Section 5: Recreation Management

RECREATIONAL AND GENERAL ACCESS	
PC 577	**The Forest should maintain trails for motorized use, including four-wheel drive recreational trails.**
Response:	Public motorized vehicle use is permitted on roads and trails designated open for use. Off road use is not permitted (Standard FR16, Proposed Revised Plan, page II-52).
PC 580	**The Forest should consider user conflicts created by timber management on the Huckleberry Trail from Spruce Knob because timber cuts create obstacles along the trail and destroy scenic diversity.**
Response:	Forest-wide Standards RC28, RC29 and Guideline RC31 provide protection to trails from harvest-related activities (Proposed Revised Plan, page II-30). However, the last timber harvest on or adjacent to the Huckleberry Trail occurred 30+ years ago when the land was privately owned. Road construction, including tree harvest did occur on Forest Road 274. There may also be storm damage on the access trail from that road to the Huckleberry Trail.
PC 582	**The Forest should create a foot trail from the Dolly Sods to Forest Road 103 to provide recreational opportunities.**
Response:	The Proposed Revised Plan would allow construction of foot trails on the Forest in this area. However, the trail you suggest would cross private property where the Forest has no jurisdiction. This proposal is beyond the scope of this revision and would be more appropriately addressed at project-level planning.
PC 574	**The Forest should protect the Allegheny Trail.**
Response:	Although we are not addressing specific trails in plan revision, Forest-wide Standards RC28, RC29 and Guideline RC31 provide protection from harvest-related activities (see Proposed Revised Plan, p. II-30).
PC 251	**The Forest should continue to allow the public to use and enjoy Federal lands, including allowing motorized access within the Forest.**
Response:	We are not changing the current status of public motorized access in plan revision.
PC 44	**The Forest should consider the negative effects of increased public access to the Forest, including: increased trash on the highways, increased drug traffic, increased forest fires, and increased degradation of the Forest by people moving to the Forest area and developing there.**
Response:	We agree that there can be negative effects associated with increased visitation, but we are not changing the current status of public access in plan revision, so plan revision should not influence those effects.
PC 45	**The Forest should limit public access to the Forest, including restricting motorized traffic as much as possible, because the vast majority of the general public are ignorant on the proper use of unspoiled lands.**
Response:	We are not proposing to change the current status of public motorized access in plan revision. Decisions to open or close roads/trails to various public uses will be made at the project or district level, based on site-specific information, public involvement, and Forest Plan guidance.
PC 247	**The Forest should increase public access to the Forest, including:** • **Keeping trails open for mountain biking and other uses** • **Providing more parking lots and access points to trails and ancient logging roads** • **Opening more roads** • **Allowing hunters to reduce deer impacts** • **Expansion recreation locations.**
Response:	We are not changing the current status of public access in plan revision. Additional trailheads and recreation facilities can be added when there is an identified need. Open roads for hunting are coordinated through the West Virginia Division of Natural Resources.
PC 371	**The Forest should provide information regarding recreation access, including:** • **Information regarding trailer parking and access** • **Information regarding trail marking, repair, and access** • **Information regarding equine access to wilderness and roadless areas.**
Response:	Specific information regarding trailer parking, trail marking, accessibility, and equine use is beyond the scope of this revision. Information is currently provided by the Ranger District Offices, who have a

	more detailed and current knowledge of trail facilities, conditions, and appropriate uses.
PC 245	**The Forest should post signs and patrol for trespassers on Forest land that the public is prohibited from accessing.**
Response:	The Forest belongs to the people of the United States, and the public is allowed access. However, the particular forms of access may be controlled based on management direction or Management Prescription emphasis. Law enforcement and Forest Protection Officers monitor and respond to illegal forms of access.
PC 964	**The Forest should have addressed travel management during forest plan revision because there are localized issues that have common threads and these need [to be] addressed in this plan.**
Response:	See the explanation on page 2-4 of the DEIS as to why travel management was not addressed in detail in the revision process. For general direction related to travel management, see Forest-wide direction for Roads and Facilities in Chapter II of the Proposed Revised Plan and Management Prescription direction for Transportation System Planning/Operations in Chapter III of the Proposed Revised Plan.

RECREATIONAL USES AND SETTINGS	
PC 667	**The Forest should consider using recreation user fees in backcountry areas if it would increase protection for the Forest.**
Response:	Although setting recreation user fees is beyond the scope of this revision, and we do not consider them necessary for resource protection at this time, it is possible that we could consider or implement them sometime in the future. Thank you for your support.
PC 655	**The Forest should provide an accurate description of recreational visits to the Forest and their impact on local economies.**
Response:	Recreational visits and their impact on local economies are assessed in the Social and Economic Environment section of Chapter 3 in the EIS.
