the EIS pertaining to surveys for TEP species because a survey statement is repeated in some, but not all, of the species-specific standards and guidelines, and we recommend that the statement be moved to apply to all TES and included under the General Direction section.
Response:	The language in the EIS has been modified to better reflect the role of surveys in the informal Section 7 consultation process. Surveys may not occur for all threatened and endangered species for all projects. Prior to field surveys, screening is conducted to determine whether potential habitat for listed species is present, whether existing occurrence information is adequate for assessing effects, whether the proposed project involves any activities with the potential to affect listed species, and whether surveys are likely to provide useful and cost-effective information.
PC 61	The Forest should adopt an objective of mitigating the impacts of fragmented Cheat Mountain Salamander habitat, including connecting fragmented habitat through forest restoration.
Response:	Goal TE54 (page II-23) in the Proposed Revised Forest Plan addresses this comment.
PC 307	The Forest should create a standard that states, “Special use permits may be authorized if the uses do not adversely affect threatened and endangered species” that is not restricted to specific

	species.
Response:	We have added a similar standard to the Final Revised Plan, but we kept specific direction for Indiana bat and running buffalo clover. Some special uses could have an adverse effect (take) on the Indiana bat if they involve large-scale tree cutting. Special uses that involve road reconstruction or maintenance could adversely affect running buffalo clover, which is often found on old roads.
PC 309	The Forest should amend Standard TE24 to indicate that a two-mile buffer zone would be established around the capture site if a reproductively active female or juvenile Indiana bat is found to allow effective survey efforts.
Response:	The suggested change has been made in the Final Revised Plan.
PC 310	The Forest should consider adding standards and guidelines to provide protection for the Indiana Bat.
PC 310a	INCLUDING A GUIDELINE THAT SUGGESTS THAT WHEN POSSIBLE, VEGETATION MANAGEMENT ACTIVITIES WITHIN THE PRIMARY RANGE OF INDIANA BATS SHOULD BE SCHEDULED TO AVOID THE SWARMING PERIOD
Response:	Generally it is not practical or desirable to limit management activity to the hibernation period because equipment and log truck operations under the wet conditions that prevail at that time of year can severely impact soil and water resources.
PC 310b	INCLUDING A STANDARD THAT AIDS IN THE PROTECTION OF LIKELY MATERNITY SITES
Response:	Mist net surveys aimed at detecting maternity colonies are required by the U.S. Fish and Wildlife Service's Biological Opinion on the Revised Forest Plan. Protection of potential and confirmed maternity colonies is addressed by Standards TE24 and TE25 in the Proposed Revised Plan. This direction has been updated for the Final Revised Plan.
PC 310c	INCLUDING PROTECTION FOR THE ZONE OF CONCERN
Response:	The commenter requested that timber harvest in primary range be restricted to the hibernation season and that timber harvest within two miles of maternity colonies be restricted to the non-maternity season. Seasonal restrictions in primary range were considered during the preparation of the recent threatened and endangered species amendment to the Forest Plan. At that time it was determined that restricting vegetation management to the winter season is not practical or desirable because such timing likely would cause damage to soil and water resources. For the management zone around maternity colonies, plan direction provides flexibility to determine protective measures on a site-specific basis. Such measures could include seasonal restrictions if they are determined to be useful and practical.
PC 306	The Forest should incorporate an additional standard into the General Direction section of the Forest Plan to address the need to design or alter projects to avoid impacts to threatened and endangered species.
Response:	The Revised Plan has no "General Direction" section. It does, however, have considerable management direction that addresses impacts to threatened and endangered species (see Chapter II, Threatened, Endangered, and Proposed Species section). Complete avoidance of impacts may not be possible in all cases. Section 7 consultation procedures under the Endangered Species Act are designed to ensure that any adverse effects do not jeopardize the continued existence of a listed species.
PC 312	The Forest should add impacts to Threatened and Endangered species or Regional Forester Sensitive Species to the list of potential reasons to restrict mineral exploration.
Response:	Standard MG09 from the Proposed Revised Forest Plan has been changed to include threatened and endangered species as a potential reason to restrict mineral activity.
PC 479	The Forest should implement closure dates for human entry to Cave Mountain Cave from March 15 to September 15 to provide protection for the Virginia big-eared bat maternity colonies.
Response:	Proposed Forest Plan Standards TE14 and TE15, which address closure of caves occupied by Virginia big-eared bats, have been modified to allow more restrictive closure dates when warranted by site-specific conditions. We chose not to include Cave Mountain Cave by name with the specific suggested dates because site-specific closure decisions are not appropriate for the Forest Plan. Also, using more general language allows more restrictive closure dates for other caves if necessary.
PC 851	The Forest should avoid using the word "mitigate" in Standard TE06 in relation to impacts to threatened and endangered species.
Response:	We have reworded this standard in the Final Revised Forest Plan to address this comment.

PC 878	The Forest should develop management direction to provide open, herbaceous habitats to benefit the Virginia big-eared bat.
Response:	We have added a goal to the Forest-wide TEP Species direction to address this comment.
PC 879	The Forest should broaden Standard TE34 to cover primary range in its entirety.
Response:	The suggested change has been made. We also broadened the standard to cover all types of harvests, not just uneven-aged harvests.
PC 880	The Forest should modify direction related to silvicultural habitat enhancements in Indiana bat primary range to allow development of additional techniques as new information becomes available.
Response:	We have added language to this standard that allows for the development of other appropriate habitat management techniques in consultation with USFWS.
PC 881	The Forest should modify Standards TE36, TE45, and TE52 to specify that activities covered by these standards must be compatible with Indiana bat management.
Response:	The three pieces of direction have been changed to require that activities be compatible with Indiana bat population maintenance or recovery.
PC 1000	The Forest should modify Standard TE60 to reflect the flexibility that is needed in mapping suitable habitat for the West Virginia northern flying squirrel. Because maps of suitable habitat will be routinely refined and reviewed, it would be inappropriate to refer to a specific map or “the” map in the Revised Forest Plan, rather the text should be revised to read “Suitable habitat shall be determined using maps collaboratively produced by the Forest, USFWS, and the WVDNR [West Virginia Division of Natural Resources] using the best scientific and commercial data available. Forest-wide maps shall be reviewed during watershed analysis or project analysis and refined when Forest, USFWS, and WVDNR biologists determine that suitable habitat is or is not present. All verified capture sites shall be included in the suitable habitat map.”
Response:	This standard has been modified in the Final Revised Forest Plan to address this comment. We did not, however, include the suggested statement about using the best commercial data available. If we determine the commercial data is the best scientific data available and it is applicable to the Forest, we would want to use it; but if it is not, we would not want to be compelled to use it by the Forest Plan.
PC 882	The Forest should reinstate language from the 1986 Plan as amended that limits pesticide use in habitat for the Virginia big-eared bat and Indiana bat.
Response:	The “limit” language from the 1986 Plan as amended was rather vague. We have clearer Forest-wide direction for vegetation that stipulates that pesticide use anywhere on the Forest, including bat foraging habitat, should be limited to those situations where it is the best method of control and can be conducted without serious environmental impacts. Also, any proposed use of pesticides in endangered bat foraging habitat would need to be addressed during project-level Section 7 consultation.
PC 711	The Forest should consider the difficulties in managing running buffalo clover, including addressing threats to running buffalo clover in the alternative comparisons.
Response:	Effects to running buffalo clover by alternative are addressed in the EIS and Biological Assessment. Running buffalo clover is a challenge to manage since it requires moderate disturbance to perpetuate. Habitat on the Forest often consists of old roads that have been used infrequently in recent years. Sometimes managing for a population increase means a short-term decrease in numbers of individuals as areas are disturbed. For these reasons, the Forest has determined that our management is likely to adversely affect running buffalo clover, and we will receive a Biological Opinion from the USDI Fish and Wildlife Service. See direction that has been added for this species in the TEP Species section of Chapter II in the Final Revised Plan to address conservation measure from the Biological Opinion.
Wildlife and Fish	
PC 884	The Forest should change the Desired Condition statement on page II-25 to the present tense.
Response:	The Desired Condition statement has been changed in the Final Revised Plan to the present tense.
PC 885	The Forest should develop or modify direction for wildlife and wildlife habitat.
PC 885a	INCLUDING DEVELOPING ADDITIONAL DIRECTION THAT IS NOT SLANTED TOWARD NON-GAME SPECIES, SENSITIVE SPECIES, AND SPECIES OF CONCERN. SUCH DIRECTION SHOULD COVER SPECIES SUCH AS BLACK BEAR, SHOWSHOE HARE, FOX SQUIRREL, FISHER, ETC.
Response:	We have modified Goal WF01 to specify providing habitat for game species and furbearers. The Forest

	Service has strong mandates in law and regulation to use specific plan direction when necessary to maintain viability and contribute to recovery of TEPS species. No such mandate exists for game species, other than general mandates to provide for multiple uses and wildlife habitat. Forest-wide and MP direction contains numerous provisions for habitat diversity, mast production, snag and cull retention, road closures, den trees, etc. These provisions are intended to provide for the hundreds of species that are not mentioned by name in the Forest Plan.
PC 885b	INCLUDING MODIFYING GUIDELINE WF15 TO ALLOW PLANTING, PRUNING, AND RELEASE OF DESIRABLE (APPROVED) NON-NATIVE TREES AND SHRUBS OF HIGH WILDLIFE VALUE
Response:	We have modified Guideline WF15 to allow the planting, pruning, and release of desirable non-native, non-invasive trees and shrubs.
PC 493	The Forest should make changes to its management direction regarding wildlife habitat.
PC 493a	INCLUDING IDENTIFYING WHAT IS OR WHAT CONSTITUTES A WILDLIFE OPENING
Response:	Wildlife openings are defined in the Glossary (DEIS, Appendix G).
PC 493b	INCLUDING PROVIDING SPECIFIC GUIDELINES ON DEVELOPMENT OF WILDLIFE OPENINGS, INCLUDING TYPE, SIZE, AND PLACEMENT/PROXIMITY TO BORDER CONFIGURATION, THE SEED MIXTURES TO BE PLANTED, THE LIME AND FERTILIZER APPLICATOR RATES, AND MULCHING
Response:	The specific characteristics of openings and methods of establishment can vary depending on landscape context, site conditions, habitat objectives, season, seed availability, etc. Therefore, these items should be addressed at the project level rather than in the Forest Plan.
PC 493c	INCLUDING PROVIDING STANDARDS FOR PLANTING MAST PRODUCING TREES, SHRUBS, AND DESIRABLE NON-NATIVE FRUIT TREES AND SHRUBS
Response:	The planting of mast-producing trees and shrubs is addressed in the Proposed Revised Forest Plan by Guideline WF15 on page II-26.
PC 493d	INCLUDING PROVIDING SUFFICIENT INFORMATION ABOUT ANIMAL SPECIES
Response:	The viability analyses used the best available information.
PC 493e	INCLUDING PROVIDING STRONG SPECIES VIABILITY STANDARDS AND MANDATORY MONITORING REQUIREMENTS
Response:	Maintenance of species viability is addressed in the Proposed Revised Forest Plan by Goal VE07, Standard VE11, Goal WF01, Goal WF05, Standard WF11, and Guideline WF17. Monitoring to support maintenance of species viability is addressed in the Proposed Revised Plan by Goal WF06 and a monitoring item in the monitoring plan (Proposed Revised Plan Chapter IV, Table 4-3b, item 44).
PC 493f	INCLUDING PROVIDING STANDARDS AND GUIDELINES FOR SNOWSHOE HARE HABITAT
Response:	No specific concern has been expressed that would warrant individualized direction for the snowshoe hare. Forest-wide and management prescription direction provides for habitat diversity, mast production, snag retention, and many other habitat features for the hundreds of species that are not mentioned by name in the Forest Plan.
PC 493g	INCLUDING PROVIDING STANDARDS AND GUIDELINES FOR FISHERIES
Response:	Direction for fisheries management is found in the 1986 Forest Plan (Fisheries Amendment No. 3) and in the Wildlife and Fish section (pages II-25 to II-27) of the Proposed Revised Forest Plan. Fisheries management is also dependent on protection of soil, water and riparian resources. This direction is located in the 1986 Forest Plan (pages 79 to 87) and the Proposed Revised Plan (pages II-8 to II-13).
PC 493h	INCLUDING PROVIDING MORE STANDARDS AND GUIDELINES UNDER MP 6.1
Response:	See responses to parts b, c, e, f, g, I, and j of this concern statement.
PC 493i	INCLUDING PROVIDING STANDARDS OR GUIDELINES FOR SEEP MANAGEMENT
Response:	Seeps direction is covered in the Proposed Revised Plan by SW51 on page II-12.
PC 492j	INCLUDING PROVIDING STANDARDS ASSOCIATED WITH DEN TREE MANAGEMENT
Response:	Den trees are addressed by snag and cull retention direction in the Proposed Revised plan at 4109, 6107, 6130, TE22, TE30, TE31, TE33, and TE34.
PC 886	The Forest should modify direction for fisheries and aquatic habitat.
PC 886a	INCLUDING MODIFYING GOAL WF04 TO CALL FOR MAINTENANCE AND RESTORATION OF DESIRABLE NON-NATIVE AQUATIC COMMUNITIES

Response:	We allow for desirable non-native species under Goal WF01. As a federal land management agency, we cannot promote the establishment, restoration, or maintenance of non-native aquatic communities.
PC 886b	INCLUDING MODIFYING OBJECTIVE WF10 TO INCLUDE HABITAT FOR DESIRABLE NON-NATIVE SPECIES
Response:	We allow for desirable non-native species under Goal WF01. The suggestion to add “and/or desirable non-native species” did not fit here because this objective pertains specifically to habitat for the aquatic MIS, which is native brook trout.
PC 886c	INCLUDING MODIFYING STANDARD WF12 TO REQUIRE CONSULTATION WITH A WVDNR FISHERIES BIOLOGIST FOR PROJECTS THAT MAY PRODUCE SEDIMENT NEAR TROUT STREAMS
Response:	WVDNR has the opportunity to comment on projects during scoping, the public comment period, and the informal coordination we do on a regular basis. However, we may want to consider revising our Memorandum of Understanding to refine the consultation process for our management activities.
PC 892	The Forest should admit that Standard WF12 is too strict because over fishing is far more detrimental to trout populations than sediment.
Response:	Similar language can be found in the 1986 Forest Plan, as amended, and our experience has been that it has not been too restrictive.
PC 15	The Forest should revise the Forest Plan to say that fish habitat improvement structures should be constructed to function well while appearing as natural as possible, because fish structures built in the past failed to function because of strict visual requirements.
Response:	We agree that habitat improvement projects should be designed and should function to meet the project objectives. A number of variables go into the success or failure of a stream improvement structure, including its design quality, construction quality, its location, and flow events. One difficulty in working in streams is the unpredictable nature of stream flows. Structures often fail shortly after they are built due to flood flows. Our intent is to build structures that function, knowing that they may be lost to a high flow event. Our preference is to use native and onsite materials that match surrounding material and help reduce project costs. See Guideline WF21 in Chapter II of the Proposed Revised Plan.
Recreation Resources	
PC 534	The Forest should establish additional standards to minimize adverse impacts from recreational wheeled vehicles.
PC 534a	INCLUDING PROHIBITING ALL-TERRAIN VEHICLES FROM TRAILS AND AREAS OTHER THAN EXISTING ROADS OPEN TO AUTO TRAFFIC
Response:	Public motorized vehicle use is permitted on roads and trails designated open for use. Off road use is not permitted (Proposed Revised Plan, page II-52, Standard FR16).
PC 534b	INCLUDING PROHIBITING MOUNTAIN BIKING IN POTENTIAL WILDERNESS AREAS
Response:	The intent of Management Prescription 5.1 is to maintain wilderness attributes and management options until Congress decides whether or not to designate the area as Wilderness. If Congress decides to designate, then mountain bikes would likely be prohibited in those areas. Until then, we do not believe that this use would compromise the current or potential wilderness attributes of MP 5.1 areas.
PC 534c	INCLUDING MOTORIZED VEHICLES AND MOUNTAIN BIKES IN THE EAST FORK OF GREENBRIER RIVER BASIN
Response:	A good portion of the upper East Fork Greenbrier River Basin is in MP 6.2, which prohibits public motorized use. Off road motorized use is not allowed. Mountain bike use is allowed; however, current use is estimated to be very low.
PC 762	The Forest should revise standards, guidelines, goals, and objectives for activities related to backcountry recreation, including: <ul style="list-style-type: none"> • Making backcountry recreational opportunities its management focus • Prohibiting motorized conveyances in areas designated for backcountry recreation • Making no changes to the management plan of the Forest and its backcountry areas Because no other entity in the State can fulfill this role, and the changes in uses will only benefit a few people and cause a loss in tourism revenue.
Response:	As part of a multiple-use agency, the Forest must manage the land for a wide variety of uses, settings, opportunities, resources, and services. We feel that the Revised Plan accommodates the diversity and sustainability of forest ecosystems, as well as a range of recreational and economic opportunity. The

	Revised Plan provides more backcountry recreation opportunities than the 1986 Plan, and the management direction for these areas is consistent with promoting those opportunities in settings that will largely be influenced by natural processes.
PC 954	The Forest should add the following statement to Guideline RC32 on page II-30: “Trail location should avoid developed and maintained wildlife clearings”.
Response:	This guideline was not the proper place to address this concern because the guideline deals with maintenance and relocation, not construction of new trails. Guideline 6136 addresses the location of new openings relative to trails in an appropriate management prescription.
Wild and Scenic Rivers	
PC 332	The Forest should provide specific management direction for Wild and Scenic Study Rivers.
Response:	Management direction for Wild and Scenic Rivers has been provided in the Wild and Scenic River section of Chapter II in the Revised Plan. Additional information about eligible Wild and Scenic River segments has been provided in the Management Prescription area descriptions in Chapter III of the Revised Plan.
PC 332a	INCLUDING A LIST OF VALUES FOR WHICH EACH SEGMENT IS TO BE PROTECTED
Response:	A list is not management direction. We have, however, added Outstandingly Remarkable Values (ORVs) to the Wild and Scenic River tables in the Management Prescriptions so that Forest managers will know what values are to be protected.
PC 332b	INCLUDING A LIST COMPANION OR OVERRIDING STATE AND FEDERAL PROVISIONS THAT AFFECT MANAGEMENT OF THE PROTECTED SEGMENTS
Response:	We follow state and federal laws or regulations, but we do not have to repeat them in the Forest Plan.
PC 332c	INCLUDING PLANS TO ADDRESS COLLABORATION WITH OTHER AGENCIES WITH MANAGEMENT JURISDICTION OF STREAMS RECEIVING WILD AND SCENIC PROTECTION
Response:	“Plans to address plans to collaborate with other agencies” is not management direction. If collaboration is required under the law, we will collaborate, but we do not have to include provisions of the law in the Forest Plan.
PC 332d	INCLUDING A REDEFINITION OF ITS “TRIGGER” FOR PERFORMING SUITABILITY STUDIES ON THE PROTECTED SEGMENTS BECAUSE THE MISSION OF SUCH A STUDY SHOULD BE TO PROTECT THE ELIGIBLE STREAMS, NOT TO ADDRESS A CONFLICTING MANAGED ACTIVITY
Response:	We disagree that the “mission” of a suitability study is to protect the eligible stream. A suitability study is conducted to determine whether the eligible stream is suitable for inclusion in the National Wild and Scenic River System. If the study determines that the stream is suitable, it is recommended for inclusion in the National System. If the study determines the stream is not suitable, the stream loses its eligibility and any associated protection.
PC 332e	INCLUDING PROTECTION FOR ALL POTENTIAL OUTSTANDING REMARKABLE VALUES
Response:	Protection of ORVs is covered under the WSR Act and its implementing regulations. ORVs have been added to the MP Wild and Scenic River tables for the Final Revised Plan. ORVs are also addressed in the desired conditions, Goal WS02, and Standard WS03 on page II-33 of the Proposed Revised Plan
PC 332f	INCLUDING ALLOWING ALL RIVERS TO MAINTAIN A FREE-FLOW CONDITION WITHOUT ANY DAMS
Response:	Free-flowing condition is covered under the WSR Act and is also addressed in the desired conditions, Goal WS02, and Standard WS03 on page II-33 of the Proposed Revised Plan.
PC 332g	INCLUDING PROTECTION AND ENHANCEMENT OF RECREATIONAL USES
Response:	Protection and enhancement of recreational uses are covered under the WSR Act.
PC 332h	INCLUDING THE MAXIMUM BUFFER BE PROTECTED FROM NEW ROAD BUILDING, LOGGING ACTIVITIES, MINING ACTIVITIES, AND OTHER ACTIVITIES THAT COULD IMPACT OUTSTANDING REMARKABLE VALUES
Response:	River corridors would receive protection commensurate with their eligible classification. Not all classifications necessarily preclude the activities you have listed, but we agree that the activities should not degrade the ORVs.
PC 332i	INCLUDING WILLINGNESS TO CLEAN UP IMPAIRED STREAMS OR PARTICIPATE IN THE

	STATE'S TOTAL MAXIMUM DAILY LOAD
Response:	See response to PC 582.
PC 332j	INCLUDING MANAGEMENT OF AREAS ELIGIBLE FOR WILD AND SCENIC RIVER DESIGNATION WILL BE DONE ACCORDING TO THE MOST RESTRICTIVE APPLICABLE LAW
Response:	Direction related to laws and regulations applies to the entire Forest, regardless of whether part of the Forest has a Wild and Scenic River corridor or not. We always have to apply the most restrictive direction applicable, and we do not need direction to tell us that.
PC 540	The Forest should limit development activities within Wild and Scenic River corridors—including timber production, road construction, and water resource projects such as in-stream construction—to protect endangered and rare species.
Response:	Water impoundments are generally prohibited in all Wild and Scenic River corridors, including those considered “eligible” on the Forest. Other development activities within eligible Wild and Scenic River corridors on the Forest are limited according to the classification of the river corridor. For example, timber harvest and road construction would generally not occur in a corridor classified as Wild; whereas timber harvest and road construction could occur in a corridor classified as Recreational if they are designed to enhance or maintain the recreational qualities and Outstandingly Remarkable Values of the corridor. Endangered and rare species would be protected by Forest-wide direction regardless of river corridor status or classification.
PC 119	The Forest should map and develop the scenic values of Wild and Scenic River corridors and very high scenic integrity corridors.
Response:	Scenic Integrity Objectives for eligible Wild and Scenic River corridors are provided in Guideline WS04 on page II-33 of the Proposed Revised Plan. We have added a map of the eligible river corridors in the FEIS and Plan map packet.
PC 558	The Forest should reduce the buffer around Wild and Scenic Rivers.
Response:	This is beyond the scope of Forest Plan revision. Wild and Scenic Rivers and their corridor boundaries are designated by Congress. There are no designated rivers on the Forest. However, there are eligible segments that are managed according to the Forest Service Handbook (FSH 1909.12, Chapter 80).
PC 891	The Forest should recommend river management plans, prohibit water resource projects, and provide direction to protect T&E Species in MP 6.1 Wild and Scenic River corridors.
Response:	River management plans are only required for designated river corridors; these corridors are only considered eligible. Water resource projects that would impair the rivers’ free-flowing condition would be prohibited. The Revised Forest Plan provides Forest-wide direction for TEP species.
Timber Resources	
PC 868	The Forest should modify timber resources direction to better address wildlife habitat concerns.
PC 868a	INCLUDING MODIFYING STANDARD TR08 TO REQUIRE REMOVAL OF SLASH FROM WILDLIFE OPENINGS
Response:	We have modified this standard to state that slash in wildlife openings must be arranged such that it does not impede wildlife movement or maintenance of the opening. We elected not to require removal of all slash from openings because slash, when properly arranged into brush piles, can provide a valuable wildlife habitat component. We disagree with the suggestion regarding slash in streams because the standard already requires that any retention of slash in streams be beneficial for aquatic resources.
PC 868b	INCLUDING CHANGING GUIDELINE TR10 TO REQUIRE A MINIMUM SPACING OF 300 FEET BETWEEN SKID TRAILS
Response:	Two hundred feet is considered the maximum practical spacing for skid trails. The guideline allows this distance to be expanded if ground conditions warrant.
PC868c	INCLUDING CHANGING GUIDELINE TR11 TO SPECIFY THAT WILDLIFE OPENINGS SHOULD NOT BE USED FOR LOG LANDINGS
Response:	We elected not to prohibit the use of wildlife openings as landings because most existing wildlife openings were developed from log landings. It would be inefficient to clear additional land for landings when landings already exist, and it could also create unnecessary impacts to other resources. However, we did modify the guideline to state that wildlife openings used as landings should be revegetated within one growing season after completion of harvest activities.

