

## Comments from Agencies, Tribes, and Elected Officials

Comments received from elected officials and federal, state, and local agencies, are represented in the public concern statements. This section presents the comments from these agencies and officials in their entirety (FSH 1909.15.24.1.3)

<b>Name</b>	<b>Organization</b>
<b>Federal</b>	
William Arguto	United States Environmental Protection Agency, Region III
Congressman Alan Mollohan	United States House of Representatives
Michael Chezik	United States Department of the Interior – Office of the Secretary
<b>State</b>	
Senator Jon Blair Hunter	The Senate of West Virginia – 14 <sup>th</sup> District
Charles Dye	West Virginia Division of Forestry
Frank Jezioro	West Virginia Division of Natural Resources
Governor Joe Manchin III	West Virginia Office of Governor
<b>County</b>	
H. Steve Conrad	Pendleton County Economic & Community Development Authority
Joel Callison	Pocahontas County Commission
Walter Schmidlen III	Randolph County Commission
Charles Friddle III	Randolph County Development Authority
Marcus Bonner	Randolph County Planning Commission
S. J Echelberger, James C Michael, and David Leary	Tucker County Commission
Andrew Duncan	Upshur County Development Authority
<b>City/Town</b>	
Judith Guy	City of Elkins
John Manchester	City of Lewisburg
Junior David	City of Thomas
Jean Dement	
Scott Eichelberger	
Jerry Flanagan	
Mary Johnson	
Matt Quattro	
Debbie Snyder	
Debra Fogus	
<b>Tribal</b>	
Karen Kaniatobe	Absentee Shawnee Tribe
Jo Ann Beckham	Eastern Shawnee Tribe of Oklahoma



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

NOV 09 07 2005

MON 2159

November 3, 2005

Monongahela National Forest  
Attn: Forest Plan Revision Comments  
200 Sycamore Street  
Elkins, WV 26241

September 26, 2005

CAG RECEIVED

NOV 09 2005

Re: Monongahela National Forest Draft Environmental Impact Statement for Forest Plan Revision, July 2005 CEQ # 20050325

Dear Sir:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. Since the Forest Plan does not compel the agency to undertake any site-specific project; rather it provides goals and objectives for the Forest Service to strive to meet in order to achieve desired physical, biological, social, and economic conditions, it is difficult to determine actual impacts that may be caused by this action.

Based on our review of the DEIS, EPA has rated the environmental impacts of the preferred Alternative as "EC" (Environmental Concerns) and the adequacy of the impact statement as "1" (Adequate). A copy of the rating criteria is contained in the attachment to this letter.

**Project Area:**

The Monongahela National Forest comprises over 919,000 acres of National Forest System lands in West Virginia. The headwaters of six major rivers- the Cheat, Elk, Gauley, Greenbier, Potomac, and Tygarts Valley- are found in the Forest, as well as four impounded lakes- Lake Sherwood, Lake Buffalo, Lake Summit, and Spruce Knob Lake. The Forest has over 500 perennial trout streams. Many communities use water from the Forest for all or part of their water supplies.

The Forest has great vegetative diversity. There are over 60 species of trees. Many tree species have high value for timber sawlogs and other products. The forest offers and sells timber for harvest as a way to help achieve vegetation and habitat objectives and support local and regional economies.



A number of rare plants and plant communities and wildlife species, including federally listed species, exist in the Forest. There are 40-50 natural gas wells and a natural gas storage field. There are also commercial quantities of coal, limestone, and gravel.

The Forest transportation network has an estimated 1,752 miles of classified roads that range from paved highways to non-surfaced roads designed for high clearance vehicles. Many roads are open for recreation and removal of forest products. Some are closed for resource protection or management reasons.

### **Project Purpose:**

According to the DEIS, the Forest Service plans to revise the Land and Resource Plan for the Forest. This plan was originally approved and released in 1986, and includes 6 significant amendments that have occurred since. The revised plan establishes direction for managing resources on National Forest System lands within the proclaimed boundaries of the Monongahela National Forest. The DEIS describes four alternatives for revising the Forest Plan.

The Forest Plan does not compel the agency to undertake any site-specific project; rather it provides goals and objectives for the Forest to strive to meet in order to achieve desired physical, biological, social, and economic conditions. The Forest Plan also establishes limitations on what actions may be authorized, and what conditions must be met, during project-level decision making. The revised Plan includes much of the direction and many of the prescriptions found in the 1986 Plan and its amendments.

The purpose of the proposed action is to provide a revised Forest Plan that will (1) guide all natural resource management activities on the Forest, (2) address changed conditions and direction that have occurred since the original plan was released, and (3) meet the objectives and requirements of federal laws, regulations, and policies. This purpose will be met by selecting a management strategy that best achieves a combination of the following goals:

- Maintain or restore long-term ecosystem health and integrity.
- Contribute to the economic and social needs of people, cultures, and communities.
- Provide sustainable and predictable levels of products and services from National Forest System lands on the Monongahela National Forest.
- Emphasize adaptive management over the long term.
- Provide consistent direction at the Forest level that will assist managers in making project decisions at a local level in the context of broader ecological and social considerations.

The Monongahela National Forest began evaluating the need for changing (Need for Change) the Forest Plan in 2001. The topics identified are: backcountry recreation, vegetation management, timber supply, and soils and water.

The alternatives considered in this DEIS include:

Alternative 1 -No Action

Alternative 2 - the purpose is to address the Need for Change topics (preferred alternative)

MON-2159

Alternative 3- emphasizes backcountry recreation opportunities and reduces management-related disturbances across the forest.

Alternative4- provides more emphasis on vegetation restoration

Given the programmatic nature of the DEIS, it is difficult to evaluate the specific impacts caused by the alternatives. Any specific Forest projects that may involve significant environmental impacts should comply with NEPA. There is a potential for significant environmental impacts to occur from activities that may be undertaken as a result of the Forest Plan revision, including the preferred Alternative 2. We recommend that Forest Service continue to develop methods to reduce impacts caused by commercial and recreational activities. These impacts could include erosion, fragmentation, emissions from vehicles and equipment, and other direct and indirect effects caused by human activity. While we recognize that access is necessary for the Forest Service to fulfill its mission, we encourage you to minimize fragmentation and disturbance caused by new and existing roadways. This

We also recommend that the Service continue to coordinate with the appropriate state and federal agencies regarding threatened and endangered species and their habitat on the property.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barb Okorn at (215)814-3330.

Sincerely,



William Arguto  
NEPA Team Leader

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEES:

SCIENCE, STATE, JUSTICE, AND  
COMMERCE & RELATED AGENCIES  
RANKING MEMBER

INTERIOR, ENVIRONMENT & RELATED  
AGENCIES

COMMITTEE ON STANDARDS OF  
OFFICIAL CONDUCT  
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ALAN B. MOLLOHAN

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Congress of the United States  
House of Representatives

November 14, 2005

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ROOM 2040, FEDERAL BUILDING  
425 JULIANA STREET  
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WHEELING, WV 26003-2900  
(304) 232-5390

Mr. Clyde N. Thompson  
Forest Supervisor  
Monongahela National Forest  
U.S. Department Of Agriculture  
200 Sycamore Street  
Elkins, WV 26241-3932  
ATTN: Forest Plan Revision

CAG RECEIVED  
DEC 01 2005

MON 3202

Dear Mr. Thompson:

Please accept these comments on the Forest Service's revised management plan for the Monongahela National Forest (the Mon).

I have followed the extensive process of revising the Forest Plan for the Mon, including the creation of a Draft Environmental Impact Statement laying out the range of alternative management strategies. I am pleased that so many organizations, such as the West Virginia Wilderness Coalition, have offered their input.

The addition of new Wilderness acres is one of the most important aspects of the revised management plan. I note that in the four alternatives that the Forest Service offers there is a range of anywhere from 0 additional acres of recommended Wilderness to 99,400 additional acres of recommended Wilderness. Obviously, the decision of how many new Wilderness acres will be added is a very important one. I am very pleased to see the new Wilderness areas that are recommended in my congressional district.

The preservation of West Virginia's heritage and future depends upon our willingness to protect special areas in our state for the use of current and future generations. I ask that you keep that concern in mind as you consider which alternative the Forest Service will put forward for Congressional consideration.

Thank you for your time and attention to this issue.

Most sincerely,



Alan B. Mollohan

ABM:ao



IN REPLY REFER TO:

## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904



**MON 2319**

November 8, 2005

ER 05/730

Mr. Clyde N. Thompson  
Forest Supervisor  
Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, West Virginia 26241

**CAG RECEIVED**  
**NOV 11 2005**

Dear Mr. Thompson:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan for the Monongahela National Forest (MNF), Forest Plan Revision (FPR) and offers the following comments for your consideration.

### **GENERAL COMMENTS**

The FPR was developed by the U.S. Department of Agriculture, Forest Service (USFS) to provide overall management direction for the next 10 to 15 years on the MNF, West Virginia. The USFS identified four major "need for change" issues to be addressed within the FPR: vegetation management, backcountry recreation, timber supply, and soils and water. The DEIS developed and evaluated four alternatives, including the No Action Alternative, that present a range of options to address these major issues. The USFS identified Alternative 2 as the preferred alternative. This alternative incorporates a new management prescription (MP) to address spruce restoration; identifies new areas to be managed for potential wilderness designation; provides updated direction for timber and vegetation management; and incorporates measures to control nonnative invasive species, protect rare plants and communities, and manage the effects of acid deposition. In addition, Alternative 2 carries through most measures implemented in the previous Forest Plan Amendment to address threatened and endangered species, and incorporates the 1999 Riparian Management Guidelines.

The evaluated alternatives appear to present an adequate range of options and address the identified major issues to varying degrees. While the Department does have some concerns regarding the details of the selected alternative as outlined below, overall we concur that Alternative 2 represents a reasonable balance of potential management uses of the forest. In addition, the Department supports many of the measures to protect fish and wildlife resources that have been incorporated into this alternative.

## SPECIFIC COMMENTS

### Consultation under the Endangered Species Act

In March 2002, the Department's Fish and Wildlife Service (FWS) completed a Biological Opinion (BO) to address potential adverse effects on the endangered Indiana bat (*Myotis sodalis*) from the previous Forest Plan. The 2004 Forest Plan Amendment incorporated the terms and conditions of the BO, as well as other measures to strengthen conservation of threatened and endangered species (TES). Notably, the Amendment developed a cooperative method of identifying and avoiding potential habitat for the endangered West Virginia northern flying squirrel (WVNFS) (*Glaucomys sabrinus fuscus*). The FWS and the USFS have recently begun cooperative efforts to implement the 2004 Amendment. The Department is pleased with the results of that cooperation and believes that the Amendment provides for enhanced management of federally listed species within the MNF. The FPR should continue to implement the major protective measures developed within the Amendment for these two species.

Information within the DEIS indicates that the USFS may increase the acreage of prescribed burns proposed within the MNF. Additional consultation with the FWS under the Endangered Species Act will be required to address this proposed change. The Department is committed to working cooperatively with the USFS to complete the revised consultation. Our agencies have already begun preliminary discussions regarding this issue. Minor changes to the text of the Forest Plan and the details of the proposed alternative may be required as a result of that consultation. The FPR should not be finalized until that consultation is complete.

### Management Prescription 4.1 - Spruce and Spruce-Hardwood Restoration

All alternatives under the FPR incorporate a new management prescription for Spruce and Spruce-Hardwood Restoration. The Department strongly supports the concept of developing a spruce management prescription and of actively engaging in spruce restoration efforts on the forest.

Many of the areas designated for inclusion within this prescription are already high quality spruce forest habitats. These types of areas would most likely not need restoration but would merely benefit from management to maintain existing characteristics. In the text this Management Prescription is alternately referred to in the text as "Spruce and Spruce-Hardwood Restoration" or as "Spruce and Spruce-Hardwood Ecosystem Management." We suggest that the ecosystem management title more accurately reflects the best overall management emphasis for areas included under this Management Prescription. In addition, it appears that most of the goals and objectives for MP 4.1 are focused on active management. An additional goal for this prescription should be to "Maintain existing high quality spruce habitats with minimal disturbance."

Two federally listed species, the WVNFS and the Cheat Mountain salamander (*Plethodon nettingi nettingi*) are closely associated with high elevation spruce ecosystems. We therefore recommend that the third bullet under Management Emphasis be changed to include "recovery of threatened and endangered species, as well as species of concern associated with spruce and spruce hardwood species."

