

## Section 6: Lands and Special Designations

<b>LAND ACQUISITION, BOUNDARIES, AND SPECIAL USES</b>	
<b>PC 277</b>	<p><b>The Forest should acquire land:</b></p> <ul style="list-style-type: none"> <li>• Including private property within the proclamation boundaries</li> <li>• Including all lands in the Spruce Knob Unit of the National Recreation Area</li> <li>• To make the Forest a contiguous whole</li> <li>• To allow more access for hunting and fishing</li> <li>• To lease to coal or wind.</li> </ul>
Response:	The Forest has acquired about 60,000 acres of land since the 1986 Plan was released. We hope to acquire more land as opportunities and funding arise. Direction for land acquisition is provided by Goal LS01 and Guideline LS05 in the Proposed Revised Forest Plan.
<b>PC 726</b>	<b>The Forest should not restrict prior existing rights on the Forest unless adequate compensation is granted.</b>
Response:	We agree. Chapter II of the Proposed Revised Plan has a statement to this effect on page II-1, under Outstanding and Reserved Rights. We have changed this statement in the Final Plan somewhat to better address your comment.
<b>PC 817</b>	<b>The Forest should not renew the existing special use permit for the transmitter tower on the Flatrock Plains.</b>
Response:	Special use permit renewal is beyond the scope of this plan revision. The Forest has a separate process for permit renewals.
<b>PC 97</b>	<p><b>The Forest should acknowledge the threats from wind turbines, including:</b></p> <ul style="list-style-type: none"> <li>• Threats to aesthetics</li> <li>• Threats to wildlife</li> <li>• Using caution when locating turbines.</li> </ul>
Response:	Any proposal for wind energy development would be subject to Forest-wide direction for special uses, as well as Forest Plan direction that protects the various resources on the Forest. Wind turbines present a challenging mix of potential impacts to scenic, recreational, and biological resources that must be factored into any application for such a use on public lands.
<b>PC 790</b>	<b>The Forest should place a high priority on the responsible development of wind power within the Forest to provide for a more sustainable future in energy resources.</b>
Response:	See response to PC 97.

<b>INVENTORIED ROADLESS AREAS</b>	
<b>PC 710</b>	<b>The Forest should honor the revised boundaries proposed by the West Virginia Wilderness Coalition to exclude wildlife management.</b>
Response:	The Forest identified roadless area boundaries following direction in the Forest Service Handbook (FSH) 1909.12 and the August 1997 R-9 Regional Forester's letter. Should any area be considered for wilderness designation by Congress, their boundaries can be adjusted by Congress to include or exclude specific features.
<b>PC 837</b>	<b>The Forest should consider perimeter changes in other areas to exclude current wildlife openings and roads, similar to changes in the Seneca Creek acreage.</b>
Response:	The Seneca Creek area qualified for the roadless area inventory. As noted in the response to PC 710, roadless area boundaries were identified using criteria that are part of the inventory process in FSH 1909.2 and the Regional Forester's letter of August 1997. If we had consistently excluded all of the current wildlife openings and old roads within Seneca Creek, it may not have qualified for the inventory because these features are scattered throughout the area, including the core area. However, if Seneca Creek were to be carried forward to Congress as a wilderness proposal, Congress could use whatever boundaries they felt were appropriate for this area to facilitate wilderness management. Congress is not bound by the boundaries we used for the inventory.

<b>PC 820</b>	<b>The Forest should conduct a site-specific inventory of all roadless areas to determine their wilderness eligibility and make recommendations, including Upper Shavers Fork East and West, North Fork Mountain, Roaring Plains North, McGowen Mountain, Meadow Creek North, Kennison Mountain, Lockridge Mountain North and South, Little Allegheny/Laurel Run, Little Mountain, Greathouse Hollow, and Beaver Lick Mountain.</b>
Response:	We took a hard look at each of the areas listed above as to their eligibility for the roadless area inventory. The results of the inventory process are found in Appendix C to the EIS. The process we used does not require field inventories. Although we were not able to visit some of these areas in person, we used a number of sources to gather the appropriate information for our inventory assessment. These sources included District personnel who were acquainted with the areas, Roth-photo maps, aerial photos, stand exam data, GIS data for roads and other features, West Virginia DNR information, and comments from the West Virginia Wilderness Coalition. In some cases, Forest personnel did visit specific sites to verify or supplement information.
<b>PC 826</b>	<b>The Forest should consider the impacts of roadless areas, including economic impacts, wildlife impacts, native plants impacts, fisheries impacts, and watershed impacts.</b>
Response:	The Wilderness evaluations that we completed for the Inventoried Roadless Areas have descriptions of resources, including wildlife, fisheries, water, and vegetation. The evaluations also include potential economic values in each area, and how they might be affected by Wilderness designation. These evaluations, however, do not feature the same sort of effects analyses as Chapter 3 of the EIS. The Chapter 3 analyses look at effects to multiple resources on and from all areas of the Forest, including roadless areas (MPs 5.1 and 6.2 in the preferred alternative). The economic impacts of roadless areas on tourism would be virtually impossible to isolate and identify, given the complexity of factors that influence tourism in general. However, recreation visits are incorporated into the economic impact analysis conducted in the Social and Economic Environment section of Chapter 3.
<b>PC 830</b>	<b>The Forest should apply a strengthened version of the Roadless Area Conservation Rule, including:</b> <ul style="list-style-type: none"> <li>• <b>Immediately protecting all uninventoried roadless areas that meet all technical criteria for roadless areas, provided those areas are 1,000 acres or larger</b></li> <li>• <b>Banning off-road vehicles, off-road vehicle trails, and surface mineral extraction in roadless areas</b></li> <li>• <b>Taking proactive steps to restore heavily roaded areas of the Forest.</b></li> </ul>
Response:	The original Roadless Area Conservation Rule no longer exists. To apply a strengthened version of this rule would be both beyond our authority as an agency and beyond the scope of this plan revision.
<b>PC 171</b>	<b>The Forest should return to the Roadless Area Conservation Rule policy of 2001.</b>
Response:	The 2001 Roadless Area Conservation Rule no longer exists. To return to this rule would be beyond our authority as an agency and beyond the scope of this plan revision.
<b>PC 32</b>	<b>The Forest should protect roadless areas, including Gauley Mountain East and West:</b> <ul style="list-style-type: none"> <li>• <b>To benefit future generations</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>To protect wildlife</b></li> <li>• <b>To prevent flooding</b></li> <li>• <b>To provide tourism revenue</b></li> <li>• <b>To protect water resources</b></li> <li>• <b>To provide educational opportunities</b></li> <li>• <b>To protect against invasive species</b></li> <li>• <b>To protect plant communities</b></li> <li>• <b>To protect endangered species</b></li> <li>• <b>For research purposes</b></li> <li>• <b>To protect from motorized use</b></li> <li>• <b>To protect from extractive development.</b></li> </ul>
Response:	Under the preferred alternative in the DEIS, the areas identified as Inventoried Roadless Areas in plan revision (including Gauley Mountain East and West) would receive resource protection through Forest-wide management direction (Chapter II, Revised Plan) and through additional direction for Management Prescriptions 5.1, 6.2, or 8.1 SPNM (Chapter III, Revised Plan). These areas would all be

	managed to provide backcountry recreation opportunities.
<b>PC 501</b>	<b>The Forest should not add roadless areas to the Forest—including the Gaudineer area and the East Fork of the Greenbrier area—because it would restrict timbering.</b>
Response:	One of the six key decisions made in forest planning is a “Recommendation to Congress of areas for wilderness classification where 36 CFR 219.17(a) applies” (DEIS, page 1-1 and 1-2). To this end, the Forest completed a Roadless Area Inventory and Wilderness Evaluation. Both the Gaudineer and East Fork Greenbrier areas met the eight inventory criteria and therefore were included in the Roadless Area Inventory and evaluated for wilderness potential. The potential timber values foregone if the areas were to be designated as Wilderness are given in the evaluations (see Appendix C to the EIS).
<b>PC 543</b>	<b>The Forest should give assurances that certain activities will be allowed within the roadless areas proposed in Alternative 2, including:</b> <ul style="list-style-type: none"> <li>• <b>Management of existing insect and disease problems</b></li> <li>• <b>Management of public health or safety situations</b></li> <li>• <b>Management of wildfire risks</b></li> <li>• <b>Management of critical wildlife habitat needs</b></li> <li>• <b>Maintenance and/or establishment of critical infrastructure needs</b></li> <li>• <b>Recognizing the right of private property owners to access their surface or subsurface properties, and</b></li> <li>• <b>Addressing emerging critical opportunities to address our country's energy or security needs.</b></li> </ul>
Response:	Management direction for roadless areas in Alternative 2 includes provisions for the concerns listed in the concern statement, although there are also limitations on the amount of development that can occur related to these and other activities. To understand the full scope of these provisions and limitations, one must read both Chapters II and III of the Revised Plan, particularly Management Prescriptions 5.1, 6.2, and 8.1 (SPNM).
<b>PC 172</b>	<b>The Forest should not alter the current Forest Plan's semi-primitive policy because changes may not protect roadless areas.</b>
Response:	The 2006 Inventoried Roadless Areas will have their undeveloped character and semi-primitive non-motorized qualities protected by management direction for MPs 5.1 and 6.2.

<b>WILDERNESS AND WILDERNESS STUDY AREAS</b>	
<b>PC 839</b>	<b>The Forest should allow the neutralization of streams impacted by acid precipitation by addition of limestone fines only if methods other than road building are used for access in roadless and wilderness areas.</b>
Response:	Delivering limestone sand to acidic watersheds via helicopters would be allowable in most areas of the Forest. However, using this means to deliver lime in MP 5.0 (Wilderness) is discouraged under the current Forest Service Manual direction 2326.03; and the Wilderness Act prohibits landing of helicopters within Wilderness areas.
<b>PC 835</b>	<b>The Forest should provide documentation of how the tangible and intangible benefits of wilderness were calculated in determining the Net Present Value.</b>
Response:	As explained in the DEIS on page 3-456, the Net Present Value analysis compares costs and revenues in its calculations. See also response to PC 748.
<b>PC 835a</b>	<b>INCLUDING RECREATION BENEFITS IN DOLLARS AND JOBS, AND HOW THE VALUES OF VARIOUS USES WERE WEIGHED IN CHOOSING ALTERNATIVE 2 OVER 3.</b>
Response:	The NPV model assigns recreation use, including wilderness use, a positive dollar value without regard to program costs. Timber harvest, mining, and livestock grazing uses incorporate program costs and therefore can be displayed as negative dollar values, if costs exceed revenues. So, if anything, the model is biased toward recreation use. The model does not weigh the values of various uses, and it does not choose one Alternative over another. It merely reports Net Present Value by alternative based on simple inputs and coefficients.
<b>PC 66</b>	<b>The Forest should recommend more land for wilderness designation.</b>
PC 66a	INCLUDING ALL AREAS RECOMMENDED IN ALTERNATIVE 3: SENECA CREEK, CRANBERRY EXPANSION, ROARING PLAINS WEST, DRY FORK, EAST FORK