PC 655a	BECAUSE THE DRAFT EIS UNDERESTIMATES THE IMPORTANCE OF BACKCOUNTRY RECREATION ON FOREST
Response:	The NVUM survey, conducted from October 1, 2002 to September 30, 2003, estimated that the Forest received about 1.3 million visits, with only 3% of users visiting Congressionally designated Wilderness. Cordell, as noted in the comments, predicted that the average annual increase in Wilderness recreation would be 2.5% over the next 25 years; however, Wildernesses are typically the most popular of all backcountry recreation areas. Given these types of numbers, we do not believe that we have necessarily underestimated the importance or use of backcountry recreation on the Forest. The commenter states that, "In the South (which does not technically include West Virginia, but does include Virginia), topping the list of most popular recreation activities are walking for pleasure, attending family gatherings, visiting nature centers, sightseeing, driving for pleasure, picnicking, viewing or photographing natural scenery, and visiting historic sites - activities that require little specialized skill or equipment." However, not one of these activities requires a backcountry recreation area, and many of them typically do not occur in backcountry recreation areas.
PC 655b	BECAUSE RECREATION-RELATED JOBS OUTNUMBER LOGGING-RELATED JOBS IN WEST VIRGINIA
Response:	While recreation-related jobs may outnumber logging jobs in West Virginia, but that was not the scope or focus of our analysis in the DEIS. We looked at the number of Forest-linked jobs in various sectors of the local economy within the 10-county impact area. For those sectors, the latest figures we had (Table SO-19 on p. 3-459), indicated that total Forest-linked jobs in Agriculture, Forestry, and Mining were about 1,500 more than those from Entertainment, Recreation, Food and Lodging in the 10-county area.
PC 490	**The Forest should use the same description of Recreation Opportunity Spectrum in the Draft EIS as is used in the U.S. Department of Agriculture Forest Service Recreation Opportunity Spectrum Guide, including:** • **The same references to "vegetation alterations"** • **Refraining from implying that Semi-Primitive Non-Motorized recreation is bad for forest health.**

Response:	We have changed the wording for the FEIS. The ROS descriptions in Table RE-6 are meant to be general descriptions of settings by ROS Class and not intended to be all-inclusive. USDA descriptions are unnecessarily long to be included in the EIS, but they would be used in project-level planning. There is no intentional inference in Table RE-6 that SPNM is bad for forest health. Rather the table indicated that vegetative alterations, if initiated, are to enhance forest health and are few and widely dispersed.
PC 437	**The Forest should conduct a census on the number of visitors to North Fork Mountain, Dolly Sods North, and Roaring Plains North and East, then compare these numbers to the number of visitors to Dolly Sods or other existing wilderness areas because if it is clear that the use of the "core solitude" methodology produces false negatives, then the use of this methodology should be abandoned in favor of an actual census methodology.**
Response:	We do not see how the experiment you suggest would show conclusively that "core solitude methodology produces false negatives". People go to different areas for different reasons. We would encourage people to hike North Fork Mountain for the exercise, the communion with nature, and the beautiful views from the ridgeline. Our roadless inventory assessment, however, must consider that those ridgeline views, from the core of the area, will include the sights and sounds of a state highway and other development features below and beyond. These features can affect a person's opportunity for feeling a sense of solitude, which is one of defined attributes of Wilderness. Conducting a census as described in your comments would not change the definition of core solitude, nor the opportunity for solitude as defined by the Wilderness Act. Core solitude is defined in the USFS 1986 Recreation Opportunity Spectrum Guide Book, Chapter IV, and is clarified in an August 1997 R-9 Regional Forester Letter. See Appendix C, pages 5-8, for more information on how this concept was applied in the inventory process. Please note that the Forest used the minimum standards when measuring core solitude area (1/2 mile buffers, below 2,500 acres), and that core solitude in and of itself was not one of the 8 criteria used to qualify or disqualify areas for the roadless area inventory.
PC 708	**The Forest should review its projections of backcountry visitors.**
Response:	Projections in the 1986 Plan (page 41) seemed to have been based on the premise that if we provided more SPNM area, backcountry use would increase dramatically (from 182,000 RVDs to 523,000 RVDs in two years.) We do not believe we have seen anything approaching those projected increases in the 20 years that followed. Plan revision projections for backcountry recreation were based on the results from the National Visitor Use Monitoring, which was conducted in FY2003, and the results of recreation visitor use research from Outdoor Recreation in American Life (Cordell 1999), Footprints on the Land (Cordell and Overdevest 2001), and Outdoor Recreation in the United States (Cordell et al. 1997). See DEIS, pages 3-363 through 3-390. We feel these projections are realistic. See also response to PC 655.
PC 87	**The Forest should prohibit unleashed pets.**
Response:	Although leashes are required in certain high-use areas, the Forest is not issuing a general prohibition on unleashed pets through forest plan revision.
PC 370	**The Forest should favor recreational uses, particularly in wilderness, over timber uses.**
Response:	Under the preferred alternative in the DEIS, about 36% of the Forest is considered suitable for timber production, whereas virtually all of the Forest is considered open for various recreation uses. The amount of Wilderness on the Forest is dependent on Congressional designation.