Goal 4104 currently reads “Work with Fernow Research Work Unit of Northeast Research Station, academia, or State and private researchers on designing and monitoring spruce restoration measures.” As a result of our recovery and consultation efforts for TES, the FWS has a strong history of working with others to design and monitor spruce restoration efforts. We request that the text of the goal be modified to include the FWS as an entity that the USFS would work with on these efforts.

Fragmentation of the remaining spruce forest habitats has been identified as one of the threats to TES that rely on this ecosystem type. An additional objective of this prescription might be to “prioritize restoration efforts in areas that would restore habitat connectivity, increase the size of existing habitat fragments, and provide travel corridors between existing spruce forest habitats.”

### **Forest-wide Management Direction – Threatened, Endangered, and Proposed Species**

#### **General Direction**

Under Desired Conditions (Pg II-20) the FPR states “Habitats are managed consistent with established and approved recovery plans.” Many recovery plans do not provide detailed habitat management guidelines so this statement may not contain much workable guidance. Text in the previous Forest Plan said that habitats would be managed to “maintain and enhance populations.” The FPR should retain that wording or the text should be revised to incorporate that concept, such as “Habitats are managed *to maintain and enhance populations* consistent with established and approved recovery plans.”

Page 3-237 of the DEIS states that any proposed project on the forest would require that the USFS would “Conduct surveys or have surveys conducted for TES to determine their presence or absence in the project area.” This statement is repeated in some, but not all, of the species specific standards and guidelines. For clarity, we recommend that the statement be moved to apply to all TES and included under the General Direction section.

The previous Forest Plan had TES Standard/Guideline 8 that addressed avoiding impacts and redesigning projects that occurred in TES habitat. Standard (WF11 on page II-26) within the new FPR provides similar direction for projects potentially affecting Regionally Sensitive Species. However, we could not find an equivalent standard in the FPR for TES. We recommend incorporating an additional standard into the General Direction section to address the need to design or alter projects to avoid impacts to TES. For example “For management actions that are proposed to occur in areas with a likelihood of occurrence for TES, the project should be either dropped or redesigned to avoid and minimize adverse effects to the maximum extent practicable.”

Many species, such as the Cheat Mountain salamander and running buffalo clover (*Trifolium stoloniferum*) do not have specific standards addressing special use permits, nor is there a standard in the General Direction section. However, Standard TE 63 states that “Special use permits may be authorized within WVNFS suitable habitat if the uses do not adversely affect WVNFS populations or habitat.” We recommend that the wording of this standard should be

extrapolated to apply to habitats supporting all TES (e.g. "Special use permits may be authorized if the uses do not adversely affect TES populations or habitat").

**Cave Habitat and Species; Virginia big-eared bat; Indiana bat**

Standard TE 10 addresses monitoring and maintaining cave gates. The previous plan had wording addressing the timing of maintenance and repairs to these bat gates. While we agree that it may not be reasonable to set a specific time frame on repairs (i.e. two weeks) as was done previously, the FPR should retain wording regarding "maintenance and repair of gates should be undertaken within reasonable time frame from vandalism recovery."

The previous plan established the 6 mile radius around occupied caves as a "zone of influence" for Virginia big-eared bats (*Corynorhinus townsendii virginianus*). The FPR includes protective measures for buildings, but no direction for vegetation management, within this radius. Open areas such as hay fields and old fields are important foraging habitats for this species and may become more important if farm lands are lost to development in the future. In addition, it should be noted that although even-age regeneration can create early successional habitats, this type of management may not create high quality foraging habitat for Virginia big-eared bats. Radio telemetry data collected by the West Virginia Division of Natural Resources (WVDNR) showed that these bats foraged in hay fields and old fields as well as forests, but they did not forage in fairly recent clear cuts near caves. Areas with a large grass component may provide the best quality foraging habitat for this species. The Department recommends that an additional standard or guideline be developed, similar to #1900 in the previous plan, to state that "Vegetation management within 6 mile radius of maternity/hibernation caves will be designed to provide and maintain a diversity of hay fields/old fields and other open habitat types in order to improve or enhance Virginia big-eared bat habitat."

Standards TE 24 & 25 establish procedures for identifying and protecting Indiana bat maternity colonies. In order to protect potential maternity colonies, a two-mile buffer zone should be established if "evidence of maternity colony is found" not just "if a maternity colony is documented." If a buffer zone is not established when "evidence" is found, timber harvests or other vegetation management activities could remove roost trees, cause Indiana bats to abandon established roosting and foraging areas, or fragment existing colonies, thereby making subsequent survey efforts to document maternity activity ineffective. Therefore, Standard TE 24 should be amended to indicate that a two-mile buffer zone would be established around the capture site if a reproductively active female or juvenile is found.

Standard TE 34 should be amended to delete the phrase "in the immediate vicinity of roost trees" Vegetation management should be used to create or maintain a component of large, over-mature (potential Indiana bat roost trees) throughout the 5 mile radius around hibernacula, not just in the vicinity of known roost trees.

Page III-34 of the FPR and Standards TE 35 and 38 address vegetation management activities within the Indiana bat primary range (5 mile radius around hibernacula). Areas within this range are not identified as "suitable timber lands." The Department supports the ideas of removing

these areas from designation as suitable timber land and concurs that certain limited vegetation management activities may enhance Indiana bat habitat. However, the text identifies very specific types of management activities (thinning, etc.) that are preferred methods of habitat improvement for the bat. Our understanding of Indiana bat summer, roosting, and foraging habitat requirements is constantly developing and is likely to change over time. Information within the FPR should not be so prescriptive that it can not be adapted to address the most current and best available scientific information. We recommend adding wording stating that “Appropriate or preferred measures to maintain or improve Indiana bat habitat (within the primary range) may be developed or revised under consultation with FWS using the best available scientific information”.

In order to ensure impacts to Indiana bats are minimized, Standards TE 36, 45 and 52 should be amended to indicate that these activities may be allowed “*if they are would not have an adverse effect on bat populations or habitat*” as has been done for Standards TE 37 and 46, or “*if they are compatible with Indiana bat management*” as was used for some standards in the previous Forest Plan. Alternatively, activities addressed under TE 36, 45 and 52 could be incorporated into Standards TE 37, 46 and 49, respectively.

The Forest Plan Amendment had text on pages 88 and 190C limiting pesticide use in Virginia big-eared bat and Indiana bat habitat areas. Both of these species forage on insects and could be affected by pesticide uses. It does not appear that this wording was carried through in the FPR. We recommend incorporating the previous language into a separate guideline under either the Pesticide Management or the TES section.

Indiana bats are known to be present within the primary range particularly during the swarming period (August 16 to November 14). Vegetation management or other activities during this period may have the potential to disturb foraging, roosting, and mating activities. The Department recognizes that it would be infeasible to restrict activities within the primary range during this time period, but avoiding activities where possible may minimize impacts. The USFS should consider adding a guideline that suggests that “When possible, vegetation management activities within the primary range should be scheduled to avoid the swarming period.”

#### **West Virginia northern flying squirrel**

Standard TE 60 details how suitable WVNFS habitat will be determined. The Department recognizes the challenges in preparing an accurate map of suitable WVNFS habitat at the programmatic level for the entire MNF. Because maps of suitable habitat will be routinely refined and reviewed, it would be inappropriate to refer to a specific map or “the” map in the FPR, rather the text should be revised to read “Suitable habitat shall be determined using maps collaboratively produced by the Forest, USFWS, and the WVDNR using the best scientific and commercial data available. Forest-wide maps shall be reviewed during watershed analysis or project analysis and refined when Forest, USFWS, and WVDNR biologists determine that suitable habitat is or is not present. All verified capture sites shall be included in the suitable habitat map.”

Mon. 2319

### Vegetation

This section of the FPR provides updated direction to address the control of non-native invasive plant species, and to maintain and restore rare plants and communities. The Department supports these ideas and suggests that many opportunities to benefit fish and wildlife resources will result from increased emphasis on these two issues within in the FPR. The Department is willing to work with the USFS to develop site-specific measures that implement these ideas.

### Mineral Operations

Standard TE 06 addresses development of privately owned mineral rights and states that the “Forest shall work with state and federal mineral operation permitting agencies to mitigate adverse effects.” The term “mitigate” has different connotations under the ESA and the National Environmental Policy Act. Under the ESA, federal agencies such as the USFS or permitting agencies do not mitigate adverse impacts. The text should be revised to use the terms “*avoid and minimize*” adverse effects.

Standard MG 09 states that “Mineral exploration may be restricted to prevent unacceptable impacts to developed recreation sites, administrative sites, or specially designated areas.” Consistent with the need to avoid impacts to these species, the Department recommends that impacts to TES or Regional Forester Sensitive Species be added to list of potential reasons to restrict mineral exploration.

Pages 3-238 through 3-242 of the DEIS, discuss the potential effects of mineral operations on TES. The text says that negative effects of mineral operations within TES habitats (e.g. small whorled pogonia and running buffalo clover) may occur. This may require that potential impacts to these species be addressed through formal consultation under the ESA. The wording changes recommended above would help ensure that mineral development activities are not likely to adversely affect listed species.

### Monitoring and Evaluation

The FPR incorporates an increased emphasis on managing the effects of acid deposition. Acid deposition has been identified as a potential threat to ecosystem health in areas throughout the MNF, and is specifically mentioned as a potential threat to the recovery of the WVNFS. The Department strongly supports the increased emphasis on this factor. We further recommend that the USFS engage in, and support, additional research and monitoring to evaluate acid deposition’s effects on forest health, particularly on high elevation spruce ecosystems.

Item 10 in Table 4-3a – Monitoring Matrix states that monitoring of management indicator species would be conducted in conjunction with state fish and wildlife agencies. For the WVNFS and other TES, this monitoring should also be conducted in conjunction with the FWS.

From review of the FPR, it is unclear whether WVNFS populations are still proposed to be monitored or if habitat acreage is being used as surrogate. The FWS recently worked with the USFS, WVDNR, and other species experts to refine WVNFS monitoring techniques. The Department supports the continuation of these monitoring efforts, coupled with periodic review

and refinement of the monitoring approach.

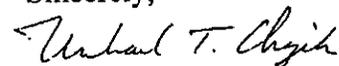
Monitoring and Evaluation Table 9 – Management Problem # 4 of the Forest Plan Amendment specified that the USFS would survey for new populations, and monitor existing populations, of TES. These two items are critical to evaluating the status and potential recovery of species that occur within the MNF. It is unclear whether the USFS will continue to monitor all TES or just management indicator species under the FPR, or if the FPR will result in changes to any of the current survey and monitoring protocols. The Department strongly supports the need to survey for new populations and monitor existing populations of all TES found within the MNF. We recommend that previous efforts in this regard continue and that the USFS work with the FWS, WVDNR, and other species experts to periodically review and refine survey and monitoring protocols.

### SUMMARY

The USFS's preferred alternative appears to provide a reasonable balance of forest management uses, and incorporates many ideas that should benefit or enhance fish and wildlife resources, including TES, within the MNF. The Department supports the inclusion of a spruce management prescription, and the increased emphasis on managing the effects of acid deposition and non-native invasive species. We suggest a number of minor wording changes or additions that would provide greater clarity or protection of Department trust resources. Additional consultation under the Endangered Species Act will likely be required. The FWS will work with the USFS to address any outstanding issues.

We appreciate your commitment to working with the Department to protect and enhance fish and wildlife resources, and we look forward to continuing our cooperative efforts in this regard. The Department contact person for this project is Ms. Barbara Douglas of the West Virginia Field Office (WVFO). Please contact the WVFO if you have any questions regarding this letter. They may be reached by mail at U.S. Fish and Wildlife Service; 604 Beverly Pike; Elkins, WV 26241, or by phone at (304)636-6586.

Sincerely,



Michael T. Chezik  
Regional Environmental Officer

cc:

Barbara Douglas, FWS-WVFO, Elkins, WV  
Thomas Chapman, FWS-WVFO, Elkins, WV



The Senate of West Virginia  
Charleston

MON 2766

JON BLAIR HUNTER  
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November 14, 2005

COMMITTEES:  
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AGRICULTURE  
EDUCATION  
ENERGY, INDUSTRY AND MINING  
HEALTH AND HUMAN RESOURCES  
JUDICIARY  
LABOR

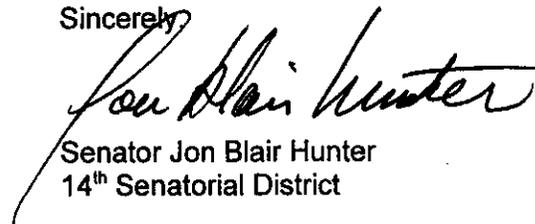
Monongahela National Forest  
ATTN: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

TO WHOM IS MAY CONCERN:

As the State Senator for Preston, Grant and Tucker counties in West Virginia, I urge you to adopt Alternative #3 which recommends more wilderness area.