	GREENBRIER, TURKEY MOUNTAIN, SPICE RUN, MIDDLE MOUNTAIN, CHEAT MOUNTAIN, BIG DRAFT, AND GAUDINEER
Response:	We agree that these areas have good potential for Wilderness, which is why we recommended them for Wilderness study in Alternative 3. They also are all Inventoried Roadless Areas, and have been given an MP 5.1 or MP 6.2 allocation under the preferred alternative in the DEIS. These prescriptions will maintain their wilderness attributes and potential for future Wilderness consideration by Congress.
PC 66b	INCLUDING DOLLY SODS EXPANSION, CANAAN MOUNTAIN/LOOP, GAULEY MOUNTAIN EAST, GAULEY MOUNTAIN WEST, ROARING PLAINS EAST, ROARING PLAINS NORTH, AND TEA CREEK
Response:	Although these areas were not recommended for Wilderness study under any alternative, they are Inventoried Roadless Areas, and they have been given an MP 6.2 under the preferred alternative in the DEIS. This prescription will maintain their wilderness attributes and potential for future consideration.
PC 66c	INCLUDING NORTH FORK MOUNTAIN, UPPER SHAVERS FORK EAST AND WEST, FIRST FORK, LOWER LAUREL FORK, RED CREEK WATERSHED, FLATROCK RUN, BIG RUN, FIRST FORK, GREEN KNOB, AND BLUE BEND
Response:	Although these areas were not recommended for Wilderness study under any alternative in the DEIS, and they are not Inventoried Roadless Areas, their Management Prescriptions under the preferred alternative would provide additional resource protection and maintain whatever undeveloped character and backcountry recreation opportunities they have now. North Fork Mountain is in 8.1 SPNM. The Upper Shavers Fork East, Upper Shavers Fork West, and First Fork areas are in MP 4.1. Lower Laurel Fork is in MP 6.2. The Red Creek watershed is primarily in 5.0 or 6.2. The portion of Flatrock Run on the Forest is in the Roaring Plains West area, MP 5.1. The Big Run area is in MP 8.2 or 4.1. The Green Knob area is in MP 4.1 and West Virginia northern flying squirrel habitat. The Blue Bend area, as far as we can tell, is the same as the Big Draft area, which is in MP 6.2. The 5.1, 6.2, and 8.2 prescriptions will maintain the areas' wilderness attributes and potential for future wilderness consideration. The 4.1 prescription will likely maintain whatever wilderness attributes and potential for future wilderness there currently is in 80 percent or more of the areas.
PC 66d	INCLUDING LITTLE ALLEGHENY MOUNTAIN AND LAUREL RUN
Response:	These areas were not recommended for Wilderness study under any alternative in the DEIS, and they are not Inventoried Roadless Areas. They are MP 6.1 under the preferred alternative, which means that they have a Wildlife Habitat Emphasis, and some lands within them could be managed for habitat diversity, mast and timber production, and restoration of oak and oak-pine forests.
PC 66e	INCLUDING ALL 15 AREAS IDENTIFIED BY THE WEST VIRGINIA WILDERNESS COALITION
Response:	These areas, though configured somewhat differently, are included in parts a, b, c, and d, above.
PC 66f	TO PROVIDE RECREATIONAL OPPORTUNITIES AND ATTRACT TOURISM
Response:	We believe that most areas of the Forest provide recreational opportunities and attract tourism.
PC 66g	TO BENEFIT FUTURE GENERATIONS
Response:	The Revised 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.
PC 66h	TO HELP IMPROVE THE ECONOMY OF WEST VIRGINIA
Response:	The Revised Forest Plan is designed to contribute to the economy of West Virginia in many different ways. See response to PC 66g, above.
PC 66i	FOR RESEARCH OR EDUCATIONAL PURPOSES
Response:	Research or educational studies may be conducted on much of the Forest. Although Wilderness and areas recommended for Wilderness study would provide excellent control areas into natural processes, or to compare the effects of natural processes with active management, so would areas assigned to MP 6.2, 8.1 SPNM, 8.2, 8.4, and 8.5 candidate Research Natural Areas.
PC 66j	TO IMPROVE OR PROTECT SURROUNDING PRIVATE PROPERTY VALUES, BECAUSE LAND NEAR WILDERNESS AREAS IS MORE VALUABLE, ECONOMICALLY AND AESTHETICALLY
Response:	Although it is widely known and accepted that property values can be higher adjacent to national forest

	land, we have not studies or research to show that they are higher new wilderness areas on the Monongahela National Forest.
PC 66k	TO PROTECT FROM SIGNS AND EFFECTS OF DEVELOPMENT, INCLUDING LOGGING AND CLEAR CUTTING, ROAD BUILDING, PRESCRIBED BURNING, OFF-ROAD VEHICLE USE, HERBICIDES, AND ACID POLLUTION
Response:	We agree that logging, road building, prescribed burning, and herbicide use would generally not occur in Wilderness or areas recommended for Wilderness study, although there may be some exceptions. Off-road vehicle use is not allowed off of roads anywhere on the Forest. Acid pollution from airborne particulates is occurring everywhere on the Forest, regardless of Management Prescription.
PC 66l	TO PROTECT ECOSYSTEMS, BIODIVERSITY, VEGETATION, MATURE FORESTS, SPRUCE FORESTS, HEMLOCK TREES, WILDLIFE AND HABITAT, HABITAT FOR BLACK BEAR, AIR QUALITY, WATER RESOURCES, TROUT STREAMS, FISHERIES, AND BROOK TROUT
Response:	We believe that the Revised Forest Plan has protections in place for all resources, regardless of Management Prescription or Wilderness recommendation.
PC 66m	BECAUSE MP 6.2 DESIGNATION DOES NOT PROVIDE SUFFICIENT PROTECTION
Response:	MP 6.2 does not provide the permanent protection of a Wilderness designation, which can only be made by Congress. In terms of protecting resources and maintaining undeveloped character, the Forest will manage MP 6.2 and MP 5.1 areas much the same.
PC 66n	BECAUSE WILDERNESS DESIGNATION WILL HAVE A NEGLIGIBLE EFFECT ON THE SUITABLE TIMBER BASE AND TIMBER HARVEST, AS PRIVATE TIMBERING SUPPLIES MOST TIMBERING JOBS, AND THERE IS STILL A LARGE AREA ON NATIONAL FOREST LAND FOR TIMBERING
Response:	We agree that Wilderness designation would have a negligible effect on the suited timber base, as long as the areas designated are MP 5.1, 6.2, or 8.1 SPNM, which are not in the suited timber base. This base is estimated to be about 36% of the Forest under the preferred alternative in the DEIS.
PC 66o	TO REDUCE FLOODING
Response:	No prescription allocation can provide absolute protection from flooding, which is a natural event and process. However, the preferred alternative has management direction designed to protect riparian areas and to prevent over harvesting or road construction in riparian areas, which should help reduce the potential for flooding in the future.
PC 66p	TO REDUCE THE COST OF FOREST MANAGEMENT
Response:	Passive management would occur in all Inventoried Roadless Areas, whether they are recommended for Wilderness study or not, so management costs would stay much the same. If Congress were to designate more areas as Wilderness, management costs may increase slightly due to additional patrols to ensure compliance with Wilderness regulations and higher costs associated with trail/site maintenance.
PC 66q	TO PROTECT MENTAL AND PHYSICAL HEALTH
Response:	Although we do not doubt that people may find Wilderness benefits their mental and physical health, that type of assessment is beyond the scope of plan revision.
PC 66r	BECAUSE WILDERNESS PROTECTION SHOULD BE THE TOP PRIORITY FOR ANY FUTURE MANAGEMENT PLAN
Response:	Wilderness protection is a high priority for us, but not necessarily any higher than protection of all resources across the Forest.
PC 66s	IF HUNTING IS STILL ALLOWED
Response:	Hunting is allowed on most of the Forest, including recommended and designated Wilderness areas.
PC 66t	TO EXTEND TIER 3 LEVEL ANTI-DEGRADATION PROTECTIONS AS DEFINED BY THE CLEAN WATER ACT AND THE STATE'S WATER QUALITY STANDARDS
Response:	Tier 3 statuses would only be extended to areas that are designated Wilderness, and only Congress can designate Wilderness.
PC 66u	BECAUSE OF THE SPIRITUAL VALUES OF WILDERNESS
Response:	Although we do not doubt that people may find Wilderness to be of spiritual value, that type of assessment is beyond the scope of plan revision.
PC 436	<b>The Forest should support the creation of new wilderness legislation that gives the Forest Service the authority to regulate mountain biking on any newly designated wilderness areas.</b>

Response:	We would support the creation of any new wilderness by managing it appropriately. Only Congress has the authority to create wilderness or wilderness legislation. It seems doubtful that Congress would incorporate the regulation of a non-conforming use into wilderness legislation, but if they did, we would support the legislation by managing the use appropriately.
<b>PC 339</b>	<b>Forest managers should show more support for additional wilderness designations and retaining existing roadless areas.</b>
Response:	Although we manage Wilderness, we do not have the authority to designate additional areas. Wilderness advocates may show all the enthusiasm they like. Our task in Forest Plan revision is to objectively identify those areas that are eligible for our Roadless Area Inventory and evaluate them for wilderness potential.
<b>PC 181</b>	<b>The Forest should manage wilderness areas in accordance with Wilderness Act requirements, including no tree cutting, road work, herbicides, or prescribed burning.</b>
	The Forest is required by law to manage Wilderness consistent with the Wilderness Act of 1964, the Eastern Wilderness Act of 1975, and any legislation specific to an individual Wilderness. This legislation does not specifically prohibit the activities mentioned, but the activities are greatly restricted to limit their potential impacts on Wilderness attributes. For example, a road may be constructed or reconstructed in a Wilderness in order to access reserved rights, such as pre-existing private property or mineral holdings. Tree cutting could occur with such road work. Prescribed burning may occur to reduce hazardous fuels in certain instances. However, we are typically not going to propose such activities as an agency because we are obliged to meet the intent and purpose of the legislation. Our management intent is expressed in the Desired Conditions and Goals of MP 5.0 in the revised Plan.
<b>PC 3</b>	<b>The Forest should protect the wilderness qualities of the Forest, including protection of existing wilderness areas and the qualities of backcountry areas.</b>
Response:	Wilderness attributes are protected or maintained for areas that are Designated Wilderness (MP 5.0) and Recommended Wilderness (MP 5.1). In addition, MP 6.2 and MP 8.1 SPNM backcountry recreation areas would be managed to maintain their undeveloped character, which would preserve future options for wilderness recommendation or designation. Alternative 2 assigns all Inventoried Roadless Areas to one of these MPs. Thus, wilderness qualities would be protected for all areas on the Forest that have been determined to possess wilderness potential at this time. See also response to PC 66.
PC 3a	TO BENEFIT FUTURE GENERATIONS
Response:	See response to PC 66g.
PC 3b	TO PROVIDE RECREATIONAL OPPORTUNITIES AND ATTRACT TOURISM
Response:	See response to PC 66f.
PC 3c	TO PROVIDE ECONOMIC OPPORTUNITIES
Response:	The Revised Forest Plan is designed to contribute to the economy of West Virginia in many different ways. See also response to PC 66g.
PC 3d	BECAUSE WILDERNESS QUALITIES INCREASE PROPERTY VALUES
Response:	See response to PC 66j.
PC 3e	TO PROTECT ECOSYSTEMS, PLANTS AND ANIMALS, AIR QUALITY, WATER RESOURCES, SOIL, AND OLD GROWTH FORESTS
Response:	We believe that the Revised Forest Plan has protections in place for all resources, regardless of Management Prescription or Wilderness recommendation.
PC 3f	TO PROTECT QUALITY OF LIFE AND PEOPLE'S HEALTH AND WELL BEING
Response:	See response to PC 66g.
PC 3g	TO PROTECT OUR NATURAL HERITAGE
Response:	"Heritage" resources in the Forest Service are those cultural artifacts and imprints that help us interpret human history. There are parts of the Forest that may never look or function the same as they did in presettlement times. However, we believe the Forest will by and large look "natural" in spite of the probability that minor portions may be undergoing developmental activities at any given time. See the Scenic Environment section of Chapter 3 in the EIS.
PC 3h	TO PROTECT EDUCATIONAL OPPORTUNITIES
Response:	See response to PC 66i.
PC 3i	TO PROTECT AND PROVIDE PEACE AND QUIET

