# Monongahela National Forest

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Department of
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Forest Service

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# Final
# Environmental Impact Statement
# Appendix I
# Responses to Comments

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# Appendix I

# Responses to Comments

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# Executive Summary

## INTRODUCTION

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

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

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

## CONTENT ANALYSIS PROCESS

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

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

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

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

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

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

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

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

Non-substantive comments are ones that:

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

## GENERAL OVERVIEW OF PUBLIC COMMENT

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

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

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

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

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

## PUBLIC CONCERN DOCUMENT CONTENT AND ORGANIZATION

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

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

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

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

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

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

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

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

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

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

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

# Section One: Decision-Making Process

| DECISION-MAKING AND MANAGEMENT PHILOSOPHY | |
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| **PC 360** | **The Forest should consider using advisory committees to provide accountability and modification as needed.** |
| Response: | Accountability and modification are provided for in the Monitoring and Evaluation Plan in Chapter IV of the Proposed and Final Revised Plans. The use of advisory committees is not out of the realm of possibility but is beyond the scope of this plan revision. |
| **PC 128** | **The Forest should revise the Forest Plan according to its professional abilities, and not according to the most number of responses for a given issue.** |
| Response: | We have used our professional abilities to design a Revised Plan and analyze the effects of different management alternatives, but we have also listened to all segments of the public as to what should be in the plan and how the Forest should be managed. |
| **PC 54** | **The Forest should keep greed out of the planning process, because you can grow forests and produce timber at the same time.** |
| Response: | We agree that we can grow forests and produce timber simultaneously. We do not believe we have used greed in the planning process. See also response to PC 256. |
| **PC 256** | **The Forest should acknowledge that the Forest belongs to the people and not special interests.** |
| Response: | The Forest belongs to the people and is managed for the people, but the people who use or support the Forest include a wide variety of interests, and the Congress that represents the people has decided that National Forests are to feature multiple uses and provide a wide variety of goods and services and opportunities. We have tried to reflect that mandate in the Revised Forest Plan. This is not a plan for special interests, but it is a plan that will provide jobs and income as an offshoot of vegetation management for habitat diversity and sustainable mast production. It is a plan that will provide jobs and income as an offshoot of producing and storing natural gas for the country's energy needs. It is a plan that will also provide abundant recreational opportunities, from driving for pleasure to hiking in Wilderness. And it is a plan will help conserve or enhance the natural biodiversity of this special area. |
| **PC 420** | **The Forest should consider that Americans favor the conservation and preservation of wild areas even if they cannot personally visit them.** |
| Response: | We believe that the Forest provides many benefits to the country that are appreciated by people who cannot or choose not to visit the area. |
| **PC 177** | **The Forest should follow the Wilderness Society's guidelines in forming its management plans.** |
| Response: | The Forest must follow direction that is provided by law, regulation, and agency policy, as opposed to guidelines proposed by private organizations or individuals. In some cases, we have been able to adjust Plan direction based on suggestions from organizations or individuals, but in other cases we have not. However, all the comments and suggestions we have received have been considered. |
| **PC 204** | **The Forest should address long-range management issues that are not ecological in nature.** |
| PC 204a | INCLUDING LONG-TERM PLANS TO ACQUIRE NON-FOREST LANDS FROM PRIVATE OWNERS |
| Response: | Land exchange and acquisition direction is provided in the Lands and Special Uses section of Chapter II of the Revised Forest Plan. This direction is intended to last as long as any other in the Plan. |
| PC 204b | INCLUDING LONG-TERM PLANS TO MANIPULATE NON-FOREST USES OR EDUCATE ADJOINING LAND OWNERS IN WHAT IS THE RIGHT THING TO DO |
| Response: | We do not have the authority to manipulate non-Forest uses or tell adjacent land owners what to do. We do provide educational materials to the public in many forms, including the Revised Forest Plan and accompanying EIS. |
| **PC 235** | **The Forest should run itself more like a business, including assigning a monetary value to each desired condition or outcome, and using economic efficiency tools.** |
| Response: | The Forest Service is not a business, as stated on page 3-456 of the DEIS. We do not have the same goals or objectives, nor do we operate under the same rules and regulations as does private business. We have assigned monetary values to our projected outcomes in the economic analysis, and the economic efficiency tools we used are summarized on page 3-456. |