Protection of endangered species and watershed protection as well as preserving clean air and water are primary concerns. Additionally, maintenance and improvement of this area expands the available recreational opportunities.

Sincerely,



Senator Jon Blair Hunter  
14<sup>th</sup> Senatorial District

CAG RECEIVED  
NOV 15 2005



MON 2602

Joe Manchin III  
Governor

Charles R. Dye  
Director/State Forester

**DIVISION OF FORESTRY**  
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Web Address: [www.wvforestry.com](http://www.wvforestry.com)

November 10, 2005

Mr. Clyde Thompson, Supervisor  
Monongahela National Forest  
200 Sycamore Street  
Elkins, WV 26241-3962

CAG RECEIVED

NOV 14 2005

Dear Clyde:

I'd like to provide a few comments regarding your Forest Plan Revision. In general, it is well done, with the Preferred Alternative (#2) taking into account the many competing interests with whom you have to deal. I empathize with you; I have to balance the viewpoints of many separate constituent groups in resolving various issues within my agency, too. It is never an easy task.

I want to be assured of several things as you evaluate public comment and select a final option for managing the Monongahela National Forest (MNF) for the next 10-15 years.

These things include:

1) Maintaining a diversity of forest age classes, species, and conditions in order to maximize to the extent possible a wide variety of wildlife species. The game populations on public lands are extremely important to the many people who hunt and fish. This is important to the State's overall economy, to many local businesses, to those who enjoy this recreational activity, and to those who provide food for their families from hunting and fishing. I also support efforts to protect plant and animal species which are threatened or endangered, as well as efforts to enhance the habitat for the many nongame species which are important to the State. The two primary ways to ensure that the above concerns are met are as follows: a) through active forest management; and b) through ensuring access for specific wildlife habitat management activities, regardless of the Management Area designation; i.e., access for habitat management in roadless areas, as one example.

2) The production of a reasonable level of timber from the MNF. This is a primary purpose of National Forests, although I am aware that it is not the only purpose. This is a renewable resource, however; and the jobs and the value to the State's economy from MNF timber sales are very important. Since you are only harvesting timber from about a third of the MNF, it is extremely important for you to take the necessary steps to ensure that you sell and harvest the allowable sale quantities. This is 63 million board feet per year for the preferred alternative. The current Plan

Mon-2602

Mr. Clyde Thompson, Supervisor  
Page 2  
November 10, 2005

allowed 65 million board feet to be harvested annually, but you never came close to that amount. It is important that you make the internal adjustments necessary to correct that problem this time around. The high quality hardwoods growing in the MNF are important to our economy.

3) Continued protection, management, and enhancement of the key tourist and aesthetic attractions for which the MNF is known; i.e., Dolly Sods, Spruce Knob, Seneca Rocks, and the various other areas that draw visitors. While your combined acreage of wilderness and roadless areas may seem high to some, it is probably reasonable in view of the high demand placed on our State for back-country recreation opportunities. Tourism and outdoor recreation opportunities are very important to our State.

Other comments:

4) I support your efforts toward restoration of the red spruce forests at our highest elevations. Both the state Division of Forestry and the Division of Natural Resources (DNR) support this effort, as well as do various other federal and state agencies, and conservation organizations. We do, however, request that your management prescription 4.1 be written so as to ensure the maintenance of the oak component wherever it currently exists. We do not support conversion of current oak stands to red spruce.

5) I understand the importance of wilderness areas to many of our citizens. With that in mind, I can endorse the additions of Dry Fork and Cranberry Expansion as recommended wilderness areas.

6) In regard to the Roadless Areas, let me say this: I am fully aware of this national issue. Although from the Forest Service standpoint this is primarily a western issue, it is also a West Virginia issue on your Forest. We are suggesting the Governor forego any petition request at this point in time until he has a chance to see your final Forest Plan. He has until November 13, 2006, to file a petition request with the USDA. This will give him plenty of time to file, after your Forest Plan is finalized in June, should he determine it would be best for the state of West Virginia. Perhaps this will not be necessary.

I endorse those areas you propose as Roadless in Alternative 2. What I would like to see in your final plan are well explained assurances that not only will those areas be managed for roadless and backcountry recreation values, but also that there will be adequate leeway in place in order to address:

- \*emerging or existing insect and disease problems;
- \*public health or safety situations;
- \*wildfire risks;
- \*critical wildlife habitat needs as determined by our DNR;
- \*maintainence and/or establishment of critical infrastructure needs, such as electronic or

MON. 2002

Mr. Clyde Thompson, Supervisor  
Page 3  
November 10, 2005

telecommunications sites, state roads and highways, utility facilities, or anything of that nature;  
\*the absolute right of private property owners to access their surface or subsurface properties;

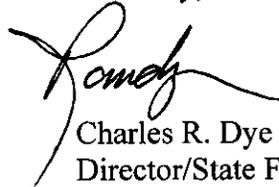
- \*emerging critical opportunities to address our country's energy or security needs;
- \*and, any other emerging needs that may arise and be important to our State or nation.

7) Again, I emphasize that cutting at the Allowable Sale Quantity (ASQ) level must be done. It is very important to do so from the standpoint of scientific forest management and forest health. It is also very important to the 25 percent fund for the 10 counties which have MNF lands. Several million dollars will not be available to the counties for roads and schools if you do not harvest at those agreed upon levels. Counties like Pocahontas, Randolph, Tucker, Greenbrier, Pendleton, and Webster desperately need those dollars due to the high amount of federal land ownership within their boundaries.

After Final Plan adoption, I would ask you to communicate with me on how you expect to meet those ASQ levels. If you need more personnel, we can discuss that with our Congressional delegation. There are other creative ways that we can assist you which we can brainstorm, including cooperative agreements, creative partnerships, private sector collaboration, and other various innovative ideas. The bottom line is that we will need to roll up our sleeves and figure out how to get this part of the Plan implemented and accomplished, rather than several years down the road listing the reasons why we did not get it done. My support for Alternative 2 includes the expectation that you will find ways to ensure that you meet the ASQ harvest levels. It is important to the state of West Virginia.

Thank you for the opportunity to comment on the Revised Forest Plan for the Monongahela National Forest. Again, I commend you for the job you have done, and I think that Alternative 2, with the comments I have provided you, will provide balanced benefits to the citizens of West Virginia and our nation. I look forward to working with you and assisting you in implementing the Forest Plan.

Sincerely,



Charles R. Dye  
Director/State Forester

CRD:jah

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MON-2591

November 10, 2005

Mr. Clyde Thompson, Forest Supervisor  
Monongahela National Forest  
200 Sycamore Street  
Elkins, West Virginia 26241

Dear Mr. Thompson:

The West Virginia Division of Natural Resources (WVDNR), Wildlife Resources Section (WRS), has reviewed the Proposed Land and Resource Management Plan and Draft Environmental Impact Statement, for the Monongahela National Forest Plan Revision. We commend the Monongahela National Forest (MNF) for developing a plan that incorporated many of our recommendations during the planning process.

We agree that the existing condition of the Monongahela National Forest has been greatly influenced by intensive logging and subsistence agriculture that occurred during the period from mid to late 1800s through the early 1930s. Use of fire by native inhabitants and early settlers to manage or clear forest vegetation along with more recent multiple use management activities has and continues to shape the forest vegetation on the land.

This agency has a long-standing established record of outstanding cooperation with the MNF in West Virginia. This ongoing relationship, made possible through a Memorandum of Understanding since the mid 1940's, has produced substantial benefits to the citizens of West Virginia, the states wildlife resources and their associated habitats on the MNF. As the lead wildlife agency for the state we are mandated by law to maintain viable populations of fish and wildlife species on private land, leased land and all State and Federal lands within the state's boundary. Currently, the WVDNR manages wildlife habitat on ten National Forest Wildlife Management Areas spread throughout the four administrative Ranger Districts of the MNF. Because of this agency's active management program on the Forest, we hereby offer the following comments and recommendations.

The WVDNR supports Alternative 2 provided the following modifications are made. Management Prescription (MP) 5.1 Recommended Wilderness is changed to MP 6.2 except we support the addition of the proposed Cranberry Expansion and Dry Fork Areas. In addition, within the southern boundary of the proposed Cheat Wilderness Area there are approximately 428 acres in Compartment 22 that is currently in MP 6.1. We request that this acreage be

retained in MP 6.1. Sixteen areas totaling 137,140 acres met the criteria and are included in the Roadless Area Inventory. Under Alternative 2, 116,259 acres are in MP 6.2, which basically serves the same purpose as wilderness, with exceptions (such as in Standard 6202, page III-42 of the Proposed Land and Resource Management Plan). MP 6.2 allows for limited management activities to insure users they will have the tranquility and solitude without mandating a hands off approach to blocks of land designated by Congress as wilderness. Many of our current and potential wildlife management activities on these areas are better served by maintaining these lands in MP 6.2. We believe that the five existing congressionally designated wilderness areas along with the additions to the Cranberry and Dry Fork expansions, offer a natural setting that provides adequate opportunities for semi-primitive non-motorized recreation where natural ecological processes occur. We recommend that the management prescriptions for Gaudineer and East Fork of the Greenbrier be changed from MP 6.2 to MP 6.1. Furthermore, we recommend that Green Knob and Haystack Knob be designated as MP 4.1.

As a cooperative partner in the management of the MNF, the loss of any MP 6.1 area negates the opportunity to conduct wildlife habitat management and manage viable populations of game and nongame wildlife. Areas under MP 6.1 and 3.0 form the core and backbone of this forest's "suitable" timber base. This base allows for silvicultural treatment of important forest types and active wildlife habitat management. Simply stated, many wildlife management objectives cannot be met without an active timber management program. Research has proven that active forest management, through sound silvicultural treatments, is the optimum means to reproducing and perpetuating important mast producing forest types and in maintaining viable and critically needed wildlife habitat types across the Forest landscape. Currently, over 33% of the MNF is outside the realm of active forest management due to wilderness designation, MP 6.2 areas and areas classified as roadless/wilderness inventory. In addition, 33% of MP 6.1 is comprised of Indiana bat primary range, which restricts opportunity to conduct active habitat management for species requiring habitats different from that of the Indiana bat. This percentage of land, coupled with other T&E species habitat restrictions, represents a significant drop in "on-the-ground" forest management. As a result, much of the MNF is no longer actively managed.

### General

The Plan Revision team states that this Forest Plan Revision is more strategic and programmatic than the 1986 Forest Plan, in "the actions needed to be taken" moving toward desired conditions and the goals and objectives of identified prescription areas. We would like to point out the 1986 Forest Plan was also strategic and programmatic. The General Direction and Standards/Guidelines of the prescriptions, gave adequate guidance to the land manager to plan and implement on-the-ground developments at the project level. This guidance was supplemented by the additional appendices that were part of the 1986 Forest Plan. One of our main concerns is that we firmly believe this new course of direction lacks sufficient standards and guidelines to address the stated goals and objectives of the 3.0 and 6.1 active management prescriptions. Specifically, we find that the standards and guidelines in the Vegetation and Wildlife Habitat sections of the 3.0 and 6.1 prescriptions are deficient in the guidance needed for land managers (from both agencies) to implement on the ground projects. We strongly believe

that if project implementation guidance and direction is not in the Forest Plan Revision, implementation at the field level will be lost.

As cooperators in the management of the MNF we strongly recommend this Forest Plan Revision include additional project-implementation appendices or a separate "project planning implementation guide" that is supported by the Proposed Land and Resource Management Plan.

### **Specific Comments**

Reviewers Guide, page 6, About the Forest Plan, No. 3 – "How": Under the National Forest Management Act (NFMA) regulations (36CFR219, 1982 regulations) it states how a "Forest Plan makes six key decisions for managing a national forest on a landscape-scale in the long-term." Under the third key decision (How), it appears the prescription standards and guidelines do not provide adequate guidance and direction in implementing on the ground projects. We feel the "How" part of the six key decisions for managing a national forest has virtually collapsed in this revised Forest Plan. As a result, we feel the "prescription standards and guidelines" do not adequately address or support the stated goals and objectives of this Forest Plan Revision.