Response:	Most activities allowed by the Forest Plan create noise, including recreation. The Revised Forest Plan also allocates large areas to places where people can generally escape from noises that people associate with large-scale development. See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS.
PC 3j	<b>TO AVOID THE CURRENT SCHEME'S PERIODIC AND COSTLY REVIEWS</b>
Response:	The only Management Prescriptions that would absolutely not be up for review in the future would be those areas that are designated by Congress or the Department of Interior.
PC 3k	<b>BECAUSE THERE ARE PLENTY OF OTHER SOURCES FOR WOOD AS WELL AS ALTERNATIVES TO WOOD</b>
Response:	The Forest Service is a multiple use agency, and one of those uses is and always has been wood production. There are plenty of other sources for recreation, and alternatives to backcountry recreation, but we will continue to provide a variety of quality opportunities in that program area as well.
PC 3l	<b>INCLUDING ADOPTING BUILDING REGULATIONS THAT REQUIRE LESS WILDERNESS LAND USE</b>
Response:	We do not set building regulations, and we are not clear as to how they might affect wilderness land use, as facility construction is generally not allowed in Wilderness.
PC 3m	<b>BECAUSE THERE ARE PLENTY OF ACTIVELY MANAGED LANDSCAPES ON PRIVATE AND STATE-OWNED LANDS OUTSIDE THE FOREST THAT WILL PROVIDE THE YOUNG SUCCESSIONAL FORESTS FOR CERTAIN SPECIES</b>
Response:	See responses to PC 269, PC 112, PC 522, and PC 17e.
PC 3n	<b>BECAUSE WE HAVE TO MAINTAIN SUFFICIENTLY LARGE AREAS WHERE NATURE CAN TAKE ITS COURSE AND REVERT BACK TO THE WAY THINGS OPERATED BEFORE WE INTERVENED</b>
Response:	See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS.
<b>PC 694</b>	<b>The Forest should examine the carrying capacity of wilderness areas.</b>
Response:	Based on the results of National Visitor Use Monitoring conducted on the Forest in Fiscal Year 2003, visual observations by employees, and comments from Wilderness visitors, we did not perceive a need to have carrying capacities at this time. The results of the NVUM indicate that only about 3% of Forest Visitors visited the Wilderness areas on the Forest, and comments did not indicate that visitors felt overcrowded (DEIS, Chapter 3, pages 385-386). In addition, we could find no clear record of how the carrying capacities were established in the 1986 Plan. We now have Wilderness monitoring in place, including NVUM, and better methodologies (such as Limits of Acceptable Change) to reassess and determine new carrying capacities if there is an identified need to do so in the future.
<b>PC 276</b>	<b>The Forest should continue to separate designated wilderness and proposed wilderness into two different management areas to avoid confusion.</b>
Response:	We agree. These management prescriptions remain separate in the FEIS and Final Revised Plan.
<b>PC 345</b>	<b>The Forest should make wilderness protection its highest priority, and therefore you should choose Alternative 3 for implementation.</b>
Response:	We acknowledge your preference. Wilderness protection is a high priority for us, but not necessarily any higher than protection of all resources across the Forest. Although Alternative 3 has more area recommended for Wilderness study than any other alternative, all alternatives have the same amount of designated Wilderness.
<b>PC 167</b>	<p><b>The Forest should protect lands with wilderness and backcountry designations:</b></p> <ul style="list-style-type: none"> <li>• <b>Including wilderness recommendation for Laurel Run</b></li> <li>• <b>Including wilderness recommendation for Little Allegheny Mountain</b></li> <li>• <b>Including wilderness recommendation for the East Fork of the Greenbrier</b></li> <li>• <b>Including wilderness recommendation for Middle Mountain</b></li> <li>• <b>Including wilderness recommendation for Spice Run</b></li> <li>• <b>Including wilderness recommendation for Big Draft</b></li> <li>• <b>Including additional wilderness designation for Dolly Sods</b></li> <li>• <b>Including the Management Prescription 6.2 areas listed in Alternative 3</b></li> <li>• <b>To protect water resources</b></li> </ul>

	<ul style="list-style-type: none"> <li>• To reduce flooding of the Greenbrier River</li> <li>• To provide recreational opportunities</li> <li>• To provide tourism revenue</li> <li>• To protect wildlife and habitat</li> <li>• To protect trout</li> <li>• To achieve ecological balance</li> <li>• To prevent the timber supply acreage from exceeding 29.5 percent of the forest acreage.</li> </ul>
Response:	The Forest does not have the authority to designate Wilderness. We identified areas for backcountry recreation prescriptions based on their current conditions or wilderness potential, not the watershed where they are located. We feel that the management direction we have provided in the Revised Plan will provide adequate protection for all resources, and the mix of management prescriptions across the Forest will provide more backcountry recreation opportunities than the 1986 Plan. See the Recreation and Wilderness section of Chapter 3 in the EIS for more information. See also responses to PCs 66 and 103.
<b>PC 258</b>	<b>The Forest should fully evaluate areas for their wilderness potential, including Upper Shavers Fork.</b>
Response:	One of the six key decisions made in Forest Planning for long term management of the Forest is a "Recommendation to Congress of areas for wilderness classification where 36 CFR 219.17(a) applies" (DEIS, pages 1-1 and 1-2). The Forest completed a Roadless Area Inventory and Wilderness Evaluation; however the Upper Shavers Fork area did not meet the eight roadless inventory criteria and therefore was not evaluated for its wilderness potential (see page C-20 in Appendix C to the DEIS).
<b>PC 425</b>	<b>The Forest should improve its description of the Seneca Creek Basin and its wilderness qualities.</b>
Response:	We agree that Seneca Creek is a special area. However, we believe that the current description adequately displays the area's qualities, without going to the level of specificity that you suggest. The Seneca Creek Backcountry would continue to be managed for backcountry recreation in all of the EIS alternatives. Alternative 1 is no change, Alternative 2 and 4 continue to manage a somewhat larger area for SPNM recreation, including portions that are now in MP 8.0, 3.0, and 6.1. Alternative 3 recommends the area for Wilderness. Public motorized use would continue to be prohibited under any alternative.
<b>PC 355</b>	<b>The Forest should acknowledge problems with its wilderness evaluation of the Big Draft area.</b>
PC 355a	<b>INCLUDING NO LOSS OF MINING OPPORTUNITIES IF BIG DRAFT IS RECOMMENDED AS WILDERNESS</b>
Response:	The wilderness evaluation in Appendix C to the EIS indicates that mineable coal is not present in the Big Draft area. Based on our information the area has a 12.5% chance of natural gas production at 1.56 million cubic feet/ acre. The moderate potential for conflict is based on the potential for natural gas discovery coincident with private ownership (40% of the area). See PC 783 for additional information.
PC 355b	<b>INCLUDING NO LOSS OF WILDLIFE CLEARINGS IF BIG DRAFT IS RECOMMENDED AS WILDERNESS</b>
Response:	Although WVDNR indicated that there were 18 acres of wildlife openings and one waterhole in this area, a subsequent check based on your comment determined that these features are in the 1986 Plan Big Draft 6.2 area, as opposed to the somewhat smaller area that qualified for the updated Roadless Area Inventory in 2005. We have reworded the Appendix C description to reflect this change.
PC 355c	<b>INCLUDING NO LOSS OF THE ABILITY TO APPLY FIRE SUPPRESSION TECHNIQUES SUCH AS PRESCRIBED FIRE IF BIG DRAFT IS RECOMMENDED AS WILDERNESS</b>
Response:	The values foregone described in the Appendix C description only apply if the area were to be designated as Wilderness, not recommended. Mechanical equipment can only be used for fire suppression in Wilderness with appropriate approvals. Similarly, prescribed fire would have specific restrictions.
PC 355d	<b>INCLUDING THE ABILITY TO LIME BIG DRAFT STREAM IF BIG DRAFT IS RECOMMENDED AS WILDERNESS</b>
Response:	Again, the values foregone described in the Appendix C description only apply if the area were to be designated as Wilderness, not recommended. However, we agree with your concern about the statement regarding stream liming for the reasons you gave, and we have removed the statement.
<b>PC 33</b>	<b>The Forest should re-evaluate roadless areas for potential wilderness recommendation to include</b>

	<b>their buffer zones, because buffer zones are an arbitrary description, and the land areas provided by buffer zones is what allows many areas to qualify as wilderness.</b>
Response:	The Forest followed FSH 1909.12, Chapter 7 and the August 1997 R-9 Regional Forester letter to evaluate potential Roadless Areas. See Appendix C to the DEIS, pages C-2 to C-21. The “buffer zones” you refer to were not removed from the areas considered for their roadless inventory potential. The buffers were applied merely to determine core solitude acres. Core solitude was not one of the eight criteria used to assess roadless inventory potential. Core solitude came into play with only one of the eight criteria, Criterion #4: “Is the area conducive to wilderness values, including proximity to pollution sources or obvious signs of development”. All undeveloped areas on the Forest lie adjacent to some development feature or features. However, the size and shape and configuration of those areas influence how much this development can be detected from within the areas. This is essentially the concept of core solitude. The larger and rounder and more contiguous an area is, the more inner or core area it generally provides to allow a visitor to experience a sense of solitude, away from the peripheral sounds and sights of development. However, if an area is relatively small or linear or intermingled with pockets or fingers of development, the opportunity to experience solitude is greatly reduced. The six areas that the comments reference (North Fork Mountain, Smoke Hole, Peters Mountain, Little Mountain, Laurel Run, and Lower Laurel Fork) generally have some combination of small, narrow, or crenulated configurations, and are abutted wholly or partially by private land development. These features not only affect their potential for roadless or wilderness status, but they can also affect their capacity to provide large remote areas for quality backcountry recreation use.
<b>PC 221</b>	<b>The Forest should properly carry out and provide information about the roadless area inventory and wilderness evaluation.</b>
Response:	The Forest followed the FSH 1909.12 direction and the August 1997 R9 Regional Foresters letter in completing the Roadless Area Inventory and Wilderness Evaluation. The processes we used are described in Appendix C to the EIS, and have been updated in the Final Appendix for clarification.
PC 221a	<b>INCLUDING THE EIGHT CRITERIA USED</b>
Response:	The 8 criteria used are explained in Appendix C, pages C-2 through C-9, and used in the evaluation matrix on pages C-11 through C-20.
PC 221b	<b>INCLUDING A MAP OF THE 16 ROADLESS AREAS</b>
Response:	A map of the Inventoried Roadless Areas is on page C-23 of Appendix C to the DEIS.
PC 221c	<b>INCLUDING INFORMATION ABOUT AREAS NOT RECOMMENDED FOR WILDERNESS IN ALTERNATIVE 3 DUE TO THE “CORE SOLITUDE” TOOL, IN CONSIDERATION OF THE UNIQUE TOPOGRAPHY, SITING, AND POTENTIAL OF PLACES LIKE NORTH FORK MOUNTAIN</b>
Response:	The inventory evaluation matrix in Appendix C (pages C-11 through C-20) denotes how each area considered either qualified for the inventory or not, based on the 8 criteria. No areas were disqualified from the inventory based solely on core solitude. The Record of Decision describes which Inventoried Roadless Areas are being recommended for Wilderness study by the Responsible Official, along with the rationale for this decision. See also response to PC 33.
PC 221d	<b>BECAUSE IT WAS NEVER DETERMINED WHETHER ANY ALTERNATIVE CONFIGURATIONS OR ALTERNATIVE ACREAGES OF CERTAIN AREAS MIGHT HAVE MET THE NUMERICAL ROADLESS AREA CRITERIA AND OTHER CRITERIA IF SOME AREAS WITH DISQUALIFYING IMPROVED ROADS, TIMBER CUTS, AND OTHER INFRASTRUCTURE WERE ELIMINATED FROM THE AREAS</b>
Response:	We used the process described on pages C-4 through C-9 of Appendix C to help identify boundaries for the areas considered for the roadless inventory. We did consider alternative boundaries submitted by the public; however, these boundaries typically did not consistently follow the process that we were obligated to use. Between the DEIS and FEIS, we did make a couple of boundary adjustments to exclude private inholdings that were near the edge of areas considered. We felt that these adjustments were within the parameters of the process we were required to follow; however, these adjustments did not result in the addition of those areas to the roadless inventory.
PC 221e	<b>INCLUDING INFORMATION ABOUT WHY AREAS THAT QUALIFY AS ROADLESS WERE NOT INCLUDED IN THE INVENTORY</b>
Response:	Areas that met all 8 of the criteria used were included in the roadless area inventory. See the inventory