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| **PC 384** | **The Forest should present a balance between various disciplines in the Plan because the Plan seems to over-represent commodity and game interests while under-representing conservation biology interests.** |
| Response: | We believe conservation biology concerns are well-represented in the Revised Plan. Land allocations create Minimum Dynamic Area reserves totaling more than 40 percent of the Forest. Another substantial portion of the Forest consists of smaller parcels of land not suitable for scheduled commercial harvest, which leaves only about a little over one third of the Forest where commodity production and game management are emphasized. |
| **PC 644** | **The Forest should consider the benefits of the non-extractive uses of the forest.** |
| Response: | We have considered these benefits and uses. See Chapter 3 of the EIS, particularly sections addressing Recreation and Wilderness, Scenic Environment, Air Quality, Soil Resource, Water, Riparian and Aquatic Resources, Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Terrestrial MIS and Other Species of Interest, and Threatened and Endangered Species. See also the Revised Forest Plan, Chapters II and III. Commodity extraction occurs primarily through timber and mineral management; however, these are only two of the many programs that we manage on the Forest. |
| **PC 642** | **The Forest should examine what non-motorized and non-consumptive uses of the forest are occurring.** |
| Response: | Non-motorized, non-consumptive recreation uses of the Forest are generally described in the Current Condition portion of the Recreation and Wilderness section of Chapter 3 in the EIS. National Visitor Use Monitoring was completed on the Forest From October 1, 2002 to September 30, 2003, and it included non-motorized and non-consumptive recreational uses that are occurring on the forest. See Table RE-5. Most Popular Recreation Activities on the Forest (DEIS, p 3-370). Trends and needs will be more discernible as use monitoring continues into the future. General effects from other management activities are described on pages 3-377 to 3-379 of the DEIS. See also response to PC 644. |
| **PC 628** | **The Forest should not use an adaptive management approach.** |
| Response: | Adaptive management is an approach that the Forest Service has adopted nationwide, one that will allow Forest managers to adapt to changing conditions, direction, needs, and public desires more efficiently and effectively over time. This strategy will put more emphasis on monitoring, which we have reflected in Chapter IV of the Revised Plan, and in the Monitoring Implementation Guide we are developing. We feel that the Monitoring and Evaluation Plan in the Revised Plan is stronger and more adaptable than the monitoring in the 1986 Plan. |
| **PC 627** | **The Forest should incorporate an adaptive management approach.** |
| Response: | We agree. See also response to PC 628. |
| **PC 159** | **The Forest should hire people that have a thorough understanding of forestry.** |
| Response: | The Forest hires foresters that have a thorough understanding of forestry, and the Forest hires other specialists that have a thorough understanding of their disciplines. It is our understanding and experience that foresters and other specialists typically receive education and training that expose them to many different scientific disciplines. We feel that type of well-rounded education and experience is a beneficial attribute for Forest managers to have. |
| **PC 375** | **The Forest should manage the Forest for multiple uses, including timber production and recreation.** |
| Response: | We agree, and we support the concept, requirement, and implementation of multiple-use management. |
| **PC 585** | **The Forest should carry out multiple-use management based upon the capacity of the land and needs and well-being of the communities it can reasonably support.** |
| Response: | We share your concern about the well-being of local communities and the need for multiple-use management. However, we are also required to look beyond the capacity of the land for production and consider the suitability of the land for certain uses given the wide range of resources and activities we manage. |
| **PC 590** | **The Forest should not subordinate the production of goods and services to other activities in order to assure desired outcomes.** |
| Response: | Not all production of goods and services is tied to the desired outcomes for restoration or maintenance of vegetation and watershed conditions, as cited in the comments. However, timber production is closely tied to achieving the desired conditions and outcomes related to vegetation management, and we believe it should be. |