PC 869	The Forest should define all even-aged and uneven-aged silvicultural treatments in the glossary, as the Forest Plan and glossary are currently deficient in defining these terms.
Response:	We have fully described all even-aged and uneven-aged silvicultural treatments to be used on the Forest in Appendix A to the Proposed and Final Revised Forest Plans.
PC 871	The Forest should make the acre projection in Objective TR04 consistent with other vegetation management objectives in the Plan.
Response:	We have reviewed and updated our vegetation management objectives in the Final Revised Plan.
Range Resources	
PC 922	The Forest should add a section d) to Guideline RA11 on page II-40 of the Proposed Revised Plan, one that addresses maintaining or improving wildlife habitat for woodcock and other early successional species.
Response:	We believe that Goal RA01 and Guideline RA10 in the Proposed Revised Plan already address wildlife habitat. We do not believe that we need to specify which species or what type of habitat, as these areas would primarily be maintained as openings with a mixture of species that would benefit many wildlife species as well as livestock.
PC 997	The Forest should modify management direction pertaining to range management.
PC 997a	INCLUDING MODIFYING STANDARD RA14 TO REQUIRE FENCING OF ALL STREAM CHANNELS IN GRAZING ALLOTMENTS
Response:	This standard requires fencing where we determine that range management is contributing to stream bank instability, and allows us to prioritize effective mitigation over time. The suggested rewording could require us to fence all allotment stream channels before grazing may continue, whether we need site-specific fences or not.
PC 997b	INCLUDING ADDING STANDARDS AND GUIDELINES FOR HAWTHORN MANAGEMENT
Response:	See responses to PC 520b, PC 921, and PC 923.
Mineral and Geology Resources	
PC 1001	The Forest should modify direction for mineral development to reduce the chances of adverse effects on threatened and endangered species <ul style="list-style-type: none"> • Because pages 3-238 through 3-242 of the DEIS say that negative effects of mineral operations within TES habitats (e.g., small whorled pogonia and running buffalo clover) may occur, and this may require that potential impacts to these species be addressed through formal consultation under the Endangered Species Act • Because suggested wording changes would help ensure that mineral development activities are not likely to adversely affect listed species.
Response:	The Proposed Forest Plan direction for minerals (MG09) has been changed to state that mineral exploration and development may be restricted to prevent unacceptable impacts to threatened and endangered species. The text in the EIS has been modified to reflect the low likelihood of adverse effects on small whorled pogonia due to mineral activities.
Lands and Special Uses	
PC 843	The Forest should list priorities under Guidelines LS04 and LS05 in the Lands and Special Uses section on Chapter II in the Revised Plan.
Response:	We intentionally did not list the items in Guidelines LS04 and LS05 as priorities in order to maintain more flexibility over time, as priorities may change.
Roads and Facilities	
PC 414	The Forest should write Standard RF06 to address any stream, not just “high risk” streams including stabilization of disturbed soils and installation of drainage features as a required component for high-risk areas and any stream.
Response:	We agree. We have rewritten this standard for the Final Revised Forest Plan.
PC 963	The Forest should consider organizing and tracking the road network and management activities in a matrix as part of its Desired Conditions on page II-50. A matrix could be used to organize and track transportation system needs by resource management needs as well.
Response:	You are describing a tool to use rather than a desired condition. The Forest Service has a number of tools that can be used to organize and track road-related features, uses, and needs. Even better processes may be developed as time goes on, so there is no real need to commit ourselves to any one

	process in the Revised Forest Plan.
PC 971	The Forest should make the following changes on pages II-50-52 in the Roads and Facilities section of Chapter II of the Proposed Revised Plan.
PC 971a	ADD “ROADS USED TO DELIVER LIMESTONE SAND OR STONE SHOULD BE RETAINED” TO GUIDELINE RF08
Response:	This guideline is designed to give general guidance on evaluating road management options. When planning teams “evaluate transportation needs based on existing uses...” they would have to identify whether the road is currently being used for limestone sand delivery, along with any other uses. It would be impractical to list every possible use in this guideline, and unfair to single out only one type of use. However, to clarify that planners should specifically consider the current access needs of cooperators, permittees and private landowners, we have added a statement to this effect.
PC 971b	ADD “BECAUSE MANY OF THE 303(D) STREAMS ON THE MONONGAHELA NATIONAL FOREST ARE ACID PRECIPITATION IMPAIRED, ROADS CURRENTLY USED OR HAVE POTENTIAL FOR DELIVERY OF LIMESTONE SAND SHOULD BE RETAINED” TO GUIDELINE RF09
Response:	To clarify that the access needs of cooperators, permittees and private landowners are also part of the prioritization process, we have added a statement to this effect in Guidelines RF09 and FR10. However, depending on the transportation planning evaluation, we may not want to retain every road that is used or has potential to be used for limestone sand delivery, particularly in stream drainages that have multiple roads that could be used for delivery. We may, for example, want to retain low-impact roads to provide stream access but remove other roads that are causing unacceptable impacts to riparian and aquatic resources.
PC 971c	ADD “CONSIDERATION SHOULD BE GIVEN TO ROADS THAT PROVIDE ACCESS TO A STREAM THAT MAY BENEFIT FROM THE ADDITION OF LIMESTONE SAND” TO GUIDELINE RF11
Response:	Guideline RF11 says to “Evaluate long-term access needs...prior to making a decision to decommission a road.” If those access needs include the only means to restore or maintain the aquatic productivity of a stream, it is likely that we would not choose that road to decommission.
PC 971d	GUIDELINE RF22: WE RECOMMEND USING ALL MEANS TO INFORM THE PUBLIC ON ROAD CLOSURES (I.E., WEBSITE) BECAUSE MANY VISITORS ARE NOT LOCAL AND DO NOT HAVE ACCESS TO LOCAL MEDIA
Response:	We are currently developing an online process for informing the public about road status on the Forest.
PC 972	The Forest should change Guideline RF09 to be a Standard because the assessment of opportunities for road decommissioning should be required of all projects.
Response:	Some projects would not have opportunities for road decommissioning. We have projects on the Forest that do not even have project areas, or the areas are not large enough to have roads or to do a meaningful road assessment. Where we do have an opportunity for assessment, though, this guideline would apply. One reason we made this a guideline is because we knew there would be exceptions where the opportunity would not exist.
PC 972a	INCLUDING PROVIDE A REFERENCE IN ITEM B) TO THE LIST OF 303(D) IMPAIRED STREAMS AND NOTE THAT 303(D) STREAMS REQUIRE NO ADDITIONAL INPUT OF DETRIMENTAL MATERIALS SUCH AS SEDIMENT
Response:	Most of the 303(d) streams on the Forest do not have sediment as a pollutant of concern. Where sediment is a concern, there may be instances when short-term additional inputs are necessary (from road decommissioning, culvert replacement, etc.) in order to correct a long-term sediment problem.
PC 1111	The Forest should change Guidelines RF10, RF11, and RF12 to Standards.
Response:	We believe that all three pieces of management direction are more appropriate as guidelines because they provide guidance and preferred courses of action related to road decommissioning. Whether a specific road is to be decommissioned is appropriately determined at the project level using site- and road-specific information.
PC 1004	The Forest should post information for Guideline RF19 (page II-52) on its website.
Response:	We are currently developing an online process for informing the public about road status on the Forest. We may also consider something similar for trail information. For now, the best source of current information would be the District Ranger Offices.

FOREST PLAN MANAGEMENT PRESCRIPTIONS	
PC 650	The Forest should explain how the management prescription area boundaries were determined under each alternative.
Response:	Strategically, we used different combinations of Management Prescription areas to reflect the overall emphasis and intent of the alternative, as depicted in the alternative descriptions in Chapter 2 of the EIS. Technically, boundaries were determined using a variety of GIS layers, such as land ownership, Forest proclamation boundary, designated Wilderness, roadless areas, NRA and other special areas, 1986 Management Prescription units, T&E species habitat, roads, and Forest compartment and stand boundaries. We did not believe that a description of the complex intersection of these layers would be of much interest to the average reader, but information is available in the project record for plan revision
PC 693	The Forest should create a separate Management Prescription for the brook trout.
Response:	<p>The Forest considered a Management Prescription for riparian areas, which would have been more comprehensive than one for brook trout. The difficulty in designating a management prescription based on streams and riparian areas, even brook trout streams, is the limitation of our existing information. We know that drawing the management prescription based on the hydrography layer in GIS (i.e., blue-line streams on topographic maps) does not capture all of the streams that are on the Forest, and ignores ephemeral and many intermittent channels which are important for the overall health of the aquatic ecosystems. Rather than trying to define a broad-scale area that would be difficult, at best, to define given the variable conditions on the Forest, we elected to provide direction as to how channels should be managed when they occur within a project area. This included direction for stream buffers to protect bank-side trees and vegetation that provides shade, large woody debris recruitment, bank stability, organic inputs, and a host of other functions, and direction to limit soil disturbance adjacent to stream channels to protect ground cover and to reduce the risk of erosion and sedimentation.</p> <p>The example the commenter used to recommend a brook trout management prescription was the management prescription the Green Mountain NF has given its Wild and Scenic Rivers. The Revised Plan also provides direction for rivers that are eligible of Wild and Scenic River designation. We do not give the eligible rivers a separate management prescription, but Forest-wide direction defines a corridor that extends ¼ mile on either side of an eligible river segment. Eligible rivers and their corridors are managed to retain their free-flowing condition, their highest potential classification and their outstandingly remarkable values until they are either designated as Wild and Scenic Rivers by Congress or returned to their original or assigned management prescription (Proposed Revised Plan, page II-33).</p>
PC 341	The Forest should review mitigation for the Lake Buffalo watershed protection and change to Management Prescription 8.0 or 6.2.
Response:	<p>The commenter was concerned about watershed protection and aesthetics in the Lake Buffalo watershed due to its allocation as MP 3.0. We believe that direction within the Proposed Revised Plan (pp. II-8 to II-13, II-25 to II-27, and II-31 to II-32) is adequate to protect aquatic and visual resources without having to change the management prescription in the area.</p> <p>The commenter also suggested the removal of Forest Roads 54 and 58 to reduce sedimentation. These are major roads that provide access for a number of administrative and recreational uses. In recent years, upgrades to Road 54 were made to help improve the road drainage and reduce potential adverse effects to aquatic resources. Future management decisions for these roads would be made at the project planning level.</p>
PC 399	The Forest should continue to classify natural resources in different management prescriptions.
Response:	Areas with different management emphasis and suitability are commonly used in forest planning throughout the country. Management areas and prescriptions are one of the six planning decisions made in plan revision.
PC 888	The Forest should develop a separate management prescription for early successional habitat and place one large early successional habitat area on each Ranger District.
Response:	Age class diversity, including early successional habitat, is a major management emphasis in MPs 3.0, 6.1, and 8.6. Some combination of these MPs can be found on each Ranger District.
Management Prescription 3.0 – Vegetation Diversity	

PC 887	The Forest should change the desired condition for openings to an objective for Management Prescription 3.0.
Response:	Objective 3016 in the Proposed Revised Forest Plan addresses the creation of wildlife openings to begin moving toward desired conditions for this habitat feature. Objectives apply to the first decade of the planning horizon.
PC 911	The Forest should explain whether the Plan will protect sensitive species and the free-flowing status of the four eligible Wild and Scenic River corridors that intersect MP 3.0.
Response:	The Proposed Revised Forest Plan provides Forest-wide direction for protecting sensitive species (p. II-26) and the free-flowing status of eligible Wild and Scenic Rivers (p. II-33). This direction would protect these features in any management prescription they are located, including MP 3.0.
PC 923	The Forest should explain whether Standard 3003 on page III-7 of the Proposed Plan means that hawthorn or other shrubs will be discouraged or eradicated on certain grazing allotments in favor in intensive management for livestock grazing. If so, this would appear to be in conflict with the hawthorn grazing amendment to the 1986 Plan
Response:	We do not believe that Standard 3003 is in conflict with Forest-wide direction for Range Resources (see RA01, RA10, RA19 in the Proposed Revised Plan) that allows for hawthorn or other wildlife habitat components in grazing allotments. However, hawthorn or other wildlife shrubs might not be planted or otherwise emphasized in MP 3.0 as they might in MP 6.1. Also, it is important to remember that the Revised Plan is replacing the 1986 Plan.
Management Prescription 4.1 – Spruce and Spruce/Hardwood Ecosystem Management	
PC 897	The Forest should change the name of Management Prescription 4.1 to “Spruce and Spruce-Hardwood Ecosystem Management” because the ecosystem management title more accurately reflects the best overall management emphasis for the areas.
Response:	We agree, and we have made this change for the Final Revised Plan and FEIS.
PC 862	The Forest should clarify how suitable timberland in MP 4.1 relates to suitable habitat for the West Virginia northern flying squirrel.
Response:	The only portion of MP 4.1 that is considered suitable timberland is the portion that is outside of suitable northern flying squirrel habitat <u>and</u> is not in an area with practical potential for spruce restoration or enhancement. At the programmatic level, we estimated suitable timberlands as those areas that are not northern flying squirrel habitat and are not in the northern hardwoods forest type group (northern hardwoods being the forest type group that is likely to contain the most spruce restoration opportunities). Final timber suitability determinations will be made at the project level and will include a site-specific assessment of northern flying squirrel habitat and spruce restoration or enhancement potential.
PC 877	The Forest should include recovery of threatened and endangered species in the management emphasis for Management Prescription 4.1.
Response:	We have made the suggested change in the Final Revised Plan.
PC 901	The Forest should clarify or change management direction in Management Prescription 4.1.
PC 901a	INCLUDING CLARIFYING OBJECTIVE 4108 FOR REGENERATION HARVESTING GIVEN THAT FOREST-WIDE DIRECTION FOR THE WEST VIRGINIA NORTHERN FLYING SQUIRREL DOES NOT ALLOW REGENERATION HARVESTING IN SUITABLE HABITAT
Response:	Objective 4108 applies to hardwood stands with little or no spruce regeneration potential that lie outside of WVNFS habitat. WVNFS habitat was not included in the suitable timber base and thus was not included in the land covered by this objective.
PC 901b	INCLUDING COORDINATING WITH THE U.S. FISH AND WILDLIFE SERVICE AND THE WEST VIRGINIA DIVISION OF NATURAL RESOURCES TO IDENTIFY BEST MANAGEMENT PRACTICES FOR SPRUCE-HARDWOOD AND MIXED HARDWOOD FORESTS THAT ENCOMPASS WEST VIRGINIA NORTHERN FLYING SQUIRREL HABITAT
Response:	The Proposed Revised Plan contains general goals and guidelines that address spruce restoration or enhancement (4101, 4102, 4103, 4105, 4106, 4111, 4112, 4122, 4124, 4126, 4127, 4128, 4129). We need research to identify more site-specific practices to enhance or restore spruce and WVNFS habitat; such research is a central goal of this MP (see Management Emphasis, Desired Conditions, 4104).
PC 901c	INCLUDING CHANGING GUIDELINE 4110 TO ALLOW MANAGEMENT FOR HARDWOODS IN STANDS WITH AN ADJACENT SPRUCE SEED SOURCE

Response:	The management emphasis of MP 4.1 is to maintain, enhance, or restore spruce wherever it is practical. Spruce restoration/enhancement in mixed stands is not intended to completely eliminate the hardwood component (see Goal 4101).
PC 902	The Forest should modify the management direction for silvicultural systems in Management Prescription 4.1.
PC 902a	INCLUDING CHANGING GUIDELINE 4121 TO A STANDARD AND SPECIFYING THAT EVEN-AGED AND UNEVEN-AGED SILVICULTURAL SYSTEMS WILL BE USED
	As a guideline, this direction provides the flexibility we need to apply appropriate silvicultural systems and regeneration methods at the project level, based on site-specific conditions.
PC 902b	INCLUDING ENSURING THAT OAK STANDS IN MP 4.1 ARE PROTECTED, MAINTAINED, AND REGENERATED
	We agree that isolated stands of oak and mixed hardwoods should be managed differently than spruce or spruce/northern hardwood stands in MP 4.1. MP 4.1 management direction specifies that hardwood stands without practical spruce restoration potential are to be managed for hardwood age class diversity and mast production (see MP 4.1 Management Emphasis, Goal 4106, Objective 4108, Guideline 4110, and Guideline 4121 in the Proposed Forest Plan).
PC 720	The Forest should have goals that clarify that core forest areas should develop corridors to link spruce forests, because isolated spruce fragments would benefit from guidelines that promote strategically linking them, not just expanding the fragments outward.
Response:	Objective 4107 in Management Prescription 4.1 in the Proposed Revised Plan has been modified to address this concern.
PC 497	The Forest should establish standards and guidelines for managing spruce and hardwood forest to benefit the West Virginia northern flying squirrel, because Appendix A, page A-7, states that “Vegetation management would be limited to research or administrative studies on lands determined to be suitable habitat for the WVNFS”, and nearly all of the MP 4.1 area in WVNFS suitable habitat.
Response:	The language on page A-7 has been revised to clarify that such limitations apply only in suitable WVNFS habitat and that other forms of vegetation management are allowed outside of suitable habitat. MP 4.1 includes direction for restoring and enhancing spruce forest. However, research is still needed to identify specific habitat enhancement techniques for the WVNFS. Such research is a central goal of MP 4.1.
PC 592	The Forest should verify the validity of converting existing hardwood stands to spruce on a smaller scale before establishing a goal of over 150,000 acres.
Response:	While Management Prescription 4.1 covers about 150,000 acres in Alternative 2, the near-term objective for active spruce restoration is roughly 100 to 500 acres per year (See MP 4.1, Chapter II, Final Plan). A central goal of MP 4.1 is research on effective techniques for spruce restoration, which should enable further restoration efforts in future decades.
PC 962	The Forest should change Standard 4115 to prohibit ATV use in MP 4.1, because this area is primary habitat for a number of federally listed or sensitive species, and it provides headwaters for many of the coldwater native trout streams on the Forest. We strongly recommend that Standard 4115 be changed to state that “ATVs, motorized trail bikes and snowmobiles are prohibited.”
Response:	The portion of Standard 4115 pertaining to off-road vehicles has been eliminated from the Final Revised Plan because the restriction of public motorized use to designated roads and trails is covered by Forest-wide direction for roads and facilities. Any proposal to designate a road or trail anywhere on the Forest for ATV use would be evaluated on a case-by-case basis for effects to resources and would need to be consistent with MP emphasis. In the case of MP 4.1, such a proposal would need to be consistent with the MP emphasis, which includes recovery of species of concern associated with spruce and spruce-hardwood communities.
Management Prescription 5.0 – Designated Wilderness	
PC 876	The Forest should ensure that activities to improve fish habitat in MP 5.0, Designated Wilderness, must also be consistent with requirements in Forest Service Manual 2323.34.
Response:	Fisheries management within Wilderness areas will comply with all existing laws, policies and manual direction.