PC 252	**The Forest should provide a range of different recreational activities.**
Response:	The Forest is managed to provide a range of recreation opportunities, with an emphasis on recreation activities that require a large land area – such as hiking, hunting, mountain biking, and horseback riding – and facilities to support that use (see Proposed Revised Plan, page II-28, Goal RC01).
PC 252a	INCLUDING BACKCOUNTRY RECREATIONAL AREAS
Response:	The amount of backcountry recreation areas on the Forest are assessed by alternative in the EIS, Chapter 3, Recreation and Wilderness section.
PC 252b	INCLUDING HUNTING AND FISHING
Response:	Hunting and fishing may occur in almost all areas of the Forest, although motorized access to those areas may vary. We have heard from people who prefer to hunt and fish in a backcountry setting, and we have heard from people who want motorized access to fishing and hunting opportunities. We believe that the Forest provides both.
PC 252c	INCLUDING "PRIMITIVE" AND "SEMI-PRIMITIVE/NON-MOTORIZED" RECREATION

Response:	The Forest does not have areas that meet the ROS classification of "Primitive", however "Semi-Primitive Non-Motorized" recreation areas are featured in MPs 5.0, 5.1, 6.2, and 8.1 SPNM.
PC 86	**The Forest should prohibit certain recreational activities to protect the Forest's pristine condition, including fishing, trapping, hunting, horse trails and pack animal use, hang gliding, free jumping, rock climbing, road rallies, mountain biking, Semi-Primitive Motorized recreation, dog training on bear cubs and nursing sows, equestrian sports, camping, and running hounds.**
Response:	The Multiple-Use Sustained Yield Act directs national forests to manage "for outdoor recreation, range, timber, watershed, wildlife, and fish purposes" (Proposed Revised Plan, page I-2). The Forest is managed to provide a range of recreation opportunities to the public (see Goal RC01, Proposed Revised Plan, page II-28). Certain activities noted, like road rallies or equestrian events, must have a special use authorization to occur on the Forest. Other activities, like rock climbing or hang gliding, are limited by terrain features. Still other activities, like hunting and fishing and dog training, are beyond our authority to prohibit or allow. However, we do have the authority to issue violations for activities conducted in an illegal manner on federal lands, and we can also issue area closures where activities are creating unacceptable impacts to the environment.
PC 259	**The Forest should not favor backcountry recreation over other uses of the Forest.**
Response:	As described in the Recreation and Wilderness section of Chapter 3 in the DEIS, backcountry recreation opportunities vary greatly by alternative, from about 16% to 46% of the Forest. Because of the size of the Forest and its large undeveloped areas, we have opportunities to provide backcountry recreation where other public land agencies do not.
PC 259a	BECAUSE REVENUE GENERATED FROM RECREATION IS CONSIDERABLY LESS THAN PAST ESTIMATES
Response:	Direct revenue to the Forest from recreation may be less than past estimates, but it is increasing. We also consider the income and employment that recreation brings to area counties and communities in the economic analysis in Chapter 3 of the EIS.
PC 259b	BECAUSE RESTRICTING FOREST MANAGEMENT OPTIONS INCREASES THE THREATS FROM INVASIVE SPECIES, AIR POLLUTION, CLIMATE CHANGE, ETC.
Response:	We agree there are trade-offs in management options that result from the recreation prescriptions that are assigned to the Forest. These trade-offs are discussed throughout Chapter 3 of the EIS.
PC 746	**The Forest should provide information supporting the current Recreation Opportunity Spectrum makeup on the Forest:** • **Including how the 2003 inventory for Forest Plan revision was done** • **Including how much on-the-ground evaluating of facilities, such as old roads, was done in assigning lands to semi-primitive motorized and natural roaded** • **Including how the current Recreation Opportunity Spectrum compares to that at the time of the 1986 Forest Plan** • **Because the public should have a basis for verifying the accuracy of this data.**
Response:	The 2003 ROS inventory was completed by West Virginia University as part of a Social Assessment for Plan revision. The existing condition ROS was mapped consistent with the Forest Service ROS User Guide. The evaluation was primarily done using our current GIS layers, including roads, and Ortho Photos. The ROS was not mapped for the 1986 Forest Plan, therefore no direct comparison can be made.
PC 748	**The Forest should provide documentation showing how the costs of semi-primitive non-motorized recreation were determined compared to the benefits in the Net Present Value analysis.**
Response:	As explained on page 3-456 of the DEIS, the economic efficiency portion of the Net Present Value analysis accounts for many non-market benefits, values, and costs that are not easily quantifiable. Recreation visits, including backcountry or SPNM recreation, are assigned a positive value, but no costs are assigned for recreation in either the economic or financial efficiency portions of the analysis. Costs are assigned in the financial efficiency portion for other resource outputs such as timber and minerals. Thus, if anything, the model is somewhat biased toward recreation. The reason the assigned recreation values are the same for all alternatives is that recreation use is assumed to be the same for all alternatives. That use is not broken out by backcountry use versus non-backcountry use. It was assumed, for example, that backcountry use would increase under Alternative 3, which emphasizes backcountry recreation. However, we also assumed that under other alternatives, overall recreation uses

	would increase by a similar amount, even though the primary use may or may not be backcountry recreation. It is important to remember that backcountry recreation does not currently account for the majority of recreation use on the Forest.