### **Maps**

Alternative 2, 3 and 4 Maps: We find the maps for Alternatives 2, 3 and 4 to be deficient in that they do not show the Indiana Bat Buffer Zones or Suitable West Virginia Northern Flying Squirrel (WVNFS) habitat. These currently identified habitat areas should be included on separate maps as part of this Forest Plan Revision.

### **Proposed Land and Resource Management Plan**

Page I-11, Site-Level Projects: In regard to "implementing site-level forest management projects," we were unable to locate Figure 1-3.

Pages II-8-12, Management Direction for Soil and Water: We recommend the following changes.

Page II-8, paragraph 2: Add "the addition of limestone sand to streams impaired by acid deposition can aid in the stream's removal from the 303(d) list."

Page II-8, paragraph 3: While many streams on the MNF are in a stable condition and currently provide suitable habitat to support viable coldwater fish populations, other streams (e.g. upper Shavers Fork) would benefit from various types of stream/habitat improvements. These improvements could be accomplished by a number of methods such as log dams, deflectors, etc., as well as natural stream channel design using the Rosgin's methodology. We recommend adding these improvements.

Guideline SW13: We recommend identifying those areas that are likely to drain to an acidified stream which would benefit from sand treatment.

Mon-2591

Standard SW37: We strongly recommend that this standard be re-written. We disagree with the use of the term “default buffer widths” (buffers) in regard to the width of riparian area on both sides of perennial, intermittent and ephemeral streams. We believe the Forest Plan Revision dialogue on “buffers” is too restrictive in regard to wildlife habitat management and selected forest management practices. In this regard we strongly recommend that the stream buffer terminology be replaced with “Stream Management Zones” and “Shade Strip Zones.” Our rationale is that the removal of selected trees or other vegetation from a riparian zone does not increase sediment or nutrient flow to a stream and can actually benefit aquatic organisms. Streamside Management Zones should be protected to prevent exposure of mineral soil and subsequent erosion. Equipment operation in these areas is permissible but should be limited. Selected tree removal and other vegetation manipulation are permitted. Enhancement of Streamside Management Zones, such as limited tree removal and tree planting with minimal to no soil disturbance, will improve existing wildlife habitats and timber stands within these riparian areas. Adequate streamside management zones should be maintained around all lakes or ponds, perennial flowing natural springs and all springs and reservoirs serving as domestic water supply.

We recommend that the table listed under this standard be revised as follows.

**Streamside Management Zones**

<b>Stream Classification</b>	<b>Zone Width</b>
Perennial	100 ft.
Intermittent	100 ft.
Ephemeral	50 ft.

In more sensitive riparian areas such as high quality trout streams, excessively steep slopes and areas with the potential of highly erodible soils, we recommend these areas be placed in Shade Strip Zones. Shade Strip Zones are defined as a no-cut or light cut area that provides adequate shading of perennial or intermittent streams so as to stabilize and preserve the biological integrity of the stream.

Standard SW40: Skid trail and landing locations should be inspected for presence of sink holes and/or karst fractures prior to placement.

Standard SW44: Road construction within channel buffer and parallel to channel should be considered if delivery of limestone sand to stream is necessary to maintain biological viability.

Page II-17, Management Direction for Vegetation, Vegetation Diversity, Guideline VE05, second sentence: Add “Non-native plants that are naturalized (apple, clover, blue grass, orchard grass).”

Mon. 2591

Page II-18, Vegetation, Rare Plants and Regional Forester's Sensitive Plant Species, Guideline VE13: Rare communities will be difficult or impossible to identify during project analysis until there is a comprehensive association level community classification for the Forest. Management guidelines for rare communities should be developed at the Forest and Regional scales rather than by an *ad hoc* "case-by-case" basis. In addition to rare communities, outstanding occurrences of more common communities should be identified and preserved. There is a great need for further community ecology research and inventory across the Forest. We recommend that this information be acknowledged in the plan and a goal developed analogous to SW02 for soils and water.

Page II-21, Virginia Big-Eared Bat and Indiana Bat: Under Standard TE15 we recommend the closure dates (for human entry) for Virginia big-eared maternity colony for Cave Mountain Cave be 15 March – 15 September. Bats have been observed returning to the cave in late March and this population is lower now than it was in the early 1990s. Furthermore, we encourage development of requirements to maintain hay fields/old fields as foraging habitat for the Virginia big-eared bat. The area of concern is within six miles of maternity colonies. These open areas are important foraging habitats and may become more important if farmland is lost to development in the future. *Indiana Bat:* Under terms and definitions, there is no definition for "Key Areas" in Appendix G – Glossary and Acronyms.

Page II-24, Management Direction for T&E Species, Standard TE60: We recommend developing definitions and guidelines for what constitutes suitable habitat, (i.e., relative density, relative BA and relative frequency of red spruce) so that "importance values" can be used in establishing standards and guidelines for the application of appropriate silvicultural systems.

Pages II-25-27, Wildlife and Fish (Forest-wide Management Direction), Standards and Guidelines: We recommend that other forest-wide wildlife and fish standards and guidelines be developed for species such as black bear, snowshoe hare, fox squirrel, fisher, etc. in addition to those listed below. Our concern here is that 5 of the 12 Forest-wide standards and guidelines for Wildlife and Fish deal with only Regional Forester's Sensitive Species (RFSS), Birds of Conservation Concern, raptors (birds of prey) and migratory birds. We feel the Forest-wide Management Direction for Wildlife and Fish is slanted to nongame species, sensitive species and species of concern, without mentioning important other wildlife species and their habitats that currently exist on the forest.

Goal WF04, first sentence: Manage cold water streams to maintain or restore suitable habitat and native aquatic communities. We recommend adding "or desirable non-native communities" to the end of this goal.

Objective WF10: Maintain at least 560 miles of coldwater stream habitat capable of supporting wild, naturally reproducing brook trout, a Management Indicator Species. We recommend adding "and/or desirable non-native species" to the end of this objective.

Standard WF12: Add "Consultation should include WVDNR Fisheries Biologist" to this standard.

MON-2591

Guideline WF 15, last sentence: We feel this sentence should be re-worded as follows: Native trees and shrubs and desirable (approved) non-native trees and shrubs of high wildlife value for wildlife may be planted, pruned or released.

Pages II-28-30, Recreation Resources, Guideline RC 32: We recommend the following addition to this guideline: "Trail locations should avoid developed and maintained wildlife clearings."

Pages II-36-38, Timber Resources: We recommend changes be made to the following standards and guideline.

Standard TR08: Removal of slash from "developed wildlife openings" should be added to the first sentence. The second sentence should be replaced with "Activity fuels (slash) should be removed from streams unless they are greater in diameter than some predetermined size that ensures minimal movement. Small diameter slash can move and lodge, possibly resulting in bank destabilization and causing channel movement and increased erosion."

Standard TR10: We recommend changing the minimum spacing of skid trails from 200 ft. to 300 ft., but may be closer to adjust to ground conditions. This will yield a better visual effect and reduce soil disturbance.

Guideline TR11: We recommend revising this guideline to read "System roads and developed wildlife openings should not be used as log landings unless they are determined to be environmentally preferable and do not result in irreversible road or vegetation damage."

Pages II-39-40, Range Improvements: We recommend changes be made to the following standards.

Standard RA14: All stream channels within grazing allotments should be fenced and provision made for confined access to water livestock.

Standard RA19: If you are not going to have hawthorn standards and guidelines under Forest-wide Management Direction, or under the 3.0, 4.1 and 6.1 MPs, then they need to be expanded in an appendix of this Forest Plan Revision or within a project implementation guide.

Pages II 50-52, Roads and Facilities: We recommend the following changes be made to these guidelines.

Guideline RF08: Add "Roads used to deliver limestone sand or stone should be retained."

Guideline RF09: Add “Because many of the 303(d) streams on MNF are acid precipitation impaired, roads currently used or have potential for delivery of limestone sand should be retained.”

Guideline RF11: Consideration should be given to roads that provide access to a stream that may benefit from the addition of limestone sand.

Guideline RF22: We recommend using all means to inform the public on road closures (i.e., website, need to be put on MNF website – many visitors are not local and do not have access to local media.

Page III –2, Management Direction, second paragraph, last sentence and third paragraph: Under MP standards and guidelines, we believe specific time frames, as presented in Appendix S of the 1986 Forest Plan for initiating or completing accomplishments are important, especially specific planting dates for specific seed mixtures, in addition to lime and fertilizer application rates and mulching guidelines.

Page III-7, Management Prescription 3.0, first paragraph, third sentence: This entire sentence, regarding maintained or natural openings, should be an Objective under 2630 – Wildlife Habitat.

Page III-7, Management Direction for 3.0, 2410 - Timber Resource Management Planning and Page III 8, 2470 – Silvicultural Systems: Appendix G (Glossary and Acronyms) is deficient in many definitions that pertain to the revised Forest Plan. We recommend that all silvicultural treatments be defined under even-age and uneven-aged management.

Page III-8, Management Direction for 3.0, 2630 Wildlife Habitat: We feel that this revised 3.0 MP is extremely deficient in standards and guidelines that address wildlife habitat. Specifically, the 2630 Wildlife Habitat does not identify what is or what constitutes a wildlife opening. There are no specific guidelines on development of wildlife openings including type, size, placement/proximity or border configuration. In addition, there are no standards for planting mast producing trees, shrubs and desirable non-native fruit trees and shrubs. Also, there are no standards as to the type of seed mixtures to be planted including legumes, which could be identified here (Under 2630 Wildlife Habitat) or referenced to an appendix of this Forest Plan Revision or to a project implementation guide.

Page III-14, Management Direction for 4.1, Spruce and Spruce-Hardwood Ecosystem Management:

Objective 4108: This objective states that 4,000 to 6,000 acres of mixed hardwoods (where spruce cannot be restored) will be regenerated over the next 10 years. We find this misleading given the fact that currently identified as Suitable WVNFS habitat does not allow for clear cutting or any other type of regeneration cut at this time. We recommend that the MNF in conjunction with the U.S. Fish and Wildlife Service (USFWS) and the WVDNR, identify “Best management Practices” (BMP’s) for the

management of spruce – hardwood and mixed hardwood forests that encompass WVNFS habitat. We recommend these BMP's be included in this Forest Plan Revision.

Guideline 4110: We recommend removing “or immediately adjacent to the stand” in the first sentence. If spruce is not present, it would be a desirable option to manage for other associated tree species.

Page III-15, Management Direction for 4.1, 2470 Silvicultural Systems, Guideline 4121: We recommend this guideline be changed to a standard and that the last part of the sentence be changed to: “even-age and uneven-age silvicultural systems will be used.” MP 4.1 has isolated stands with an oak component, primarily red oak. These stands should be protected, maintained and regenerated as the need to perpetuate their presence arises. Because of their importance for mast production and wildlife habitat, we want to insure their presence in the MP 4.1 areas. We do not want to encourage oak removal via spruce restoration efforts aimed at reducing the number of oak trees due to the lack of suitability for WVNFS habitat.

Page III-16, Management Prescription 4.1, 2630 – Wildlife Habitat: We are concerned that there is no mention of the snowshoe hare in this prescription, nor are there any recommended standards or guidelines for snowshoe hare habitat. There are Vegetation (1900), Silvicultural Systems (2470) and Reforestation and Timber Stand Improvement standards and guidelines, some of which would benefit the habitat requirements of snowshoe hare. However, there is no specific mention of these stand improvement practices, as to how it would enhance snowshoe hare habitat under 2630 – Wildlife Habitat. There are other wildlife species that inhabit this prescription that also have habitat management requirements, that should be identified in 2630 – Wildlife Habitat standards and guidelines.

Page III-21-22, Management Prescription - 5.0 Designated Wilderness: We recommend the inclusion of a statement allowing treatment with limestone fines from outside 5.0 areas and that aerial application of limestone sand is possible with Forest Service approval.

Guideline 5026: If a or b does not include the addition of limestone sand outside the Wilderness boundary to correct poor water quality (low pH) in the Wilderness, then it needs to be specified in this Guideline. This also applies to Management Direction 5.1.