PC 896	The Forest should consider providing the authority for allowing the actions described in Standard 5005; they can be found in FSM 2324.04(a-c).
Response:	Although Forest Plan direction needs to be consistent with Forest Service Manual direction, we are not specifically referencing or providing that direction in the Forest Plan Management Prescriptions.
PC 912	The Forest should modify Standards 5005 and 5105 to read, “Vegetation Management is allowed as a component of actions needed to protect the area and adjacent lands from fire, NNIS, and pests and pathogens”.
Response:	We modified this standard to read, “Vegetation Management is allowed as a component of actions needed to treat NNIS or to protect adjacent lands from fire, pests, and pathogens”. Native pests and pathogens are generally considered part of the natural features in a wilderness or a wilderness study area, and would not typically be treated unless they are threatening adjacent lands.
PC 913	The Forest should modify Standards 5038, 5039, and 5136 to include pest and pathogen control.
Response:	We have added “pathogen” to what used to be Standards 5038 and 5136 in the Proposed Revised Plan. Standard 5039 did not need this addition, as it refers specifically to pesticide applications.
PC 927	The Forest should change “Preserve wilderness attributes” on page III-17 to “Preserve wilderness character” because the Wilderness Act of 1964 charges federal land managing agencies to preserve the wilderness character of the areas (Sec.2 (a), 4(b)).
Response:	We used wilderness “attributes” rather than “character” to be more specific as to what defines wilderness. Attributes include the protection and perpetuation of wilderness character and values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences. We do not believe that changing “attributes” to “character” will have any affect on how we manage wilderness, and we feel that the combined attributes better define the area’s wilderness character.
PC 927a	SINCE THE WILDERNESS INFORMATION STEERING GROUP OF THE FOREST SERVICE IS CURRENTLY WORKING ON A PROJECT TO DEFINE EXACTLY WHAT "WILDERNESS CHARACTER" IS, USING WORDING FROM THE WILDERNESS ACT OF 1964, THIS WILL NEATLY TIE THE NEW MONONGAHELA FOREST PLAN INTO NATIONAL LEVEL DEFINITIONS AND STANDARDS
Response:	It would be hard to imagine that any definition of wilderness character would not rely heavily on the incorporation of wilderness attributes from the Wilderness Act.
PC 928	The Forest should change the last paragraph of page III-17 that states “... provides opportunities for semi-primitive non-motorized recreation where natural ecological processes occur” to “... provides opportunities for solitude or a primitive and unconfined types of recreation where natural ecological processes predominate,” because: <ul style="list-style-type: none"> • The Monongahela’s wildernesses have progressed to the point where a primitive ROS class is not only possible, but fitting and desired • Continuing to refer to them as SPNM is misleading about what the management goals of wilderness should be, and confuses the visitor about what to expect • Many of the other management areas across the Forest are classed as SPNM for recreation; wilderness should be classified as primitive to provide for a greater range of experiences • There is no better place than wilderness to provide for primitive recreation.
Response:	We used “semi-primitive non-motorized” instead of “primitive” when referring to wildernesses in the Proposed Revised Plan solely for technical reasons. We recognize that we should be managing wilderness for primitive recreation opportunities, but under the Recreation Opportunity Spectrum (ROS) criteria, the Monongahela does not technically have any wildernesses that meet the criteria for primitive recreation because of their relatively small size. The criteria state that primitive areas should be greater than 3 miles from an open road or development, and we have little if any wilderness land that meets that criteria. In that sense, we felt that describing the areas as “primitive” would be misleading and setting up expectations for desired conditions that could not be met. On the other hand, recreational experiences are really in the mind of those who experience them. There are many people who feel that they are having a primitive experience when they step off the road pavement into the forest, irrespective of whether the area is in a designated wilderness or not. Others seek out wilderness areas for primitive recreation experiences, knowing that the sights and sounds of human development will be minimal. In that sense, we agree that the Forest’s wildernesses can and will provide for primitive recreation.

PC 929	The Forest should change the Forest Service directive code 2350 on page III-20 to code 2320, “Wilderness Management”, because 2350 is the code for “Trail, River, and Similar Recreation Opportunities”.
Response:	You are correct that 2320 is the file designation code for wilderness management. The file designation codes we are using in the Revised Forest Plan relate to specific Forest activities we are managing within the Management Prescriptions. Therefore, 2350 relates to the General Forest Activities (such as trails) that we are managing within Wilderness, just as 1900 relates to Vegetation we are managing within wilderness, etc. These file designation codes appear within all of the Management Prescription areas, not just MP 5.0.
PC 930	The Forest should use the word “mechanical” rather than “mechanized” when referring to non-conforming uses in Wilderness, including in Management Prescription 5.0 – pages III-20, III-21 First paragraph, Standard 5002, and Guideline 5014, because: <ul style="list-style-type: none"> • “Mechanized” has a slightly different meaning than “mechanical”, the word actually used in the Wilderness Act • If Howard Zahniser had really meant “mechanized” in the Wilderness Act of 1964, he would have used the word • Agencies managing wilderness should keep to the actual words used in the legislation whenever and wherever possible. This is a small pet peeve and it has to do with language creep.
Response:	We acknowledge your concern over language creep and retaining the original language of Wilderness legislation. However, terms such as “motorized equipment” and “mechanized transport” are now part of the commonly accepted vocabulary in the agency when referring to non-conforming uses in Wilderness. We do not make these changes but we are obligated to adopt them so that everyone in the agency is using a consistent and commonly understood language.
PC 931	The Forest should change or drop the last sentence in the first paragraph on page III-20 of the Forest Plan that refers to special uses, because: <ul style="list-style-type: none"> • Not all special uses are compatible in wilderness • Special uses such as competitive events or motion picture/commercial production would not be permitted because, in the words of the Wilderness Act 1964 Sec. 4(d)(5): “Commercial services may be performed ... to the extent necessary for activities which are proper for realizing the recreational or other purposes of the areas” • Wilderness management should favor only those special uses that conform to Sec 4(d)(5) and cannot take place in a setting outside of wilderness.
Response:	Our intent was not to imply that any special uses are allowed in wilderness, but rather that any special uses that occur would be compatible with the wilderness setting. This is a desired condition statement rather than an allowance standard. However, your interpretation is understandable given the ambiguity of the sentence. Therefore, we have changed this sentence in the Final Revised Forest Plan to read, “Special uses are compatible with the intent of the Wilderness Act.”
PC 931a	REFERENCE FSM 2323.13(H) ON COMPETITIVE EVENTS, AND REFERENCE FSM 2323.14(G) ON OUTFITTER-GUIDES TO INCLUDE INFORMATION IN THE NEW FOREST PLAN AS DIRECTED
Response:	We do not feel it is necessary to reference the Forest Service Manual for this desired condition statement. We have to follow the Manual but we are not obligated to repeat it in our Forest Plan.
PC 932	The Forest should delete Guideline 5013 on page III-20 of the Plan and start Guideline 5014 with, “Trails are constructed and maintained...”
PC 932a	BECAUSE VISITORS MAY HAVE A VASTLY DIFFERENT PERCEPTION OF WHAT “REASONABLE PRECAUTIONS” ARE. FOR INSTANCE, THEY MAY THINK IT UNREASONABLE THAT YOU NOT BRIDGE A WILDERNESS STREAM IF THEY HAPPEN TO COME UPON IT DURING FLOOD STAGE, EVEN THOUGH IT MAY ONLY REACH THAT CONDITION ONCE OR TWICE A YEAR
Response:	We agree that visitors can have different ideas as to what a “reasonable precaution” might be. That is one reason we spelled out in Guideline 5013 that trail bridges are not normally provided. We do, however, want the flexibility to provide a bridge where chronic resource damage is occurring, or where safety issues might be an ongoing concern.

PC 932b	BECAUSE WITH MANY VISITORS, ANYTHING THAT PREVENTS THEM FROM DOING WHAT THEY WISH TO DO IS “UNREASONABLE”
Response:	We have tried to make it clear in the Plan, and in our signing and other wilderness-related literature, that visitors should expect more challenging experiences in Wilderness areas.
PC 932c	BECAUSE GUIDELINE 5014 STATES WILDERNESS TRAIL GOALS QUITE WELL
Response:	Guideline 5014 focuses on trail maintenance. To say that trails are constructed primarily for resource protection would be inaccurate. Trails are primarily constructed to take visitors through recreation areas or to recreation destinations.
PC 933	The Forest should cross-reference Standard 5020 back to Standard 5005 in Management Prescription 5.0 in the Forest Plan.
Response:	We deleted Standard 5020 in the Final Revised Plan, primarily because Standard 5005 says essentially the same thing in a positive rather than negative way.
PC 934	The Forest should consider adding the following to Standard 5039 on page III-22 of the Forest Plan, “A Minimum Requirements Decision worksheet should be completed prior to any action and before requesting authorization by the Regional Forester or other authority”.
Response:	The Forest Service Manual establishes criteria and requirements for requesting authorization, whether it is from the District Ranger, Forest Supervisor, Regional Forester, or Chief. The Minimum Requirements Decision Guide is a good current tool to use to meet Manual authorization requirements, but it is also a process that could change in content or name over time, so we have avoided specifically referencing processes like this in the Revised Forest Plan.
PC 986	The Forest should include treatment with limestone fines as an allowable method in Guideline 5026 on page III-21.
Response:	We do not preclude limestone fine treatment within Wilderness, but the means of application has to be non-motorized or non-mechanized if it occurs within Wilderness. See also response to PC 942.
PC 942	The Forest should add a statement allowing treatment with limestone fines from outside 5.0 areas, and that aerial application of limestone sand is possible with Forest Service approval. If part a) or b) of Guideline 5026 does not allow for the addition of limestone sand outside the Wilderness boundary to correct poor water quality (low pH) in the Wilderness, then it needs to be specified separately. This also applies to Management Direction 5.1.
Response:	Direction within the 1986 Forest Plan and Revised Forest Plan does not preclude the use of limestone fines outside of wilderness boundaries to treat streams within Designated Wilderness (MP 5.0) or Recommended Wilderness (MP 5.1). This approach has recently been implemented with limestone fines placed in tributaries outside of the Cranberry Wilderness. Direction within the Revised Forest Plan also makes allowances for correcting water quality problems in wilderness and recommended wilderness areas when the problems are human-caused and cannot be corrected by ecological processes (see Guidelines 5026 and 5123). These problems would include human-caused acid deposition and its effects on aquatic ecosystems. The method for correcting water quality problems would be addressed during project planning and design to account for site-specific conditions and management objectives.
PC 944	The Forest should explain how the plan will address the importance of free-flowing WSR eligible rivers in Wilderness, MP 5.0, and Recommended Wilderness, MP 5.1.
PC 944a	BECAUSE THESE RIVERS SHOULD REMAIN FREE-FLOWING
Response:	All eligible rivers would remain free-flowing, regardless of what Management Prescription that are in, as directed by Forest-wide Goal WS02. Although a suitability study could remove their eligibility status, impoundments are rare in wilderness areas and require Presidential approval.
PC 944b	BECAUSE EXISTING STRUCTURES, AT THE TIME OF DESIGNATION, ARE PERMISSIBLE WITHIN A RECREATIONAL LISTED RIVER, BUT IMPROVEMENT IS NOT ENCOURAGED, AND NO NEW STRUCTURES ARE ALLOWED
Response:	New structures or improvements are not generally allowed in MPs 5.0 and 5.1, either, and existing structures can be and often are removed when an area is designated as Wilderness.
PC 944c	BECAUSE WILD AND SCENIC MANAGEMENT DICTATES THAT MOTORIZED TRAVEL “BE RESTRICTED OR PROHIBITED WHERE NECESSARY TO PROTECT THE VALUE” (FEDERAL REGISTER, 09/07/82) OF THE ELIGIBLE RIVER CORRIDOR
Response:	Motorized travel is generally prohibited in Designated Wilderness, and public motorized travel is prohibited in Recommended Wilderness, so we see no conflict in our direction for eligible rivers in

	these MP areas.
PC 949	The Forest should make the following changes to the introductory section of Management Prescription 5.0.
PC 949a	CHANGE THE WORD “MAINTAIN” TO “PRESERVE” IN THE THIRD BULLET OF MANAGEMENT EMPHASIS (DRAFT PLAN, PAGE III-17), AS “MAINTAIN” IMPLIES SOME TYPE OF ACTIVE HUMAN ECOSYSTEM MANAGEMENT WHERE THERE SHOULD BE NONE
Response:	We have changed “maintain” to “preserve” and combined the three bullets statements into two for the Final Revised Plan.
PC 949b	CORRECT THE AREA DESCRIPTION (DRAFT PLAN, PAGE III-17) RELATING TO WILDERNESS BEING 9% OF THE MNF BECAUSE IT IS NOW ONLY 8.5% IN THAT THERE IS MORE LAND ON THE MNF NOW THAN IN 1986 BUT THE SAME AMOUNT OF WILDERNESS, WHICH MAKES THE PERCENT OF WILDERNESS LOWER
Response:	We have changed this statement in the Final Revised Plan to address your concern.
PC 949c	LIST THE T&E PLANTS OF 5.0 MP AREAS TO ILLUSTRATE THE SPECIAL NATURE OF THESE AREAS (DRAFT PLAN, PAGE III-17)
Response:	T&E species and their habitats exist in all of the MP areas but are not specifically identified in any of the MP descriptions.
PC 949d	CORRECT THE FIRST PARAGRAPH (DRAFT PLAN, PAGE III-18) TO STATE THAT THERE HAS BEEN NO TIMBER HARVEST IN THESE AREAS SINCE LONG BEFORE 1986, AS THESE AREAS WERE DESIGNATED AS WILDERNESS IN 1975 AND 1883
Response:	We have changed this sentence in the Final Revised Plan to say that no harvest has occurred in these areas since well before their designation (1975 and 1983). We assume your reference to 1883 was a typo, as some of these areas were probably full of roads, railroads, and logging camps in 1883.
PC 950	The Forest should make the following changes to the Management Direction section of MP 5.0 in the Draft Plan.
PC 950a	ADD BACK SECTION 1600 FROM THE 1986 PLAN BECAUSE IT HELPS CONTROL THE USE OF THESE AREAS TO PREVENT OVERCROWDING BY NOT SPECIFICALLY ADVERTISING THEM AND IT ALSO DIRECTS LEAVE-NO-TRACE USE
Response:	We have not found this section to be useful or needed in the last 20 years for a number of reasons: 1) We generally do not actively promote wilderness, but do not feel we need restrictions on promotion 2) Much of this section is process, like user information and public contact protocol, which we don't want or need in the plan, 3) Leave-no-trace camping is now SOP and policy in our wilderness literature and contacts, and 4) We have no intention of expanding our interpretive programs to wilderness areas.
PC 950b	STANDARD 5004: CHANGE “VEGETATION MAY BE TREATED” BACK TO “VEGETATION MANIPULATION MAY BE USED” FOUND IN THE 1986 PLAN BECAUSE THE NEW LANGUAGE IMPLIES MORE ACTIVE HUMAN INTERVENTION THAN ALLOWED BY THE WILDERNESS ACT
Response:	We prefer to use plainer language, because not everyone knows what “manipulation” means.
PC 950c	OBJECTIVE 5006: EXPLAIN THE CHANGE IN WORDING FROM “OPERATION AND MAINTENANCE PLANS” IN THE 1986 PLAN TO “WILDERNESS IMPLEMENTATION SCHEDULE”, BECAUSE THE FORMER IMPLIES ACTION, WHILE THE LATTER IMPLIES ONLY TIME
Response:	We do not do Operation and Maintenance Plans for wilderness, but we can do Implementation Schedules.
PC 950d	ADD BACK SECTION 2100 ON AIR QUALITY FROM THE 1986 PLAN, AS IT IS ESPECIALLY IMPORTANT FOR THE CLASS 1 AIR OF DOLLY SODS AND OTTER CREEK
Response:	The Class 1 air quality protection direction was not removed from the Proposed Revised Plan, but rather it was updated and consolidated in Section 7450, Air Quality, where we felt it was more appropriate.
PC 950e	ADD BACK THE SECTION ON CARRYING CAPACITIES FROM THE 1986 PLAN, AS THIS GUIDANCE SHOULD BE USEFUL, ASSUMING THERE IS A REPUTABLE METHOD FOR COMING UP WITH THESE NUMBERS
Response:	We removed the carrying capacity numbers because we were not coming close to approaching them and we therefore felt they were not very meaningful or useful. Also, we were not sure what the 1986 Plan

	numbers were based on. If National Visitor Use Monitoring trends or public demand lead us to believe we need carrying capacities in the future, we can always apply an accepted methodology to derive capacities at that time.
PC 950f	ADD BACK THE STANDARDS RELATED TO COOKING FIRES, HORSE USE, AND TRAIL DENSITIES FROM THE 1986 PLAN
Response:	Some of the 1986 Plan language was vague and/or needlessly restrictive. For example, trail densities are not that meaningful in a dense hardwood forest, and can always be adjusted if conflicts occur. Also, “encourage” is too indeterminate a word to use in a standard, much less measure. We have, however, incorporated direction on camp stoves and cooking fires in Standard 5011 in the Proposed Revised Plan.
PC 950g	GUIDELINE 5013: RETURN TO THE ORIGINAL LANGUAGE FROM THE 1986 PLAN, ENDING THE SENTENCE AT “NOT PROVIDED”, AS THE NEW LANGUAGE IS A VERY SUBJECTIVE EVALUATION AND GOES AGAINST WILDERNESS ACT GUIDANCE
Response:	We agree that visitors should be prepared to be more challenged in a wilderness setting, and we have included language within MP 5.0 to indicate that. However, the Wilderness Act does not direct us to completely ignore resource protection or user safety, either. We believe that there may be instances where trail bridges are appropriate to protect resources and/or provide for public safety. The guideline as written clearly indicates that they would be exceptions to the rule.
PC 950h	GUIDELINE 5014: CHANGE “THE FOREST SUPERVISOR MAY AUTHORIZE SUCH USE” TO “SUCH USE MUST BE AUTHORIZED BY THE FOREST SUPERVISOR” SO THAT THE AUTHORITY IS BETTER DEFINED
Response:	We have changed the language in the Final Revised Plan to say, “The Forest Supervisor is authorized to allow this use” to better define the authority.
PC 950i	GUIDELINE 5014: CHANGE THE LAST SENTENCE FROM “ARE DESIRABLE” BACK TO THE MORE DIRECTIVE 1986 PLAN WORDING “WILL BE CONTINUED AND ENCOURAGED”
Response:	See response to 947g.
PC 950j	STANDARD 5020: CHANGE THE LANGUAGE TO THE FOLLOWING LANGUAGE FROM THE 1986 PLAN (PAGE 158, SECTION 2470): “NO TIMBER MANAGEMENT OR MANAGEMENT FOR NON-WILDERNESS PURPOSES. NATURAL SUCCESSION WILL OCCUR”, AS THE WILDERNESS ACT DOES NOT ALLOW FOR TIMBER HARVEST
Response:	We believe that the 1986 language is flawed. The second line is not a real sentence, and it is unclear what a “non-wilderness purpose” is. The third line is just an obvious statement of what will occur if we do not harvest. We do not need direction to demand that natural processes occur. Finally, vegetation management is well captured in Section 1900, so this has been deleted from the Final Revised Plan.
PC 950k	ADD A GUIDELINE TO SECTION 2500 THAT “CERTAIN USES MAY BE LIMITED IN SOME AREAS TO PROTECT SOIL AND WATER RESOURCES”
Response:	See response to 947i.
PC 950l	RETURN THE WILDLIFE LANGUAGE REGARDING HUNTING FROM THE 1986 PLAN, PAGE 158, AS WE HAVE FOUND THROUGH OUR WILDERNESS COALITION WORK, THAT THERE IS MUCH MISCONCEPTION IN THE PUBLIC ABOUT NOT BEING ABLE TO HUNT OR FISH IN WILDERNESS AREAS
Response:	We deleted this direction because we did not want to imply that we were controlling the hunting, fishing, or trapping opportunities on the Forest. It seemed more logical to expect that any hunter, angler, or trapper should be consulting the state regulations and map units, which include our wilderness areas, rather than the Forest Plan of an agency that does not regulate these activities.
PC 950m	GUIDELINES 5034 AND 5035: REPLACE THESE GUIDELINES WITH THE 1986 GUIDELINE, “OTHER SPECIAL USES ARE GENERALLY NOT COMPATIBLE WITH WILDERNESS MANAGEMENT, HOWEVER THEY WILL BE CONSIDERED ON A CASE-BY-CASE BASIS,” AS 5034 AND 5035 ARE TOO PERMISSIVE
Response:	We believe that some recreational special uses are compatible with MP 5.0 management. We also wanted to provide more precise language that indicated what we would be measuring a permit application against, and we felt that the 1986 Plan language did not do that.
PC 950n	GUIDELINE 5038: CHANGE “IS ALLOWED” BACK TO “MAY BE ALLOWED” BECAUSE WE CAN THINK OF NO INSTANCE WHERE INSECT AND DISEASE CONTROL SHOULD BE DONE “TO PROTECT (HUMAN) HEALTH AND SAFETY,” AS WILDERNESS AREAS ARE

	SUPPOSED TO BE UNDER NATURAL FORCES, WHICH INCLUDE INSECTS AND DISEASE
Response:	We have changed the wording in the Final Revised Plan to address your concerns. However, the “may be” language you requested, along with the general guidance in the rest of this direction, convinced us to change it to a more appropriate guideline.
PC 950o	GUIDELINE 5038: REMOVE OR CHANGE THE LAST SENTENCE AS IT GOES AGAINST WILDERNESS MANAGEMENT GUIDANCE IN THE FOREST SERVICE MANUAL: “ECONOMY, CONVENIENCE, COMMERCIAL VALUE, AND COMFORT ARE NOT STANDARDS OF MANAGEMENT OR USE OF WILDERNESS” (FSM 2320.6). PEST MANAGEMENT SOLUTIONS SHOULD BE BASED UPON WHAT WOULD BEST PRESERVE WILDERNESS ATTRIBUTES AND VALUES
Response:	We have changed the wording in the Final Revised Plan to address your concerns. However, “comfort and “convenience” are not the same as “safety”, so “safety” remains.
PC 950p	STANDARD 5043: DELETE THE LAST SENTENCE, AS THERE SHOULD BE NO NEED TO CONSTRUCT HELISPOTS WITHIN THESE WILDERNESS AREAS FOR FIRE CONTROL GIVEN THEIR SMALL SIZE
Response:	We have deleted this sentence in the Final Revised Plan to address your concerns.
PC 950q	GUIDELINE 5045: DELETE THIS GUIDELINE ENTIRELY AS THERE IS CLEAR EVIDENCE THAT FIRE WAS NOT A MAJOR NATURAL FORCE IN PRE-SETTLEMENT DAYS IN THE FOREST, AND THE AMOUNT OF RAINFALL THAT OCCURS IN THE FOREST AND THE RESULTING GENERALLY MOIST NATURE OF THE FOREST FLOOR HAS RESULTED IN FEW SIGNIFICANT FIRES ON THE FOREST OVER ITS HISTORY SINCE REFORESTATION HAS TAKEN PLACE
Response:	We have deleted this Guideline in the Final Revised Plan to address your concerns.
PC 950r	GUIDELINE 5045: MAINTAINING WILDLIFE OPENINGS OR RANGE ALLOTMENTS IS NOT APPROPRIATE, AS THE FOREST SERVICE MANUAL (2324.22.7) SAYS “DO NOT USE PRESCRIBED FIRE IN WILDERNESS TO BENEFIT WILDLIFE, MAINTAIN VEGETATIVE TYPES, IMPROVE FORAGE PRODUCTION, OR ENHANCE OTHER RESOURCE VALUES”
Response:	See response to 950q, above.
PC 950s	STANDARD 5046: ADD BACK THE EXAMPLES FROM THE 1986 PLAN TO MAKE IT CLEAR TO THE PUBLIC WHAT TYPES OF NON-CONFORMING USES THIS COVERS, AND ADD “SPECIAL USE PERMIT VIOLATIONS” TO THE LIST
Response:	We did not believe that this direction was needed in the Revised Forest Plan because our law enforcement agents know what the non-conforming uses are, they are typically posted at wilderness area trailheads, and the general public does not read the Forest Plan to get this sort of information. Also, the risk is that anytime you use a list of examples, people tend to interpret the list as all-inclusive.
PC 950t	SECTION 6700: ADD BACK THE GUIDELINE FROM THE 1986 PLAN THAT INFORMS THE PUBLIC WHAT TO EXPECT IN WILDERNESS IN TERMS OF THE CHALLENGES, BECAUSE ONE OF THE MOST FREQUENT CAUSES FOR BACKCOUNTY RECREATION ACCIDENTS IS LACK OF PREPAREDNESS
Response:	The inherent safety problems noted in the comments apply to the entire Forest, not just wilderness areas. Also, if we have to inform people of the inherent dangers of wilderness during normal contacts in the field or even in the office, it may well be too late. Visitors are typically either going to be physically and mentally prepared for the challenges at that point, or they aren’t, and face-to-face “alerts” are not likely to help. Finally, we have plenty of literature that we already distribute to the public that addresses these challenges in wilderness and other Forest landscapes, including trailhead postings.
PC 950u	SECTION 7460 (MISSING): REPLACE THE WORDING FROM THE 1986 PLAN, PAGE 163, WHICH PROVIDES THE PUBLIC WITH IMPORTANT WILDERNESS USE INFORMATION
	See response to 947v.
PC 995	The Forest should consider using the term “Wildland Fire for Resource Benefits” instead of “prescribed natural fire” (e.g., Standard 5042 on page III-22) because the latter term can easily be confused with prescribed fire (that is set by management).
Response:	We have changed the term in the Final Revised Plan from “prescribed fire” to “Wildland Fire Use”. We have also reworded this standard and moved it to the Forest-wide direction for Fire Management in Chapter II of the Final Revised Plan, as we felt it should apply to the entire Forest instead of a single