PC 808	**The Forest should acknowledge that it lacks adequate funding to provide the numerous law enforcement officers needed for the Hatfield-McCoy Trail System.**
Response:	We do not manage nor have jurisdiction over the Hatfield-McCoy Trail System, nor do we currently have plans to create such a system.
PC 68	**The Forest should recognize the importance of educational programs at visitor centers.**
Response:	We agree that the educational programs at the Cranberry and Seneca Rocks Visitor Centers are important and should continue.
PC 68a	INCLUDING LEAVE NO TRACE INFORMATION AT DISTRICT RANGER STATIONS
Response:	We have educational efforts in place, including Leave No Trace information at our offices and trailheads, interpretive programs at visitor centers and campgrounds, and recreation guards providing public contacts within Wilderness areas. We can always add to these efforts as needed without Plan direction telling us to do so.
PC 50	**The Forest should keep all backcountry areas in their current designation to provide recreational opportunities and to attract tourism.**
Response:	We acknowledge your preference. The EIS alternatives include a range of backcountry area options. Alternative 1 would keep the current MP 6.2 areas. Alternative 2 would keep some of the current 6.2 areas, recommend some for Wilderness designation, and add many new 6.2 or 8.1 SPNM areas. Alternative 3 would keep all of the current 6.2 areas, recommend many of them for Wilderness, and add many new 6.2 areas. Only Alternative 4 would feature fewer backcountry areas than are currently provided. See the Recreation and Wilderness section in Chapter 3 of the EIS for a full analysis.
PC 19	**The Forest should emphasize low-impact recreational uses of the Forest to provide a sustainable source of income for the region and to protect ecosystems:** • **Including improving non-motorized trail access** • **Including providing rustic camping facilities** • **Including providing healthy game populations for hunters** • **Including reducing roads, clear cuts, and mines** • **Because walking and non-motorized biking are healthier than motorized recreation.**
Response:	The Forest is managed to provide a range of recreation opportunities with an emphasis on recreation activities that require a large land area – such as hiking, hunting, mountain biking, and horseback riding – and facilities to support that use (see Goal RC01, Proposed Revised Forest Plan, page II-28). The potential effects of recreational developments and other management activities on ecological resources are analyzed and mitigated as needed during project planning. Habitat management for game species is a major management emphasis in Management Prescriptions 3.0 and 6.1. Game populations are managed by the State, not the Forest Service.
PC 271	**The Forest should continue to develop methods to reduce impacts caused by commercial and recreational activities.**
Response:	We agree. During the revision process, we have reviewed, updated, and developed management direction for each resource area and management prescription on the Forest (see Chapters II and III of the Revised Plan). We have also developed a Monitoring and Evaluation Plan to monitor the effectiveness of our management practices and resource protection methods (see Chapter IV of the Revised Plan). Through this adaptive plan we can continue to make adjustments over time to further reduce impacts if needed.
PC 164	**The Forest should use reliable recreation-use statistics for all forms of recreation to better allocate lands for various forms of recreation, because the statistics regarding wilderness are highly subjective.**
Response:	National Visitor Use Monitoring was completed on the Forest from October 1, 2002 to September 30, 2003, and the results are based on accepted statistical data collection and analysis procedures (DEIS, pages 3-365 to 3-372). We do not agree that these statistics are "highly subjective"; however, we expect recreation-related information to improve over time as more data are collected.

PC 815	**The Forest should examine the demand for dispersed and non-motorized recreation under various logging and non-logging levels.**
Response:	There are no accepted or proven methods that we know of for determining recreation demand under various timber harvest levels. We have followed the NEPA process in developing a range of alternatives with various levels of different types of recreation and timber harvest. We have disclosed the effects of these alternatives to the public and considered their comments prior to making a decision on which alternative to implement. What we have learned from these comments is fairly obvious and does not require individual studies of resource demand. People who prefer backcountry recreation would like to see more area devoted to this type of recreation opportunity and less area that features timber harvest. People who would like to see more timber harvest would typically like to see less area devoted to backcountry recreation and more area open to harvest and motorized recreation.
PC 546	**The Forest should not recommend any additional areas for backcountry recreation because the forest should be open to all visitors, and backcountry recreation areas are not necessary for individuals to have wilderness.**
Response:	We agree with you that people may experience the wildness of the Forest without necessarily visiting a backcountry recreation area. The Forest is open to all visitors, but some areas feature different modes of transportation than others. See also response to PC 259.
PC 75	**The Forest should acknowledge the need for recreational opportunities on the East Coast.**
Response:	We acknowledge that people on the East Coast have a need to recreate, as do people in other parts of the country. The opportunities for backcountry recreation are not as great in the East as they are farther West, but that is primarily because there is a much higher percentage of land that is privately owned in the East. Therefore, people who seek backcountry recreation opportunities in large remote areas tend to do so in the West. We are not convinced that any alternative we have considered would change that basic relationship. Because of the land ownership patterns within our proclamation boundary, not one of our roadless areas is over 25,000 acres, which is relatively small and not very remote compared to roadless and Wilderness areas in the West.