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| **PC 101** | **The Forest Service should manage the Forest as a working forest to:**<br>• **Create a healthy and diverse ecosystem**<br>• **Improve the economy of West Virginia**<br>• **Increase timber harvest**<br>• **Control disease, infestations, and invasive plants.** |
| Response: | We agree that the Forest should manage vegetation for many reasons, including those that you specifically state. However, we manage many other resources as well, and therefore we have developed management alternatives that provide a range of goods, services, settings, and opportunities. |
| **PC 223** | **The Forest should get the most out of all its resources in a sustainable manner.** |
| Response: | The Revised Forest Plan provides for a mix of Forest resources and uses. |
| PC 223a | BECAUSE THE LANDSCAPE CHARACTER WILL NEVER BE RETURNED TO HOW IT WAS 100 TO 150 YEARS AGO |
| Response: | We are not managing the landscape to return the entire Forest to how it was 100 to 150 years ago. We agree that much has changed in the interim and that such a strategy would preclude many multiple-use goals and objectives that are part of our legal mandate. However, ecological restoration is also a legitimate multiple-use goal. Therefore, in many areas of the Forest, we are allowing natural resources to continue to recover from the impacts that occurred 70-120 years ago. |
| PC 223b | TO PROVIDE FOR THE ECONOMIC, SOCIAL, AND CULTURAL NEEDS OF LOCAL COMMUNITIES |
| Response: | The Social and Economic Environment section in Chapter 3 of the EIS describes how the alternatives would contribute to local economies and social effects. |
| PC 223c | INCLUDING SUFFICIENT DETAIL TO LIMIT LOCAL DISCRETION |
| Response: | Limiting local discretion is not a specific management goal or objective of the Forest. |
| PC 223d | INCLUDING LOOKING AT POTENTIAL TIMBER PRODUCTS AND WHETHER THOSE PRODUCTS ARE AN APPROPRIATE USE OF THE FOREST OR JUST CONTRIBUTING TO FOREST DEGRADATION |
| Response: | People recreating on the Forest may not feel that wood products are the most appropriate use of trees while they are recreating, but we believe that wood production is one of many appropriate uses of the Forest, and one that has short-term and long-term positive effects on people and the human environments in which they live. It is also part of our mandate under the Multiple Use and Sustained Yield Act and the National Forest Management Act. |
| **PC 825** | **The Forest should provide goods and services that cannot be provided by private lands.** |
| Response: | We do not have any goods and services that cannot be provided by private lands, but all of the goods and services on the Forest can contribute to those that are also produced on private lands for the overall benefit of the public. See also response to PC 698. |
| **PC 586** | **The Forest should take into account the severe limitations on commodity production that characterizes most Federal lands when determining the appropriate use of Forest lands.** |
| Response: | Certain federal lands, like National Parks, do have more limitations on commodity production than National Forests. However, National Forests have their limitations as well. Our limitations are described by management direction in Chapters II and III of the Revised Forest Plan. In particular, see the management direction for Timber Resources, Mineral Resources, and Range Resources. We do not feel that these limitations are "severe" given our responsibility to protect non-commodity resources defined by the various laws, regulations, and policies under which we operate. |
| **PC 704** | **The Forest should examine how increasing environmental awareness affects public interest and use of the forest.** |
| Response: | We recognize that the public uses the Forest in many other ways than commodity production. Some of these uses and interests are captured in the Recreation and Wilderness section of Chapter 3 in the EIS. |
| **PC 158** | **The Forest should not subsidize logging or mining on public lands.** |
| Response: | We acknowledge your preferences. Timber sales on the Forest are appraised based on market conditions and past timber sales and then sold through the sealed bid process. There is presently no mining on the Forest. Coal mining ceased on the Forest in the early 1990s, and no coal mine permit applications on National Forest System land are pending or known to exist (DEIS, page 3-347). Should mining be proposed, the Forest would process the proposal and administer operations according to |