	Management Prescription area.
Management Prescription 5.1 – Recommended Wilderness	
PC 796	The Forest should list decisions by the President as the reason why certain developments may be added even if recommended wilderness areas (MP 5.1) become wilderness.
Response:	Your comment is duly noted as it relates to Wilderness, but MP 5.1 does not represent Wilderness. If 5.1 areas become Wilderness, then Standard 5032 in the Proposed Revised Forest Plan would apply.
PC 935	The Forest should change “Maintain wilderness attributes” on page III-24 of the Forest Plan to “Maintain wilderness character”, because while it is not wilderness yet and may never be, it is the wilderness character that defines how well it meets the requirements that might help it become designated, and it will be the wilderness character that will need to be protected and will determine management direction for the area if it becomes wilderness.
Response:	See response to PC 927. We feel that by maintaining the wilderness attributes, which are better defined, we will also be maintaining the wilderness character of the area.
PC 936	The Forest should change the Forest Service directive code 2350 on page III-27 to code 2320, “Wilderness Management”, because 2350 is the code for “Trail, River, and Similar Recreation Opportunities”.
Response:	See response to PC 929. Also, MP 5.1 areas are not Designated Wilderness; they are areas recommended for Wilderness study.
PC 937	The Forest should reverse the language in Standards 5109 and 5011 regarding the use of camp stoves, because camp stoves are recommended for cooking in MP 5.1, but in MP 5.0, which should have the more protective standards, Standard 5011 only says that dead and down firewood may be used for fuel wood.
Response:	We agree that the camp stove recommendation should be added to Standard 5011 for consistency, and we have done this for the Final Revised Forest Plan. However, we are keeping the camp stove recommendation in 5109 as well, as we feel it will help protect resource values and maintain the natural setting.
PC 938	The Forest should avoid the use of “reasonable precautions” in Guideline 5111 for the same reasons stated for Guideline 5013.
Response:	See response to PC 932.
PC 939	The Forest should add the following statement to Standards 5124 and 5128 in Management Prescription 5.1 of the Forest Plan: “Habitat improvements should not preclude future wilderness designation. Use the Wilderness Character Monitoring Framework for guidance.”
Response:	We added a similar statement to Standard 5124 in the Final Revised Plan. However, we did not include the Wilderness Character Monitoring Framework language, as the framework is one of a number of tools we could use. Also, we have not applied this statement to Standard 5128 because the statement addresses improvements, and the standard addresses a prohibition on impoundments. We addressed improvements in Standards 5125 and 5126 in the Proposed Revised Plan.
PC 943	The Forest should add direction to Management Prescription 5.1 to allow the maintenance of existing wildlife habitat improvements.
Response:	We have added a guideline to address maintenance of existing wildlife habitat improvements in MP 5.1.
PC 946	The Forest should make the following changes to the introductory section of Management Prescription 5.1.
PC 946a	CHANGE THE WORD “MAINTAIN” TO “PRESERVE” IN THE THIRD BULLET OF MANAGEMENT EMPHASIS (DRAFT PLAN, PAGE III-24), AS “MAINTAIN” IMPLIES SOME TYPE OF ACTIVE HUMAN ECOSYSTEM MANAGEMENT WHERE THERE SHOULD BE NONE
Response:	We believe the word “maintain” is consistent with our management emphasis for Recommended Wilderness. The intent of this management prescription is to maintain wilderness attributes and management options until Congress decides whether or not to designate these areas as Wilderness.
PC 946b	LIST THE RARE FLORA AND FAUNA IN THE FINAL GROUPING OF 5.1 MP AREAS TO ILLUSTRATE THE SPECIAL NATURE OF THESE AREAS INSTEAD OF JUST SAYING THAT A VARIETY ARE FOUND (AREA DESCRIPTION, DRAFT PLAN, PAGE III-24)
Response:	Rare flora and fauna are identified for these areas in the Wilderness Evaluations in Appendix C to the EIS. Rare flora and fauna and their habitats exist in all of the MP areas but are not specifically identified in any of the MP descriptions.

PC 946c	ADD THAT VERY MINIMAL “ROAD” ACCESS IS PROVIDED WITHIN 5.1 AREAS (DRAFT PLAN, P. III-26, PARAGRAPH 1)
Response:	We have modified this statement in the Final Revised Plan. We no longer refer to the road access in this sentence, because we feel that the road access status is described in better detail in other portions of this Management Prescription.
PC 946d	PROVIDE THE ACTUAL CONDITION AND MAINTENANCE LEVELS OF THE ROADS YOU SAY EXIST IN THESE AREAS
Response:	We have dropped the maintenance level portion of this description in the Final Revised Plan. We feel that, due to the extremely low average road density of 0.01 miles per square mile, there is little reason to spend time and space detailing road conditions, especially as we have not done this for other MPs.
PC 946f	NOTE THAT THE CLASS 1 AND 2 ROADS THAT DO EXIST ARE WELL ON THEIR WAY TO HEALING ALREADY, AND THESE ROADS SHOULD BE AMONG THE HIGHEST PRIORITY FOR DECOMMISSIONING
Response:	Road decommissioning priorities are described in Forest-wide direction for Roads and Facilities, Chapter II in the Revised Plan. Roads that are recovering well on their own would likely not be the highest priority for the Forest.
PC 946g	LIST THE SPECIFIC ROADS THAT “ARE STILL USED AND MAINTAINED” (DRAFT PLAN, PAGE III-26, PARAGRAPH 2), AS WAS DONE WITH CANAAN LOOP ROAD IN THE 1986 PLAN, AND SPECIFY THEIR LOCATION AND THE ENTITY USING AND MAINTAINING THESE ROADS, THE REASONS, AND THE LEVEL
Response:	The Canaan Loop Road in the 1986 Plan was open to public motorized use. Roads in MP 5.1 areas in the Revised Plan are not open to the public. See also response to 946d, above.
PC 946h	STATE THE LOCATION OF THE 21 ACRES OF TIMBER HARVEST THAT HAS OCCURRED SINCE 1986
Response:	We have modified this statement in the Final Revised Plan to show that seven acres of timber harvest have occurred in the Cranberry Expansion area.
PC 946i	STATE WHERE THE 33 PERCENT SEMI-PRIMITIVE MOTORIZED AND 9 PERCENT ROADED NATURAL AREAS ARE LOCATED (DRAFT PLAN, PAGE III-26, PARAGRAPH 3)
Response:	The ROS descriptions are based on the ROS mapping done by West Virginia University as part of the Social Assessment completed for Forest Plan revision. This mapping was completed using the Forest Service ROS Mapping Guide. The GIS layer for the ROS mapping is available upon request.
PC 946j	DELETE “MOUNTAIN BIKING” IN PARAGRAPH 3 ON PAGE III-26 FROM THE LIST OF NON-MOTORIZED RECREATION, AS THIS IS NOT CURRENTLY A SIGNIFICANT USE IN ALL OF THESE AREAS; IN FACT, WE QUESTION THAT ANY IS OCCURRING IN CHEAT MOUNTAIN, CRANBERRY EXPANSION, AND OTTER CREEK EXPANSION, AND THIS MISLEADING STATEMENT IN THE PLAN IMPACTS THE “VALUES FOREGONE” SECTION OF THE WILDERNESS EVALUATION IN DRAFT EIS APPENDIX C
Response:	We agree that mountain biking is not a current significant use in these three areas, but the statement you reference does not address significant uses in specific areas. It describes general non-motorized uses that may occur in any of the 5.1 areas, and those uses include mountain biking. We do not see how this description for areas that have now been recommended for wilderness study could impact wilderness evaluations that were completed before the areas were chosen.
PC 946k	DELETE THE WORD “GENERALLY” IN LINE 1 BE OMITTED (DRAFT PLAN, PARAGRAPH 2, PAGE III-27), BECAUSE MOTORIZED USE IS COUNTER TO WILDERNESS MANAGEMENT GUIDELINES, AND RECOMMENDED WILDERNESS SHOULD BE MANAGED AS WILDERNESS
Response:	We have deleted the phrase containing this word in the Final Revised Plan in order to clarify our desired management intentions.
PC 947	The Forest should make the following changes to the Management Direction section of MP 5.1 in the Draft Plan.
Response:	Many of these change requests seem to be premised on the opinion that we should be managing MP 5.1 areas as Wilderness. We are managing MP 5.0 areas as Wilderness. We are managing MP 5.1 areas to maintain the wilderness attributes of the areas until Congress decides whether or not to designate the areas as Wilderness. Therefore, we are allowing certain activities in MP 5.1 that may be considered

	non-conforming uses in MP 5.0, as long as the activities would not permanently alter the wilderness attributes or potential of the 5.1 areas.
PC 947a	STANDARD 5104: USE ONLY THE MINIMUM TOOLS FOR MANAGEMENT ACTIVITIES IN THESE POTENTIAL NEW WILDERNESS AREAS, AND NOT THE USE OF CHAINSAWS AND BRUSH-CLEARING POWER TOOLS, SO THAT THESE AREAS ARE MANAGED AS WILDERNESS
Response:	We believe the use of power tools would not alter the wilderness attributes or potential of these areas. The use of power tools, however, would allow us to annually maintain more trail miles for the enjoyment of backcountry recreationists.
PC 947b	STANDARD 5105: CHANGE “IS ALLOWED” BACK TO “MAY OCCUR”, AND ADD “ADJACENT” WHEN REFERRING TO LANDS TO BE PROTECTED, AS IN THE 1986 PLAN
Response:	We have added “adjacent” to this direction in the Final Revised Plan as requested. We have also changed this standard to a guideline, so that the “may occur” language is more appropriate.
PC 947c	STANDARD 5108: USE LANGUAGE SIMILAR TO 5012 HERE, BECAUSE IF FACILITIES ARE PLACED WITH NO GUIDANCE, WILDERNESS DESIGNATION MAY BE IMPACTED. LEAVE THE QUALIFIER ABOUT PRIMITIVE AND LOW IMPACT NATURE
Response:	We have changed the language of this standard in the Final Revised Plan to be more like Standard 5012 in the Proposed Revised Plan. We believe that facilities would have to be of a low impact nature to meet the desired ROS setting of the area.
PC 947d	SECTION 2350: ADD STANDARD 5010 TO MP 5.1
Response:	As of now, we are not planning to require entry permits in non-wilderness areas anywhere on the Forest. This situation could change if use exceeds capacity, but we have seen no indication of that yet.
PC 947e	GUIDELINE 5111: OMIT THE FIRST SENTENCE AS WE DO NOT SUPPORT USE OF CONSTRUCTION EQUIPMENT IN THESE POTENTIAL WILDERNESS AREAS
Response:	We believe that the use of trail construction equipment would not permanently alter the wilderness attributes or potential of these areas. Sight and sound effects from this use, which is likely to be very limited, would only be temporary, and trails are an accepted development feature in recommended and designated wilderness areas.
PC 947f	GUIDELINE 5111: END THE LAST SENTENCE AT “NOT PROVIDED” BECAUSE TRAIL BRIDGES ARE NOT PRIMITIVE FACILITIES EASILY REMOVED, AT LEAST AS THEY ARE GENERALLY CURRENTLY DESIGNED, AND THESE AREAS ARE MEANT TO PROVIDE CHALLENGES NOT FOUND IN MORE DEVELOPED AREAS
Response:	As in Wilderness areas, we believe that there may be instances where trail bridges are appropriate in MP 5.1 to protect resources and/or provide for public safety. The guideline as written clearly indicates that they would be exceptions to the rule.
PC 947g	GUIDELINE 5113: REMOVE THE USE OF POWER TOOLS, AND CHANGE THE LAST WORD FROM “DESIRABLE” TO THE MUCH MORE ACTION ORIENTED “CONTINUED AND ENCOURAGED,” AS IN MP 5.0 OF THE 1986 PLAN
Response:	See response to 947a, above. We have changed the last sentence to read, “Approved cooperative trail maintenance programs should continue.” We have avoided the imprecise term “encourage” in the Revised Plan because it is not clear direction.
PC 947h	STANDARD 5119: CHANGE THE LANGUAGE TO THE FOLLOWING LANGUAGE FROM THE 1986 PLAN (PAGE 158, SECTION 2470): “NO TIMBER MANAGEMENT OR MANAGEMENT FOR NON-WILDERNESS PURPOSES. NATURAL SUCCESSION WILL OCCUR”
Response:	The wilderness-related wording you request is inappropriate for a non-wilderness area. We feel the 1986 language is flawed. The first line is not a real sentence, and it is unclear what a “non-wilderness purpose” is. The second line is just an obvious statement of what will occur if we do not harvest. We do not need direction to demand that natural processes occur.
PC 947i	GUIDELINE 5121: ADD “CERTAIN USES MAY BE LIMITED IN SOME AREAS TO PROTECT SOIL AND WATER RESOURCES” AND ADD THE LANGUAGE FROM STANDARDS 5023 AND 5024 TO MINIMIZE ANY IMPACTS THAT WOULD DETRACT FROM WILDERNESS ATTRIBUTES
Response:	We have added a similar “certain uses may be limited...” statement to our Forest-wide integrated desired conditions, because we felt that this could apply to any activity on the Forest. Conversely, we

	felt that it was inappropriate and misleading to apply this statement selectively to only some activities in some MPs. We changed this Standard in the Final Revised Plan to incorporate some of the language and intent of Standards 5023 and 5024 in the Proposed Revised Plan, and we also changed this to a guideline because there may be more allowable exceptions in a non-wilderness area.
PC 947j	STANDARD 5124: DELETE THIS STANDARD, AS WE OPPOSE CREATION OF NEW WILDLIFE HABITAT IMPROVEMENTS UNTIL THE WILDERNESS DISPOSITION OF THESE AREAS IS DETERMINED
Response:	We believe that limited and qualified habitat improvements may occur without compromising the wilderness attributes and potential of the areas.
PC 947k	STANDARD 5127: ADD THAT FISH STOCKING SHOULD NOT BE DONE BY ANY MEANS THAT WOULD DETRACT FROM THE AREA'S WILDERNESS ATTRIBUTES
Response:	We have deleted this standard in the Final Revised Plan because fish stocking is managed by the State. We will continue to coordinate with the WVDNR on their stocking program.
PC 947l	STANDARD 5129: REMOVE THIS STANDARD BECAUSE LIMESTONE ROTARY DRUMS ARE NOT ALLOWED IN WILDERNESS
Response:	Limestone drums would not be consistent with the SPM setting, as specified in this standard.
PC 947m	SECTION 2600: INCLUDE THE WILDLIFE LANGUAGE REGARDING HUNTING FROM THE 1986 PLAN, PAGE 158, AS THERE IS MISCONCEPTION IN THE PUBLIC ABOUT NOT BEING ABLE TO HUNT OR FISH IN WILDERNESS AREAS, AND THIS WOULD ALSO APPLY TO RECOMMENDED WILDERNESS
Response:	We agree but we removed the language that was in the 1986 Plan because hunting, fishing, and trapping are managed by the State, not the Forest Service. Hunters, anglers, and trappers should be consulting State regulations for where to conduct these activities rather than our Forest Plan.
PC 947n	GUIDELINES 5131 AND 5132: REPLACE THESE GUIDELINES WITH THE 1986 GUIDELINE, "OTHER SPECIAL USES ARE GENERALLY NOT COMPATIBLE WITH RECOMMENDED WILDERNESS MANAGEMENT, HOWEVER THEY WILL BE CONSIDERED ON A CASE-BY-CASE BASIS," AS 5131 AND 5132 ARE TOO PERMISSIVE
Response:	We believe that some recreational special uses are compatible with 5.1 management. We wanted to provide more precise language that indicated what we would be measuring a permit application against, and we felt that the 1986 language did not do that.
PC 947o	GUIDELINE 5136: CHANGE "IS ALLOWED" BACK TO "MAY BE ALLOWED" BECAUSE WE CAN THINK OF NO INSTANCE WHERE INSECT AND DISEASE CONTROL SHOULD BE DONE "TO PROTECT (HUMAN) HEALTH AND SAFETY," AS WILDERNESS AREAS ARE SUPPOSED TO BE UNDER NATURAL FORCES, WHICH INCLUDE INSECTS AND DISEASE
Response:	Although MP 5.1 areas are not Designated Wilderness, we agree with your point about health and safety, and we have removed that phrase in the Final Revised Plan. The phrase "is allowed" was not in Guideline 5136 in the Proposed Revised Plan.
PC 947p	GUIDELINE 5136: REMOVE OR CHANGE THE LAST SENTENCE AS IT GOES AGAINST WILDERNESS MANAGEMENT GUIDANCE IN THE FOREST SERVICE MANUAL: "ECONOMY, CONVENIENCE, COMMERCIAL VALUE, AND COMFORT ARE NOT STANDARDS OF MANAGEMENT OR USE OF WILDERNESS" (FSM 2320.6). PEST MANAGEMENT SOLUTIONS SHOULD BE BASED UPON WHAT WOULD BEST PRESERVE WILDERNESS ATTRIBUTES AND VALUES
Response:	MP 5.1 is not Designated Wilderness, and thus FSM 2320.6 does not directly apply.
PC 947q	GUIDELINE 5139: DELETE THIS GUIDELINE ENTIRELY AS THERE IS CLEAR EVIDENCE THAT FIRE WAS NOT A MAJOR NATURAL FORCE IN PRE-SETTLEMENT DAYS IN THE FOREST, AND THE AMOUNT OF RAINFALL THAT OCCURS IN THE FOREST AND THE RESULTING GENERALLY MOIST NATURE OF THE FOREST FLOOR HAS RESULTED IN FEW SIGNIFICANT FIRES ON THE FOREST OVER ITS HISTORY SINCE REFORESTATION HAS TAKEN PLACE
Response:	We believe that fire exclusion has had major effects on vegetation in some areas of the Forest, and prescribed fire is a tool that can be used to help reverse those effects (See EIS, Chapter 3, Vegetation Management section).
PC 947r	GUIDELINE 5139: MAINTAINING WILDLIFE OPENINGS OR RANGE ALLOTMENTS IS NOT