Camping	
PC 21	**The Forest should improve camping facilities, including providing places to put boats while camping, and building short spur roads leading to primitive campsites.**
Response:	We acknowledge your preference, but your comments are beyond the scope of this plan revision. These types of activities or uses are determined at the project or site-specific level.
PC 187	**The Forest should not overly develop remote camping sites, including not adding an amphitheater at Big Bend Campground, because there are many developed camping areas and few remote ones.**
Response:	We acknowledge your preference, but your comments are beyond the scope of this plan revision. These types of activities or uses are determined at the project or site-specific level.
OHV Use	
PC 819	**The Forest should consider the Hatfield-McCoy Trail System as a well-maintained and enforced alternative for off-road vehicle users.**
Response:	We agree that the Hatfield-McCoy Trail System may be a good alternative for some off-road vehicle users. The Forest does not manage nor have jurisdiction over the Hatfield-McCoy Trail System.
PC 508	**The Forest should increase enforcement of illegal all-terrain vehicle use, including:** • **Supporting a requirement that all-terrain vehicles be registered** • **Supporting a requirement that all-terrain vehicles be insured** • **Requiring a license for all-terrain vehicle users** • **Setting aside an area for all-terrain vehicle users** • **Protecting the Forest's natural resources** • **Enforcing road closures** • **Using law enforcement personnel from other areas** • **Concentrating enforcement efforts where all-terrain vehicles are exiting private lands and entering Forest land.**
Response:	Public motorized vehicle use, including ATV use, is permitted on roads and trails designated open for that use. Off road use is not permitted (Standard FR16, Proposed Revised Plan, page II-52). ATV use may also be controlled based on management direction or Management Prescription emphasis. Law

	enforcement and Forest Protection Officers monitor and respond to illegal forms of access. However, the enforcement of laws relating to all terrain vehicles is beyond the scope of this plan revision.
PC 104	**The Forest should provide snowmobile access to a section of property located adjacent to the Highland Scenic Highway, including providing specific rules and regulation to prevent unauthorized use, because snowmobiling can be allowed without threatening property, wildlife, plant life, etc., and snowmobilers could provide revenue to the local area.**
Response:	We acknowledge your preference, but we are not changing the status of public motorized use in this plan revision. These types of activities or uses will be determined at the project or site-specific level, or in conjunction with a Forest-wide trail plan.
PC 367	**The Forest should allow the use of all-terrain vehicles and other off-road vehicles in designated areas to provide recreational opportunities with minimal environmental impact, and to provide another revenue source.**
Response:	We acknowledge your preference, but your comments are beyond the scope of this plan revision. These types of activities or uses will be determined at the project or site-specific level, or in conjunction with the Forest wide trail plan.
PC 441	**The Forest should support the development of all-terrain vehicle trail systems on lands far away from the Forest, including as far from wilderness areas and 6.2 areas as possible, to protect the Forest's resources.**
Response:	We recognize the Hatfield and McCoy trail system as a good location for motorized recreation within the State of West Virginia, but we have no control or influence over that trail or its location.
PC 208	**The Monongahela National Forest should revise the statement on page 3-127 to say that roads are "never" constructed solely for motorized recreational use instead of "rarely" constructed, because:** • **Designating trails for all-terrain vehicle use would only increase illegal all-terrain vehicle use** • **All-terrain vehicle users are notorious for going off trails and ignoring legal boundaries and restrictions** • **Current law enforcement is insufficient to control illegal all-terrain vehicle use.**
Response:	The statement on page 3-127 is accurate as written. We occasionally construct a road to access a campground or other recreational feature, but this situation is relatively rare compared to other road construction that has occurred on the Forest. We are not proposing to construct or designate any ATV roads or trails as part of plan revision.
PC 47	**The Forest should increase motorized access.**
Response:	We acknowledge your preference. See response to PC 45.
PC 47a	SO PEOPLE IN WHEEL CHAIRS CAN ENJOY THE FOREST
Response:	There are some trails on the Forest that are wheelchair accessible, but the majority are designed and maintained for hiking.
PC 47b	BECAUSE A BLANKET CLOSURE OF THE FOREST TO ONE MAJOR CLASS OF RECREATION IS A PROVEN FORMULA FOR FAILURE OF THE MISSION OF THE FOREST SERVICE
Response:	We would not describe the current situation for motorized use on the Forest as a blanket closure. Forest-wide direction in the 1986 and Revised Plans allows public motorized use on roads and trails designated open for that use. We have not yet designated any routes for public motorized use, and one of the main reasons is that we do not have any roads or trails that have been designed and constructed specifically for ORV use, which raises a number of concerns related to operator safety, potential resource damage, maintenance costs, and user conflicts. However, Forest Plan direction has certainly not closed the door to future opportunities.