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| | authorities granted through the mineral deed, law, and regulation, and agency policies and directives. |
| **PC 329** | **The Forest should address the value of demonstrating good forest management practices to the public that could be applied to private land.** |
| Response: | The Forest and Rangeland Renewable Resources Planning Act of 1974, in section 2 paragraphs (5) and (6), states the federal government and the Forest Service "should be a catalyst to encourage and assist" private forest landowners in the "efficient long term use and improvement of these lands…consistent with the principles of sustained yield and multiple use", and "the Forest Service…has both a responsibility and opportunity to be a leader…". Management activities on national forest lands are often used as examples of good land stewardship practices for other government land management agencies as well as private and industry forest landowners, at the local, state, national, and international levels. |

| **PUBLIC INVOLVEMENT** | |
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| **PC 631** | **The Forest should play a more active role in community planning.** |
| Response: | We feel that we have had positive interaction with local communities during Forest Plan revision. Outside of revision, we coordinate and cooperate with local communities in a number of mutually beneficial activities. However, we also recognize that there are limitations to our authority and influence in community planning efforts. |
| **PC 118** | **The Forest should acknowledge that allowing the Responsible Official to limit the plan alternatives without public comment may be illegal** |
| Response: | The Responsible Official is responsible for reviewing and approving the range of alternatives considered in the EIS. The public has had the opportunity to review and comment on the alternatives, and we have considered additional alternatives that have been suggested. See also the Alternatives Considered But Eliminated From Detailed Study section in Chapter 2 of the EIS. |
| **PC 630** | **The Forest should consider public comments.** |
| Response: | We have considered public comments throughout the plan revision process. See Appendix A to the EIS, as well as the responses to comments on the DEIS and Proposed Revised Plan in this appendix. |
| PC 630a | INCLUDING THE ADVERSE EFFECTS OF THE OUTSOURCED CONTENT ANALYSIS PROCESS |
| Response: | We do not believe that the content analysis process we used to organize comments on the Drafts had adverse effects on our ability to consider or respond to the comments. |
| PC 630b | INCLUDING COMMENTS OF PROPERTY OWNERS |
| Response: | We considered comments from any property owners that submitted them. |
| PC 630c | INCLUDING COMMENTS SUBMITTED ON THE 1986 FOREST PLAN |
| Response: | We did not consider comments on the 1986 Plan, but we believe the quotes that you cited from the Plan are as relevant today as they were 20 years ago, and they will still be relevant 20 years from now. |
| PC 630d | BECAUSE MOST AMERICANS ARE OPPOSED TO LOGGING IN NATIONAL FORESTS AND ROADLESS AREAS, AS SEEN IN NATIONAL POLLS |
| Response: | We do not believe that national polls, regardless of their content or purpose, constitute specific or substantive comments on our Proposed Revised Plan or DEIS, and we did not consider them as such. |
| **PC 70** | **The Forest should give more weight to majority opinion rather than minority opinion.** |
| Response: | We are interested to hear what everyone has to say about our planning efforts, but we have also told people that Revised Plan or EIS changes will be more likely influenced by well-informed substantive comments on specific document elements or issues than they will by mass opinions or preferences. |
| **PC 105** | **The Forest should conduct more consultation with average citizens, including local people.** |
| Response: | We have engaged the public openly throughout the revision process, including open houses, phone calls, e-mails, newsletters, and visits to local and county meetings. See Appendix A to the EIS. |
| PC 105a | INCLUDING CONDUCTING CITIZEN POLLS ABOUT WHAT THEY WOULD LIKE THE DIRECTION OF FOREST MANAGEMENT TO BE |
| Response: | We have heard from thousands of people, and we feel that the breadth of information and commentary we received was more valuable than any targeted poll we could have conducted. Although polls can be useful to gather specific information, they are typically limited by their design and are certainly no |