	APPROPRIATE, AS THE FOREST SERVICE MANUAL (2324.22.7) SAYS “DO NOT USE PRESCRIBED FIRE IN WILDERNESS TO BENEFIT WILDLIFE, MAINTAIN VEGETATIVE TYPES, IMPROVE FORAGE PRODUCTION, OR ENHANCE OTHER RESOURCE VALUES”
Response:	MP 5.1 is not Wilderness, and thus FSM 2324.22.7 does not directly apply.
PC 947s	SECTION 5300 (MISSING): ADD A SECTION ON LAW ENFORCEMENT IN MP 5.1 IDENTICAL TO THE ONE IN MP 5.0
Response:	MP 5.1 is not Wilderness, and thus Standard 5046 does not directly apply. These areas do not technically have non-conforming uses.
PC 947t	STANDARD 5140: CHANGE THE LANGUAGE TO REFLECT THAT LANDS ASSIGNED TO MP 5.1 ARE VERY SPECIAL, HAVING PASSED THROUGH THE TESTS FOR ROADLESS INVENTORY AS WELL AS WILDERNESS--WE DO NOT, THEREFORE, SUPPORT ANY EXCHANGES OF THESE PUBLIC NF LANDS, REGARDLESS OF THEIR FUTURE WILDERNESS STATUS
Response:	We have changed this standard in the Final Revised Plan so that it ends after the word “exchange”.
PC 947u	STANDARD 5141: USE THE SAME SIGNAGE AS IN WILDERNESS TO AVOID HAVING TO ALTER THEM IN CASE OF WILDERNESS DESIGNATION, AND TO PREVENT IMPACTS ON WILDERNESS ATTRIBUTES, ESPECIALLY IF THE VERY UGLY, BLUE, PLASTIC BLAZES ARE EVER CONSIDERED FOR USE HERE
Response:	MP 5.1 is not Wilderness. If any of the areas become Wilderness, we will change the signage accordingly. For now, the change would be an unnecessary expense to taxpayers and could be confusing to recreationists who might think they are in a Wilderness but are not. We do not see how plastic blazes can have any permanent impact on wilderness attributes or potential.
PC 947v	SECTION 7460 (MISSING): REPLACE THE WORDING FROM THE 1986 PLAN, PAGE 163, WHICH PROVIDES THE PUBLIC WITH IMPORTANT WILDERNESS USE INFORMATION
Response:	MP 5.1 is not Wilderness, so we are not requiring wilderness latrines. We removed landfill direction in all MPs so that people do not get the mistaken impression that we may allow landfills somewhere on the Forest. We do not allow landfills anywhere on the Forest. The carry in/carry out philosophy is now a widely accepted practice in the backcountry that we advertise in signs and literature, so we do not need to have this direction in the Forest Plan.
PC 947w	STANDARD 5143: ADD THE STATEMENT “CERTAIN USES MAY BE LIMITED IN SOME AREAS TO PROTECT SOIL AND WATER RESOURCES AND TO MINIMIZE CONFLICTS AMONG USERS,” BECAUSE SOME OF THE ACTIVITIES MENTIONED, ESPECIALLY MOUNTAIN BIKING, CAN RESULT IN SOIL DISTURBANCE AS RECOGNIZED ELSEWHERE IN THE DRAFT PLAN/DRAFT EIS
Response:	See response to 947i, above.
Management Prescription 6.1 – Wildlife Habitat Emphasis	
PC 867	The Forest should change the title of MP 6.1 to Timber and Wildlife Habitat Diversity to reflect a greater emphasis on timber management because: <ul style="list-style-type: none"> • This would better reflect the importance of timber harvesting , which is the driving force used to create habitat diversity • Too often silviculture practices are modified to satisfy some perceived wildlife, aesthetic value that compromises silvicultural requirements, and this practice has resulted in regeneration failures.
Response:	First and foremost, MP 6.1 focuses on wildlife habitat diversity and mast production. Silvicultural practices would be designed to meet those ends and would, for the most part, be consistent with commercial timber production. In other cases, prescribed fire or precommercial thinning may be used to achieve habitat objectives. However, giving timber production “top billing” in the MP title would fundamentally change the emphasis of the MP to something that it was never intended to be.
PC 494	The Forest should provide a series of concise standards for grapevine management in Management Prescription 6.1 or in an appendix.
Response:	The grapevine direction in Appendix P of the 1986 Plan is very detailed and convoluted, and it has proven difficult to implement in the field. Therefore, it is not appropriate to include it as programmatic direction in the Revised Forest Plan. Direction in Management Prescription 6.1 establishes the desirability of retaining grapevines (see 6108 in the Proposed Revised Plan on page III-35). More

	specific strategies for grapevine management are best developed at the project level.
PC 891	The Forest should recommend river management plans, prohibit water resource projects, and provide direction to protect T&E Species in MP 6.1 Wild and Scenic River corridors.
Response:	River management plans are only required for designated river corridors; these corridors are just considered eligible. Water resource projects that would impair the rivers' free-flowing condition would be prohibited. The Revised Forest Plan provides Forest-wide direction for T&E species in Chapter II.
PC 599	The Forest should control grapevines on site indices greater than 70 feet and less than 3,000 feet in MP 6.1 areas, because grapevines damage young oak and cherry and reduce mast production.
Response:	The Proposed Revised Plan allows for control of grapevines in MP 6.1 areas if such control is needed to achieve wildlife management objectives (see Guideline 6108 on page III-35). Sustainable production of mast to benefit wildlife is emphasized in MP 6.1. There are no restrictions on grapevine control in other MP areas.
PC 961	The Forest should change Standard 6117 to prohibit public motorized use in MP 6.1 so that disturbance of wildlife is limited.
Response:	MP 6.1 in the Revised Plan emphasizes restricted public motorized access to limit disturbance to wildlife. However, seasonal public motorized use may be needed on selected roads to facilitate hunter distribution, and some collector roads that are currently open will remain open to public motorized use. The comment that the 1986 Plan prohibited public motorized use in MP 6.1 is not correct. Direction in the 1986 Plan was very similar to direction in the Revised Plan regarding seasonal opening of roads and keeping some collector roads open to the public. The portion of Standard 6117 pertaining to off-road vehicles has been eliminated from the Final Revised Plan because the restriction of public motorized use to designated roads and trails is covered by Forest-wide direction for roads and facilities. Any proposal to designate a road or trail anywhere on the Forest for ATV use would be evaluated on a case-by-case basis for effects to resources and would need to be consistent with MP emphasis. In the case of MP 6.1, such a proposal would need to be consistent with the MP emphasis on limited disturbance to wildlife.
Management Prescription 6.2 – Backcountry Recreation	
PC 616	The Forest should consider that Management Prescription 6.2 does not provide permanent protection for areas.
Response:	Only Congress can provide permanent protection in the form of designated Wilderness. MP 6.2 is not designed to provide permanent protection but rather to maintain areas in an undeveloped condition and provide backcountry recreation opportunities. Although the Revised Forest Plan provides less MP 6.2 acreage than the 1986 Plan, it actually provides more combined prescription areas (6.2, 5.1, 8.1 SPNM) that feature undeveloped land and backcountry recreation opportunities. See the Recreation and Wilderness section of Chapter 3 in the EIS.
PC 281	The Forest should prohibit vegetation management on MP 6.2 areas, with the exception of especially aggressive non-native invasive species.
Response:	The Proposed Revised Plan prohibits programmed commercial timber harvest in MP 6.2, but would allow vegetation management to enhance dispersed recreation opportunities or settings, to maintain or enhance public safety, to help control insect or disease outbreaks, to salvage or restore areas extensively damaged by natural phenomena or to meet the emphasis of the management area (see page III-42, Standard 6202).
PC 440	The Forest should change the newly-proposed MP 6.2 areas with open roads in Alternative 3 to remote wildlife management areas to avoid closure of existing roads.
Response:	Because Alternative 3 features maximum backcountry recreation opportunities, there are some proposed 6.2 areas that currently have roads open to public motorized use. There are not many open roads in these areas, and they could be addressed with a number of management options (closure, cherry-stemming, exception like FR 13 in the 1986 Plan) if Alternative 3 were selected for implementation. We considered your suggestion but decided not to adopt it. Changing the areas from 6.2 to 6.1 in Alternative 3 might avoid these closures, but it would also remove backcountry recreation areas from the backcountry emphasis alternative and decrease the overall range of the alternatives considered in detail.
PC 925	The Forest should remove the new language in the preferred alternative that would allow “vegetation management to meet the emphasis of the management area” in Management

	Prescription 6.2, as it is unacceptable.
Response:	We acknowledge your opinion. We can only presume that you find this language unacceptable because you do not wish to see <i>any</i> vegetation management in a 6.2 area. We believe that, similar to the 1986 Plan, it is implicit in the management area emphasis that vegetation management would be minimal to the point that it would not impact the overall undeveloped character of the area.
PC 959	The Forest should make the following changes to the introductory section of MP 6.2 in the Draft Plan.
PC 959a	EXPLAIN HOW THE FIGURES “36% OF THE AREA HAS A SEMI-PRIMITIVE NON-MOTORIZED SETTING, 31% IS SEMI-PRIMITIVE MOTORIZED, AND 33% IS ROADED NATURAL” WERE DETERMINED, BECAUSE MOST OF THE ACREAGE SHOULD BE SPNM IN DESIGNATED MP 6.2 AREAS, AND BORDERING ROADS ARE NOT PART OF THE 6.2 ACREAGE
Response:	The entire Forest was mapped using the ROS mapping tool, as part of the Social Assessment for the Forest Plan Revision. The percentages are based on the mapping criteria for each ROS setting. It is important to remember that this description is of current conditions, and that the desired condition is to manage the areas for SPNM (see page III-42).
PC 959b	OMIT “TYPICALLY” AT THE END OF PARAGRAPH 1 IN DESIRED FUTURE CONDITION ON PAGE III-42), BECAUSE ALL STRUCTURES IN MP 6.2 SHOULD BE RUSTIC IN APPEARANCE, AS WELL AS RARE, TO BE CONSISTENT WITH MANAGEMENT OBJECTIVES
Response:	We have modified this statement in the Final Revised Plan to address your concern.
PC 959c	ADD “NO ADDITIONAL ROADS WILL BE BUILT OR RECONSTRUCTED” TO PARAGRAPH 2 OF DESIRED FUTURE CONDITION ON PAGE III-42 TO BE CONSISTENT WITH THE TRANSPORTATION SYSTEM PLANNING STANDARD, AND THE SPNM [SEMI PRIVATE NON MOTORIZED] NATURE AND DIRECTION OF MP 6.2
Response:	We believe that Standard 6234 (“No new Forest Service System roads shall be constructed”) addresses your concern. This section, however, is for desired conditions rather than standards.
PC959d	CHANGE “MOTORIZED RECREATION” TO “MOTORIZED ACCESS” IN PARAGRAPH 4 OF DESIRED FUTURE CONDITION ON PAGE III-42, WHICH INCLUDES ADMINISTRATIVE AND DNR [DIVISION OF NATURAL RESOURCES] USE AS DESCRIBED IN THE GUIDELINES. OTHER THAN CANAAN LOOP ROAD, THERE IS NO MOTORIZED RECREATION WITHIN 6.2 AREAS, AND THE WORD “ACCESS” WOULD COVER THAT OCCURRING ALONG BORDERING ROADS
Response:	We have modified this statement in the Final Revised Plan, as we agree that “access” is a more appropriate term to use in this context. In the Revised Plan, the Canaan Loop Road is no longer contained within a 6.2 area.
PC 960	The Forest should make the following changes to the Management Direction section of MP 6.2 in the Draft Plan.
PC 960a	SECTION 1900: ADD THE FOLLOWING DIRECTION, “VEGETATIVE CHANGE WILL OCCUR PRIMARILY THROUGH NATURAL PROCESSES”
Response:	We believe that the direction in 1900 and the desired condition section sufficiently describe the intent for vegetative management in MP 6.2.
PC 960b	STANDARD 6202: ADD TO PART B) THE PHRASE “CONSISTENT WITH THE MODERATE TO HIGH DEGREE OF RISK THAT CAN BE POSED BY THESE AREAS.”
Response:	We have added a statement in the Final Revised Plan similar to the one you have suggested.
PC 960c	STANDARD 6202: RETURN THE GUIDELINE FROM THE 1986 PLAN TO CONTROL SALVAGE OPERATIONS: “ENVIRONMENTAL ANALYSIS PROCEDURES WILL BE USED TO PLAN SALVAGE OPERATIONS”
Response:	The National Environmental Policy Act (NEPA) provides requirements for environmental analysis. We have to follow this and other laws; thus we have no need or obligation to repeat them in the Forest Plan.
PC 960d	STANDARD 6202: OMIT ITEM E) BECAUSE IT IS MUCH TOO NEBULOUS AND REPLACE IT WITH LANGUAGE FROM THE 1986 PLAN, PAGE 185, VEGETATION STANDARD 3, “NO TIMBER STAND IMPROVEMENT WILL BE ALLOWED”
Response:	We have added the “no timber stand improvement” standard to the Final Revised Plan. However, we

	do not believe that a link to the management emphasis of the area is nebulous.
PC 960e	STANDARD 6206: ADD THE LANGUAGE, “AND GUIDED BY A SITE-SPECIFIC RANGE ALLOTMENT PLAN”
Response:	Adding that language could be somewhat misleading, as range development may occur as a result of a site-specific NEPA analysis and can be added to the range allotment plan when that plan is updated. We are also trying to avoid adding process to the Plan, particularly any processes that we already have to follow by law, regulation, or policy.
PC 960f	STANDARD 6207: SPECIFY HOW PESTICIDE USE CONTROL IS TO BE DONE. WE RECOMMEND RESTORING SOME OF THE LANGUAGE FROM THE 1986 PLAN, PAGE 185 “... MAY BE CUT OR REMOVED WHERE SPECIFIED IN THE RANGE ALLOTMENT PLAN AND GUIDED BY THE APPROPRIATE NEPA DOCUMENT”
Response:	Implementation methods would be described in the site-specific environmental analysis in the appropriate NEPA document, based on site-specific conditions and needs. We would like to maintain the flexibility to address those conditions and needs at the project level.
PC 960g	SECTION 2310: INCLUDE THE ORIGINAL LANGUAGE FOR IN THE 1986 PLAN, PAGE 185, BECAUSE IT WAS ACTION-DIRECTED LANGUAGE
Response:	We believe the revised language is an improvement over the 1986 Plan. Although the 1986 Plan language may have been more action oriented, it was written more like a standard, and it was unclear what actions would “maximize” the area’s potential for SPNM recreation.
PC 960h	SECTION 2350: INCLUDE THE ORIGINAL POLICY STATEMENT FROM SECTION 2350 OF THE 1986 PLAN, PAGE 185, AS A GOAL: “SET POLICIES FOR RECREATION USE THAT WILL CONTRIBUTE TO THE SEMI-PRIMITIVE NON-MOTORIZED ENVIRONMENT” IN ORDER TO GUIDE DECISIONS WITH REGARD TO THE POSSIBLE FACILITIES THAT FOLLOW
Response:	We considered the 1986 Plan language as a policy to set policies, which is unneeded. The context for recreation use is set through desired conditions and the management direction we have already provided more clearly, as in Goal 6209. Also, we did not feel that recreation use necessarily contributes to the SPNM environment; but rather that the SPNM environment should contribute to certain types of recreation opportunities and experiences.
PC 960i	STANDARD 6210: QUALIFY THIS STANDARD BY ADDING: “SUCH FACILITIES WILL BE RARE, AND WILL BE DESIGNED TO BLEND IN WITH THE NATURAL ENVIRONMENT” BECAUSE DEVELOPED FACILITIES LIKE PIT TOILETS AND BRIDGES ARE NOT NECESSARILY APPROPRIATE IN EVERY MP 6.2 AREA.
Response:	We incorporated your suggested language into this direction, but changed the standard to a guideline because we foresee some obvious exceptions such as trailhead parking lots.
PC 960j	STANDARD 6210: STATE THAT FACILITIES DECISIONS WILL BE MADE “ON A CASE-BY-CASE BASIS WITH EA”, AND TRAIL BRIDGES SHOULD BE VERY RARE IN MP 6.2 AREAS, CONSISTENT WITH THE AREA DESCRIPTION AND DESIRED CONDITIONS
Response:	As noted above, we are not expanding the Revised Plan with processes that we already have to follow due to existing law, regulation, or policy.
PC 960k	GUIDELINE 6212: IN ALL REFERENCES TO VISITOR SAFETY, INCLUDE THE PHRASE “CONSISTENT WITH THE MODERATE TO HIGH RISK THAT CAN BE POSED BY THESE AREAS”. AND LIKE TRAILS, THE APPROPRIATE BRIDGE DESIGN SHOULD BE DESCRIBED AS “GENERALLY MINIMAL, RUSTIC BRIDGES OF PRIMARILY NATURAL MATERIALS FROM THE SITE” AND EMPHASIZE MINIMUM DISTURBANCE TO THE SURROUNDING AREA IF A BRIDGE IS TO BE INSTALLED
Response:	We have incorporated similar language into this guideline for the Final Revised Plan. Disturbance to the surrounding area, however, will depend on site-specific conditions and needs determined at the project level.
PC 960l	GUIDELINE 6213: CHANGE “POWER AND MECHANICAL TOOLS MAY BE USED FOR TRAIL MAINTENANCE” TO “HAND TOOLS ARE PREFERRED FOR TRAIL MAINTENANCE, WITH POWER TOOLS USED ONLY WHEN JUSTIFIABLE”. BECAUSE POWER TOOLS GENERALLY DO NOT HAVE TO BE USED
Response:	See response to PC 947a.
PC 960m	GUIDELINE 6213: CHANGE COOPERATIVE AGREEMENTS ARE “DESIRABLE” TO

	“SHOULD BE CONTINUED AND ENCOURAGED”
Response:	We have replaced this portion of the guideline with Forest-wide direction that reads, “Approved cooperative trail maintenance programs should continue”, because we have trails in all prescription areas, and this direction would apply to them all. We have avoided the imprecise term “encourage” in the Revised Plan because it is not clear direction.
PC 960n	STANDARD 6216: CHANGE “OBJECTIVES OF HIGH” TO “OBJECTIVES OF VERY HIGH” BECAUSE MP 6.2 IN THE 1986 PLAN HAD “PRIMARILY A MAXIMUM VQO = “RETENTION,” WHICH IS ANALOGOUS TO “VERY HIGH” IN SMS [SAFETY MANAGEMENT SYSTEM] TERMINOLOGY
Response:	We believe that “High” is the appropriate level for these areas. We can retain the overall undeveloped character of these areas and still provide for some minimal management flexibility. The Revised Plan is replacing the 1986 Plan.
PC 960o	STANDARD 6216: CHANGE THE DEVIATION SENTENCE TO “DEVIATIONS FROM HIGH TO VERY HIGH MAY OCCUR ON A SITE-SPECIFIC BASIS ONLY IF JUSTIFIED TO MEET SPNM MANAGEMENT OBJECTIVES THROUGH AN EA PROCESS”
Response:	See response to 969n, above. We do not foresee any instance where we would deviate from “High” to allow a “Very High” scenic integrity.
PC 960p	STANDARD 6216: INCLUDE THE PHRASE “CONSISTENT WITH THE MODERATE TO HIGH RISK THAT CAN BE POSED BY THESE AREAS” AFTER “PUBLIC SAFETY”
Response:	We agree that a degree of risk is inherent to the backcountry. However, this standard is included to respond to specific identified hazards. An example would be an insect and disease outbreak that puts visitors at risk from dead and falling trees along trails, or their vehicles at risk at the trailhead.
PC 960q	STANDARD 6216: OMIT “OR TO RESTORE ECOLOGICAL COMMUNITIES OR NATURAL HABITAT STRUCTURE” BECAUSE THIS GOAL IS TO BE ACHIEVED THROUGH NATURAL PROCESSES, NOT HUMAN MANAGEMENT
Response:	Management emphasis and direction allow for very low levels of management. This standard is included to help ensure that levels do not increase to the point where they could affect the overall undeveloped character of the areas. These areas are to be managed as SPNM, rather than a wilderness that features only natural processes.
PC 960r	GUIDELINE 6217: CHANGE LANGUAGE IN THE FIRST SENTENCE TO “...FOR THE PURPOSE OF <i>PREVENTING OR</i> REDUCING ...” AND ADD A NEW GUIDELINE: “ACTIVITIES THAT HAVE THE POTENTIAL TO CAUSE SOIL EROSION IN SENSITIVE AREAS MAY BE LIMITED TO PROTECT THE SOIL AND WATER RESOURCES”. ADD THIS STATEMENT TO STANDARD 6219 AS WELL.
Response:	It is doubtful that we can ever “prevent” erosion, as it is a natural process. However, we can reduce the effects of erosion from past management actions, and that is the intent of this guideline. As for the request for a new guideline, see response to PC 947i.
PC 960s	SECTION 2600: ADD A NEW STANDARD: “NO NEW ROADS OF ANY TYPE WILL BE CONSTRUCTED FOR WILDLIFE MANAGEMENT ACTIVITIES. ACCESS BY MOTOR VEHICLES WILL BE PRIMARILY THROUGH USE OF EXISTING ROADS. ON A CASE-BY-CASE BASIS, WHERE JUSTIFIABLE BASED UPON AN EA DECISION, INFREQUENT ACCESS BY MOTOR VEHICLES INTO A MP 6.2 AREA FOR WILDLIFE MANAGEMENT MAY BE ALLOWED USING EXISTING APPROPRIATE TRAILS OR LINEAR WILDLIFE OPENINGS.”
Response:	We have expanded the road-related direction in this MP for the Final Revised Forest Plan.
PC 960t	STANDARD 6220: RESTORE LANGUAGE FROM 1986 PLAN FOR ITEM 2) BY ADDING “OR EXTENSIVE TREE CUTTING”
Response:	We believe that we could not do “extensive tree cutting” for new openings without changing the undeveloped character of the area or being incompatible with the SPNM setting. In other words, we do not expect extensive new large openings to occur in 6.2 areas, and we feel that the existing direction adequately addresses that concern.
PC 960u	STANDARD 6220: OMIT “ECOSYSTEM RESTORATION” FROM ITEM 3) BECAUSE NATURAL SUCCESSION IS THE GOAL IN MP 6.2 AREAS
Response:	The goals for MP 6.2 are described in the Revised Plan. They do not include natural succession, as we believe that natural succession will continue with or without our direction. We prefer to maintain the

	flexibility to do minor ecosystem restoration if a need arises. Direction is in place to ensure that this activity would not alter an area's undeveloped character or recreation opportunities.
PC 960v	STANDARD 6221: THIS STANDARD SHOULD EXPLAIN HOW WEST VIRGINIA DIVISION OF NATURAL RESOURCES IS TO BE GIVEN ACCESS FOR NON-STOCKING-RELATED FISHERIES MANAGEMENT
Response:	We have added language to this standard to help clarify that it applies to activities and equipment beyond fish-stocking trucks.
PC 960w	STANDARD 6225: MODIFY BY ADDING THE LANGUAGE FROM THE 1986 PLAN, SECTION 2700, STANDARD/GUIDELINE 2, PAGE 188: "APPLICATIONS FOR SPECIAL USE PERMITS WILL BE CONSIDERED ON A CASE-BY-CASE BASIS AND WILL BE APPROVED ONLY WHERE NO OTHER FEASIBLE ALTERNATIVES EXIST"
Response:	We believe that the special uses direction as written provides the blend of restriction and flexibility that we need in MP 6.2 areas. Permits are always considered on a case-by-case basis, and alternatives are a part of that consideration, so your suggested addition would not really provide us with more helpful direction.
PC 960x	STANDARD 6231: THIS STANDARD SHOULD GIVE GUIDANCE ON WHAT SUPPRESSION TECHNIQUES WILL BE USED THAT ARE CONSISTENT WITH THE SPNM OBJECTIVE AND ROADLESS NATURE OF MP 6.2
Response:	We have added a guideline in the Final Revised Plan to provide more guidance.
PC 960y	STANDARD 6234: DOES THE QUALIFIER "SYSTEM" COVER ALL POSSIBLE ROADS? ADD TO THIS STANDARD: "OLD SYSTEM ROADS IN THESE AREAS GENERALLY WILL BE DECOMMISSIONED AND REHABILITATED, OR WILL BE MAINTAINED AS TRAILS OR LINEAR WILDLIFE OPENINGS"
Response:	We have modified this standard in the Final Revised Plan to say "authorized" rather than "system" roads. Authorized roads include any that we authorize to build, whether they are put on our system or not. However, this change also necessitated the addition of exceptions related to statute and existing rights. Priorities and protocols for decommissioning are described in Forest-wide Plan direction in the Roads and Facilities section of Chapter II. We have also added an objective in this section of the Final Revised Plan to address road decommissioning.
PC 960z	GUIDELINE 6235: CHANGE TO, "MOTORIZED ACCESS BY FEDERAL AND STATE AGENCIES FOR ADMINISTRATIVE USES COMPATIBLE WITH THE SPNM RECREATION EMPHASIS MAY BE ALLOWED ALONG APPROPRIATE TRAVELWAYS", BECAUSE NEW MP 6.2 AREAS SHOULD NOT BE DESIGNATED FOR AREAS CONTAINING OPEN ROADS, AND THE OBJECTIVE FOR MP 6.2 AREAS, FEATURING NON-MOTORIZED RECREATION, SHOULD BE THE EVENTUAL ELIMINATION OF OLD ROADS, NOT THEIR RECONSTRUCTION. CONSIDERING THE HUGE BACKLOG IN ROAD MAINTENANCE ON THE FOREST, THESE OLD ROADS SHOULD EITHER BE MAINTAINED AS TRAILS, OR DECOMMISSIONED AND REHABILITATED.
Response:	Road work should be confined to maintenance in most circumstance; however, some reconstruction may be needed to reduce resource impacts or to access portions of a road for proper decommissioning.
PC 960aa	GUIDELINE 6237: ADD THE SENTENCE, "ANY TRAILS OR LINEAR WILDLIFE OPENINGS USED FOR ADMINISTRATIVE MOTORIZED ACCESS WILL BE MAINTAINED TO PROTECT SPNM RECREATION, SOIL, AND WATER RESOURCES"
Response:	We believe that Standard 6236 and Guideline 6237 in the Proposed Revised Plan adequately address trail use and maintenance in MP 6.2 areas. It is unclear as to how we would maintain trails "to protect SPNM recreation".
Management Prescription 8.0 – Special Areas	
PC 859	The Forest should provide more information on Special Area protection, including:
PC 859a	RESULTS OF NEW SURVEYS/NEW FINDS OUTSIDE OF THESE AREAS SINCE THE 1986 FOREST PLAN
Response:	Probably the biggest changes since 1986 have resulted from: 1) putting the 57,000-acre NRA under one management prescription, and 2) acquiring the 6,800-acre Buskirk tract that has now been designated as a Grouse Management Area.
PC 859b	WHAT ADDITIONAL AREAS MAY WARRANT PROTECTION AS SPECIAL INTEREST AREAS