PC 47c	BECAUSE DENYING ACCESS WILL ONLY CREATE ABUSE OF THE RESOURCE BY LOCAL RENEGADES THAT HAVE LITTLE REGARD FOR THE LAW
Response:	We know that illegal motorized use is occurring in areas of the Forest, and we attempt to control that use through law enforcement. It is not clear whether increasing motorized access to the Forest would help control illegal use or provide opportunities for it to occur in more accessible places.
PC 47d	INCLUDING KEEPING AS MUCH LAND OPEN FOR OFF-ROAD VEHICLE USE AS POSSIBLE
Response:	There are no lands on the Forest open for off-road vehicle use in the 1986 Plan or Revised Plan.
PC 724	**The Forest should consider the negative impacts that the overuse of off-road vehicles can cause,**

	including erosion, noise pollution, harm to wildlife, user conflicts, forest fragmentation, harm to riparian areas, litter, safety problems, aesthetic damage, trespassing on private lands, enforcement problems, damage to soils, water, and vegetation, fire hazards, air pollution, increased vandalism, increased access to ecologically sensitive areas, impacts on trailhead capacity, and impacts to the Forest's budget for enforcement and trail maintenance.
Response:	Negative impacts from motorized use are assessed for various resources throughout Chapter 3 of the DEIS. We may supplement them in the FEIS with the list you have provided; however, we recognize that all of these potential impacts may occur. Off-road or off-trail motorized use is not allowed in the Revised Plan, and no changes are proposed to motorized access under the preferred alternative. We have management direction in Chapters II and III of the Revised Plan to reduce impacts from motorized use, while still allowing motorized access to various parts of the Forest.
PC 807	**The Forest should acknowledge that there is no area of sufficient size in an appropriate management prescription to allow trails for all-terrain vehicles.**
Response:	This assessment is beyond the scope of plan revision. These types of activities or uses will be determined at the project or site-specific level, or in conjunction with a Forest-wide trail plan.
PC 602	**The Forest should allow the use of all-terrain vehicles during hunting season to help control deer over-population.**
Response:	Off road vehicle use is not allowed in the 1986 or Proposed Revised Forest Plan, and ATVs are restricted to routes designated for that use. The Proposed Revised Plan does not designate any specific routes for ATV access.
PC 77	**The Forest Service should ban off-road vehicles and snowmobiles from National Forests:** • **To prevent harm to the environment** • **To protect the safety of other Forest users** • **To prevent noise** • **To prevent pollution** • **To protect wildlife** • **Except for management use and emergency situations** • **Including motor biker vehicles from Seneca Creek basin** • **To prevent impacts to private landowners** • **To protect tourism** • **Because the Hatfield-McCoy Trail System is already available** • **Because all-terrain vehicle trail systems are expensive to build and maintain** • **Because current law enforcement would be unable to deal with the increased illegal use.**
Response:	We acknowledge your preference, but your request and comments are beyond the scope of this plan revision. We do not have the authority to ban this use from National Forests. These types of activities or uses on our Forest will be determined at the project or site-specific level, or in conjunction with the Forest-wide trail plan.
Mountain Biking and Horseback Riding	
PC 26	**The Forest should allow mountain biking in areas within the Forest:** • **Including the Spruce Knob Recreation Area** • **Including on the East Fork Greenbrier Trail** • **Including the Dolly Sods Area** • **Because mountain bikers help protect the wilderness** • **Because of the importance of mountain biking as an activity and an economic force.**
Response:	Mountain bike use is currently allowed in all areas of the Forest except Congressionally designated Wilderness, where it is prohibited by law. The Revised Forest Plan would not alter that status.
PC 531	**The Forest should consider allowing mountain biking in new wilderness areas:** • **Because there would be no user conflicts** • **Because there would be no environmental concerns** • **Because the definition of mechanical device or mechanized travel can be revised.**
Response:	Mountain bike use is currently allowed in all areas of the Forest (including MP 5.1 – Recommended Wilderness), except Congressionally designated Wilderness, where it is prohibited by law. Whether mountain biking would be allowed in new Wilderness areas would ultimately be up to Congress.

	However, biking has typically been considered a non-conforming mechanized use in past Wilderness legislation.
PC 444	**The Forest should design an appropriately-located trail system and attendant facilities for mountain biking as well as horseback riding that will also protect resources and minimize conflicts between users.**
Response:	Specific trail system and dispersed site changes or design are beyond the scope of this plan revision. However, the Revised Forest Plan does have an objective to develop a Forest–wide trail management plan to establish trail classes, permitted uses, and construction, reconstruction, and maintenance priorities.