Page III –24-29, Management Prescription - 5.1 – Recommended Wilderness: We recommend the following:

Standard 5124: Add. “Existing wildlife habitat improvements (clearings, waterholes, savannahs, etc) will continue to be maintained” to this standard.

Page III-30-38, Management Prescription - 6.1, 1900 Vegetation and 2630 Wildlife Habitat: We recommend fisheries recommendations (standards and guidelines) be included under 2630 – Wildlife Habitat.

Standard 6108, Grapevines: This is not a standard but perhaps a guideline. There needs to be a series of concise standards for grapevine management in this prescription or in an appendix, similar to Appendix P of the 1986 Forest Plan. For the past 19 years this Appendix has served as the essential guidance to the land manager in managing grapevines, hawthorn, wildlife food plantings and in the general management of trees, shrubs and vines across the Forest.

Guideline 6136: We feel this guideline should be expanded to include developed openings such as type, size, placement and border configurations. As a cooperator on the MNF we are very concerned about the lack of standards and guidelines for Wildlife Habitat under this prescription. There are no standards for the planting of important mast producing trees and shrubs, and no prescription standards or guidelines for seep management. Seeps are extremely important wildlife habitats. There are also no standards and guidelines for wildlife opening seed mixtures (including the planting of desirable non native grasses and legumes) lime and fertilizer application rates or mulching guidelines. There should also be standards associated with den tree management.

Page III-39-44, Management Prescription 6.2 - Backcountry Recreation: We recommend the implementation of timber management and wildlife habitat development activities in MP 6.2 areas that are not designated Roadless Areas on a limited scale to offset early successional habitat losses associated with acreage designated to endangered species.

Standard 6234, Fire: This standard needs to specify that minimal road construction may be allowed around fringes (1/4 mile) of 6.2 MP with Forest Service approval.

Page III-49, Management Prescription 8.0 - Special Areas (2630 Fish Habitat): Standard 8016 should state that although limestone drums are not permitted, limestone fines are allowed.

Page III-55, Management Prescription 8.6 - Spruce Mountain and Brushy Mountain Grouse Management Areas: The WVDNR strongly recommends the development of a separate 'Early Successional Habitat' Management Prescription. We feel this is important in itself and for the fact that we recommend at least one 'Grouse Management Area' or one large early successional habitat area, on each Ranger District of the Forest. Between Guideline 8606 and 8607 we recommend inserting the following additional Guideline: "Favor introduction of legumes, such as clover (a favored food source for ruffed grouse), when developing new wildlife openings, savannahs, seeded log landings and logging roads."

Page III-58, 1900 Vegetation, Guideline 8103: Hunting should be recognized as an important recreational opportunity in this prescription and across the entire MNF. We recommend that 1 to 2 acre wildlife openings and 5-10 acre savannahs be allowed to be developed to provide a continued diversity of habitats for wildlife species, and the recreational hunting experience.

Mon-2591

Page III – 59, 2600 Wildlife Management, Goal 8118: We encourage development of wildlife openings outside of programmed commercial timber harvests for the habitat of game and non-game wildlife.

Appendix A, Page 7, Management Prescription 4.1, second sentence: The statement “Vegetation management would be limited to research or administrative studies on lands determined to be suitable habitat for the WVNFS” is very alarming and essentially prevents implementation and maintenance of wildlife management practices. Nearly all of the MP 4.1 area is WVNFS suitable habitat, which limits vegetation management. The ultimate result will be a general decline in forest age class diversity and an important wildlife habitat component. We recommend establishing standards and guidelines for managing spruce and spruce hardwood forest so as to benefit the WVNFS.

Appendix C – Analysis of the Management Situation Summary: We are concerned, that Appendix C dealing with “Analysis of the Management Situation” on the MNF, does not have any sub-section concerning **Wildlife Habitat** existing condition and “Need for Change.” Wildlife openings, in all their different forms, are an extremely important component throughout forest ecosystems and landscape levels of this Forest, and needs to be addressed in this Appendix C Summary. Even though the WVDNR is responsible for managing populations for game and nongame wildlife on National Forest lands, the MNF is responsible for providing a diversity of early-successional type wildlife habitats to support viable wildlife populations in perpetuity. In addition, the MNF still lacks (Forest-wide) the 5-8% of permanently maintained openings, crucial to the life cycles of many game and nongame species. In this regard, it is an existing condition with “Need for Change.” We recommend Appendix C include a ‘Wildlife Habitat’ analysis of what kinds and amounts of wildlife habitat are existing and what future measures will be taken during this Forest Plan Revision to enhance or develop additional wildlife clearings, savannahs or shrub/brush type habitats.

Appendix D, page D-1, Table D-1: Our agency has three major concerns with the Management Indicator Species (MIS) selected for this Forest Plan Revision. The first concern is selecting an endangered species such as the WVNFS as a MIS species. We are fully aware that under NFMA regulations, endangered species can be selected as a MIS. However, we feel the selection of the WVNFS, as an MIS will have a detrimental affect on other species such as habitat management for snowshoe hare. In addition, there are other species such as wild turkey that are strongly dependent upon the mast produced by black cherry trees, that are an important component species of the spruce – hardwood forests within the 4.1 Management Prescription. Because this species is shade intolerant, the regeneration of black cherry is best accomplished through even-age silvicultural treatments associated with regeneration cutting. If this is not allowed in MP 4.1 areas, a valuable mast species utilized by wildlife will under go a steady decline. Another extremely negative impact will be a major decrease in age class distribution of hardwoods, with a black cherry component, throughout these 4.1 prescription areas. In Alternative 2 this 4.1 prescription accounts for over 150,000 acres (17% of the Forest) of spruce – hardwood communities.

Our second concern is that there is no MIS species identified for early successional habitat. We feel the MNF should identify and select an MIS species for early successional habitat during this plan revision. In this regard we recommend Ruffed Grouse as an adequate MIS candidate species for early successional habitat.

The third concern is the Cerulean warbler as an MIS species for mid-late to late successional habitat. Because of population declines in eastern neo-tropical migrant birds, Cerulean warbler is not a true MIS of habitat change on the forest.

### **Summary of the Draft Environmental Impact Statement for Forest Plan Revision**

#### Page S-7, Terrestrial Ecosystem Diversity:

Issues: Ecological communities are the foundation of biological diversity. We recommend that the MNF cooperate with WVDNR to classify ecological communities on the forest in accordance with the National Vegetation Classification. WVDNR is currently the lead agency for development/revision of the National Vegetation Classification within West Virginia, and would welcome the opportunity to fully include the critically important ecological communities of the MNF in this process. WVDNR is already working with the United States National Park Service and USFWS in this respect.

Indicators: Old growth wetlands (forested swamps) do not appear to be included in this EIS. WVDNR has recently identified several old growth wetlands that could be included, either in this Forest Plan Revision or later, in the eventual implementation of the plan.

#### Page S-33-62, Comparison of Alternatives:

Air Quality, Table S-5: While the cumulative emissions are small relative to outside sources of acid deposition and other pollutants, we also know that continued poor air quality is a serious threat to the health of the MNF. A sincere effort should be made to reduce all airborne caused ills in the Forest.

Page S-49, Virginia big-eared bat: Although even-age regeneration harvests can create early successional habitats beneficial to the Virginia big-eared bat, areas with complete tree removal within one cut may result in loss of foraging habitat during the short term. We oppose the creation of large areas receiving total tree removal as a justification for the creation of Virginia big-eared bat habitat. Regeneration harvest that result in grass/herbaceous cover similar to old field conditions will likely benefit this species.

Non-Native Invasive Species, page S-57, Issue: Non-Native Invasive Species (NNIS) on the MNF are arguably one of the greatest threats to forest health and survival today. Every effort should be made to reduce the spread of NNIS on the forest.

MON-2591

**Draft Environmental Impact Statement (EIS)**

Page 3-230, Virginia Big-eared Bat, Table TE-1: Cave Hollow should be listed as Cave Hollow/Arbogast. These caves are connected and form a cave system, and the system is referred to as Cave Hollow/Arbogast in other places in the Forest Plan Revision.

Page 3-231, Virginia Big-eared Bat, paragraph 5: WVDNR is cited for data given on the farthest known movement of Virginia big-eared bats. The number given is 40 miles. We have not documented movements that large in WV. We believe that number is in the literature for other subspecies, but this is not WVDNR data.

Page 3-233, Virginia Big-eared Bat, paragraph 3: The number of Indiana bats in Hellhole was 11,890 in February 2005. This number should be used to show the increase in this population. The Forest Plan Revision states "over 8,000." If "over 8,000" remains in the plan, the year should be given when the population exceeded 8000.

Page 3-381, Roadless Area Inventory and Wilderness Evaluation: As stated previously this agency is against the inclusion of the Gaudineer and East Fork of the Greenbrier as two of sixteen Inventoried Roadless Areas. The Gaudineer (6,727-acre) area has an estimated 6,344 acres (94%) that is considered suitable timberland and an estimated 4,107 acres (61%) is considered to be prime timberland. (Appendices to the Draft EIS, page C-72, Timber).

We appreciate the opportunity to comment on the Proposed Land and Resource Management Plan and associated documents. Should you have any questions or need clarification on our recommendations and comments, please feel free to contact Mr. Richard Hall, Supervisor of Game Management.

Sincerely,



Frank Jezioro, Director  
Division of Natural Resources

RLH/pf

cc: Curtis I. Taylor  
Richard L. Hall



MON 2603

Office of the Governor  
State Capitol  
1900 Kanawha Blvd., East  
Charleston, WV 25305

*State of West Virginia*  
*Joe Manchin III*  
*Governor*

Telephone: (304) 558-2000  
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[www.wv.gov.org](http://www.wv.gov.org)

November 9, 2005

Mr. Clyde Thompson, Forest Supervisor  
Monongahela National Forest  
200 Sycamore Street  
Elkins, West Virginia 26241

Dear Clyde:

Many West Virginians have a deep love and affection for the Monongahela National Forest. Many visitors from other states and countries are also attracted to the beauty of Cranberry Glades, Dolly Sods, Hill Creek Falls, Seneca Rocks, Smoke Hole, Spruce Knob, and many other of the Forest's wonderful places. At the same time, the Forest provides West Virginians with world-class opportunities to hunt and fish, protects watersheds and treasured wild lands, and provides local communities with jobs based on tourism and timber. The State of West Virginia has invested deeply in developing its timber and tourism industries; the National Forest plays a significant role in each. The state has invested deeply in developing tourism attractions embedded within the national forest at Blackwater Falls, Canaan Valley Resort, Cass Scenic Railroad, Greenbrier River Trail, and Watoga State Parks.

I encourage the Monongahela National Forest to continuously endeavor to address using our natural resources wisely in ways that benefit our people while protecting the beauty and wildness that draws so many to the Forest. Of the alternatives considered in the Draft Forest Plan Revision, I believe Alternative 2, with some modifications, reaches the best balance of current needs in West Virginia. It sets aside a significant part of the National Forest as remote backcountry, maintaining irreplaceable wild lands for the continued enjoyment of current and future generations. Alternative 2 also makes available substantial areas of the National Forest for game and timber management, enabling local communities to economically benefit from the Forest's resources.

Alternative 2 does provide substantial opportunities for timber harvesting on the National Forest, an issue of great concern to some local communities in and near the Forest. Harvests will occur on slightly fewer acres in Alternative 2 (at 330,200 acres) than provided for under the 1986 plan (331,160 acres). Alternative 2 has an Allowable Sale Quantity of 63 million board feet (MMBF) annually, which is comparable to the currently Allowable Sale Quantity of 65 MMBF. On the other hand, that translates to being considerably higher than recent actual timber harvest rates of 2.1 to 12.8 MMBF. It is my understanding that typical annual timber production on the national forest is much lower than the Allowable Sale Quantity (ASQ); it is important for the regional and state economy that the Forest Service work to ensure that timber harvesting increase to a level closer to the ASQ. With regards to roadless areas I have decided to forego a petition request to the USDA at this time and support the roadless areas you propose in Alternative 2. However, I expect that the Forest Service and the appropriate state agencies will be able to work together to address critical wildlife habitat and other forest management needs.

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NOV 14 2005

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Mr. Clyde Thompson  
Page Two  
November 9, 2005

The Forest is to be commended for looking at ways to reduce the scenic and environmental impacts of timber harvesting. These include new guidelines that minimize road construction on a per volume basis, designing harvests to reduce fragmenting edge effects that are detrimental to many birds and non-game wildlife species, and avoiding harvests in soils that are susceptible to damage from acid precipitation. These are in addition to the many steps the national forest takes to protect streams, rare species, and other environmental features. Since many West Virginians are concerned about the visual impacts of increasing the size of allowable clearcuts on the National Forest, I do ask the National Forest to consider options that can reduce those impacts to the scenic landscapes our tourism depends upon.