Response:	The Pike Knob area was identified as a candidate RNA special area for protection and management between the DEIS and FEIS. The Loop Road Research Area was given MP 8.5 status as well.
PC 859c	WHAT PRESCRIPTIONS ARE NEEDED INSIDE EXISTING AND POTENTIAL SPECIAL AREAS IN ORDER TO ADEQUATELY DIRECTLY AND INDIRECTLY PROTECT THE RESOURCES, BIOLOGICAL COMMUNITIES; SURROUNDINGS, DRAINAGES, UNDERGROUND RESOURCES, ETC. OF EXISTING AND POTENTIAL SPECIAL AREAS
Response:	Management prescriptions, including direction for resource protection, for special areas can be found in the 8.0 section of Chapter III of the Proposed Revised Forest Plan. The special area management prescriptions and direction were reviewed and updated for the Final Revised Plan.
PC 859d	HOW HAVE MANAGEMENT ACTIVITIES AND USES AFFECTED THESE AREAS AND THE RESOURCES OF CONCERN
Response:	Effects have varied greatly. Most of the special areas—such as Botanical Areas, National Natural Landmarks, and candidate Research Natural Areas—have not been affected to any measurable degree by management activities in the past 20 years. The NRA has experienced changes mostly to its developed recreation facilities, including trail maintenance. The Fernow Experimental Forest has conducted many research projects during that time.
PC 859e	WHAT AREAS SHOULD BE PROTECTED AS SPECIAL INTEREST AREAS AND RESEARCH NATURAL AREAS
Response:	We have no “special interest areas” on the Forest. There are four candidate Research Natural Areas that are identified in Chapter III of the Revised Forest Plan.
PC 860	The Forest should explain what happened to the Hawthorn Research Natural Area in the 1986 Forest Plan.
Response:	This area was dropped as a candidate Research Natural Area (RNA) in the Revised Forest Plan. Hawthorn is still found on the site and the site still retains its function as wildlife habitat. There has been no active interest in this area as a RNA since the 1986 Forest Plan. The area is not representative of a major forest type on the Forest, needs active management to control invasion of non-native shrubs, and has not been of research interest since the 1986 Forest Plan. Research could still be conducted in the area, and the wildlife benefits provided by the area are not removed by dropping the candidate RNA status.
PC 475	The Forest should revise Standard 8016 to state that although limestone drums are not permitted, limestone fines are allowed.
Response:	We have amended this standard in the Final Revised Forest Plan to include an allowance for limestone fines where current access allows.
PC 476	The Forest should develop additional wildlife openings in Management Prescription 8.1.
Response:	Goal 8118 from the Proposed Revised Forest Plan has been modified to clarify that wildlife openings are allowed in MP 8.1. See also response to PC 496.
PC 1005	The Forest should change Standard 8106 on page III-58 to read “shall be aggressively” instead of “may be” and adding “by whatever means possible”.
Response:	We acknowledge your preference, but we feel that “controlled as needed” would cover any situation we may come across.
PC 855	The Forest should protect the area around Big Run Bog by strengthening Standard 8227 to create a no timber harvest/no road construction buffer around the area.
Response:	The Management Prescription around the bog has been changed from 6.1 to 4.1 for the Final Revised Forest Plan. The small watershed that contains the bog is entirely 8.2, a National Natural Landmark.
PC 914	The Forest should modify Standard 8312 to add “and other natural communities” to bogs, as limestone gravel contributed to an explosion of non-native invasive species in the Bear Rocks grass bald.
Response:	We have added “and other rare communities” to this standard.
PC 14	The Forest should add a standard to the Plan that allows trail construction in the 8.3 Dolly Sods Scenic Area to fully capture the scenic potential of the area.
Response:	The Revised Forest Plan does not specifically prohibit trail construction in the Dolly Sods Scenic Area. However, a trail construction decision would have to be made at the project level under a separate NEPA document.
PC 853	The Forest should delete Standard 8415 because the site has been signed for the public for a long

	time and has not been a threat.
Response:	We agree and we deleted this standard in the Final Revised Forest Plan.
PC 854	The Forest should delete Standard 8424 because public enjoyment is not a threat to this site.
Response:	We agree and we deleted this standard in the Final Revised Forest Plan.
PC 915	The Forest should add a standard to the Fannie Bennett Hemlock Grove addressing non-native invasive species and pests and pathogens, as this site is already at grave risk to hemlock wooly adelgid.
Response:	We added such a standard in the Final Revised Plan for all of the 8.0 areas, which would include the Fannie Bennett Hemlock Grove.
PC 874	The Forest should modify Standard 8605 for the Grouse Management Areas to prohibit construction for oil and gas development during the grouse brood season.
Response:	The grouse brood season could potentially cover most of the spring and summer. Added to the existing restriction for the hunting season, which covers most of the fall and winter, a brood season restriction would essentially preclude all oil and gas development. While oil and gas development has the potential for short-term negative impacts on grouse, in the long term it creates beneficial edge and herbaceous habitat.
PC 889	The Forest should add management direction to MP 8.6 favoring introduction of legumes such as clover in wildlife openings and seeded roads.
Response:	We have added a new guideline to MP 8.6 specifying the planting of non-invasive legumes in wildlife openings. This guideline does not specifically mention clover because most non-native clover species are considered invasive.

FOREST PLAN MONITORING AND EVALUATION	
PC 645	The Forest should provide an adequate monitoring program that: <ul style="list-style-type: none"> • Covers an ecologically appropriate scale • Includes inventories evaluating biological diversity in terms of its prior and present condition • Provides protection for all historic and prehistoric archaeological/cultural sites • Includes recreational uses, like mountain biking and horseback riding • Includes monitoring effects of logging hardwoods on wildlife habitat and age-class diversity • Protects soil and water resources.
Response:	The Forest's Monitoring and Evaluation Plan is presented in Chapter IV of the Proposed and Final Revised Plans. This monitoring plan covers all of the general resource areas described and more, and it includes as much detail as the monitoring prescribed for the 1986 Plan. Also, we are developing a Monitoring Implementation Guide that provides additional information as to how the monitoring should be done, who should do it, when it should occur, etc. This guide is considered separate from the Plan so that it can be adjusted and improved as needed during the planning period without amending the Plan. Monitoring is all about adaptation, learning from success and failure, and making adjustments, and that is why we have taken this adaptive approach to the Plan.
PC 857	The Forest should have disclosed the results of required monitoring from the 1986 Forest Plan, including: <ul style="list-style-type: none"> • Whether the items have been monitored on a regular basis • Whether monitoring was evaluated at a representative range of sites, under representative conditions • Whether monitoring was thorough • Whether scientific protocols were used • Whether adequate data was collected • What the monitoring results say • Whether monitoring efforts have been inadequate for any items • What additional monitoring and analysis needs to take place to complete plan revision in an informed manner.
Response:	Although there is no requirement to disclose the results of past monitoring in the Revised Forest Plan or EIS, monitoring results since 1986 have been disclosed periodically to the public in the form of Annual

	Monitoring Reports. The results of past monitoring were also reviewed during the plan revision process to help determine Need For Change in the Forest Plan, and to help develop an updated Forest Monitoring and Evaluation Plan (see Chapter IV of the Revised Forest Plan). In determining what monitoring items should be brought forward from the 1986 Plan, or added or deleted, we looked at many of the criteria suggested in these comments but in a somewhat different way. For instance, instead of asking whether scientific protocols were used, we asked whether there were any scientific protocols available for use and how would they apply on our Forest? Instead of asking whether adequate data was collected, we asked whether adequate data could be collected, and if it could not, why not? We did ask whether monitoring efforts had been inadequate, but we also asked why, and the answer was usually that we were looking for the wrong information or with the wrong methodology. These results either validated existing monitoring or indicated a Need For Change in the Forest Plan.
PC 988	The Forest should list the issues you will monitor, including acid rain, soil chemistry, stream chemistry, fish populations, and stream channels.
Response:	Monitoring of soil and water resources includes the effects of acid deposition on soil and stream chemistry. Monitoring items also include stream habitat inventories and fish population sampling. A monitoring implementation guide is being developed to address future monitoring activities.

FOREST PLAN APPENDICES	
Appendix A – Vegetation Management Practices	
PC 904	The Forest should change the second to last sentence in the herbicide paragraph on page A-16 to read “Mechanized equipment would be used on gentle slopes in the forested environment.”
Response:	We have made a similar change in Appendix A to the Final Revised Forest Plan.
PC 905	The Forest should change the third to last sentence in the herbicide paragraph on page A-16 to read, “All treatments would follow label guidelines and would be supervised by a State-certified or USDA-certified applicator.”
Response:	West Virginia law requires pesticide application be done by a state-certified applicator. A USDA certified pesticide applicator license by itself is not sufficient to apply pesticides on public land in West Virginia.
PC 956	The Forest should omit the statement in Appendix A (Draft Plan, page A-6), “This management would typically consist of thinning,” because this is an activity specifically not allowed in the 1986 Plan (page 106 and page 185, Vegetation Standard 3: “No timber stand improvement will be allowed”).
Response:	We have modified this statement in the Final Revised Plan by replacing “would typically” with “might”. We did not mean to imply that these would be typical activities in MP 6.2. We were instead trying to describe what they might typically be if they were to occur. We feel the important part of this statement is that, if vegetation management were to occur, it would be “...to a level that would not alter the undeveloped character of the area.” The “thinning” referred to would not be done for timber stand improvement, but rather to help restore stands to a more appropriate ecological structure, composition, and function.
Appendix B – Old Growth	
PC 908	The Forest should replace the final sentence on page B-3 with, “Old-growth definitions may continue to be refined with developments in the science community, and the next forest plan will reflect such developments”.
Response:	We have reworded this sentence in Appendix B to the Final Revised Plan to better reflect what we meant to say.
PC 909	The Forest should provide important pieces of information needed to adequately analyze the alternatives, including information on potential old growth for all alternatives on page B-5.
Response:	The information in Appendix B was based solely on Alternative 2 because it was identified as the preferred alternative in the DEIS. The Final Appendix B is based on Alternative 2M, the preferred alternative in the FEIS. Appendix B is part of the Forest Plan, which does not analyze the alternatives. An analysis of forest age classes and Minimum Dynamic Areas by alternative can be found in Chapter 3 of the EIS.

Appendix C – Summary of the AMS	
PC 498	The Forest should amend Appendix C to include a “Wildlife Habitat” analysis identifying the type and amount of wildlife habitat that exists and future measures that will be taken during this Forest Plan Revision to enhance or develop additional wildlife clearings, savannahs or shrub/brush type habitats.
Response:	The summary of the AMS (Appendix C to the Proposed Revised Plan) focuses only on the four major need for change issues. The full AMS, which includes chapters on wildlife and species viability, is available upon request. MPs 3.0, 4.1, and 6.1 in the Proposed Revised Plan contain desired conditions, goals, and objectives for wildlife openings/savannahs and early successional forest stands (shrub/brush habitat). The species viability chapter of the AMS contains a detailed analysis of existing wildlife habitats; and the EIS summarizes existing habitats and projects future amounts of the major habitats under each of the plan alternatives (EIS Chapter 3, Terrestrial Ecosystem Diversity section).
PC 924	The Forest should remove the last sentence on page C-16 concerning grapevine management, as it serves no purpose and only results in confusion.
Response:	We agree that this sentence was somewhat confusing as written, as grapevines do not necessarily cause the loss of early seral habitat. We have changed this sentence to read, “Are the effects to wildlife habitat greater if localized grapevines are lost or if mast-producing trees are not regenerated?”

ENVIRONMENTAL IMPACT STATEMENT	
PC 1003	The Forest should eliminate the paragraph on page S-5 that discusses revision topics because this term “topics” is confusing with the issues that are presented later in the document.
Response:	We have provided more information on this “topic” in the EIS than the Summary.
PC 926	The Forest needs to change “Laurel Fork East and West” on page S-20 to “Laurel Fork North and South”.
Response:	We have corrected this error in the FEIS.
PC 297	The Forest should ensure that the affected environment is consistently defined and all effects are determined within identical assessment areas in order to adequately determine direct, indirect, and cumulative impacts to the forest.
Response:	As stated on page 3-1 of the EIS, under Scope of the Analysis, the affected environment areas may vary in size and time depending on the resource, issue, or anticipated activities. There are other factors involved as well. We cannot, for example, analyze effects on a species that spends its entire life in one cave the same way we analyze effects on a species that flies around the Forest, or spends part of its life cycle in Central America. All resources and issues are looked at separately to determine the appropriate area of consideration for an effects analysis. See the Scope of the Analysis for each resource section in Chapter 3 of the EIS for the rationale used for determining areas.
PC 349	The Forest should examine the effects of forest management.
Response:	Effects are analyzed and disclosed throughout Chapter 3 of the EIS, including effects to many of the items noted in the comments (see below). However, effects are presented somewhat differently in plan revision than they are in project-level NEPA documents, because the spatial and time scales are different, and the Forest Plan is not actually implementing any specific management activities to assess. Therefore, the effects discussions tend to focus more on general types of effects that may occur during plan implementation, and management direction that would reduce or neutralize potential adverse effects. Also, Environmental Impact Statements were never intended to be encyclopedic in nature, but rather concentrate on disclosing significant or differential effects to specific issues or resources from proposed management options. Consequently, if effects to some of the items noted do not appear in the EIS, it is likely because these items were not raised as issues, or are beyond the scope of what we can or need to analyze at this scale, or would not have differential effects on, or be differentially affected by, the alternatives in revision.
PC 349a	INCLUDING: <ul style="list-style-type: none"> • IMPACTS TO THE ROLE OF THE FOOD CHAIN IN MAINTAINING DIVERSITY, VIABLE SPECIES AND FOREST HEALTH • HOW THE REDUCTION OF ORGANISMS AT VARIOUS LEVELS IN THE FOOD CHAIN

	<p>AFFECT ORGANISMS THROUGHOUT THE FOOD CHAIN</p> <ul style="list-style-type: none"> • IMPACTS ON BIODIVERSITY
Response:	Species viability and diversity are examined in the Terrestrial Species Viability, Terrestrial Ecosystem Diversity, and Watershed, Aquatic, and Riparian Resources sections of EIS Chapter 3. Detailed species-by-species viability analyses are contained in the project record. Forest health is addressed in the Vegetation section of EIS Chapter 3.
PC 349b	<p>INCLUDING:</p> <ul style="list-style-type: none"> • IMPACTS TO BIOLOGICAL, POTENTIAL BIOLOGICAL, AND HISTORICAL BIOLOGICAL CORRIDORS • A REGIONAL APPROACH WHEN EXAMINING BIOLOGICAL CORRIDORS • IMPACTS OF LOGGING AND ROAD BUILDING IN UNROADED AREAS AND IN ROADED AREAS PROVIDING CORRIDORS OR LINKAGES BETWEEN CORE ROADLESS AREAS • IMPACTS ON UNDISTURBED AND INTERCONNECTED HABITAT
Response:	Landscape-level conservation biology issues are examined in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS.
PC 349c	INCLUDING THE FULL COSTS AND BENEFITS OF VARIOUS HABITAT MANIPULATION METHODS USED
Response:	Economic data specific to wildlife openings and other habitat manipulations are not available for the Forest.
PC 349d	INCLUDING THE EFFECTS ON WATER QUALITY AND RESOURCES, AQUATIC ECOSYSTEM HEALTH, AND RIPARIAN AREAS
Response:	Potential and general effects to these resources are covered in the Watershed, Aquatic, and Riparian Resources section of Chapter 3 in the EIS.
PC 349e	INCLUDING THE IMPACTS ON THE PRIVATE PROPERTY OWNERS WHOSE LANDS ADJOIN OR ARE SURROUNDED BY THE FOREST
Response:	Plan revision is not creating any impacts on private property owners or their lands.
PC 349f	INCLUDING IMPACTS ON CAVES, BLOWHOLES, UNDERGROUND STREAM SYSTEMS, AND RECHARGE AREAS
Response:	The Terrestrial Species Viability Evaluation considered karst features through the examination of numerous cave-associated species. The Terrestrial Ecosystem Diversity analysis considered caves as a habitat component.
PC 349g	INCLUDING IMPACTS ON SOIL, STEEP SLOPES, EROSION SOILS, OTHER SENSITIVE SOILS ALONG CREEKS AND TRIBUTARIES, AND GEOLOGIC FORMATIONS THAT ARE ACIDIC, TOXIC OR HARMFUL WHEN DISTURBED
Response:	Potential and general impacts to soils are addressed in the Soil Resource section of Chapter 3 in the EIS, and management direction to protect soils is found primarily in the Soil and Water Resources section of Chapter 2 in the Revised Plan. We do not have any geological formations that are acidic, toxic or harmful when disturbed.
PC 349h	<p>INCLUDING:</p> <ul style="list-style-type: none"> • IMPACTS ON WATERSHED QUALITY, WOODY DEBRIS, ORGANIC CONTENT OF SOILS, PIT AND MOUND TOPOGRAPHY, LARGE BOLES ON THE FOREST FLOOR, SNAGS, AND NURSE LOGS • IMPACTS ON MAST PRODUCTION, DEN TREES, AND OTHER HABITAT COMPONENTS FOR WILDLIFE • IMPACTS ON COVE HARDWOODS, NORTHERN HARDWOODS, BOULDER FIELDS, AND OTHER SPECIAL OR UNIQUE HABITAT • IMPACTS ON CANOPY, CANOPY STRUCTURE, AND DISTURBANCE REGIMES
Response:	Habitats and habitat features are examined in the Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Terrestrial Management Indicator Species, and Watershed, Riparian, and Aquatic Resources sections of EIS Chapter 3.
PC 349i	INCLUDING FLOODING IMPACTS
Response:	The potential effects of canopy reduction on flood flows are presented in the DEIS, pages 3-73 to 3-74.