PC 445	**The Forest should apply appropriate assessments and controls for mountain biking and horseback riding:** • **To prevent the damage that these activities can cause to the Forest** • **Including prohibiting these activities on certain trails** • **Including controlling these activities in the Seneca Creek Area** • **To protect soil resources** • **Including impacts from races and tours** • **Including recognition of damages in the "values foregone" section for various areas** • **To reveal impacts as functions of soil type, slope, rainfall, and proximity to streams** • **Through cooperative planning with recreational users** • **Including better regulation of corral location and type, handling of waste, and trailer parking.**
Response:	Trail system and dispersed site changes are beyond the scope of this plan revision. However, the Revised Forest Plan has an objective to develop a Forest–wide trail management plan to establish trail classes, permitted uses, and construction, reconstruction, and maintenance priorities. The Revised Plan also has Forest-wide management direction designed to reduce impacts from all uses on the Forest, including mountain biking and horseback riding. In addition, the Forest Supervisor has the authority to close specific areas or trails to certain uses if unacceptable impacts are occurring.
PC 797	**The Forest should restrict mountain biking in certain areas of the Forest.** • **Because mountain biking can cause erosion and cause trails to become braided, wide, and muddy in places** • **To protect other non-motorized recreational opportunities.**
Response:	Specific trail system and dispersed site changes or design are beyond the scope of this plan revision. However, the Revised Forest Plan does have an objective to develop a Forest–wide trail management plan to establish trail classes, permitted uses, and construction, reconstruction, and maintenance priorities. Any type of trail use can cause erosion, particularly under wet conditions. The Forest can close specific areas to specific uses if unacceptable resource impacts or conflicts are occurring.
PC 780	**The Forest should acknowledge that the discussion concerning mountain biking is misleading.**
PC 780a	BECAUSE IT OVERSTATES THE IMPACT THAT WILDERNESS DESIGNATION WILL HAVE ON THE TRAIL SYSTEM
Response:	Our “discussion” on mountain biking consists of area-specific descriptions of current estimated use, and how that use might be affected under a Wilderness designation, as seen in the Wilderness evaluations in Appendix C to the EIS. The effects address the use rather than the trail system involved. The use information has been collected from Forest recreation specialists, district personnel, and from mountain bikers or bike groups.
PC 780b	BECAUSE THE FOREST THE LACKS BOTH THE BUDGET AND STAFF TO ADEQUATELY MANAGE EXISTING MOUNTAIN BIKE USE AND PREVENT, MITIGATE, OR REPAIR CURRENTLY OCCURRING RESOURCE DEGRADATION
Response:	A debate on budget and staff levels relative to mountain bike use is beyond the scope of plan revision. However, it is worth noting that mountain bike groups have done volunteer trail maintenance in areas they use on the Forest.
PC 780c	BECAUSE IT FAILS TO ACKNOWLEDGE THAT MOUNTAIN BIKING ACCELERATES EROSION AND DAMAGE TO TRAILS, PARTICULARLY STEEP, WET, AND EROSIVE AREAS, SOME OF WHICH ARE BEING CONSIDERED IN THE WILDERNESS EVALUATION
Response:	See response to PC 445.

PC 763	**The Forest should consider the impact of horseback riding on public lands, including:** • **Restricting horse camping to hardened sites away from streams and creeks** • **Requiring horse users to help maintain routes** • **Adverse impacts to trails and heritage resource sites** • **Positive effects.**
Response:	See response to PC 445.
Hunting	
PC 263	**The Forest should not limit hunting in the Forest:** • **Because hunters provide revenue to local areas** • **Because hunting helps control animal populations** • **Because hunters contribute to the conservation of wildlife.**
Response:	Under all plan alternatives, hunting will continue to be allowed in most areas of the Forest, including all wilderness and remote backcountry areas. Hunting will continue to be limited or prohibited in areas with safety concerns, such as campgrounds and other developed sites. Hunting will also continue to be prohibited in a few small, localized areas that are closed to all public access due to resource protection or safety concerns. For example, the immediate vicinity of some cave openings is fenced to protect hibernating bats. Hunters are reminded that state laws and regulations regarding licensing, safety, seasons, bag limits, area closures, etc. apply throughout the Forest.
PC 684	**The Forest should further develop the analysis of how hunting will be impacted by the Revised Forest Plan:** • **Because hunting is a very popular hobby in West Virginia and has a large positive impact on local economies** • **Because the Forest receives many thousands of dollars and volunteer labor each year from organizations that are supported mostly by hunters.**
Response:	The EIS evaluated the potential effects of the plan alternatives on the three most popular big game species: wild turkey, white-tailed deer, and black bear (see the Terrestrial Management Indicator Species and Other Species of Interest section of EIS Chapter 3). Hunting opportunities can be assumed to be directly related to habitat conditions for these species. Other game species were not directly analyzed in the EIS, but habitat conditions for many of them are correlated with habitat conditions for the three game species that were analyzed. For example, gray squirrels are mast-dependent and should be partly represented by the habitat indicators for wild turkey and black bear; ruffed grouse are dependent on a mosaic of young and mature forest and should be partly represented by the habitat indicator for white-tailed deer. Access for hunting is virtually the same for all alternatives, and is not changing from the current status. Wildlife recreation opportunities, including hunting and fishing, are also included in the economic impact analysis in Chapter 3 of the EIS. The analysis assumes that the positive economic effect of hunting and wildlife-related opportunities would not change measurably by alternative over the short term because we are not proposing to significantly change access or habitats over the next 10 years under any alternative. Because the analysis focused on effects to local economies, it did not incorporate direct funding or volunteer labor that the Forest received, but the Forest certainly appreciates any cooperative contributions to its wildlife program.