	evaluation matrix in Appendix C (pages C-11 through C-20) for additional information.
PC 221f	INCLUDING PROVIDING DOCUMENTATION OF THE FIELDWORK AND OTHER STEPS TAKEN TO UPDATE THE ROADS INVENTORY USED IN THE ROADLESS INVENTORY, AS WELL AS TO OBTAIN INFORMATION ON OTHER HUMAN IMPACTS, INCLUDING THOSE PURPORTED TO COME FROM ADJACENT PRIVATE LAND
Response:	See response to PC 820.
PC 221g	INCLUDING USING ONLY CLASS 3 THROUGH CLASS 5 ROADS - NOT CLASS 1 AND 2, WHEN DEFINING "IMPROVED ROADS"
Response:	Maintenance Level 3-5 roads were considered "improved roads" in the inventory evaluation (see page C-6 and C-7 in Appendix C to the DEIS). In a few instances where Level 1 and 2 roads on our GIS layer looked more like Level 3-5 roads on the ortho-photo quads, we field-verified these roads to determine whether they were actually designed and constructed improved roads that met the criteria on pages C-6 and C-7.
PC 221h	INCLUDING NOT OVER EMPHASIZING THE DEFINITION OF "SOLITUDE"
Response:	Core solitude was determined based on the criteria in the ROS mapping guide. No areas were disqualified from the inventory based solely on core solitude. See also response to PC 33.
PC 221i	INCLUDING EVALUATING LITTLE ALLEGHENY MOUNTAIN AND LAUREL RUN SEPARATELY
Response:	We did evaluate these areas separately in Appendix C to the DEIS. However, due to new information received between the DEIS and FEIS, these two areas were re-evaluated as one area for the Final Appendix C inventory.
PC 221j	BECAUSE EXCLUDING AN AREA FROM THE ROADLESS INVENTORY BECAUSE OF A RAILROAD GRADE IS INAPPROPRIATE
Response:	In Appendix C to the DEIS, Lower Laurel Fork was disqualified from the roadless inventory due to Criteria #4 as well as Criteria #1 that included the railroad tunnel. For the Final EIS, this area was disqualified solely based on Criteria #4. See also response to PC 434.
PC 221k	BECAUSE NON-CONFORMING ACTIVITIES ON ADJACENT PRIVATE LANDS ARE NOT ADEQUATE REASONS FOR EXCLUDING AN AREA FROM THE ROADLESS INVENTORY
Response:	Private land development or uses were not used alone as a reason to disqualify any area from the roadless area inventory. However, the potential for encroachment and non-conforming uses, along with manageability, were considered as part of Criteria #3 and #4 that looked at ownership patterns and the area's location in terms of proximity to outside influences and obvious signs of development.
PC 221l	INCLUDING CONSIDERING NORTH FORK MOUNTAIN'S REVISED BOUNDARY WHEN ASSESSING THE AREA'S ROADLESS AND WILDERNESS STATUS AND ATTRIBUTES
Response:	Based on public comments we received, we reconfigured the North Fork Mountain area boundary to exclude the private inholdings. However, this area still did not qualify for the inventory due to Criterion #4 (see Appendix C to the Final EIS). People climb and hike North Fork Mountain for the spectacular view from the cliffs along the ridge. That view includes State Highway 55, traffic, houses, farm buildings, and agricultural development. From up on Chimney Rocks, one can even see the entire city of Petersburg. As noted above, the view is spectacular, but it is not a view that one would expect to see in a Wilderness because of the sights and sounds of nearby development.
PC 221m	INCLUDING PROVIDING INFORMATION ABOUT USER DENSITY
Response:	We do not have information on specific user density for these areas. However, based on National Visitor Use Monitoring completed in FY 2003 and interactions we have had with the public, we have not identified concerns with user density or overuse of these areas.
PC 221n	BECAUSE AREAS SHOULD NOT BE EXCLUDED FROM THE ROADLESS AREA INVENTORY BECAUSE OF THE EXISTENCE OF UNIMPROVED ROADS OR TRAIL DEVELOPMENT
Response:	No areas were excluded from the inventory due solely to the presence of unimproved roads or trails. However, existing roads were one of the factors considered in Criteria #1 and #2 that looked at whether an area was regaining its natural appearance and whether improvements were disappearing or muted.
PC 221o	INCLUDING WHETHER THE LOGGING THAT EXCLUDED LAUREL FORK FROM THE INVENTORY TOOK PLACE PRIOR TO THE ROADLESS AREA CONSERVATION RULE BEING COMPLETED
Response:	The logging took place within the last 10 years, which is considered in Criteria #1, #2, and #7. The

	timing of the activity relative to the RACR is immaterial to the process we used to evaluate potential roadless areas.
<b>PC 432</b>	<b>The Forest should expand the Dolly Sods/Roaring Plains wilderness area:</b> <ul style="list-style-type: none"> <li>• To accommodate the large number of visitors</li> <li>• To prevent fragmentation caused by timbering</li> <li>• Because forests in the highlands recover slowly as a result of slow tree growth</li> <li>• Because spruce restoration is naturally occurring without timber operations</li> <li>• To protect the Red Creek watershed</li> <li>• Because Red Creek has the potential to become an attractive brook trout fishery.</li> </ul>
Response:	The Forest cannot designate Wilderness; only Congress has that authority. For plan revision, we followed FSH 1909.12 and the R9 Regional Foresters August 1997 letter to establish boundaries for Inventoried Roadless areas (Appendix C, pages 3-8). All of the Dolly Sods/Roaring Plains areas are either Wilderness or on the Roadless Area Inventory. In the FEIS preferred alternative, Dolly Sods North, Roaring Plains East, and Roaring Plains North are in MP 6.2, Roaring Plains West is MP 5.1 and Dolly Sods is MP 5.0. Under all of these MPs we would continue to manage this general area of around 27,000 acres to provide for backcountry recreation, emphasizing a SPNM setting.
<b>PC 354</b>	<b>The Forest should not over-emphasize the importance of "solitude" when evaluating potential wilderness areas, because Congress has rejected the "sight and sound doctrine", and several potential wilderness areas provide considerable solitude, despite minor intrusions.</b>
Response:	See response to PC 33. In plan revision, we are required to re-inventory the roadless areas on the Forest in order to evaluate their potential for Wilderness. The inventory and evaluation are connected actions. One does not occur without the other. Well-defined wilderness attributes include the opportunities for solitude and primitive recreation. Therefore, we feel that it is appropriate, as part of a revision roadless inventory process, to look at how the size and shape of prospective inventory areas would potentially affect an area's capacity to provide for solitude and primitive recreation.
<b>PC 454</b>	<b>The Forest should review the boundaries of the proposed wilderness areas based on comments from concerned private citizens and professionals.</b>
Response:	We did review the boundaries for other proposed wilderness areas. In some cases, the proposed areas did not make our roadless inventory, regardless of the boundaries. In other cases where the proposed areas were on our inventory, we were obligated to use the boundaries established through the inventory process in the Forest Handbook. All of the inventoried areas were evaluated for wilderness potential, and we do not feel that the differences in other boundaries versus ours had any measurable effect on our wilderness recommendations.
<b>PC 191</b>	<b>The Forest should create continuous strips of wilderness areas connecting larger wilderness areas together to allow animals to move easily from one mature habitat to another.</b>
Response:	The Forest followed FSH 1909.12 and the R9 Regional Forester's August 1997 letter to establish the Roadless Area Inventory and complete wilderness evaluations. The criteria used and rationale is in Appendix C to the EIS, pages 4-9. See also response to PC 9u.
<b>PC 760</b>	<b>The Forest should not impose stricter standards for wilderness than Congress does.</b>
Response:	Congress does not recommend areas for Wilderness study, and the Forest Service does not designate Wilderness. This comment appears to be comparing two separate processes, with the expectation that they should be using the same process and criteria.
PC 761a	BECAUSE AN ARBITRARY ACREAGE THRESHOLD OR BOUNDARY SETBACKS BASED ON SOLITUDE SHOULD NOT PRECLUDE LANDS FROM CONSIDERATION AS A POTENTIAL WILDERNESS AREA
Response:	We followed FSH 1909.12 and the R9 Regional Forester's August 1997 letter to establish the Roadless Area Inventory and complete wilderness evaluations. The criteria used and rationale is in Appendix C to the EIS, pages 4-9. We do not believe that the process was arbitrary or arbitrarily applied.
PC 761b	BECAUSE SIGHTS AND SOUNDS OF HUMAN ACTIVITY FROM OUTSIDE ANY PARTICULAR ACRE OF LAND SHOULD NOT DISQUALIFY THAT AREA FROM BEING RECOMMENDED OR DESIGNATED AS WILDERNESS
Response:	See responses to PC 33 and 354.
PC 761c	BECAUSE CONGRESS DOES NOT USE THE RECREATION OPPORTUNITY SPECTRUM IN ITS WILDERNESS DECISIONS