PC 349j	INCLUDING IMPACTS ON OLD GROWTH
Response:	Potential effects to old growth, or late successional stages, are presented in the Vegetation Management and Terrestrial Ecosystem Diversity sections in Chapter 3 of the EIS.
PC 349k	INCLUDING IMPACTS ON POACHING, ILLEGAL ROAD USE, LITTER PROBLEMS, AND NOISE
Response:	The Forest does not typically have impacts on these activities. Poaching, illegal road use, and littering are law enforcement concerns that are addressed outside of plan revision. Most activities allowed by the Forest Plan create noise, including recreation. The Forest Plan also allocates large areas to places where people can generally escape from noises that people associate with large-scale development.
PC 349l	INCLUDING IMPACTS ON ROAD DENSITIES
Response:	Forest Plan revision is not constructing or decommissioning any roads, so it is not having any impacts on road densities. Impacts from roads are discussed throughout the General Effects portions of various resource sections in Chapter 3 of the EIS.
PC 349m	INCLUDING IMPACTS FROM CHANGES IN VEGETATION TYPES RESULTING FROM FOREST TYPE CONVERSIONS AND EVEN-AGED MANAGEMENT
Response:	Impacts from even-aged management are discussed throughout Chapter 3 of the EIS, most notably in the Vegetation Management section.
PC 349n	INCLUDING IMPACTS FROM SKI RESORTS, MOTORIZED WINTER RECREATION, AND OTHER HIGH IMPACT WINTER RECREATION
Response:	We have very little “high impact” winter recreation occurring on the Forest. Snowmobiling is currently only allowed along the Highland Scenic Highway, and the season is highly variable. The activities from the ski resorts located within the proclamation boundary occur primarily on private lands.
PC 122	The Forest should consider making the issues of vegetation, timber, recreation, soil, and water inclusive.
Response:	Although these issues are interrelated, they are different enough that we addressed them separately in the EIS. Forest Plan direction is separated out as well, but we have provided links from one resource to another where appropriate.
Chapter 1	
PC 974	The Forest should change the reference on page 2 of Chapter 1 of the DEIS from “over 500 of perennial trout streams” to the “600 miles of cold water streams” given on page 53 of Chapter 3.
Response:	We have corrected this error in the FEIS.
Chapter 2	
PC 989	The Forest should break down Table 2-42 on page 2-60 by county.
Response:	The model we does not have the capability of breaking this information out by county in any meaningful or accurate way.
PC 989a	Including breaking down “Other Forest Service Expenditures” further because if “livestock grazing” can be listed separately with just 6 jobs then further definition can be given to this classification.
Response:	The “Other Forest Service Expenditures” are too numerous to mention here but include supplies, contractors, rent, maintenance, and other expenses. As seen in the table, they are not expected to vary by alternative. The jobs related to livestock grazing, on the other hand, were included to show how little overall impact this source has to the local economy.
PC 990	The Forest should expand Tables 2-43, 2-44 and 2-45 on pages 2-61 and 2-62 of the DEIS to project employment and incomes for +20 and +50 years in the future.
Response:	We considered that option but felt that it was not appropriate to project economic changes beyond the planning period due to the increasing level of uncertainty that would factor into the projections over time.
PC 991	The Forest should explain whether the figures in Table 2-46 on page 2-63 of the DEIS are in thousands of dollars.
Response:	No, they are in dollars. Wherever we have displayed figures in “thousands of dollars” we have said so in the table or the table title.
PC 951	The Forest should explain why the income in Table 2-44 on page 2-61 of the DEIS is the same for Alternative 2 and Alternative 3.
PC 951a	BECAUSE MORE AVAILABLE RECREATION WOULD NATURALLY LEAD TO SOME SORT

	OF INCREASE IN INCOME IN ALTERNATIVE 3, AS IT ALLOCATES 45% OF THE FOREST TO RECREATION PRESCRIPTIONS VS. ONLY 24% FOR ALTERNATIVE 2 (PER TABLE 2-36 ON PAGE 2-55)
Response:	The table referred to displays the percentages of areas on the Forest by alternative that emphasize backcountry recreation. However, the Forest provides a variety of recreation opportunities across all Management Prescriptions. For example, based on a National Visitor Use Survey conducted in FY-03 of the 1.3 million visits to the Forest, only about 3% of visitors used wilderness while over 34% participated in driving for pleasure. Thus, we did not assume in our analysis that increasing the land allocated for backcountry recreation would lead to an increase in recreation use on the Forest.
PC 951b	SIMILARLY, HOW CAN ALTERNATIVE 2 SCORE HIGHER THAN ALTERNATIVE 3 IN TABLE 2-45 FOR THE ENTERTAINMENT/RECREATION/FOOD/LODGING SECTOR?
Response:	The numbers in this table are the result of ripple effects from all Forest-linked activities that lead to income in the local economy. The recreation-linked activity was assumed to be the same for all alternatives, but the timber-linked activity was more in Alternative 2 than Alternative 3—thus, the linked income from that activity was more as well.
PC 1006	The Forest should add a total for each Alternative in Table 2-19 and Table 2-20 on pages 2-40 and 2-42.
Response:	The numbers for these tables have been recalculated and rounded for the FEIS. The purpose of these tables is to show distribution of acres by MP rather than total acres, which are roughly the same.
Air Quality	
PC 1009	The Forest should use the plural rather than singular verb when applied to “data” on page 3-19, as it is a plural noun.
Response:	We have likely made this error in a number of places in the EIS, but we were unable to find any change that was needed on page 3-19.
Water, Riparian, and Aquatic Resources	
PC 250	The Forest should acknowledge the impact that mining and timber management roads, clearings, and skid trails have on non-native invasive plants and sedimentation of streams.
Response:	We describe the impacts from these and other management-related activities in Chapter 3 of the EIS. See the Non-native Invasive Species section and the Water, Riparian, and Aquatic Resources section.
PC 975	The Forest should revise its “Potomac Highlands” description of the Forest on page 3-53 of the EIS, paragraph 2, where you discuss that the Forest is the headwaters of five major river systems, and we all know that four of them, with the majority of the forested area, drain to the West into the Ohio, and the one traceable part of the Potomac that could be considered highlands is the Fairfax Spring and it drains precious little area.
Response:	We have expanded our description of the Forest watersheds and drainage patterns in the FEIS under Watershed Characteristics in the Watershed, Riparian and Aquatic Resources section of Chapter 3.
PC 872	The Forest should clarify how all the management projected for the Greenbrier River watershed will provide protection for watershed resources and prevent flooding.
Response:	The potential effects of timber harvesting on flooding are discussed in the DEIS (pages 3-73 to 3-74). In order to influence flooding in a watershed the size of the Greenbrier River, harvesting on NFS lands would have to be at a scale that would not occur given other resource concerns and management objectives. Potential effects are more likely to occur in smaller, localized areas, such as subwatersheds and headwater streams. These potential effects are better addressed during project-level analysis based on site-specific conditions and the magnitude and scope of the project.
Terrestrial Ecosystem Diversity (Coarse Filter)	
PC 906	The Forest should acknowledge that passive spruce restoration is preferable to active restoration and that Alternative 3 provides for the most passive restoration.
Response:	The discussion of spruce forest in the Terrestrial Ecosystem Diversity section of EIS Chapter 3 has been updated to include a better discussion of passive spruce restoration. A mixture of active and passive spruce restoration is expected to occur in MP 4.1, and both forms of restoration are intended to develop multi-aged, late successional conditions over time (see MP 4.1 Management Emphasis and Desired Conditions in the revised Forest Plan). For example, while spruce seedlings are abundant under northern hardwood canopies in many places, even a shade-tolerant species like spruce needs to be released so it can reach the canopy. Such release can occur through natural disturbances, but spruce

	restoration may be achieved sooner and more consistently through active release. Management direction for active spruce restoration in MP 4.1 focuses on thinning and other treatments that enhance multi-aged ecosystem structure, and complete overstory removal is to be avoided (see Goal 4103 and Guideline 4120 in the Proposed Revised Forest Plan).
PC 718	The Forest should discuss the historic reduction of white pine from the Greenbrier Valley east of the Greenbrier River and south of Frost.
Response:	The Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS has been modified to address this comment.
PC 916	The Forest should acknowledge that ericaceous shrub lands occurred during presettlement times on page 3-109 of the DEIS.
Response:	We have changed the text in this section of the EIS to reflect the difference of opinion in the historical accounts.
PC 561	The Forest should clarify its statement regarding the lack of effect of surface occupancy in Minimum Dynamic Areas.
Response:	The passage cited in the DEIS refers back to the paragraph at the top of page 3-118, which explains the typical amount of habitat alteration associated with natural gas development surface occupancy. The paragraph explains that at a maximum well density of one per 640 acres, long-term habitat alteration would amount to only 4 acres per 640 acres (less than 1 percent of the landscape). As explained on page 3-119, this amount of habitat alteration is not substantial when considered at the landscape scale of MDA reserves.
PC 547	The Forest should consider the surrounding landscape when analyzing forest habitat.
Response:	The cumulative effects analysis in the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS considered all land within the Forest boundary, including National Forest land, private land, state land, and other federal land. See the Background section and the Cumulative Effects section.
Terrestrial Species Viability (Fine Filter)	
PC 844	The Forest should provide additional details regarding its terrestrial species viability analysis.
PC 844a	INCLUDING DESCRIBING THE SCREENING PROCESS USED TO NARROW DOWN THE INITIAL SPECIES LIST
Response:	The process is described on pages 3-167 through 3-168 of the DEIS. The 451 species that were screened have not been compiled into a single list. The data sources that were used in the screening are contained in the project record.
PC 844b	INCLUDING SOLICITING A LIST OF ALL SPECIES ON THE FOREST FROM CONSERVATION AGENCIES AND ORGANIZATIONS
Response:	A comprehensive list of all species that occur on the Forest does not exist. If the cited groups had such a list, we would have used it.
PC 875	The Forest should divide Figure SV-1 on page 3-173 in two, so that there is a graph for each outcome with it's percentage against the total.
Response:	The D and E outcomes both indicate a fairly high degree of viability risk. Combining them for the display is a convenient way to show the proportion of evaluated species in each habitat with high viability risk.
PC 917	The Forest should modify habitat descriptions for some of the plants included in the Terrestrial Species Viability evaluation, including <i>Gymnocarpium appalachianum</i> (Appalachian oak fern), <i>Hexalectris spicata</i> (crested coral root), <i>Hypericum mitchellianum</i> (Blue Ridge Saint John's-wort), <i>Isotria medeoloides</i> (small whorled pogonia), <i>Juglans cinerea</i> (butternut), and <i>Paxistima canbyi</i> (Canby's mountain-lover).
Response:	We have modified these habitat descriptions in the FEIS.
MIS and Other Species of Interest	
PC 895	The Forest should explain why the current acreage is not the same for all alternatives shown in Figure MIS-4 on page 3-218.
Response:	The current acreage of likely active spruce restoration areas varies by alternative depending on the amount of land allocated to MP 4.1.
Threatened and Endangered Species	
PC 214	The Forest should explain why the time frame for determining the effects on Threatened and

	Endangered species is five to ten years, because the end result of this time frame seems to be a passive management system that prevents a proper inventory and assessment of Threatened and Endangered species.
Response:	This language in the EIS has been modified to better reflect the potential long-term effects of the Forest Plan. Regardless of the timeframe for determining effects, we will continue to inventory for threatened and endangered species and assess effects to them at the project level.
PC 845	The Forest should provide a map of the ecological sections mentioned on page 3-226 of the DEIS.
Response:	We have a map of these areas in the project record that is available on request. We did not feel that the map is critical to the analysis or needed in the EIS.
PC 890	The Forest should list Cave Hollow on page 3-230 of the DEIS as Cave Hollow/ Arbogast, as these two caves are connected and form a cave system.
Response:	We have made this change in the FEIS.
Vegetation Management	
PC 903	The Forest should change the age range for early seral habitat to 0-10 years.
Response:	The structural classes used for age class diversity need to be kept to a manageable number for analysis purposes. While there are noticeable differences between 11-19 year old stands versus 0-10 year old stands, 11-19 year old stands are more structurally similar to 0-10 year old stands than they are to stands in the next older structural class (early-mid successional, 20-39 years old).
PC 918	The Forest should clarify on page 3-288 that winters with temperatures as cold as 1993-1994 are probably far too rare to have any meaningful impact on the spread and abundance of the hemlock woolly adelgid, especially at lower elevations.
Response:	We agree that this type of severe weather is not common at lower elevations in this area. This statement was merely meant to show that severe cold weather does have an effect on HWA. It does not imply that this type of weather occurs in this area on a regular basis. Although severe cold weather may control this pest, the statement does not imply that the pest is eradicated nor that hemlock mortality will not occur. More recent information indicates that when temperatures fall below -5 degrees Fahrenheit, mortality of HWA exceeds 90% (USDA Forest Service NA-TP-03-04, 2004). Again this does not imply that all hemlock trees will recover or survive if winter temperatures consistently, on an annual basis, are -5 degrees F or lower. Neither does it imply that we should rely on severe cold weather for HWA control. Other factors may be involved that are causing additional stress on trees when HWA are present or some hemlock trees may be more susceptible to mortality from HWA than other hemlock trees. At this time there does not appear to be any resistant eastern or Carolina hemlocks to this pest, but some trees may succumb more rapidly than others. Biological controls also have not yet proven to reduce hemlock mortality in the eastern U.S. The only effective method known so far is chemical control but this can be extremely costly or impractical and treatments must occur on a regular basis.
PC 994	The Forest should clarify the statements on page 3-291, first full paragraph, about prescribed burns. It sounds like you have only done 306 acres in the past seven years, 85 in 1998, and 221 in 2003. Is that right?
Response:	No, there were a total of 306 acres in those two years. There were close to 860 acres of prescribed fire use on the Forest in the period from 1998 to 2003. Information of wildfires during that period is found on page 3-290. The point of the discussion on page 3-291 is our use of prescribed fire as a vegetation management tool. With the Revised Forest Plan, the Forest is making a concerted effort to re-introduce this disturbance element to suitable areas. There is more support for the application of prescribed fire now than there was even 7 years ago.
Timber Supply	
PC 654	The Forest should provide an accurate description of the timber supply area and contributions of the Forest and the industry in general to the local economy.
Response:	The analysis area for Timber Supply addresses the volume of timber that would be produced on the Forest. The economic contributions of timber production are addressed in the Social and Economic Environment section of the EIS. We have expanded our description of the analysis area for the Social and Economic Environment section in the Final EIS.
PC 654a	BECAUSE NOT ALL OF THE TIMBER HARVESTED WILL BE PROCESSED WITHIN THE TEN-COUNTY FOREST REGION
Response:	See response to PC 654, above, and see the Social and Economic Environment section of the EIS for

	information about where timber produced on the Forest is processed.
PC 654b	INCLUDING PLACING THE QUANTITY OF RED MAPLE AND ALL OAK SPECIES ON THE FOREST IN CONTEXT WITH ALL OF THE RED MAPLE AND OAK SPECIES ON ALL WEST VIRGINIA TIMBERLANDS
Response:	We have added a statement in the Final EIS on the red maple and oak volume for West Virginia.
PC 654c	INCLUDING DISPLAYING THE ACREAGE OF ALL OTHER TIMBER LAND IN NON-NATIONAL FOREST OWNERSHIP IN WEST VIRGINIA
Response:	We have added a table in the Final EIS to show acreage of other timber lands in West Virginia.
PC 654d	INCLUDING PROVIDING CUT VOLUMES IN THE LOG DATA, SINCE IT IS THE ONLY VOLUME DEFINITION THAT PRODUCES ECONOMIC VALUE
Response:	We have displayed volume harvested in Table TR-4 in the Final EIS.
PC 654e	INCLUDING CORRECTING DOLLAR VALUE DATA FOR INFLATION
Response:	We have removed dollar value numbers in Table TR-4 in the Final EIS, as they were not particularly important to the harvest information we were displaying.
PC 654f	INCLUDING USING "DOLLAR VALUE PER MBF SOLD" RATHER THAN "VOLUME OFFERED" DIVIDED BY "TOTAL SALE VALUE"
Response:	We have removed dollar value numbers in Table TR-4 in the Final EIS, as they were not particularly important to the harvest information we were displaying.
Recreation and Wilderness	
PC 945	The Forest should add the 1983 law establishing the Cranberry and Laurel Forks Wilderness Areas, because it was omitted from Table RE-9 in the DEIS on page 3-375.
Response:	We have added this law in the FEIS. The omission was unintentional.
PC 452	The Forest should explicitly state that all bike use will be eliminated if an area is designated as wilderness.
Response:	Although the likelihood of eliminating bike use in designated Wilderness was addressed many times in Appendix C to the DEIS, we have included a similar statement in the FEIS, Chapter 3, Recreation and Wilderness section.
PC 952	The Forest should explain, in Table 2-42 on page 2-60, how the recreation headcount can be the same for these alternatives given the drastic differences in how the land is allocated in the MPs between the four alternatives.
PC 952a	BECAUSE THE DIFFERENCE IN HEADCOUNT IS CLEAR FOR TIMBER HARVEST, ALTERNATIVE 2 IS NATURALLY HIGHER THAN ALTERNATIVE 3 FOR EXAMPLE...SO I WOULD EXPECT, IN TURN, THAT ALTERNATIVE 3 WOULD HAVE A HIGHER HEADCOUNT FOR RECREATION...BUT IT DOESN'T
Response:	See response to PC 951. Increasing the amount of the Forest managed for backcountry recreation does not necessary lead to an overall increase in overall recreation use, in our estimation.
PC 952b	AND WHERE IS THE CATEGORY FOR THE HEADCOUNT FOR ACTIVE MANAGEMENT OF THE FOREST (VEGETATION, SPRUCE, OAK, ETC)...WHICH CATEGORY HAS THE HEADCOUNT TO ACTIVELY MANAGE THESE MPS THAT WERE PROPOSED?
Response:	Active vegetation management fell primarily into the "Timber Harvest" category.
PC 953	The Forest should explain why there is no "Primitive" ROS in Table RE-15 on page 3-384 of the EIS, because existing wilderness should be classified as "Primitive".
Response:	One of the criteria for Primitive Recreation in our Recreational Opportunity Mapping Guide requires these areas to be greater than 3 miles from an open road or development. There are no areas on the Forest that meet that criterion.
PC 955	The Forest should explain why the statements in Table RE-6 on ROS Class Setting Descriptions (DEIS, page 3-371) that relate to "vegetation alterations" were added, because no such criterion for ROS evaluation is found in the USDA Forest Service ROS Users Guide, table 1, page 6-8, so Table RE-6 should be replaced by table 1 of the ROS Users Guide, as we strongly object to this vegetation language, especially the qualifying phrase "to enhance forest health" found in the SPNM [semi private non motorized] section, which implies that there is a problem with of rest health in SPNM recreation areas.
Response:	The vegetation language in Table RE-6 of the DEIS was used to help readers understand what they

	might expect to see in various ROS settings relative to vegetation management activities. We agree that the language is not a criterion found in the ROS Users Guide, and we have removed the vegetation-related statements in the FEIS to help avoid that confusion, although the table was not meant to be simply a list of ROS criteria.
Scenic Environment	
PC 849	The Forest should provide a few significant and appropriate landmarks for Figure SE-1 on page 3-398, especially near the high integrity areas like the Scenic Highway.
Response:	The Scenery Management Map on page 3-398 is at a very small scale and is only trying to provide a broad conceptual view of the Forest's existing Scenic Integrity. This mapping will be reviewed and refined at the project-specific level.
PC 850	The Forest should use a stronger verb on page 3-406, paragraph 2, that starts, "However these effects might be..."
Response:	We have changed "might" to "would" in the FEIS.
Road Transportation System	
PC 965	The Forest should add "road closures" to the list of mitigation methods in the paragraph that describes Resource Protection Methods for the Scenic Environment on page 3-399 of the DEIS.
Response:	We agree that road closures can have the effect of mitigating impacts to scenery because the public are not be able to see them as easily; however, this is not a commonly used mitigation for scenic impacts, but rather a by-product of road closure mitigation for other reasons, such as wildlife disturbance.
PC 966	The Forest should consider that "The inability to provide an appropriate level of road maintenance..." (p. 3-413, second paragraph) may be a backdoor way to have less roads. You could also reclassify the maintenance level to the sustainable level that the road will receive.
Response:	Permanent road closure and maintenance level reclassification are options that we have considered and will continue to consider.
PC 967	The Forest should reconsider the full obliteration option for road decommissioning (see DEIS, p. 3-414, first paragraph) because full obliteration would create even more disturbed area and the benefit would be minimal with relatively high costs.
Response:	As noted in the first paragraph, full obliteration is just one of many options that we consider for road decommissioning, based on a number of factors. We agree that obliteration can be costly from both a short-term economic and environmental standpoint, but the long-term beneficial trade-off is that the land is returned to vegetative productivity, hydrologic function, and a natural appearance.
PC 968	The Forest should make information on which roads are open or closed to the public (see DEIS, p. 3-415 second paragraph) in an Appendix or at least on the your website.
Response:	An appendix would only capture a snapshot in time of open and closed roads on the Forest, as road access can change quickly and often. For now, the best sources for this information are the Ranger District Offices, as they have the most up-to-date knowledge of closures. We are working toward having this information available on our website on a map that would be updated annually.
PC 969	The Forest should break out the maintenance miles by type of road (arterial, collector, local) in Table RO-2 on page 3-417 of the DEIS.
Response:	We have noted in the FEIS that 82 percent of the open roads on the Forest were maintained during this time period. Open roads are generally arterial and collector roads.
PC 970	The Forest should list the bullets on page 3-417 of the DEIS in order of impact on maintenance.
Response:	The factors in this bulleted list can vary greatly from year to year and therefore have varying impacts on our ability to maintain roads. That is why we made this a bulleted list rather than a numbered list.
PC 973	The Forest should explain where the guidance is for the statement, "The Forest may create new roads and trails if needed for site level projects or respond to increased demand," as this is too broad of a statement on its own.
Response:	Guidance for road and trail construction can be found in the Revised Forest Plan, Chapter II, Roads and Facilities and Recreation Resources sections, and in the Recreation and Transportation Planning parts of the Management Prescription sections in Chapter III of the Revised Forest Plan.
PC 865	The Forest should change the word "usually" to "always" in the sentence on page 3-420 that begins, "Timber sale purchasers are usually..."
Response:	We used "usually" because there can be exceptions to the rule, such as for very small sales with no road

	work involved.
PC 866	The Forest should state that the 98,000 acres on page 3-426 of the DEIS should be at the top of the list to clearcut if they are available.
Response:	Harvest decisions would be based on many factors, including Management Prescription emphasis and direction, current and desired conditions, scenery constraints, etc.
PC 569	The Forest should consider that using total acreage to indicate the need for new roads distorts the comparison among alternatives.
Response:	In the EIS analysis, we used acres of projected timber harvest by alternative, and Table RO-3 should have been labeled “maximum” timber harvest, as acres were based on maximum modeled outputs. We have expanded the roads analysis in the FEIS. See the Road Transportation System section in Chapter 3 of the FEIS.
PC 573	The Forest should provide estimates of actual road/trail miles for each alternative.
PC 573a	BECAUSE THE DEIS SAYS THAT INCREASED LOGGING LEADS TO INCREASED ROADS BUT NO INCREASED ROAD LEVELS WERE GIVEN
Response:	The cumulative effects analysis of the Road Transportation System section in Chapter 3 of the DEIS describes why the actual miles of road related to timber harvest are impossible to precisely predict. Other unknown factors affecting road system levels are discussed as well. However, we have expanded the roads analysis in the FEIS to give a rough approximation of roads that may be required for harvest based on harvest area distance from existing roads. We do not consider these estimates accurate predictions but rather a basis for showing potential relative differences between alternatives. See the Road Transportation System section in Chapter 3 of the FEIS.
PC 573b	BECAUSE, GIVEN THE EXTENT OF ROAD MAINTENANCE NEEDS, IT IS DIFFICULT TO IMAGINE THAT ROAD CONSTRUCTION COSTS WILL SUPPORT A JUMP IN ACRES HARVESTED FROM 498 ACRES PER YEAR TO AN AVERAGE OF 4,000 TO 5,500 ACRES PER YEAR IN THE FIRST PLANNING CYCLE
Response:	Road maintenance funds and road construction funds come from two entirely different sources, so it is not accurate to imply that one depends on the other. Road construction funds for timber sales typically come from the timber sales; i.e., the road construction is essentially funded by a portion of the timber value. Also, acres harvested do not directly translate to road miles constructed because much of the road transportation system is already in place, and options available to reduce construction and associated construction and maintenance costs include harvesting by helicopter, using existing roads, and using temporary roads that are obliterated following harvest-related activities.
PC 573c	BECAUSE THE DEIS SAYS THAT THE PLAN CONTAINS DIRECTION TO DEFINE A “MINIMUM ROAD SYSTEM” YET THE DESIRED CONDITIONS IN THE PLAN MAKE NO MENTION OF THE NEED TO REDUCE THE FOREST’S ROAD NETWORK TO STAY WITHIN THE AVAILABLE MAINTENANCE BUDGET
Response:	<p>We did not base our Desired Conditions for roads on the available maintenance budget because budgets change over time. The Desired Conditions do include the statement, “Roads not needed for long-term objectives are decommissioned and stabilized” (Proposed Revised Plan, page II-50). In addition Goal RF02 on page II-50 says to:</p> <p>”Provide developed roads to the density and maintenance level needed to meet resource and use objectives. During watershed or project-level planning:</p> <ol style="list-style-type: none"> Update inventory of area transportation system. Determine the minimum transportation system necessary to achieve access management objectives. Incorporate cost efficiency into construction, reconstruction and maintenance needs. Identify roads to decommission, obliterate, replace, or improve that are causing resource damage. Integrate needs for off-road parking.” <p>We have added a Forest-wide objective for road decommissioning in the Final Revised Plan. Guidelines RF08 and RF09 in the Proposed Revised Plan further describe how decommissioning opportunities should be identified and prioritized. We believe that all of this direction clearly indicates the Forest’s intent to reduce the road system where and when it is appropriate to do so, as opposed to basing reduction on a maintenance budget level that changes from year to year, or road densities that can vary widely from area to area depending on access needs.</p>