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| | substitute for open communication. |
| **PC 397** | **The Forest should acknowledge that many respondents may feel that expressing their concerns is futile and will provide little incentive for the Forest Service to rethink its proposed plan.** |
| Response: | We appreciate the effort that you and others made to comment, and we assure you that your comments were read and considered, whether or not they generated a change in the Proposed Revised Plan. |
| **PC 544** | **The Forest should work with appropriate state agencies to address forest management needs.** |
| Response: | We agree. See additional responses to this concern below. |
| PC 544a | INCLUDING CRITICAL WILDLIFE HABITAT NEEDS |
| Response: | The Forest has worked cooperatively with the WVDNR and the USFWS throughout the revision process to ensure that critical wildlife habitat needs are met. |
| PC 544b | INCLUDING WORKING WITH THE WEST VIRGINIA DIVISION OF NATURAL RESOURCES IN DEVELOPING THE SPRUCE RESTORATION PROGRAM |
| Response: | We intend to work cooperatively with WVDNR, USFWS, The Nature Conservancy, and other interested parties in implementing spruce restoration. |
| PC 544c | INCLUDING THE STATE OF WEST VIRGINIA IN THE PLANNING PROCESS BECAUSE THE STATE HAS NOT BENEFITED ECONOMICALLY FROM THE MONONGAHELA IN THE PAST |
| Response: | We believe that the State and local communities have benefited economically from the Forest. See the Social and Economic Environment section of the EIS for an analysis of effects that Forest activities and revenues have had, and may have on State counties and local communities. |
| **PC 302** | **The Forest should consult with the U.S. Fish and Wildlife Service.** |
| Response: | We agree and we do. |
| PC 302a | BECAUSE THE ENDANGERED SPECIES ACT REQUIRES IT BEFORE INCREASING THE ACREAGE OF PRESCRIBED BURNS WITHIN THE FOREST |
| Response: | We have consulted informally and formally with the USFWS on the effects of the Revised Forest Plan on threatened and endangered species, including the effects of increased prescribed burning. |
| PC 302b | INCLUDING SPRUCE RESTORATION ACTIVITIES |
| Response: | Goal 4104 in the Proposed Revised Plan has been modified to include USFWS as a potential cooperator in designing and monitoring spruce restoration efforts. |
| **PC 295** | **The Forest should work closely with partners.** |
| Response: | We work cooperatively with many agencies and organizations toward nature conservation and other objectives. More information on consultation, cooperation, and coordination can be found in the Introduction to Chapter II in the Proposed Revised Plan. |
| PC 295a | INCLUDING THE NATURE CONSERVANCY (TNC) TO ACCOMPLISH MONITORING AND EVALUATION |
| Response: | We believe there is good potential to work with TNC on monitoring or other projects. |
| PC 295b | INCLUDING THE WEST VIRGINIA WILDERNESS COALITION REGARDING LEGISLATION |
| Response: | We do not legislate, and neither does the West Virginia Wilderness Coalition. |
| PC 295c | INCLUDING CITIZEN GROUPS, BUSINESS TOURISM IN PARTICULAR GOVERNMENT TO PRESERVE IN BALANCE AS MUCH OF NATURE AS POSSIBLE |
| Response: | We have spoken with TNC about our intent to update the management plan for the NRA and how they could be involved. |
| PC 295d | INCLUDING THE WEST VIRGINIA DIVISION OF NATURAL RESOURCES (WVDNR) TO CLASSIFY ECOLOGICAL COMMUNITIES ON THE FOREST IN ACCORDANCE WITH THE NATIONAL VEGETATION CLASSIFICATION |
| Response: | We work with WVDNR in many capacities. The State had not completed its National Vegetation Classification efforts at the time we were revising the Forest Plan, and the Forest Service currently uses a different classification system. It may be possible to coordinate a workable crosswalk between our different systems in the future. |
| **PC 626** | **The Forest should consult agencies without bias.** |
| Response: | We agree. Information on consultation, cooperation, and coordination with other agencies can be found in the Introduction to Chapter II in the Proposed Revised Plan. |
| **PC 633** | **The Forest should hold public hearings and provide for comments over an extended period.** |
| Response: | We considered your suggestion. Although public hearings can be cathartic for their participants, we did |