Response:	Congress may use whatever information they want to in designating Wilderness, including the Recreation Opportunity Spectrum.
PC 761d	BECAUSE THERE IS NO MINIMUM SIZE REQUIREMENT FOR WILDERNESS
Response:	The revised Roadless Area Inventory has areas ranging in size from nearly 25,000 acres to under 3,000 acres. We believe these areas have the highest Wilderness potential on the Forest. Congress may choose from these inventory areas or select ones of their own for Wilderness designation.
PC 347	<b>The Forest should leave wilderness designations up to Congress, and leave all potential wilderness areas as MP 5.1 until Congress them designates or not.</b>
Response:	We agree that only Congress has the authority to designate Wilderness. We state in Appendix C to the EIS that our roadless area inventory constitutes the areas we consider to be eligible for Wilderness evaluation and recommendation. We have chosen to recommend different amounts of these areas for Wilderness by alternative to give the Responsible Official and the public a reasonable range to consider. However, Congress may consider any areas for Wilderness designation, whether or not we have recommended them as Wilderness, or they are on the roadless inventory.
PC 428	<b>The Forest should clarify whether recommended wilderness remains as recommended wilderness until the next planning cycle if Congress chooses not to designate it, or if the recommended wilderness is assigned a 6.2 Management Prescription until the next planning cycle.</b>
Response:	All Management Prescription assignments would remain in place during this planning period unless there is some over-riding reason to change them. Congressional Wilderness designation or release language would qualify as an over-riding reason. Because the Recommended Wilderness (MP 5.1) areas in the DEIS preferred alternative are also Inventoried Roadless Areas, we would likely assign them a 6.2 prescription should Congress release them from Wilderness consideration, unless Congress directs us to do otherwise.
PC 738	<b>The Forest should acknowledge that only Congress can choose to designate wilderness, and it does so according to its own prerogatives.</b>
Response:	We agree that only Congress can choose to designate wilderness.
PC 738a	BECAUSE THERE ARE NO "RECREATION TESTS" REQUIRED BEFORE WILDERNESS IS DESIGNATED
Response:	We have not used the two "recreation tests" from the Western Counties Alliance that you reference in your comments to identify areas with wilderness potential. We have used the roadless area inventory process and wilderness evaluations described in Appendix C to the EIS.
PC 683	<b>The Forest should explain about why it thinks wilderness designation should be precluded in areas where stream liming needs to occur.</b>
PC 683a	BECAUSE WILDERNESS DESIGNATION DOES NOT PROHIBIT LIMING IF IT IS DONE BY HELICOPTER
Response:	We have not said, nor do we think, that wilderness designation should be precluded in areas where stream liming needs to occur. We have stated in applicable areas evaluated for Wilderness potential that, "Wilderness designation would restrict the use of mechanized equipment or transport to add lime to streams or restore watershed conditions to help maintain or improve water quality and fish habitat" (e.g., page C-52 of Appendix C to the DEIS). This statement is based on the past and current methods that WVDNR uses to lime streams, and on general restrictions for mechanized use and transport found in Wilderness regulation and policy. We are not necessarily opposed to liming by helicopter in Wilderness areas, but we do recognize that there is only one area in the country (St. Mary's Wilderness in Virginia) where helicopter liming has been allowed in a Wilderness, and that allowance required a lengthy environmental analysis and Congressional approval. In other words, Wilderness helicopter liming, at this point in time, appears to be the exception, rather than the rule. We have indicated to WVDNR, Trout Unlimited, and others interested in liming Wilderness streams by helicopter that it may be feasible to work with Congress on allowing this activity in the Wilderness-specific legislation, if and when any areas are considered by Congress for designation; however, we cannot assume in our evaluations that this allowance would occur. These groups or individuals may be interested in the economic analysis of the helicopter option that was provided in the comments.
PC 683b	INCLUDING WHETHER AN ECONOMIC ANALYSIS HAS BEEN DONE THAT BALANCES THE NEED TO BUILD ROADS TO LIME STREAMS AGAINST THE LONG-TERM ECONOMIC VALUE OF RETAINING WILDERNESS QUALITIES BY LIMING VIA HELICOPTER

Response:	We have indicated to WVDNR, Trout Unlimited, and others interested in liming Wilderness streams by helicopter that it may be feasible to work with Congress on allowing this activity in the Wilderness-specific legislation, if and when any areas are considered by Congress for designation; however, we cannot assume in our evaluations that this allowance would occur. These groups or individuals may be interested in the economic analysis of the helicopter option that was provided in the comments.
<b>PC 749</b>	<b>The Forest should re-evaluate wilderness candidate areas because the Wilderness Attribute Rating System is flawed and the rankings given too many potential wilderness areas appear to be poorly justified and inconsistent.</b>
Response:	We did not use the Wilderness Attribute Ranking System (WARS) during the Roadless Area Inventory and wilderness evaluation process for plan revision. Wilderness evaluations included narrative descriptions of individual areas based on their wilderness attributes and Wilderness Capability, Availability, and Need (see Appendix C to the DEIS, pages C-24 to C30).
<b>PC 395</b>	<b>The Forest should acknowledge that wilderness designation will not have a negative effect on wildlife management:</b> <ul style="list-style-type: none"> <li>• <b>Because wilderness areas protect wildlife habitat</b></li> <li>• <b>Because wilderness managers are required to maintain native wildlife populations within wilderness areas</b></li> <li>• <b>Because the use of motorized or mechanized equipment can be used for wildlife management purposes within wilderness areas when necessary</b></li> <li>• <b>Because chemical treatment of waters is permissible in wilderness areas if done to restore native habitat impacted by human activity</b></li> <li>• <b>Because fish-stocking activities can be carried out in wilderness areas under certain circumstances.</b></li> </ul>
Response:	We have not stated in our Appendix C wilderness evaluations that wilderness designation would have a negative effect on wildlife management. We have instead indicated that wilderness designation would restrict the use of mechanized equipment or transport to accomplish certain management activities, such as stream stocking and liming by truck, or maintaining wildlife openings with bush-hogs. This statement is based on the past and current methods that WVDNR uses, and on general restrictions for mechanized use and transport found in wilderness regulation and policy [e.g., see Public Law 88-877, Stat 890, section 4 3(c)].  Wildlife populations are managed by the WVDNR. WVDNR could choose to employ other, non-mechanized methods to achieve their objectives. Congress could choose to allow certain mechanized management activities in Wilderness-specific legislation, if and when any areas are considered by Congress for designation. However, we cannot assume in our evaluations that other methods or allowances would occur. See also response to PC 683.
<b>PC 225</b>	<b>The Forest should not classify too many areas such as wilderness areas, inventoried roadless areas, and remote backcountry areas as having “Distinctive” scenic attractiveness:</b> <ul style="list-style-type: none"> <li>• <b>Because most of these areas should be classified as “Typical” sceneries, with the remainder of the Forest outside these areas being indistinctive</b></li> <li>• <b>Because the only influence such classifications will have is on vegetative patterns.</b></li> </ul>
Response:	Based on personal preferences, there may be different perspectives and opinions on what is Distinctive, Typical, or Indistinctive Scenic Attractiveness. The areas that we identified as “Distinctive” are ones that we believe are the most important to visitors both viewing landscapes and anticipating a backcountry/SPNM recreating experience.
<b>PC 149</b>	<b>The Forest should consider that most people who visit the wilderness areas are local people, and most of them have indicated no desire for additional wilderness designation.</b>
Response:	We do not have actual demographic breakdowns for people visiting Wilderness on the Forest, but the National Visitor Use Monitoring completed in 2003 indicated that about 55% of all Forest visitors are not local. We have received comments that strongly support more wilderness and others who do not want to see additional areas designated. One of the requirements for Forest Plan revision is to evaluate wilderness potential and, if appropriate, make a recommendation to Congress regarding potential additional Wildernesses. This process is described in Appendix C to the EIS. Recommended Wilderness in the DEIS ranged from none in Alternatives 1 and 4, to four areas in Alternative 2, to 11

	areas in Alternative 3.
<b>PC 453</b>	<b>The Forest should eliminate the Dry Fork Wilderness from its wilderness list.</b>
Response:	Dry Fork by itself is too small to be recommended for wilderness, but it is contiguous with Otter Creek and would expand the current Otter Creek Wilderness by an estimated 739 acres. Therefore we are required to consider it in our roadless area inventory process and wilderness evaluations.
<b>PC 173</b>	<b>The Forest should not recommend areas for wilderness designation if it would endanger brook trout, because wilderness designation would preclude the use of mechanized equipment that is needed to mitigate acidic conditions in fisheries, affecting brook trout.</b>
Response:	We agree that Wilderness designation would likely preclude the use of motorized and mechanized equipment to transport lime or other chemicals in any area so designated. Materials could be transported into the wilderness by foot or horseback, or lime could be added to Wilderness streams from points outside of the Wilderness; however the use of trucks, helicopters, or liming drums would likely be prohibited unless approved by Congress.
<b>PC 134</b>	<b>The Forest should not recommend any new wilderness area designations and should subject existing wilderness areas to re-evaluation with each new Forest Plan.</b>
Response:	If recommended wilderness areas (MP 5.1) are not designated for Wilderness by Congress in the interim, we would likely re-evaluate them for Wilderness potential during the next Forest-wide planning process. The Forest does not have the authority to reconsider Wilderness designations made by Congress.
<b>PC 795</b>	<b>The Forest should consider the negative effects of wilderness designation;</b> <ul style="list-style-type: none"> <li>• <b>Including the limits it puts on the management of acid deposition in streams</b></li> <li>• <b>Including the limits it puts on the ability to remediate long-term physical alterations of areas caused by anthropogenic effects or climactic changes and events.</b></li> </ul>
Response:	See response to PC 173. We acknowledge in the wilderness evaluations that designation would likely prohibit the use of motorized and mechanized equipment to access areas for stream treatments.
<b>PC 195</b>	<b>The Forest should not recommend any new wilderness areas until the new study of need is completed as part of the new regulations that allow States to participate in directing management of the Forest.</b>
Response:	We believe you are referring to the process related to the State Petitions for Inventoried Roadless Area Management. This process is not so much a study of need as it is an opportunity for state governors to involve themselves in roadless area management on federal lands within their states. The Governor of West Virginia has opted not to pursue the petitioning process at this time (see letter from the Governor's Office in this appendix).
<b>PC 736</b>	<b>The Forest should consider, when making wilderness recommendations, that the 917,000 acres of federal land within the MNF proclamation boundary is broken up by over 600,000 acres of private land, unlike the West where most of the land is in huge blocks of solid federal ownership.</b>
Response:	We acknowledge your points; however, we are obliged to follow the standard process for wilderness evaluation. Proximity is one of many factors that is considered in wilderness recommendations. It should be obvious that, if proximity were the only criterion we considered, we would not have recommended any Wilderness.
<b>PC 940</b>	<b>The Forest should show more clearly how restrictions on land management are affecting multiple uses of the Forest.</b>
PC 940a	BECAUSE BACKCOUNTRY STATUS SHOULD SERVE TO PROTECT THE SO-CALLED "ROADLESS" VALUES ON THE FOREST WITHOUT BINDING THE HANDS OF MANAGERS FOR THE FORESEEABLE FUTURE
Response:	We agree that we should be able to do limited management in backcountry areas without affecting the overall roadless values of the area.
PC 940b	BECAUSE IT IS OUR OBSERVATION THAT WITH REGARD TO WILDERNESS RECREATION, PEOPLE ARE NOT USING WHAT HAS ALREADY BEEN SET ASIDE
Response:	The visitor use numbers presented in the Recreation and Wilderness section of Chapter 3 in the EIS indicate that people are using wilderness areas, but at relatively low rates compared to other areas.
PC 940c	BECAUSE BACKCOUNTRY, WILDERNESS AND PROPOSED WILDERNESS MAKE UP ABOUT 24 PERCENT OF THE FOREST THAT SAYS "CLOSED" TO THE VAST MAJORITY OF POTENTIAL USERS