PC 49	**The Forest should not allow any development that would detract from hunting opportunities, because hunting offers a long-term financial benefit that outweighs the short-term benefit of logging.**
Response:	We agree that hunting is a significant contributor to local economies in the area. As part of a multiple-use agency, however, the Forest must manage the land for a wide variety of uses, opportunities, resources, and services. Most of the Forest would remain open to hunting under all plan alternatives (see response to PC 263). Timber harvest creates shrubby and young forest habitats that are favored by many game species.

SCENIC ENVIRONMENT	
PC 829	**The Forest should incorporate the new Scenery Management System into the plan revision.**
Response:	We have incorporated the Scenery Management System into plan revision. See page 3-392 of the DEIS.
PC 828	**The Forest should apply appropriate aesthetic standards to visual corridors.**
Response:	The Scenery Management System establishes aesthetic standards based on Scenic Integrity Objectives, Landscape Character, Concern Levels, Visibility and Scenic Classes. See Proposed Revised Plan Chapter II, pages 31-32.
PC 521	**The Forest should examine whether or not the forest looks "natural".**
Response:	The Scenic Environment section in Chapter 3 of the EIS examines potential impacts to Forest scenery from the alternatives considered in detail. "Natural" was a somewhat subjective term used in the 1986 Plan, and we now prefer the term "natural-appearing" instead. Many comments we received expressed the concern that proposed management would destroy the existing natural appearance of the Forest, even though the Forest has been managed for many decades. Similarly, many people wanted us to protect old growth on the Forest, even though there has not been any old growth to speak of in the past 100 years. To most people, the presence of trees represents a natural appearance. We believe that over time management proposed under any alternative would maintain a natural, forested appearance over most of the Forest.
PC 117	**The Forest should acknowledge the importance of the Forest's scenic resources.**
Response:	Potential effects to the Scenic Environment are discussed in the DEIS on pages 3-391 to 3-409. The Introduction on page 3-391 acknowledges the importance of scenery on the Forest, and states that "The MNF provides some of the highest quality scenic landscapes in the East."
PC 222	**The Forest should acknowledge that the more roads that are closed to traffic, the less there is to see and problems with the scenic environment will be greatly reduced.**
Response:	Closed roads are open to a variety of recreational users including hikers, mountain bikers, and equestrians who access these areas for a wide variety of reasons and have expectations of what the scenic environment should look like. We do not believe that closing roads will automatically "reduce the problems" or interest related to the scenic environment.
PC 226	**The Forest should acknowledge that adverse effects to the scenic environment resulting from timber harvest are important only to hikers and not to motorized travelers unless the disturbed areas are right beside the road.**
Response:	The scenic environment is important to many people, and potential effects to scenery from timber harvest activities are discussed in detail in the DEIS, pages 3-391 through 3-409. See also responses to PC 222 and PC 792.
PC 847	**The Forest should have scenic environment indicators that only include those areas seen from roads and trails.**
PC 847a	BECAUSE YOU SAY THAT SCENERY IS OF MORE INTEREST IF IT CAN BE SEEN FROM A ROAD OR TRAIL
Response:	As stated in the DEIS, page 3-396, we used several factors to identify concern levels for Scenery Management. We included roads and trails but also considered developed recreation sites, lakes and rivers, and specially designated areas. These factors were used as well as Scenic Classes, and Landscape Visibility, to establish Scenic Attractiveness and existing Scenic Integrity. It should be noted that using just roads and trails would not consider many of the other locations where visitors view the Forest. The Scenery Management System is a tool that we use to analyze changes in viewsheds resulting from management activities, and where primary visual concern areas are located. It does not mean that because an area has high scenic attractiveness or concern levels that no vegetative management activities can occur. Rather, in many cases lands are managed to provide a mosaic of landscapes across the viewshed.
PC 847b	BECAUSE MOST CASUAL VIEWERS ARE ALSO OCCASIONAL VIEWERS AND ARE NOT VERSED IN THE FINE NUANCES OF LINE, FORM, COLOR, TEXTURE, ETC.
Response:	Neither are many Forest employees, but we also want to do what is best for the forest. The Scenery Management System is a tool that we use to disclose the effects that a project has on the scenic landscape, just as other tools are used to evaluate the effects on forest health, wildlife, soils, etc. Decisions to implement projects consider the rationale, trade-offs, and effects to various resources

	including scenery.
PC 848	**The Forest should revise the definition of "middleground", as the only individual tree you can see at 0.5 to 4 miles is one standing alone in a pasture.**
Response:	The general definition for "middleground" is from the Scenery Management Handbook. It is not based on the ability to identify individual trees, but rather on stands of trees (generally 10 acres or more) that can be viewed from identified viewpoints. Most people can tell if tree stands are present or absent at distances of 0.5 to 4 miles.