PC 573d	BECAUSE STANDARDS AND GUIDELINES DO NOT INCLUDE ROAD BUDGET LIMITATIONS AS A FACTOR IN DECISIONS TO CONSTRUCT NEW ROADS OR DECOMMISSION EXISTING ROADS
Response:	We do not believe it is appropriate to base road construction standards and guidelines on a maintenance budget level that changes over time and has little to do with whether roads can be constructed or not. Instead we have provided specific standards and guidelines that directly address road construction, decommissioning, and maintenance.
PC 573e	BECAUSE IF TRANSPORTATION SYSTEM DECISIONS ARE MADE ONLY AT THE PROJECT LEVEL, ABANDONED ROADS THAT ARE THE BEST CANDIDATES FOR DECOMMISSIONING WILL NEVER BE ADDRESSED
Response:	Guideline RF09 in the Proposed Revised Plan describes how road decommissioning opportunities should be identified and prioritized at the watershed or project levels. This guidance would apply to all roads in a given area, including abandoned roads. However, abandoned roads may not necessarily be the highest priority for decommissioning based on the guideline's criteria or impacts that are occurring.
PC 573f	BECAUSE THE PLAN NEEDS TO CLEARLY STATE THAT TRANSPORTATION ANALYSIS AT THE PROJECT LEVEL MUST COMPLY WITH A FOREST-WIDE MANDATE TO REDUCE THE OVERALL SIZE OF THE ROAD SYSTEM
Response:	All project-related activities, including planning and analysis, should tier to or follow Forest Plan direction. We believe that the cumulative direction in the Roads and Facilities section of the Revised Plan (and links to other resource direction) will lead to an effective and efficient transportation system that will provide for public and agency access needs while reducing impacts to other Forest resources.
Social and Economic Environment	
PC 989	The Forest should break down Table 2-42 on page 2-60 of the DEIS by county.
Response:	The model we used does not have the capability of breaking this information out by county in any meaningful or accurate way.
PC 990a	INCLUDING BREAKING DOWN "OTHER FOREST SERVICE EXPENDITURES" FURTHER BECAUSE IF "LIVESTOCK GRAZING" CAN BE LISTED SEPARATELY WITH JUST 6 JOBS THEN FURTHER DEFINITION CAN BE GIVEN TO THIS CLASSIFICATION
Response:	The "Other Forest Service Expenditures" are too numerous to mention here but include supplies, contractors, rent, maintenance, and many other expenses. As seen in the table, they are not expected to vary by alternative. The jobs related to livestock grazing, on the other hand, were included to show how little overall impact this source has to the local economy.
PC 990	The Forest should expand Tables 2-43, 2-44 and 2-45 on pages 2-61 and 2-62 of the DEIS to project employment and incomes for +20 and +50 years in the future.
Response:	We considered that option but felt that it was not appropriate to project economic changes beyond the planning period due to the increasing level of uncertainty that would factor into the projections over time.
PC 991	The Forest should explain whether the figures in Table 2-46 on page 2-63 of the DEIS are in thousands of dollars.
Response:	No, they are in dollars. Wherever we have displayed figures in "thousands of dollars" we have said so in the table or the table title.
PC 863	The Forest should explain how the income in Table 2-44 (page 2-61 of the EIS) is going to be attained when the Forest has not been producing the ASQ on which this income is dependent.
Response:	Table 2-44 shows a comparison of Forest Service linked income by alternative that could come from multiple sources, one of which is timber harvest. The harvest-related figures are based on achieving maximum outputs. As the DEIS states on page 3-453, the numbers in the "Current" column are more representative of what the Forest has produced over the last 10 years. The discrepancy between the last 10-year production period and maximum projected outputs can be related to many factors, including appeals, litigation, budget, changes in law or policy, Forest priorities, and project-level decisions. Only time will tell how these factors may affect the projected outputs in this forest plan revision.
PC 232	The Forest should expand on the subject of "lifestyles and social organization", because as resource related employment is lost, the personal ties to the land fade.
Response:	We do not doubt that some people who work on the land have close ties to the land, but we do not feel it is appropriate for us to speculate how people feel toward the land based on their type of employment.

	We have no data to support such conclusions.
PC 624	The Forest should revise its economic analysis approach.
PC 624a	TO FULLY DEFINE THE “CURRENT CONDITION” AND USE THAT SITUATION AS THE BASELINE FOR PURPOSES OF COMPARISON WITH THE ALTERNATIVES FOR TIMBER HARVEST
Response:	The DEIS on page 3-454 does not say that Alternative 1 should be used as the baseline comparison for purposes of comparison, as cited in the comments. Table SO-15 merely provides the type of comparison that has been used by many other Forest-level analyses. We chose to use average outputs over the past 10 years as our baseline or current condition comparison, as seen in Tables S0-11 through SO-14. These tables have been updated for the FEIS.
PC 624b	TO USE THE TOTAL LABOR ECONOMY OF THE ECONOMIC INFLUENCE ZONE TO EVALUATE EFFECTS OF ALTERNATIVES, BECAUSE INCLUDING ONLY LABOR INCOME IN BASELINE INCOME DATA UNDERESTIMATES THE IMPORTANCE OF RECREATION-BASED INCOME AND DOES NOT TAKE INTO ACCOUNT THE ECONOMIC IMPORTANCE OF RECREATION, TOURISM, AND WILDERNESS
Response:	We have included information on total full-time and part-time employment in the FEIS. We do not necessarily agree with the premise that these numbers or total personal income somehow better reflect the economic importance of recreation, tourism, and wilderness. Large portions of the personal income inputs, for example, may have little or nothing to do with recreation, tourism, or wilderness. These numbers do, however, support our contention in the DEIS that Forest-linked contributions “are fairly minor when compared to the overall area employment and income” (page 3-460).
PC 624c	TO PROVIDE A MORE REALISTIC ESTIMATE OF TIMBER-RELATED JOBS AND INCOME BECAUSE TIMBER-RELATED IMPACTS ARE OVERESTIMATED
Response:	The value of pulpwood processed outside of the 10-county area, and the processing itself, are not factored into the employment and income figures given for the 10-county area of influence. Although pulpwood may constitute up to 20 percent of timber harvested in a given year, it only comprises 1 or 2 percent of overall timber value.
PC 621	The Forest should disclose all the information used in the economic analysis.
Response:	We believe we have disclosed an appropriate amount of information in the EIS economic analysis. Additional information is available in the project record for plan revision.
PC 621a	TO ALLOW THE DRAFT EIS TO ACCURATELY DESCRIBE THE AFFECTED ENVIRONMENT AND CUMULATIVE IMPACTS
Response:	The affected environment and cumulative effects have been expanded somewhat for the FEIS.
PC 621b	INCLUDING PROVIDING CORRECT ECONOMIC DATA REGARDING THE “CURRENT CONDITION” OF BARBOUR, GRANT, GREENBRIER, NICHOLAS, PENDLETON, POCAHONTAS, PRESTON, RANDOLPH, TUCKER, AND WEBSTER COUNTIES
Response:	We have updated information on these counties and their current condition for the FEIS.
PC 621c	BECAUSE THE ECONOMIC ANALYSIS APPEARS TO BE SKEWED TO FAVOR TIMBER HARVEST
Response:	We recognize that the alternative timber-linked projections are based on maximum potential timber production. We also displayed current baseline projections for comparison. We explained this situation in the DEIS (page 3-453). We also clearly stated in the DEIS (e.g., page 3-2) that, “The modeling and analysis conducted for this EIS are intended and designed to indicate relative differences between the alternatives, rather than to predict absolute amounts of activities, outputs, or effects.” The economic impact analysis applied the same assumptions and modeling methodologies to all alternatives to compare relative differences. We have no intent to favor one activity or output over another.
PC 621d	INCLUDING CLARIFYING WHETHER THE ESTIMATES FOR TOURISM-RELATED SECTORS ADEQUATELY REFLECT THE IMPACT OF THE CONSTRUCTION OF CORRIDOR H
Response:	There are many factors outside of the Forest’s influence that are not necessarily captured in the economic impact analysis. Although we have deduced that tourism will likely increase in the 10-county area as a result of the Corridor H completion, we cannot accurately predict how much that increase would be or whether it would be directly associated with Forest levels of backcountry recreation opportunities or timber harvest.
PC 621e	INCLUDING PROVIDING A COMPLETE AND ACCURATE EFFICIENCY ANALYSIS

Response:	We believe our analysis is accurate and complete, given the information and parameters we are using.
PC 621f	TO PROVIDE A MORE COMPREHENSIVE COMPARISON OF ALTERNATIVES THAT INCORPORATES THE MANY NON-CASH VALUES THAT ARE IMPORTANT TO THE PUBLIC
Response:	We have based the economic impact analysis primarily on economic values. Social and amenity values are discussed in the social-based analyses, but we do not have the level of detailed information to be as comprehensive. We are also not as comfortable trying to describe how people should feel about a given alternative, or how it may affect their lives. Instead, we try to highlight some of the more important social implications of Forest management and estimate how they might differ by alternative, recognizing that there are always going to be differences in value perception.
PC 621g	INCLUDING CLARIFYING WHAT IS INCLUDED IN THE CATEGORY OF “ASSIGNED VALUES” AND WHAT DOLLAR AMOUNTS ARE ATTRIBUTABLE TO EACH SUB-CATEGORY
Response:	That information is included as appropriate in the project record for plan revision.
PC 621h	INCLUDING THE ACTUAL INCREASES IN FULL-TIME AND PART-TIME EMPLOYMENT FOR BOTH THE TEN FOREST COUNTIES OF INTEREST AND STATE OF WEST VIRGINIA FOR THE TIME PERIOD OF INTEREST
Response:	We have provided that information for the 10-county area in the FEIS.
PC 621i	TO PROVIDE AN IMPORTANT REGIONAL, STATE AND NATIONAL CONTEXT FOR FOREST PLAN DECISION IMPACTS THAT CLEARLY SHOWS THE FOREST IMPACTS ARE SMALL COMPARED TO THE OVERALL SIZE OF THE ECONOMY AND ITS GROWTH OVER TIME
Response:	We agree that the Forest impacts are small compared to the overall size of the economy, and we have said as much in both the DEIS and FEIS.
PC 621j	INCLUDING PROVIDING DOCUMENTATION SUPPORTING THE CLAIM THAT RECREATION-LINKED EMPLOYMENT IS HIGHEST UNDER ALTERNATIVE 4 AND LOWEST UNDER ALTERNATIVE 3
Response:	Our analysis is based on assumptions, inputs, and methodologies that are included in the project record and summarized in the EIS. Your inference that Alternative 3 should have more recreation-linked employment than Alternative 4 is likely based on your own assumptions and inputs, which do not necessarily match ours.
PC 622	The Forest should separate out the direct effects of Forest management on employment to clearly estimate the impact of the Forest Plan on employment within West Virginia.
Response:	We do not believe that the Forest Plan has direct effects on employment in West Virginia, as the Plan only sets the stage for various activities and uses, it does not authorize or implement them. In that sense, virtually all of the potential impacts from Forest Plan revision can be looked at as indirect or induced.
PC 659	The Forest should revise the DEIS to place predicted Forest-related timber industry jobs in the context of overall Forest industry trends, both statewide and for the ten-county area because timber industry jobs may decrease rather than increase.
Response:	As noted in the response to PC 623b, information on local and state economics has been added to the FEIS.
PC 657	The Forest should acknowledge that the local economies are not as dependent upon timber, minerals, and range outputs of Forest lands as the DEIS states on page 3-450 because grazing is estimated to have tiny economic effects.
Response:	We did not mean to imply that local economies were highly dependent on any resource outputs in the statement cited on page 3-450 of the DEIS. The contributions from various industry sectors of the economy are clearly indicated in other parts of the economic analysis. We were trying to convey that outputs from timber, recreation, minerals, and grazing contribute to local economies to varying degrees. We have changed this statement in the FEIS to reflect contribution rather than dependency.
PC 656	The Forest should acknowledge that none of the pulp wood contained in the allowable sale quantity will be processed within the ten-county region.
Response:	We acknowledge that there are no pulp and paper industry mills currently in the economic impact area. No employment and income in the DEIS economic analysis were directly associated with those mills. However, the pulpwood logging activities that take place on National Forest land are included in the analysis, and they do result in economic effects to employment and income.
PC 658	The Forest must provide actual inputs to the Implementation Plan in the Draft EIS, and must

	base the inputs on realistic projections of likely future Forest outputs.
Response:	Detailed model inputs are not appropriate for the EIS. The NEPA requires the disclosure of effects in an EIS, rather than every modeling detail that was used to arrive at the effects and conclusions. Inputs are included in the project record for plan revision, and are available upon request.
PC 658a	INCLUDING MAKING IT CLEAR THAT ANY SIGNIFICANT EMPLOYMENT RESPONSE BY INCREASED CUTTING ON THE FOREST MAY TAKE PLACE ONLY WHERE LOGS ARE PROCESSED
Response:	Employment and income related to timber management activities on the Forest are analyzed for the 10-county area of influence that includes the Forest (see Social and Economic Environment in Chapter 3 of the EIS). The reference cited on page 3-325 in the Timber section of the DEIS acknowledges that much of the pulpwood harvested on the Forest is processed outside of the 10-county area. However, the IMPLAN model used to calculate employment and income does not recognize this pulpwood as being processed within the 10-county area because there are no processing mills in that area. The pulpwood was not factored into any of the mill processing employment or income in the 10-county area, and therefore, the jobs and income from this portion of timber-linked effects was not over-estimated as the comments suggest.
PC 623	The Forest should improve its social and economic analyses regarding the effects the agency has on local economies and the people using the natural resources.
Response:	See the Social and Economic Environment section in Chapter 3 of the FEIS to see changes made based on public comments.
PC 623a	INCLUDING FULLY EVALUATING AND PROVIDING THE BEST ESTIMATE OF THE IMPACTS OF THE “CURRENT CONDITION” AND THE “FOREST PLAN DECISION”, BOTH TO THE TEN-COUNTY REGION AND STATE OF WEST VIRGINIA, AS MEASURED BY CHANGES IN “TOTAL FULL-TIME AND PART-TIME EMPLOYMENT” AND “TOTAL PERSONAL INCOME”
Response:	We have added total full-time and part-time employment figures in the county profiles in Chapter 3 of the FEIS. We have also provided 10-county region and West Virginia summaries for context.
PC 623b	INCLUDING EVALUATING AND DISPLAYING CHANGES IN LOCAL AND STATE ECONOMIES THAT HAVE OCCURRED IN THE PAST AND ARE BEING PROJECTED INTO THE FUTURE
Response:	Additional information on local and state economics has been provided in the economic analysis in Chapter 3 of the FEIS.
PC 623c	INCLUDING DEFINING ITS AREA OF INFLUENCE BY ALL COUNTIES AFFECTED BY NATIONAL FOREST INPUTS AND OUTPUTS
Response:	The Scope of the Analysis described on page 3-428 of the DEIS defines the area of influence used in the analysis. We have expanded this discussion for the FEIS. We focused on the 10-county area because this is the area that is most influenced by Forest management activities, revenues, and settings. For indicators like Federal Payments to Counties, the 10 counties are the only area influenced by MNF revenues. For other indicators, we have tried to provide a state context where appropriate, but the state economics are not significantly affected by the Forest-linked economics and therefore we see no reason to expand our detailed analyses to cover all counties or the state. The value of the pulpwood processed outside of the 10-county area, and the processing itself, are not factored into the employment and income figures given for the area of influence. Although pulpwood may constitute up to 20 percent of timber harvested in a given year, it only comprises only 1 percent of overall timber value.
PC 992	The Forest should show how the market and non-market values for NPV [Net Present Value] were derived in Table SO-18 of page 3-457 of the DEIS.
Response:	We have generally explained the types of values that were used for the NPV analysis and given some examples in the EIS. The entire list of NPV values are derived from a complex mix of local Forest-derived costs, agency directive appraisal prices, and national RPA market and non-market values. This type of detailed supporting documentation is more appropriately located in the project record, but is available upon request.
PC 993	The Forest should revise Tables SO-11, SO-12, SO-13, and SO-14 to show the more recent and optimistic economic data on tourism that are now available.
Response:	We have updated some of the general information on recreation and tourism for the FEIS in the

	Recreation and Wilderness section of Chapter 3. However, there is no single tourism industry figure that we can use in the context of these tables. We have, though, increased the predicted rate of use for recreation in these tables, which has resulted in an increase in recreation-related outputs relative to the current condition.
PC 993a	BECAUSE TOURISM AND RECREATION IS ONE OF THE FASTEST GROWING ECONOMIC SECTORS IN WEST VIRGINIA AND NATIONWIDE, AND A NEW WV DIVISION OF TOURISM STUDY INDICATES THAT TRAVEL SPENDING INCREASED BY 11.4% PER YEAR IN THE PERIOD 2000-2004 IN THE STATE
Response:	We agree that tourism has increased substantially in West Virginia over the last decade, and that it provides a valuable source of income to the State.
PC 993b	BECAUSE DURING 2004, VISITOR SPENDING SUPPORTED MORE THAN 40,000 JOBS WITH EARNINGS OF \$766 MILLION, AND LOCAL AND STATE TAX REVENUES GENERATED BY TRAVEL SPENDING WERE \$536 MILLION
Response:	We agree that tourism generates important revenue to the State. However, tourism-related jobs are generally not the most lucrative the State has to offer. The 40,000 jobs with earnings of \$766 million that are cited in the comment only break down to about \$19,000 a year for each job, which is below the poverty level for most families, and well below the median family income for the 10-county region, which is one of the lowest in the country. It would be interesting to see a study that tracks whether all the new tourism-related jobs are in addition to current jobs and income, or are replacing higher paying jobs that were in other industry sectors.
PC 993c	BECAUSE OVER THE LONG TERM, LOCAL BUSINESSES AND COMMUNITIES CAN CONTINUE TO BENEFIT FROM THE PROTECTION OF THE SCENIC AND RECREATIONAL OPPORTUNITIES THAT THE FOREST PROVIDES
Response:	We agree that Forest recreational opportunities and scenery can benefit local businesses and communities.
PC 993d	BECAUSE ALTERNATIVE 3, WHICH PROVIDES GREATER RECREATION OPPORTUNITIES, SHOULD BE SHOWN AS SUPPORTING INCREASED FOREST-LINKED EMPLOYMENT AND INCOME
Response:	We associate recreation opportunities with the entire Forest, not just those portions with a backcountry emphasis. Also, scenery is not predicted to change significantly by alternative. Therefore, we cannot assume that Alternative 3 would automatically produce more forest-linked employment and income over time based on its backcountry recreation use emphasis. However, we have increased the overall influence of recreation in the FEIS economic analysis by increasing the predicted rate of recreation use.
PC 996	The Forest should let the \$38,000 that Livestock Grazing represents set the minimum significant figure that should be broken out in Other Forest Service Expenditures in the economic impact analysis (Tables SO-11 and SO-13).
Response:	The source categories for Table SO-13 in the DEIS are already built into the model used to calculate change in Forest Service linked income by alternative. We do not have the latitude to break them out into finer segments.
Resource Commitments	
PC 1007	The Forest should let the public know that plan revision had an unavoidable adverse effect on the internal resources and consultants used in the revision process (see page 3-463).
Response:	We agree that plan revision had an impact on the people who worked on it, both directly and indirectly related to other work they might have done, but that does not alter the fact that plan revision does not by itself produce unavoidable adverse effects to the environment.

ENVIRONMENTAL IMPACT STATEMENT APPENDICES	
Appendix C	
PC 883	The Forest should clarify that the wildlife openings in the Big Draft IRA are actually outside of the area, on the other side on CO 36/1 Road, on the lower slopes of Coles Mountain.
Response:	We agree. This portion was excluded from the IRA prior to the DEIS to omit County Road 36/1, but we missed deleting the wildlife areas in the wilderness evaluation. This correction has been made in Appendix C to the FEIS.
PC 948	The Forest should correct its page C-11 reference to an enclosure under Criteria 2 for Big Draft, because our understanding is that this enclosure is not in the roadless area.
Response:	We have deleted this reference in the FEIS Appendix C description of the Big Draft area.
PC 1008	The Forest should change “Spice Run” to “Big Draft” on page C-38 of Appendix C to the DEIS.
Response:	We have corrected this error in Appendix C to the FEIS.
PC 719	The Forest should provide information on mineral development activities in the Big Draft area and support wilderness designation for the area for the following reasons: <ul style="list-style-type: none"> • To promote the local tourism economy • Because of the solitude it provides • To provide recreational opportunities • Because it is of sufficient size and has clear boundaries • To protect scenic resources • Because mountain biking is not popular in the area • To protect rare and threatened plant species • Because the existence of wildlife openings should not prevent wilderness designation • Because fire management would not be hindered.
Response:	As stated in Appendix C to the DEIS, page C-38, “There are no active private or federal gas leases or coal operations within the area”. The Forest completed a Roadless Area Inventory and Wilderness Evaluations consistent with the planning regulations. Based on the wilderness evaluations in Appendix C and the Responsible Official’s discretion, different amounts of areas were recommended for Wilderness in the range of alternatives considered in detail. The Big Draft area was recommended for Wilderness and given an MP 5.1 in Alternative 3. Under Alternatives 1 and 2, Big Draft would remain primarily in MP 6.2, which would provide similar management direction for resource protection as MP 5.1. MP 6.2 would also maintain the undeveloped character and backcountry recreation opportunities of the area. The Record of Decision identifies the areas the Responsible Official has chosen to recommend, and provides the rationale for the recommendations.