Response:	The 24 percent figure has risen slightly in the FEIS and Revised Plan to 26 percent. These areas do restrict certain uses, although many forms of recreation and administrative uses are still available.
PC 940d	BECAUSE WE ESTIMATE THAT WITH OTHER RESTRICTIONS ON HARVESTING, EVEN WITHIN MPS 3.0 AND 6.1, THERE IS A LARGE AREA OF THE FOREST THAT WOULD NOT BE MANAGED, PERHAPS AS MUCH AS 75 PERCENT
Response:	We estimated in the DEIS that, relative to timber harvest, about 64 percent of the Forest would not be managed on any sort of programmed or regulated basis. This number includes most other restrictions in MPs 3.0 and 6.1.
PC 940e	BECAUSE WE FEEL THAT A MAXIMUM OF 1/3 IN ACTIVE MANAGEMENT WOULD BE CLOSER TO TRUE MULTIPLE USE
Response:	The estimated 36 percent of the Forest available and suitable for timber harvest would appear to meet your 1/3 criterion.
<b>PC 735</b>	<b>The Forest should provide the reasons it chose to recommend so few areas for wilderness designation in Alternative 2</b>
Response:	Although you evidently think that we recommended too few areas for Wilderness study in Alternative 2, other people thought we recommended too many. The rationale for choosing the recommended Wilderness areas in the selected alternative is provided in the Record of Decision. We disagree with your inference that the over-riding decision criteria should be our capability to provide wilderness relative to state or private lands. There are many factors that go into this decision. One of the factors that cannot go into this decision is whether our primary agency role is to provide wilderness. We do not have the authority to provide or designate wilderness. We can, however, provide backcountry recreation opportunities and maintain the undeveloped character of qualified areas on the Forest until Congress makes a decision to designate them as wilderness or not. We have done this in Alternative 2.
PC 735a	BECAUSE THE FOREST SEEMS TO IMPROPERLY RELY UPON USER DENSITY SURVEYS IN MAKING THESE RECOMMENDATIONS
Response:	Although we did use NVUM survey information to indicate use levels in existing Wilderness areas, this was just one of many information sources we considered in making Wilderness recommendations.
PC 735b	INCLUDING HOW THE NON-RECREATION USES/VALUES OF WILDERNESS WERE CONSIDERED AND WEIGHED
Response:	The wilderness evaluations considered potential wilderness and non-wilderness values and uses, as detailed in the Capability and Availability sections of the evaluations in Appendix C to the EIS. See also response to PC 941.
PC 734c	INCLUDING HOW THE NUMEROUS, MORE-DEVELOPED RECREATION SETTINGS ON NEARBY STATE AND PRIVATE LANDS WERE TAKEN INTO ACCOUNT WHEN DETERMINING THE RIGHT MIX OF RECREATION OPPORTUNITIES ON THE FOREST THAT WOULD COMPLEMENT THESE MORE DEVELOPED SITES
Response:	Alternative 2 has around 240,000 acres in Management Prescriptions (5.0, 5.1, 6.2, 8.1 SPNM) that emphasize undeveloped recreation settings and opportunities. We believe these areas provide a good complement to the more developed sites that exist on private, state, and federal lands near the Forest.
PC 734d	INCLUDING PROVIDING A TABLE/MAP THAT DOCUMENTS THE CURRENT STATE AND PRIVATE LAND RECREATION DEVELOPMENTS WITHIN THE FOREST PROCLAMATION BOUNDARY AND REASONABLE RADIUS TO ALLOW AN ACCURATE EVALUATION OF THE PROPER ROLE OF THE FOREST TO BE COMPLETED
Response:	We agree that there are many state and private recreation developments near and within the Forest proclamation boundary. Any list would vary greatly depending on how one defines "recreation development" and a "reasonable radius".
PC 734e	BECAUSE SUCH DOCUMENTATION WOULD SHOW THAT THE FOREST'S PRIMARY ROLE IN RECREATION IS ITS ABILITY TO PROVIDE WILDERNESS AND BACKCOUNTRY EXPERIENCES NOT AVAILABLE ON STATE OR PRIVATE LANDS
Response:	We believe that the Forest's recreation role is adequately captured in the Recreation Resources desired conditions and goals, as stated in Chapter II of the Revised Forest Plan, and the description of the Forest in Chapter I of the Revised Plan.
<b>PC 941</b>	<b>The Forest should discuss how the non-recreation uses and values of wilderness were weighed in deciding to recommend so little wilderness in Alternative 2.</b>

Response:	These comments appear to be mixing two different assessments and a public comment process that had little influence on each other, and making an overall assumption that they did.
PC 941a	INCLUDING HOW THE TANGIBLE AND INTANGIBLE BENEFITS OF WILDERNESS, REQUIRED BY THE FOREST SERVICE HANDBOOK (FSH), WERE USED IN CALCULATING THE VALUE OF WILDERNESS IN THE NET PRESENT VALUE OF EACH ALTERNATIVE, BECAUSE THE FSH, REFLECTING THE 1960 MUSYA, STATES: “THE PREDOMINANT VALUE DOES NOT NECESSARILY REFLECT THE USE OR COMBINATION OF USES THAT WOULD YIELD THE GREATEST DOLLAR RETURN OR THE GREATEST UNIT OUTPUT”, AND THE UNCOMMON AREAS OF EXTENSIVE BACKCOUNTRY WHICH THE FOREST SERVICE ADMITS THAT THE MONONGAHELA PROVIDES ARE OF GREAT AND INCREASING VALUE IN THE EAST, AND IT IS NOT AT ALL CLEAR THAT THIS WAS TAKEN INTO ACCOUNT IN THE ECONOMIC ANALYSES (SUMMARY TABLES, P. S-67 TO S-72) AND IN CHOOSING ALTERNATIVE 2 OVER ALTERNATIVE 3
Response:	As explained on page 3-456 of the DEIS, wilderness visits were assigned a monetary value in the Net Present Value analysis, even though we do not collect fees for visitation. This value is built into the model used in this analysis. We have tried to clarify the discussion of this analysis in the FEIS.  The economic impact analysis and the Net Present Value analysis were not used to identify which areas should be recommended for wilderness, or to ultimately decide which alternative to choose as the preferred alternative in the DEIS. In fact, if these economic analyses had been used for these purposes, as the comments infer, the results would have led us to choose Alternative 4 rather than 2 as the preferred alternative.
PC 941b	BECAUSE THE INTERPRETATION OF DATA PRESENTED IN THE DEIS ON PAGES 3-445 TO 3-446 IS VERY DIFFERENT FROM MY OWN PERCEPTION OF THE OPINIONS OF THE VAST MAJORITY OF THE PUBLIC, AND IT MAKES ME ASK HOW THE PUBLIC COMMENTS ON THE DRAFT PLAN/ DRAFT EIS ARE GOING TO BE APPROPRIATELY WEIGHED
Response:	The attitudes and beliefs cited on page 3-446 are accurate depictions of what we heard from the public regarding their views toward wilderness, timber harvest, and other land uses or activities.
PC 941c	BECAUSE I HAVE A SERIOUS CONCERN THAT A COMMENT MADE BY LESS THAN 10 PERSONS WILL BE WEIGHTED EQUAL TO OPPOSITIONAL COMMENTS ON THE SAME TOPIC FROM 3,000 OTHER PEOPLE, AND TENS OF ORGANIZATIONS, ESPECIALLY AS CONCERNS WILDERNESS/ROADLESS AREA PROTECTION
Response:	We did not “weigh” comments for the scoping or draft comment periods. Rather, we looked at each comment individually in the context of how we might manage the Forest. We cannot put areas on the roadless inventory that do not meet the inventory qualifications, nor can we grant any area of the Forest Wilderness protection—only Congress has that authority. What we can do and did is come up with a reasonable range of recommended wilderness in the alternatives that reflects the range of comments we heard from the public. Again, it is ultimately up to Congress to choose how much of the Forest they want to designate as Wilderness.
<b>PC 813</b>	<b>The Forest should clarify that wilderness designation does not prevent the agency from fighting fires or using prescribed fire.</b>
Response:	The Proposed Revised Plan states that the agency shall suppress wildfires in Wilderness and specifies what approvals are needed for various types of equipment to suppress wildfires (p. III-22). The Plan also says that prescribed fire may be used to restore or maintain fire-dependent ecosystems, wildlife openings or range allotments. However, this direction has been removed in the Final Plan due to comments we received that claimed it conflicts with Forest Service Manual direction.
<b>PC 533</b>	<b>The Forest should revise the EIS to provide a proper description of the high demand for wilderness areas in the East, because large wilderness areas exist in the West, but are very limited in the East.</b>
Response:	There are few large wilderness areas in the East for a number of reasons, including the fact that there are relatively few large contiguous parcels of federal land in the East due to land ownership patterns, and the fact that almost all eastern federal lands have been well developed at some time in the past. We are fortunate to have two relatively large Wilderness areas on the Forest in Cranberry (over 35,000 acres) and Otter Creek (20,000 acres). The preferred alternative in the DEIS included recommendations to potentially expand both of these areas.

PC 784	<p><b>The Forest should not reduce the size of the potential Cheat Mountain wilderness area and should provide information about mineral and gas lease activities in the area:</b></p> <ul style="list-style-type: none"> <li><b>To protect scenic resources</b></li> <li><b>To provide recreational opportunities</b></li> <li><b>Because of the solitude it provides</b></li> <li><b>To protect vegetation</b></li> <li><b>To protect wildlife and habitat</b></li> <li><b>Because current wilderness evaluation results are not consistent with existing MPs.</b></li> </ul>
Response:	<p>The Forest does recommend Cheat Mountain for Wilderness in Alternatives 2 and 3, based on the wilderness attributes identified in this area as described in Appendix C to the DEIS, pages 46-50. Although the West Virginia Wilderness Coalition’s proposal includes another 4,000 acres of area on Cheat Mountain to the south, this area has several miles of road numerous wildlife openings that may have disqualified it from meeting all 8 Roadless Area Inventory criteria. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Cheat Mountain area was presented on page C-52 and C-53 of Appendix C to the DEIS.</p>
PC 785	<p><b>The Forest should support wilderness designation for the Cranberry Expansion:</b></p> <ul style="list-style-type: none"> <li>• <b>To provide connectivity to the existing trail system in the current Cranberry Wilderness Area</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>Because little timber harvesting has been done in the area during the past decade</b></li> <li>• <b>To protect wildlife and habitat</b></li> <li>• <b>Because there is no established mountain biking use in the area</b></li> <li>• <b>Because current wilderness evaluation results are not consistent with existing MPs.</b></li> </ul>
Response:	<p>The Forest does recommend the Cranberry Expansion for Wilderness in Alternatives 2 and 3. This recommendation is based on the opportunity to increase the size of the Cranberry Wilderness and the wilderness attributes identified in this area as described in Appendix C to the DEIS, pages 51-55. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision.</p>
PC 786	<p><b>The Forest should support wilderness designation for the Dolly Sods Expansion:</b></p> <ul style="list-style-type: none"> <li>• <b>Because you have failed to acknowledge the public support for this area as wilderness</b></li> <li>• <b>To disperse the heavy use of the Dolly Sods Wilderness Area</b></li> <li>• <b>Because of special features such as the high elevation, bog and heath ecosystem, and vast spreads of low bush blueberries</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>To protect unique flora</b></li> <li>• <b>Because mountain bike use in the area is minimal</b></li> <li>• <b>Because current wilderness evaluation results are not consistent with existing MPs</b></li> <li>• <b>To protect the headwaters of Red Creek</b></li> <li>• <b>Because of its unique landscape.</b></li> </ul>
Response:	<p>The wilderness evaluation for the Dolly Sods Expansion states that “There has been public interest in this area becoming wilderness. The West Virginia Wilderness Coalition included this area in its 2004 wilderness proposal”, see Appendix C to the DEIS, page 59. Based on visual observations, National Visitor Use Monitoring completed in FY-03, and limited traffic counts, we do not concur that wilderness designation of Dolly Sods Expansion would decrease use in the Dolly Sods Wilderness or that mountain bike use is minimal. Under Alternatives 2, 3, and 4, the Dolly Sods Expansion would be managed as MP 6.2, and in Alternative 1, as MP 8.0. Both of these MPs would protect the areas special features and continue to provide for a variety of SPNM recreation opportunities. See DEIS Appendix C pages 56-60 for additional information on solitude, special features, botanical features, and recreation opportunities.</p>
PC 787	<p><b>The Forest should support wilderness designation for the Dry Fork/Otter Creek expansion and provide information about mineral activities in the area:</b></p> <ul style="list-style-type: none"> <li>• <b>Because of the solitude it provides</b></li> </ul>