For sportsmen, hunting will continue across the entire National Forest. In Alternative 2, Management Prescription 6.1, which focuses on managing vegetation diversity for game wildlife, will provide West Virginians with nearly 290,000 acres of federal land dedicated to providing high quality deer, turkey, and grouse habitat. Those game species, and others that prefer younger forests, will also benefit from the lands assigned to Management Prescription 3.0, which provides nearly 200,000 acres with a focus on timber management.

Management Prescription 4.1 (Spruce Restoration) sets a new direction for part of the National Forest by emphasizing the restoration of the magnificent spruce forests that once covered over a half million acres of West Virginia, but which were almost completely eliminated by logging and fires a century ago. Spruce forests are important to a variety of rare and endangered plants and animals, contribute to the quality of many of our native brook trout streams, and provide unique recreational experiences for this far south. Restoring this forest is a goal shared with the Division of Natural Resources, U.S. Fish and Wildlife Service, and private conservation groups such as The Nature Conservancy. Alternative 2 designates over 150,000 acres to this Prescription. I urge the Forest to continue to work closely with the DNR in developing its spruce restoration program.

Large intact blocks of forests that have not been fragmented by roads, utilities, or other human impacts are invaluable for providing habitat for animals that require minimal disturbance, allowing ecological processes that require large landscape areas to continue, and providing our citizens opportunities for backcountry recreation. They also provide the visual backdrop of large landscapes in a primarily natural condition that draws so many visitors to the mountains. Emotion and personal values often weigh in on trying to determine how much wild land is appropriate. I believe the National Forest has done a commendable job in identifying areas most suited for maintaining as largely undeveloped and remote wild lands.

The National Forest's approach is well grounded in the most recent research available from the fields of forest ecology, conservation biology, and landscape ecology for identifying large blocks of wild land for effectively maintaining species diversity and viable populations of plants and animals. The identification of these Minimum Dynamic Area Reserves followed a process that looked at environmental variability, forest block integrity, forest representativeness, maintenance of natural disturbances, and forest development processes. Conservation biologists have explained to me that this is the "state-of-the-art" approach to identifying blocks of wild lands most valuable for protecting ecosystem health and viability.

Superimposing these, as appropriate, with a few additional areas of high potential value for backcountry recreation has allowed the Forest to identify in a credible, repeatable fashion areas best suited for management as wild lands. Alternative 2 designates substantial areas totaling 223,500 acres suitable for backcountry recreation, or 24 % of the Forest, which compares favorably to the current plan's level of 202,600 acres. Much of this is in Management Prescription 6.2 (Backcountry Recreation). Many of these areas have been identified as having qualities suitable for designation as Wilderness and I hope that the National Forest will maintain those attributes.

Mr. Clyde Thompson  
Page Three  
November 9, 2005

However, Alternative 2 fails to designate some places that have high ecological, scenic, or recreational value that are appropriate for placing in MP 6.2 or a comparable prescription. I propose the following modifications to Alternative 2: (1) I support the addition of the 5.1 Wilderness recommendation for the Cranberry Wilderness Expansion and Dry Fork Expansion of the Otter Creek Wilderness but recommend that Roaring Plains West and Cheat Mountain be designated as 6.2.; (2) I recommend that the additional areas in Roaring Plains West (Green Knob and Haystack Knob) be designated either 4.1 or 6.2.; (3) I recommend that the following areas North Meadow Creek Mountain and lower Laurel Fork of the Cheat be designated as 6.2; (4) Weiss Knob be designated as 4.1; and (5) North Fork Mountain south of Pike Knob be designated as 8.0.

Under Alternative 2, National Forest lands adjoining the upper Blackwater Canyon are set aside as MP 6.2 or 4.1 (spruce restoration). However, National Forest lands along the lower Blackwater Canyon, which are also of considerable recreational, scenic, and ecological value, are not similarly designated. Management prescriptions for federal lands within and adjoining the canyon, including the designated special area surrounding Big Run Bog, should be strengthened to protect the bog, potential habitat for the Cheat Mountain salamander and endangered West Virginia northern flying squirrel, the rail trail, and scenic integrity of the canyon. Backcountry attributes of lands within the National Recreation Area in the Seneca Creek watershed, the largest roadless area in West Virginia besides the Cranberry Wilderness, should also be maintained. Additional protection for these areas, which change management prescriptions on less than 25,000 acres, should not at all prevent the Forest from achieving its anticipated timber harvest targets.

I also applaud the National Forest for using the most recent scientific research available to address some of the most serious threats to the health of the Forest ecosystem. These include new standards and guidelines for using managed fire to promote oak forest regeneration, addressing non-native invasive plants that are displacing our natural vegetation, addressing introduced forest pests and pathogens that are killing off several species of our native trees, providing for the expansion of old-growth forests, and providing for an ongoing review of potential areas to be designated as special botanical and ecological areas.

The Monongahela National Forest lies in close proximity to millions of Americans that seek its beauty and wildness for relaxation and recreation. Local communities depend upon the Forest for tourism, timber, and other natural resources. The Central Appalachians, especially in and around the Monongahela National Forest, represent one of the most biologically diverse regions in North America. The Forest recognizes in its draft plan that it has a special responsibility to steward the land for all of these, and other needs. I believe that Alternative 2, as modified above, will help the Forest meet that responsibility in a way that provides benefits to all West Virginians. The Department of Natural Resources and the Division of Forestry will be sending more detailed letters on specific management issues.

Sincerely,

Joe Manchin III  
Governor



JM:ah

**PENDLETON COUNTY ECONOMIC & COMMUNITY DEVELOPMENT  
AUTHORITY**

*Post Office Box 602 Franklin, West Virginia 26807*

*A Certified Development Community*



October 25, 2005

Monongahela National Forest  
Attention: David Ede  
200 Sycamore Street  
Elkins, WV 26241

RE: Comments on the release of the proposed Forest Management Plan

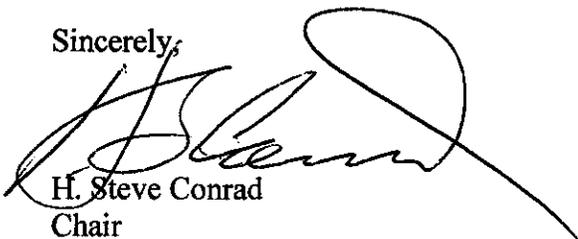
Dear Mr. Ede:

Thank you for your presentation to the Pendleton County Economic and Community Development Authority last month on the Monongahela National Forest Proposed Forest Management Plan. First we would like to extend our support to your organization for choosing Map Alternative 2. Although this map proposes additional designated wilderness areas, the Pendleton County Economic and Community Development Authority does not support any further Congressional designations of wilderness areas within the entire Monongahela National Forest.

We would also support language in the plan that enforces a sustained program for commercial timber harvesting. Currently, our county is faced with the dilemma of losing one of its major employers, due to reductions of available timber in the National Forest. Likewise, our county education system has seen a steady decrease in annual revenue from the sale of National Forest timber. A continuous timber harvesting program would allow our schools to better budget expenses and fully fund programs from year to year. The Pendleton County Economic and Community Development Authority would ask that the Monongahela National Forest sustain its commercial timber sales at the rate of at least 20 million board feet every year.

Thanks again, we greatly appreciate the opportunity to provide commentary to this proposed plan for the Monongahela National Forest. We look forward to your review and welcome any questions that you may have concerning our comments. Please feel free to call our office at 304-358-2074.

Sincerely,



H. Steve Conrad  
Chair

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NOV 02 2005

MON 503



JOEL S. CALLISON  
President

RETA J. GRIFFITH  
Commissioner

JAMES W. CARPENTER  
Commissioner

SANDRA FRIEL  
Clerk

October 4, 2005

Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

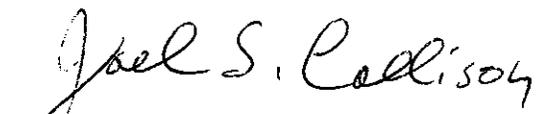
Dear Forest Service Planners:

The Pocahontas County Commission would like to take this opportunity to comment on the proposed Forest Plan and Draft Environmental Impact Statement released in August 2005. As the local government representative for Pocahontas County, we support a multi-use forest plan with no additional wilderness designation for the Monongahela National Forest.

There are no specific references that the commission chose to address as a group except that no additional wilderness be created and that those areas selected for wilderness simply be planned accordingly in management areas that could be subject to re-evaluation with each new forest plan.

Again the Commission appreciates the opportunity to offer comments.

Sincerely,

  
Joel S. Callison, President  
Pocahontas County Commission

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OCT 17 2005

# RANDOLPH COUNTY COMMISSION

MON 2606

Commission Members:

Voras K. Haynes, President  
Walt L. Schmidlen, III, Commissioner  
Julia L.P. Elbon, Commissioner



Randolph County Clerk  
Sandra Pawelczyk

Phone: (304) 636-2057  
Fax: (304) 637-2057

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PO Box 2092  
Elkins, West Virginia 26241

November 14, 2004

Forest Service  
Clyde Thompson  
Forest Supervisor  
200 Sycamore Street  
Elkins, WV 26241

CAG RECEIVED  
NOV 14 2005

Dear Mr. Thompson,

The Randolph County Commission supports the purpose of the Monongahela National Forest Plan which is to provide management direction to ensure sustainable ecosystems and resilient watersheds that are capable of providing a sustainable flow of beneficial goods and services to the public. Implementation of the correct alternative and variation there of, will allow the Forest Service to sustain the health, diversity and productivity of the nation's forests and grasslands to meet the needs of present and future generations. The National Forest Management Act requires that the National Forest System land be managed to ensure a continued supply of goods and services to the American people. We feel that Alternative #4 with no back county recommendations is the best proposal to achieve the goals of the Monongahela National Forest.

Alternative # 4 allows for the opportunity of the largest percentage of timber harvest. West Virginia and Randolph County in particular, is considered the hardwood capitol of the world. Much of our economy is based on the timber industry and the Monongahela National Forest has the potential to be one of the largest contributors to the industry. The quality of timber available from the forest is exceptional. The abundant supply, coupled with the superior quality, provides an excellent opportunity to accelerate the local economy which is driven by timber.

Timber has a life span. This is recognized by the professionals in the industry, the Forest Service, local residents and even environmental groups. Timber that is reaching or that has obtained maturity should be harvested so that it can be used to fuel the engine of our local economy. Harvesting will provide jobs to not only loggers, but also truck

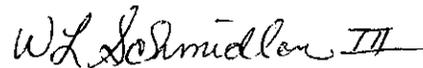
MON. 2004

drivers, saw mill operators, building contractors, furniture and cabinet makers, many individuals in the retail market and even create additional employment in our local Forestry Department. Timber harvest would also maintain the forest in a broader range of age classes. This range of age will help support a wider variety of wildlife for the forest visitors to enjoy.

The Randolph County Commission feels that there should be no additional areas recommended for back country recreation. The forest is open to all visitors who wish to experience hiking, biking, camping, hunting, fishing and various other outdoor activities which the forest supports and encourages. Any individual can have a wild and undisturbed experience with nature, even in the roaded areas of the forest, by trekking back into the forest for a mere few hundred yards.

For all the previous mentioned reasons, and many not mentioned, the Randolph County Commission supports Alternative #4 with no additional back country recreation areas recommended. We also encourage the Forest Service to take more advantage of the renewable resources that the forest has to offer.

Sincerely,

A handwritten signature in cursive script that reads "Walter L. Schmidlen III".

Walter L. Schmidlen III  
Randolph County Commissioner



MON 2540

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Randolph County Development Authority  
West Virginia Wood Technology Center  
10 Eleventh Street  
Elkins, West Virginia 26241  
(304) 637-0803 • Fax (304) 637-4902  
[http: www.rcdawv.org](http://www.rcdawv.org)  
E-mail: [info@rcdawv.org](mailto:info@rcdawv.org)

Mr. Clyde Thompson  
Forest Supervisor  
Monongahela National Forest  
200 Sycamore Street  
Elkins, West Virginia 26241

CAG RECEIVED

NOV 14 2005

November 10, 2005

Dear Supervisor Thompson

The Randolph County Development Authority (RCDA) is the lead economic development organization for Randolph County. The Draft Forest Plan for the Monongahela National Forest (MNF) will impact the county and therefore the RCDA has taken time to review the draft plan and provide these comments.