	<ul style="list-style-type: none"> <li>• To provide recreational opportunities</li> <li>• To protect scenic resources</li> <li>• Because the surrounding private land would make it easy to manage this area</li> <li>• Because most of the area is managed as wildlife habitat and not for timber harvest</li> <li>• Because current wilderness evaluation results are not consistent with existing MPs.</li> </ul>
Response:	The Forest does recommend Dry Fork for Wilderness in Alternatives 2 and 3. This recommendation is based on the opportunity to increase the size of Otter Creek Wilderness and the current wilderness attributes as described in Appendix C to the DEIS, pages 61-64. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Dry Fork area was presented on page C-52 and C-53 of Appendix C to the DEIS. This information has been updated for the FEIS.
<b>PC 788</b>	<p><b>The Forest should support wilderness designation for the East Fork Greenbrier area:</b></p> <ul style="list-style-type: none"> <li>• To protect scenic resources</li> <li>• To protect vegetation</li> <li>• To provide recreational opportunities</li> <li>• Because of the lack of roads in the area</li> <li>• Because mountain biking use is minimal in the area.</li> </ul>
Response:	The Forest does recommend the East Fork Greenbrier area for Wilderness in Alternative 3. This recommendation is based on the wilderness attributes identified in this area. Alternative 2 would continue to manage this area as MP 6.2, and this management would continue to provide backcountry recreation opportunities and protect the resource values identified in this comment. We believe that our wilderness evaluation for the East fork of the Greenbrier is accurate and that the boundaries established best meet the mapping criteria described in Appendix C to the DEIS (see pages C-65 through C-69). The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision.
<b>PC 434</b>	<p><b>The Forest should support wilderness designation for the Lower Laurel Fork area:</b></p> <ul style="list-style-type: none"> <li>• To protect trout populations</li> <li>• To provide a wildlife corridor connecting the northern and central portions of the Forest.</li> </ul>
Response:	<p>Lower Laurel Fork did not meet the 8 criteria for roadless areas in the East (DEIS Appendix C, page 5) and therefore was not included in the Inventory or moved forward for wilderness evaluation. The rationale is presented on page 16 in Appendix C to the DEIS. However, due to public comments, we have decided to change the Management Prescription under the preferred alternative from 6.1 to 6.2 in the FEIS and Final Revised Plan for the following reasons:</p> <ul style="list-style-type: none"> <li>• The area is currently in 6.2 under the 1986 Plan,</li> <li>• A 6.2 would provide additional protection to wetlands and fisheries in the area,</li> <li>• About two thirds of the area is in an eligible WSR corridor with a Wild classification, which gives the area a strong existing backcountry recreation emphasis,</li> <li>• Our options for actively managing the area under a 6.1 are slim at present due to the eligible WSR corridor and the fact that this area is surrounded by private land,</li> <li>• Keeping this area in 6.2 would accommodate a wide variety of supporters who have shown a relatively high interest in protecting this area in a 6.2 prescription.</li> </ul> <p>We believe that the 6.2 designation will provide essentially the same level of protection for the resources mentioned as would a Wilderness recommendation (MP 5.1).</p>
<b>PC 739</b>	<p><b>The Forest should support wilderness designation for the Middle Mountain area and disclose information about mineral leases in the area:</b></p> <ul style="list-style-type: none"> <li>• Because of the solitude it provides</li> <li>• To provide recreational opportunities</li> <li>• To protect scenic resources</li> <li>• To protect wildlife</li> <li>• Because timber harvesting is not common in the area.</li> </ul>
Response:	The DEIS provided a range of alternatives for managing the Middle Mountain area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends the Middle Mountain area for Wilderness. Appendix C to the

	DEIS includes the roadless Area inventory process, and the Middle Mountain Wilderness Evaluation is on pages C-83 to C-87. We believe that management of the Middle Mountain Area in Alternative 2 as MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Middle Mountain area is presented on page C-85 of Appendix C to the DEIS.
<b>PC 740</b>	<p><b>The Forest should support wilderness designation for the Roaring Plains West area and disclose information about mineral leases in the area:</b></p> <ul style="list-style-type: none"> <li>• <b>To protect scenic resources</b></li> <li>• <b>To protect geological and cultural features</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>Because mountain biking is almost non-existent in the area</b></li> <li>• <b>Because the area is not conducive to timber harvesting</b></li> <li>• <b>To protect wildlife.</b></li> </ul>
Response:	We have recommended Roaring Plains West for wilderness in Alternatives 2 and 3 in the DEIS. This recommendation is based on the wilderness evaluation in Appendix C to the EIS. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Roaring Plains West area is presented on page C-90 of Appendix C to the DEIS.
<b>PC 741</b>	<p><b>The Forest should support wilderness designation for the Spice Run area and disclose information about mineral leases in the area:</b></p> <ul style="list-style-type: none"> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>To protect geologic features</b></li> <li>• <b>To protect scenic resources</b></li> <li>• <b>Because there are no established mountain bike trails in the area</b></li> <li>• <b>Because current wilderness assessment results are not consistent with existing MPs and restoration efforts.</b></li> </ul>
Response:	The DEIS provides a range of alternatives for managing the Spice Run area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends Spice Run for Wilderness. Appendix C includes the roadless Area inventory process, and the Spice Run Wilderness Evaluation is on pages 98-102. We believe that management of the Spice Run Area under Alternative 2 as MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The final recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Spice Run area is presented on page C-100 of Appendix C to the DEIS.
<b>PC 742</b>	<p><b>The Forest should support wilderness designation for the Turkey Mountain area and disclose information about mineral leases in the area:</b></p> <ul style="list-style-type: none"> <li>• <b>Because no logging has occurred in the area in the past ten years</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>To protect wildlife</b></li> <li>• <b>To prevent road building</b></li> <li>• <b>To protect water resources.</b></li> </ul>
Response:	The DEIS provided a range of alternatives for managing the Turkey Mountain area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends the Turkey Mountain area for Wilderness Appendix C to the DEIS includes the roadless area inventory process, and the Turkey Mountain Wilderness Evaluation is on pages C-108 to C-111. We believe that management of the Turkey Mountain Area in Alternative 2 as a MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Turkey Mountain area is presented on

	page C-100 of Appendix C to the DEIS.
<b>PC 743</b>	<b>The Forest should support separate wilderness designations for Upper Shavers Fork East and West to provide remote backcountry recreational opportunities in these areas.</b>
Response:	Upper Shavers Fork East and West did not meet the 8 criteria for roadless areas in the East (Appendix C to the DEIS, page C-20), and therefore they were not included in the Inventory or moved forward for wilderness evaluation. Under the preferred alternative, these areas would be managed as MP 4.1. This MP emphasizes spruce and spruce-hardwood restoration. The high-elevation areas of Upper Shavers Fork provide suitable habitat for the West Virginia northern flying squirrel, and therefore little development activity is expected in this area. MP 4.1 and Forest-wide direction would provide protection for natural resources, as well as backcountry recreation opportunities.
<b>PC 744</b>	<b>The Forest should support wilderness designation for the Canaan Loop area</b> <ul style="list-style-type: none"> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>Because no timber harvesting has taken place in the area for 20 years</b></li> <li>• <b>To protect from damage caused by mountain biking</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>Because there are currently no mineral or gas leases in the area</b></li> <li>• <b>To help meet the growing demand for wilderness tourism</b></li> <li>• <b>To take pressure off the overused Dolly Sods and Otter Creek Wilderness Areas.</b></li> </ul>
Response:	The Canaan Loop area was evaluated and included in the Roadless Area Inventory. This area received a wilderness evaluation (Appendix C to the DEIS, pages C-41 through C-45). Based primarily on the area's popularity for mountain biking and its location between two highly used state parks, it was not recommended for wilderness in any of the EIS alternatives (or in the West Virginia Wilderness Coalition proposal, for that matter). Alternative 2 would manage the Canaan Loop area (the portion inside the FR 13 loop) under MP 6.2. This MP would continue to manage the area for backcountry recreation while protecting or maintaining the resources identified in this concern. Portions of the Canaan Area outside of the FR13 loop would be managed under MP 4.1. This MP emphasizes spruce and spruce-hardwood restoration. Canaan Mountain provides suitable habitat for the West Virginia northern flying squirrel, and therefore little development activity is expected in this area. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Canaan Loop area is presented on page C-43 of Appendix C to the DEIS.
<b>PC 745</b>	<b>The Forest should support wilderness designation for the Tea Creek area and disclose information about mineral leases in the area.</b> <ul style="list-style-type: none"> <li>• <b>Because there has been insignificant logging in the area over the past decade</b></li> <li>• <b>Because of the solitude it provides</b></li> <li>• <b>To provide recreational opportunities</b></li> <li>• <b>To protect geologic features</b></li> <li>• <b>Because current wilderness evaluation results are not consistent with existing MPs</b></li> </ul>
Response:	The Tea Creek area was evaluated and included in the Roadless Area Inventory. This area received a Wilderness Evaluation (Appendix C to the DEIS, pages C-103 through C-107). Based primarily on the area's popularity for mountain biking, it was not recommended for Wilderness in any of the EIS alternatives (or in the West Virginia Wilderness Coalition proposal). Alternative 2 would manage the Tea Creek area under MP 6.2. This MP would continue to manage the area for backcountry recreation while protecting or maintaining the resources identified in this concern. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Mineral information regarding Inventoried Roadless Areas and Potential Wilderness is responded to in PC 783. The minerals summary for Tea Creek is located in Appendix C to the DEIS, page C-105.
<b>PC 737</b>	<b>The Forest should not use the Recreation Opportunity Spectrum semi-primitive non-motorized core criteria to evaluate potential wilderness areas, because:</b> <ul style="list-style-type: none"> <li>• <b>Its interpretation of the word "solitude" is too restrictive</b></li> <li>• <b>A half mile buffer should not be used in wilderness evaluation criteria</b></li> <li>• <b>It undermines many other wilderness values and goes against decades of wilderness legislation and Congressional testimony</b></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>The guidance is not signed by a line officer.</b></li> </ul>
Response:	The Forest followed Forest Service Handbook 1909.12 and the August 1997 Regional Forester's letter to identify Inventoried Roadless Areas (IRAs) and to complete wilderness evaluations. See Appendix C, pages 4-9. We disagree with your opinion that we relied too heavily on the core solitude concept to identify IRAs. IRAs must meet all eight criteria in FSH 1909.2 to be included on the roadless area inventory. The core solitude concept comes into play in only one of these eight criteria, Criterion #4: Is the area conducive to Wilderness values (proximity to pollutions sources or obvious signs of development). We feel this criterion is appropriate given that the sole purpose of conducting the roadless area inventory during plan revision is to eventually identify those areas on the Forest that have potential for wilderness recommendation, which is one of the six planning decisions that are made in the revision process. Thus, we consider the inventory process, wilderness evaluations, and wilderness recommendations to be connected actions in plan revision. Furthermore, we looked at over 40 areas for potential inclusion on the roadless area inventory, and only 2 of those areas were excluded from the inventory based solely on Criterion #4. No area was excluded based on core solitude; in fact, there are three areas on the inventory that have little if any core solitude.
PC 957	<b>The Forest should change a number of the areas listed as assigned to MP 6.2 (Draft Plan, page III-39) to MP 5.1, and retain all areas assigned as MP 6.2 in the 1986 Plan as 6.2, along with some new suitable roadless acreage.</b>
Response:	We acknowledge your preference. We generally used this allocation strategy for Alternative 3.