The Forest is an important aspect of the economic, social, and cultural life of the county. The US Forest Service Forest Supervisor's Office is in Elkins, Randolph County and as a result, the City of Elkins functions as the operational hub and western gateway to the Monongahela National Forest (MNF). The MNF is the largest expanse of public land in the State of West Virginia and its presence in Randolph County affects many aspects of business and residential life.

The RCDA endorses Alternative 2, but has the following eight comments on this alternative.

- 1) The wood products industry is the top private niche employer of people in Randolph County. Supporting and expanding employment opportunities in the wood industry is a long standing goal of the RCDA. The MNF contains world renowned hardwood trees that are of great commercial value. The MNF is so unique that, "*The Forest contains the northern-most populations of certain southern species, and the southern-most populations of some northern species.*" Likewise, "*Many of the 60+ species of trees found on the Monongahela are valuable for commercial wood products as well as wildlife habitat. Especially valuable are black cherry, sugar maple, and red oak.*" (Page 1-6) **The RCDA would like to see that USFS provide enough resources to actively and responsibly oversee timber sales so as to prepare and offer quality hardwoods to the economy of the area and help the MNF achieve age class diversity and forest health.**

Wood Technology Center Training Programs Sponsored by  
West Virginia Department of Education, Regional Education Service Agency  
and Randolph County Development Authority  
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MON-2540

- 2) Alternative 2 is only practical if the USFS provides enough resources to achieve the amount of timber harvest (63 million board feet) targeted in the alternative.

In 2004, only 4 million board feet was sold and harvested from the MNF. In fact an exceptionally low volume of timber has been sold in the past decade. The average of timber volume sold on the MNF from 1996 to 2003 (Table C-5) has been less than ten million board feet (9.5 MMBF) of an allowable 50MMBF.

**The last ten years of actual harvest shows a trend of exceptionally low rates, despite what is published as allowable timber harvest in the Forest Plan. The RCDA would like to know how the USFS plans to achieve the allowable number of timber sales it proposes in Alternative 2.**

Given the fact that The Plan factored out all the land that is not suitable for timber harvest due to environmental reasons (this includes commercial forest land), leaving 330,300 acres (36% of the total forest), the final projected annual volume of timber that can be harvested by decade (63 MMBF) should be achieved without exception.

- 3) The RCDA supports sustainable forest management. The USFS's management philosophy for the MNF *"is based on the belief that public land in the Appalachians is scarce and precious."* It goes on to say that *"We believe our job is to manage the Forest for its special features, and in ways desired by today's public and future generations."* (Page I-8) **The RCDA feels that current and future generation in Randolph County, a rural and mountainous county, will continue to depend on jobs provided by traditional sectors of the economy (e.g. agriculture, logging and secondary forest products), which should be encouraged by the USFS.**
- 4) Similarly, the health of the forest is vital to a wide range of businesses in Randolph County. It was reported that a climax forest in this region ranges from 80-120 years old and the current forest is approaching that age. **RCDA reinforces the USFS's plans to encourage healthy forest management to keep the MNF within a healthy forest age range.**
- 5) The presence of the MNF in Randolph County contributes to the overall quality of life. The Forest is the headwaters of six major river systems, which gives the State a prominent role in the formation of key Eastern US rivers such as the Potomac and Monongahela. The Plan notes that more than ninety percent of the high quality trout waters in West Virginia are within the Forest, which contributes to the tourism base of the region. **Controlling silt and run off is a critical issue concerning our rivers, and thus the RCDA would like to see the MNF encourage timbering that does not harm local rivers and streams, while still producing and allowing timber harvests that are affordable to all companies, including small independent loggers.**
- 6) Providing an opportunity for companies of all sizes to bid on timber sales is a desired goal of the RCDA. Large tract logging, SBA set aside criteria, and the required

MON-2540

expensive road construction is an issue that makes it difficult for many companies to bid on timber in the MNF. **We would like the MNF to help assist local companies manage road construction and consider various logging methods so as to maintain sustainable timbering and resource protection.**

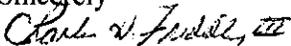
- 7) Another area of economic activity is natural gas reserves. The Forest provides for 40-50 natural gas wells, and additional wells will most likely be discovered for public use. **These reserves should be made available where it is environmentally suitable to do so.**
- 8) Under the section of impacts to the Social and Economic Environment (page S-67) it states, *"Because the difference in the maximum potential of timber production between alternatives is not substantial (50 to 80 mmbf), it is doubtful that this influence on population would vary much by alternative."* The past 10 years have realized only a small percentage of the potential allowable timber production.

Similarly, under Employment impacts, (S-69, 70) the Plan states, *"Timber-related increases in employment are estimated by alternatives based on maximum projected volume outputs generated by the Spectrum model to achieve vegetation conditions for the Forest."* Table S-43 outlines the jobs to be generated within major industrial sectors. Under Income, the Plan goes on to say, *"Similar to jobs, Forest-linked income is expected to be relatively static....except for timber harvest. Increases in projected income over current levels range from 44% .... To 83%."* The value of jobs various sectors from service to manufacturing are significantly different. Therefore the RCDA encourages growth in the higher paying wood industry sector as critical to regional economic growth.

**The RCDA contends that the economic, employment, and income projections are faulty and misleading estimates because the MNF is not achieving anywhere close to maximum projected outputs for timber production upon which the projections are based.** The projections in The Plan lead readers to believe the alternatives will increase jobs and income in the forestry sector over the next decade. This is not accurate based on realistic figures from the past. Without some assurance from the MNF that timber harvests will be actively managed, the Plan's projections are meaningless and misleading.

Thank you for giving us the opportunity to comment on the 2005 Draft Forest Plan for the Monongahela National Forest.

Sincerely



Charles H. Friddle, III

President

Dear Forest Service Representative,

MON 2605

After reviewing the information about the Monongahela National Forest, the Randolph County Planning Commission would like to make the following recommendations.

We would like to see the Forest Service do a better job with managing the natural resources on the Mon. Forest. There needs to be more timber sales because mature timber is ruining on the Mon. Forest due to wind damage, over-maturing, rot, hollowing, etc. Harvesting mature timber makes the forest healthier as well as adding a great economic benefit to the community.

The following paragraph was taken word for word from a recent publication from the West Virginia Forestry Association.

In MNFC # 4, the annual growth on the MNF was reported as being about 293 million board feet annually. For discussion let's assume a sale of 85 million board feet and lets also assume that the volume percentages will be as for the forest, i.e., red oak would be 13.9%, cherry 10.9%, yellow poplar 11.6%, etc. The contract price for professional marking would be about \$255,000 and would take two months. Based on current prices in the area, the harvest would sell for \$40,516,450. The Counties share would be \$10,129,112. If the entire growth were to be cut, the income would be \$139,468,000 and the Counties share would be \$34,867,000.

We know that more than half of the MNF is already off limits for timber management because of Wilderness Areas and other designated areas. We do not agree with over half of the Mon. Forest being off limits to timbering, but we would like for the Forest Service to focus on selling mature timber on the rest of the Forest.

Forestry is a big industry in this area and many jobs are associated with it. The Mon. Forest makes up a large percentage of Randolph County's acreage. Since the Forest Service has been selling little to no timber in Randolph County, the burden has been harder on the taxpayers of Randolph County because we could be getting 25% of the timber sales. That would be a large sum of money as the above figures suggests. It is a shame that the Forest Service has had so few timber sales in the last decade. Timber sale proceeds would also go to the Mon. Forest. These funds would help the Forest Service to become more self-sufficient instead of depending entirely on other tax revenues. We are also opposed to adding more land to non-timbering categories such as wilderness areas in the Mon. Forest. The RCPC believes that there would be many benefits from more timber sales such as; more tax money for Randolph County, more jobs for the people of Randolph County, more revenue for the Forest Service, more justification for the vast amount of employees from the Forest Service, healthier forests, and forests that would provide better food sources for the wildlife.

After reviewing the alternatives of the Mon. Forest, the Randolph County Planning Commission supports alternative 2 with no more wilderness areas. We also do not support any areas being taken out of timbering categories. Any land on the Mon. Forest that was designated in the 1986 plan so that timber sales could take place should be left as such. None of these lands should be put into non-timbering categories.

Sincerely,

Marcus Bonner 11-14-05  
Marcus Bonner, President of the Randolph County Planning Commission

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NOV 14 2005

TUCKER  
COUNTY  
COMMISSION

215 First Street, Suite 3  
Parsons, WV 26287

Phone: 304-478-2866  
Fax: 304-478-2446

Commissioners:  
S. J. Echelberger  
James "Chris" Michael  
David C. Leary

Coordinator:  
Brian K. Flanagan

November 7, 2005

F - 23+

Mr. Clyde Thompson, Forest Supervisor  
Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

CAG RECEIVED  
NOV 14 2005

Dear Mr. Thompson:

The Tucker County Commission supports **Alternative 2 with NO ADDITIONAL WILDERNESS** for the Monongahela National Forest Plan revision. Our forests need managed for fire, disease, wildlife management. Below are some reasons that the Tucker County Commission believes that no more wildernesses are needed within West Virginia!

Alternative 2 in the Forest Service plan is a good mix of forestry, recreation, soil and water protection, endangered species protection, etc.

The Tucker County Commission supports alternative 2, but believes the State cannot stand the loss that additional Wilderness Areas will bring.

More than half of the Monongahela is already off limits for timber management, including nearly 9% that has already been proclaimed as Wilderness by Congress.

Nearly 5% of the entire nation, an area slightly larger than the State of California, has already been proclaimed Wilderness.

Actually, there is no shortage of Wilderness in the world. A comprehensive global analysis issued in 2002 showed nearly 50% of total forest land is Wilderness.

Legislated Wilderness is only open to hikers, or those riding animals. Much of the population, including our Senior citizens, can never enjoy it. (Wilderness areas are off limits to any motorized vehicles; many of the Citizens in Tucker County are Senior Citizens and are unable to hike long distances and would be denied access to these areas for fishing or any recreational use.)

MON 3434

Wilderness designation prevents the Counties from receiving the 25% of Forest receipts that county school systems ordinarily receive from timber management on the Forest. (Already acre per acre Tucker County has more wilderness acreage than many surrounding counties within the Monongahela National Forests. A lack of tax base and continued decline in population and school enrollment finds that the 25% Fund, which is generated by productivity, is heavily relied upon by the Tucker County School System. Any additional wilderness area designation will be detrimental to funding for our county schools.)

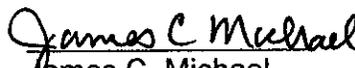
A recent government count of visitors to the Monongahela showed only one million annually instead of the claimed 3 million. Only 70% were there for recreation. This is an acre per visitor overall, a high price when each acre averages \$6,000 of high grade timber.

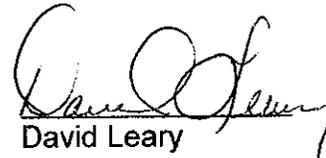
By actual survey only about 26,000 people annually visit the 78,000 acres of Wilderness on the Monongahela - about one per year for each three acres so restricted. This includes multiple visits. Nationwide, only about 4 million people visit the 106 million acres of proclaimed Wilderness.

Lastly, because of non-use of motorized vehicles in a Wilderness Area, fire fighting will be limited as to response and safety; hunters and hikers are as well placed in great jeopardy, while approval is being sought to gain motorized access to retrieve them; it creates unsafe conditions for all concerned and places surrounding forest areas in great jeopardy.

Sincerely yours,

  
S.J. Echelberger  
Commissioner

  
James C. Michael  
Commissioner

  
David Leary  
Commissioner

TCC/bkf



Edmiston Way - PO Box 109  
Buckhannon WV 26201  
Busi: 304-472-1757  
Fax: 304-472-4998

[www.info@upshurda.com](mailto:www.info@upshurda.com)  
[www.upshurda.com](http://www.upshurda.com)



205 207 25 85 11

October 17, 2005

Monongahelia National Forest  
Forest Plan Revision Committee  
200 Sycamore Street  
Elkins WV 26241

Dear Madam or Sir:

At the October 12, 2005 meeting of the Upshur County Development Authority, the draft impact study for the Monongahelia National Forest was reviewed.