<b>WILD AND SCENIC RIVERS AND SCENIC BYWAYS</b>	
PC 562	<p><b>The Forest should include further discussion regarding wild and scenic rivers, including:</b></p> <ul style="list-style-type: none"> <li>• <b>Clarifying what Federal or State water quality parameters and designated uses must be protected</b></li> <li>• <b>Clarifying what agencies the Forest Service must coordinate with and how they will work together to maintain and/or improve water quality</b></li> <li>• <b>Clarifying what impairments have been defined by the Forest Service or other agencies</b></li> <li>• <b>Clarifying whether the goal is protection or improvement and how Forest Service management will respond to changing conditions over the life of the Forest Plan.</b></li> </ul>
Response:	The "discussion" items referenced appear to have been generated from information found in the federal implementing regulations for designated Wild and Scenic Rivers. We have no designated rivers on the Forest; our rivers are considered eligible. On the other hand, the concerns related to state water quality parameters, 303(d) stream impairment, and coordination with other agencies are ones that we have to address for ALL of our water bodies, not just eligible Wild and Scenic River segments. Because the processes for addressing these concerns are covered in existing law, regulations, and policies, there is no need to repeat them in the Forest Plan. We have, however, provided more discussion related to these concerns in the Watershed, Riparian, and Aquatic Resources section of Chapter 3 in the FEIS.
PC 333	<b>The Forest should recommend all potential wild and scenic river segments at the highest levels possible.</b>
Response:	The Wild and Scenic River Act and its implementing regulations say that eligible segments should be classified at their highest potential classification. Potential classification is based on current conditions, rather than desired conditions or highest potential protection. Thus, if an eligible corridor has a number of current development features, like roads or bridges or campgrounds, its highest potential classification may only be "Recreational" rather than "Scenic" or "Wild".
PC334	<b>The Forest should place eligible wild and scenic river segments in a separate management prescription to ensure that the correct standards, guidelines, and management practices are applied.</b>
Response:	We considered the option of giving eligible river segments their own management prescription prior to the DEIS and Proposed Revised Plan. This is an approach that some other Forests have taken, typically for designated rivers. We decided against this strategy for the following reasons: 1) our river segments are eligible, not suitable or designated, and therefore their WSR status could change, 2) the guidance for managing Wild and Scenic Rivers and their corridors is included in the WSR Act and Forest Service policy direction, and therefore does not have to be repeated in the Forest Plan, and 3) overlaying

	prescriptions generally makes a Forest Plan more difficult to follow. What we have done in the Final Revised Plan to address this concern is provide a map of the eligible river corridors on the Forest and more information in the MPs about the rivers' potential outstandingly remarkable values that need to be maintained.
<b>PC 911</b>	<b>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.</b>
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.
<b>PC 944</b>	<b>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.</b>
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 direction for rivers in these areas.

<b>OTHER SPECIAL DESIGNATIONS</b>	
<b>PC 338</b>	<b>The Forest should consider the population of eastern states near the forest when determining the percentages of classification for roadless and wilderness areas.</b>
Response:	The Forest considered National, Regional, and Local Recreation and Leisure trends as well as visitor information from the National Visitor Use Monitoring completed in FY2003 (DEIS, Chapter 3, pages 3-365 – 3-370). Additional information that we used can be found in the Recreation Analysis of the Management Situation and the Monongahela National Forest Social Assessment. Both of these documents are located in the Forest Plan Revision project record. See also response to PC 533.
<b>PC 266</b>	<b>The Forest should use designations other than wilderness designations to protect areas in the Forest, including backcountry designations.</b>
Response:	Current designated Wilderness makes up a relatively small percentage (8.6) of the Forest, and we do not have the authority to designate additional Wilderness. The 6.2, 5.1, and 8.1 SPNM prescription areas provide backcountry recreation opportunities and settings over large areas. Protective prescriptions are also given to smaller areas, such as National Natural Landmarks, Scenic Areas, and botanical areas.
PC 266a	TO ALLOW MOUNTAIN BIKING
Response:	The MP 5.1 areas that we are recommending for Wilderness study in the preferred alternative comprise a total of 27,000 acres (3% of the Forest), and they are not popular mountain biking areas. These MP 5.1 areas currently allow mountain biking but would likely lose that use if Congress were to designate them as Wilderness.
PC 266b	TO LIMIT USES OF THE FOREST BUT ALLOW MOST USES
Response:	The Forest Management Prescriptions all allow multiple uses but have different degrees of limitations on those uses. Virtually all of them allow mountain biking except for Designated Wilderness (5.0).
PC 266c	INCLUDING DESIGNATING ROARING PLAINS AND CRANBERRY EXPANSION AS NON-MOTORIZED BACKCOUNTRY RECREATION
Response:	These areas feature non-motorized backcountry recreation under Management Prescription 5.1. They would likely revert to MP 6.2 if Congress decides not to designate them as Wilderness.

PC 266d	TO ATTRACT TOURISM
Response:	We believe that much of the Forest, including Wilderness, attracts tourism to some degree.
PC 266e	TO ALLOW MOTORIZED ACCESS
Response:	Backcountry recreation prescriptions (MPs 5.1, 6.2, and 8.1 SPNM) prohibit public motorized access.
<b>PC 761</b>	<b>The Forest should designate special use recreation areas if there is to be an increase in protected areas.</b>
Response:	Management Prescriptions 5.0, 5.1, 6.2, and 8.1 SPNM all feature non-motorized recreation use and a fairly high level of resource protection.
<b>PC 336</b>	<b>The Forest should not split off the National Recreation Area lands from the rest of the Forest because current management is working and there is no apparent need for change.</b>
Response:	We have given the NRA its own prescription (8.1) in the Revised Plan for the following reasons: 1) We believe the NRA is a special area on the Forest and should be therefore given a Special Area prescription to highlight its importance, 2) The special area prescription for an NRA is a significant trend in nation-wide planning, 3) The NRA legislation that created the area includes the same goals and objectives for the entire area, and 4) We believe that we can adequately and appropriately manage the NRA using the recreation-based ROS system, as opposed to separate management prescriptions within the NRA.
PC 336a	BECAUSE 6.2 AREAS WILL NO LONGER RECEIVE THE SAME PROTECTION OF RESOURCES AND EMPHASIS FOR RECREATION
Response:	We have added more specific 8.1 management direction for the Semi-Primitive Non-Motorized (SPNM) areas for the Final Revised Plan that clarifies our management intent and protections.
<b>PC 958</b>	<b>The Forest should assign MPs to lands within the Spruce Knob-Seneca Rocks NRA so that we know the fate of these lands.</b>
Response:	The lands within the NRA are assigned to MP 8.1, which is described in both the Proposed and Final Revised Plans. See also response to PC 336.
<b>PC 597</b>	<b>The Forest should treat the Spruce Knob and Seneca Rocks Areas as separate units with differing management practices because they are unique habitats with individual issues.</b>
Response:	The NRA is currently separated into two administrative units. However, management direction at the Forest planning level is applied to the entire NRA. That direction does not preclude different management practices being applied appropriately to different areas within the NRA at the project level.
<b>PC 286</b>	<b>The Forest should designate land as Diversity Areas to protect mountain bike access.</b>
Response:	We do not have any "Diversity Area" Management Prescriptions, although we consider the entire Forest to be fairly high in flora and fauna diversity. We do have several different kinds of Special Areas under the 8.0 prescription. However, most of these--like botanical areas, geological areas, national natural landmarks, research areas, grouse management areas--are not appropriate for bicycle recreation or lack trails. See also response to PC 266a.
<b>PC 337</b>	<b>The Forest should designate occupied wood turtle sites as Special Zoological Areas.</b>
Response:	The only currently known wood turtle location within the proclamation boundary is not on National Forest System land. If additional occurrences are discovered, protections can be evaluated on a case-by-case basis.
<b>PC 340</b>	<b>The Forest should establish Research Natural Areas.</b>
Response:	The Forest is carrying forward or proposing several candidate Research Natural Areas in the Revised Forest Plan. Specific protection for these areas is provided under MP 8.5 in Chapter III. We will work the Northern Research Station to establish these areas, and additional areas may be considered if there is an identified need.
PC 340a	TO PROTECT NATURAL WILD VALUES, IMPORTANT FOREST, SHRUBLAND, AQUATIC, AND GEOLOGIC TYPES
Response:	Management prescription allocations under all alternatives would provide for large core areas of contiguous forest where natural disturbance and recovery processes predominate. See EIS Chapter 3, Terrestrial Ecosystem Diversity section, subsections on Minimum Dynamic Area reserves. In these areas a variety of forest types, shrublands, aquatic systems, and geologic types are protected from direct impacts of management of the Forest.
PC 340b	INCLUDING BIG RUN BOG

Response:	The comments included in this concern addressed a standard specific to the 8.2 Big Run Bog National Natural Landmark that allowed timber harvest in the area outside the bog. This standard has been dropped in the Final Revised Plan. The boundary of the 8.2 area includes the watershed feeding the bog, and the surrounding area is assigned to MP 4.1 (Spruce-Spruce-Hardwood Ecosystem Management). Commercial timber harvest in the area is unlikely. The National Natural Landmark designation for Big Run Bog provides similar protections and research opportunities as would an RNA allocation.
PC 340c	<b>INCLUDING THE RESEARCH AREA SOUTH OF LAUREL FORK WILDERNESS</b>
Response:	The research area south of Laurel Fork Wilderness has been assigned an MP 8.5 designation in the Final Forest Plan. This area is considered a disjunct section of the Fernow Experimental Forest.
<b>PC 227</b>	<b>The Forest should acknowledge that Scenic Byways designations are more important to lobbyists and activists than they are to the public.</b>
Response:	The Forest currently has only one Scenic Byway. The Revised Forest Plan would not change the current Scenic Byway status on the Forest. Speculating on what is important to lobbyists or activists is beyond the scope of plan revision.