After discussion of same, and a review of the four options under consideration, the UCDA adopted a motion to support Alternative #2 as the best one for management of this valuable resource.

We look forward to the final plan.

Sincerely yours,

Andrew C. Duncan  
President

CAG RECEIVED  
OCT 21 2005



Monongahela National Forest  
Proposed Forest Plan and Draft Environmental Impact Statement  
Comment Form

(Please Print)

Name: Judy Guye Organization: City of Elkins

Street Address: 401 Davis Ave

City: Elkins State: WV Zip Code: 26241

E-mail Address: mayor@cityofelkinswv.com Telephone: 636 1414

COMMENTS (Please be as specific as possible):

See enclosed letter

CAG RECEIVED  
NOV 09 2005

(over)

Mail to: Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

PLEASE Return Comments by  
November 14, 2005

Attach Additional Sheets as Necessary

# CITY OF ELKINS

MON-2160

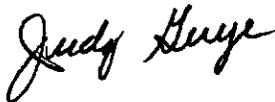
Judith A. Guye  
Mayor

401 Davis Avenue  
Elkins, West Virginia 26241

## Comments

I would like to support Alternative 2 in the Forest Service plan because in Alternative 2 there is more area on the Forest with backcountry recreation emphasis than in the 1986 plan. However, I support Alternative 2 without any additional wilderness areas, unless it is to extend the Cranberry and Dry Fork areas which are already existing Wilderness Areas. The State cannot stand the loss that additional Wilderness Areas will bring. The creation of new Wilderness Areas should await the results of the new year-long planned study of need. Nearly 5% of the entire nation, an area larger than the State of California, has already been proclaimed Wilderness. Nearly 50% of the entire forest land is Wilderness. Legislated Wilderness is only open to hikers, or those riding animals. Much of the population, including our seniors, can never enjoy it. Wilderness designations prevent the counties from receiving the 25% of Forest receipts that county school systems ordinarily receive from timber management on the Forest. Randolph County Board of Education should not be deprived of any revenue that they count on in their budget. Alternative 2 plan would produce little change from the current timber harvest.

Any plan made, needs revisions in 20 years time, as conditions change and new ways of handling the forest need to be addressed, such as acid deposition, invasive species management, riparian areas guidelines and restoration of different species of trees. Therefore I feel Alternative 2 would be the best plan.



Judith A. Guye  
Mayor



# CITY OF LEWISBURG

*National Register Historic District*

P.O. Drawer 548 • 119 W. Washington Street • Lewisburg, West Virginia 24901-0548  
(304) 645-2080 • Fax (304) 645-2194

MON-2604

November 14, 2005

Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

To Whom It May Concern:

Attached you will find a copy of the Resolution in support of additional wilderness area designation in the Monongahela National Forest. The Resolution was passed by Lewisburg City Council on November 18, 2003. That stance remains exactly the same.

In reading over the descriptions of the alternatives under consideration in the Draft Plan, I find that Alternative 3 represents the spirit of the Resolution passed by Lewisburg City Council.

Please add this to your public comments.

Sincerely,

John Manchester  
Mayer  
Lewisburg, West Virginia

Attachment

RESOLUTION

K-231

A RESOLUTION BY THE COUNCIL OF THE CITY OF LEWISBURG, WEST VIRGINIA TO SECURE PERMANENT PROTECTION FOR THE WILDEST PARTS OF WEST VIRGINIA AS WILDERNESS FOREST AREAS.

Mon. 2604

WHEREAS, wilderness forest areas protect the value of backcountry recreation, clean water and air, scenic beauty and wildlife habitat; and

WHEREAS, wilderness forest areas encompass the development of rural communities as people are attracted to, or stay in, places that are clean, beautiful and where they have ample opportunities to connect with nature; and

WHEREAS, wilderness forest areas encourage economic development in West Virginia because of tourists that are drawn to these wild areas to hike and camp; and

WHEREAS, people and businesses locate where the quality of life, based in part on a clean natural environment and high quality recreational opportunities is high; and

WHEREAS, public lands represent natural assets that provide communities with a comparative advantage over other rural areas in diversifying their economies; and

NOW, THEREFORE BE IT RESOLVED, BY THE COUNCIL OF THE CITY OF LEWISBURG:

That the Mayor and Council of the City of Lewisburg support the protection of additional wilderness forest areas in the Monongahela National Forest.

On motion duly made my Councilperson McClure and seconded by Councilperson Curver, the City of Lewisburg, West Virginia does hereby approve and authorize the adoption of said Resolution to become effective immediately.

Adopted this 18<sup>th</sup> day of November, 2003

John Manchester  
John Manchester, Mayor

STATE OF WEST VIRGINIA  
COUNTY OF GREENBRIER  
MUNICIPALITY OF LEWISBURG: to wit,

I, Pat Johnson, CITY RECORDER of said municipality do hereby certify that the foregoing is a true, correct and complete copy of a Resolution adopted by the Council of the City of Lewisburg at a regular meeting held on November 18, 2003, in accordance with law, and that such Resolution has not been repealed, revoked, rescinded or amended, but is in full force and effect on the date hereof.

Witness my hand and the seal of the City of Lewisburg, West Virginia, this 18<sup>th</sup> day of November, 2003

Pat Johnson, CMC  
Pat Johnson, CMC, Recorder

CITY OF THOMAS  
PO BOX 248  
THOMAS, WV 26292

MON 11675

November 9, 2005

Mr. Clyde Thompson, Forest Supervisor  
Monongahela National Forest  
Attn: Forest Plan Revision  
200 Sycamore Street  
Elkins, WV 26241

F - 2 3

Dear Mr. Thompson:

The City of Thomas supports Alternative 2 with **NO ADDITIONAL WILDERNESS** for the Monongahela National Forest Plan revision. Our forests need managed for fire, disease, and wildlife management. Below are some reasons that the City of Thomas believes that no more wilderness is needed within West Virginia!!!!

Alternative 2 in the Forest Service plan is a good mix of forestry, recreation, soil and water protection.

The City of Thomas supports alternative 2, but believes the State cannot stand the loss that additional Wilderness Areas will bring.

More than half of the Monongahela is already off limits for timber management, including nearly 9% that has already been proclaimed as Wilderness by Congress.

Nearly 5% of the entire nation, an area slightly larger than the State of California, has already been proclaimed Wilderness.

Actually, there is no shortage of Wilderness in the world. A comprehensive global analysis issued in 2002 showed nearly 50% of total forestland is Wilderness.

Legislated Wilderness is only open to hikers, or those riding animals. Much of the population, including our Senior Citizens, can never enjoy it.

Wilderness designation prevents the Counties from receiving the 25% of Forest receipts that county school systems ordinarily receive from timber management on the Forest.

A recent government count of visitors to the Monongahela showed only one million annually instead of the claimed 3 million. Only 70% were there for recreation. This is an acre per visitor overall, a high price when each acre averages \$6,000 of high-grade timber.

CAG RECEIVED  
NOV 14 2005

By actual survey only about 26,000 people annually visit the 78,000 acres of Wilderness on the Monongahela – about one per year for each three acres so restricted. This includes multiple visits. Nationwide, only about 4 million people visit the 106 million acres of proclaimed Wilderness.

Sincerely,

A handwritten signature in cursive script that reads "Junior Davis".

Council Person of The City of Thomas

MON 11675

MON-2607

RESOLUTION

A RESOLUTION BY THE COUNCIL OF THE CITY OF WHITE SULPHUR SPRINGS, WEST VIRGINIA TO SECURE PERMANENT PROTECTION FOR THE WILDEST PARTS OF WEST VIRGINIA AS WILDERNESS FOREST AREAS.

WHEREAS, wilderness forest areas protect the value of backcountry recreation, clean water and air, scenic beauty and wildlife habitat; and

WHEREAS, wilderness forest areas encompass the development of rural communities as people are attracted to, or stay in, places that are clean, beautiful and where they have ample opportunities to connect with nature; and

WHEREAS, wilderness forest areas encourage economic development in West Virginia because of tourists that are drawn to these wild areas to hike and camp; and

WHEREAS, people and businesses locate where the quality of life, based in part on a clean natural environment and high quality recreational opportunities is high; and

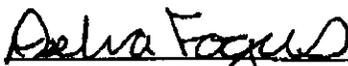
WHEREAS, public lands represent natural assets that provide communities with a comparative advantage over other rural areas in diversifying their economies; and

NOW, THEREFORE BE IT RESOLVED, BY THE COUNCIL OF THE CITY OF WHITE SULPHUR SPRINGS:

That the Mayor and Council of the City of White Sulphur Springs support the protection of additional wilderness forest areas in the Monongahela National Forest.

On motion duly made by Councilperson Hanna and seconded by Councilperson King, the City of White Sulphur Springs, West Virginia does hereby approve and authorized the adoption of said Resolution to become effective immediately.

Adopted this 12<sup>th</sup> day of October, 2005

  
Debra Fogus, Mayor

Mon. 2007

STATE OF WEST VIRGINIA

COUNTY OF GREENBRIER

MUNICIPALITY OF WHITE SULPHUR SPRINGS: to wit,

I, Peggy Bland, CITY RECORDER of said municipality do hereby certify that the foregoing is a true, correct and complete copy of a Resolution adopted by the Council of the City of White Sulphur Springs at a regular meeting held on October 12, 2005, in accordance with law, and that such Resolution has not been repealed, revoked, rescinded or amended, but is in full force and effect on the date hereof.

Witness my hand and seal of the City of White Sulphur Springs, West Virginia, this 12<sup>th</sup> day of October 2005

  
Peggy L. Bland  
Peggy Bland, Recorder

**From:** USDA Forest Service [usdafs@fs.fed.us]  
**Sent:** Wednesday, September 07, 2005 3:18 PM  
**To:** Monongahela  
**Subject:** FORWARDED FROM FS: Fw: WV/Monongahela Natl Forest/Forest Mgmt Plan/More Info

Patricia Shields  
monongahela@FSNOTES  
09/07/2005 16:01  
Forest/Forest Mgmt Plan/More Info  
To: comments-eastern-  
cc:  
Subject: Fw: WV/Monongahela Natl

Patricia Shields  
Monongahela National Forest  
304 636-1800  
pshields@fs.fed.us  
----- Forwarded by Patricia Shields/R9/USDAFS on 09/07/2005 05:01 PM -----

"Karen  
Kaniatobe"  
\_monong\_website@fs.fed.us>  
<kkaniatobe@astr  
ibe.com>  
Forest/Forest Mgmt Plan/More Info  
09/07/2005 11:07  
AM  
To: <r9  
cc:  
Subject: WV/Monongahela Natl

Thank you for contacting the Absentee Shawnee Tribal Historic Preservation Office for comment regarding your proposed Forest Management Plan and Draft Environmental Impact Statement. Though your heritage resources section allows for the protection of all cultural resources we wanted to stress our concern for the protection and preservation of sites sacred to the Absentee Shawnee people in our ancestral settlement regions.

Please note this is an area rich in Shawnee history therefore in the case of inadvertent discovery (American Indian human remains with or without funerary objects) we request to be notified within 48 hours. In advance, we appreciate your cooperation with this request.

Also are there any items in your inventory that could be culturally traced to the Shawnee? Please let me know. Thank you.

Karen Kaniatobe, Tribal Historic Preservation Officer  
Absentee Shawnee Tribe  
2025 S Gordon Cooper  
Shawnee Oklahoma 74801  
Phone: 405.275.4030 x199  
E-mail: kkaniatobe@astribe.com

September 6, 2005

**RE: MONONGAHELA NATIONAL FOREST  
RELEASE OF PROPOSED FOREST MANAGEMENT PLAN AND DRAFT  
ENVIRONMENTAL IMPACT STATEMENT**

*To Whom It May Concern:*

*Thank you for notice of the referenced project(s). The Eastern Shawnee Tribe of Oklahoma is currently unaware of any documentation directly linking Indian Religious Sites to the proposed construction. In the event any items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) are discovered during construction, the Eastern Shawnee Tribe request notification and further consultation.*

*The Eastern Shawnee Tribe has no objection to the proposed construction. However, if any human skeletal remains and/or any objects falling under NAGPRA are uncovered during construction, the construction should stop immediately, and the appropriate persons, including state and tribal NAGPRA representatives contacted.*

*Sincerely,  
Jo Ann Beckham, Administrative Assistant  
Eastern Shawnee Tribe of Oklahoma*