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| | not feel that they would provide any more information for plan revision beyond that received through direct public comment and interaction. Appendix A to the DEIS summarizes our public involvement, which includes a 90-day comment period on the DEIS and Proposed Revised Plan. We felt this period was more than adequate, and it produced nearly 13,000 comments for us to consider. |
| **PC 610** | **The Forest should acknowledge that a strong majority of the public supports a high level of protection for wild areas in national forests.** |
| Response: | We acknowledge that we heard from many people who support protection and/or wilderness recommendation for many different areas on the Forest. These people are well represented in the public concerns and associated comments that we are addressing in this appendix. It was not always clear as to whether they considered the entire Forest "wild" or just the specific areas that they wanted to see recommended or designated as wilderness. Although the number of comments we received was impressive, it would be presumptuous of us to deduce that several thousand people represent "a strong majority of the public", as stated in the comments. It may well be that these numbers more accurately represent the networking and recruiting skills of the environmental organizations that solicited them, based on the number of form letters and e-mails from letter generators we received. |
| **PC 209** | **The Forest should ask people on the mailing distribution list for assistance with soil, water, riparian, and aquatic active restoration projects.** |
| Response: | The Forest actively participates in partnerships with multiple entities to accomplish restoration and monitoring projects. The Forest does not solicit specific group or individual participation but does readily join partnerships and accept volunteers to aid in completing such projects. Successful partnerships have occurred with USDA- Natural Resource Conservation Service, universities, non-profit organizations such as Trout Unlimited, The Nature Conservancy, The Boy Scouts of America, individual volunteers, and other entities. |
| **PC 331** | **The Forest should provide an objective admission of environmental impacts in their final response to comments, including your newsletter responses to complaints about rollbacks in protection or loss of protection for some existing 6.2 areas that are clearly attempts to cover up or deny the significance of these changes.** |
| Response: | We stand behind the objectivity of our EIS and the analyses of effects by alternative, including Alternative 4, which we consider a viable management option. The effects reported may have been "unacceptable" to the commenter, but that does not negate the fact that they were disclosed objectively.<br><br>As for the newsletter, we were in fact clarifying the overall disposition of backcountry recreation opportunities in Alternative 1 versus Alternative 2. We felt that this explanation was more objective and comprehensive than merely focusing on the disposition of existing 6.2 areas. The issue we are addressing in the EIS is backcountry recreation opportunities, of which 6.2 areas are only one component. |

| **ADEQUACY AND AVAILABILITY OF INFORMATION** | |
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| **PC 503** | **The Forest should provide information about the sources of information it used when revising its Forest Plan, including consultation with non-governmental partners and interest groups, as well as federal, state, and county officials.** |
| Response: | The agencies, officials, organizations, interest groups, and individuals we have contacted or consulted are listed in Appendix A to the EIS. The information they provided is largely captured in the comment letters they sent us, or notes from meetings or other contacts we have had. These letters and notes are part of the project record. |
| **PC 137** | **The Forest should make the plan, proposals, and other relevant information easily accessible on the Internet to save paper.** |
| Response: | We have posted the Proposed Forest Plan, DEIS, Appendices to the DEIS, and several other plan-related documents on our internet site at: www.fs.fed.us/r9/mnf. The final documents are posted as well. Because there is limited space on the website, we have to make choices as to which documents would have more value or interest to the general public. Some are prohibitively large, and some are not currently available in electronic format. If there are specific documents you would like to see or copy, you may contact us at the Forest Supervisor's Office, Monongahela National Forest, Elkins WV 26241. |

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| PC 137a | INCLUDING THE 1999 INTERIM GUIDES FOR ALTERNATIVE 1 |
| Response: | We have not had any other requests for this document, so we have not posted it on the website. We can make a copy available to you if you contact us at the address above. |
| PC 137b | INCLUDING THE MONONGAHELA NATIONAL FOREST SCENERY MANAGEMENT ANALYSIS, DECEMBER 2004 |
| Response: | This documentation is not available in electronic format. |
| PC 137c | INCLUDING THE AGRICULTURE HANDBOOK NUMBER 701 |
| Response: | This handbook is not available to us in electronic format. |
| PC 137d | INCLUDING THE SOCIAL ASSESSMENT FOR THE MONONGAHELA NATIONAL FOREST |
| Response: | We document was too large to post on the website, and we have limited hard copies. We have made it available for people to come in and read or copy portions on request. |
| **PC 723** | **The Forest should educate the public on various Forest subjects, including recreation, wilderness management, forest ecology, remote sensing and landscape analysis.** |
| Response: | We inform people about natural resource management in many different ways. The Seneca Rocks Discovery Center and Cranberry Nature Center are designed to provide information and education on a variety of forest topics. We have interpretive signs and programs, we speak at schools, we participate in outdoor environmental programs, and we distribute educational literature about forest resources, including wilderness, recreation, and ecology. We also try to make our various NEPA documents educational in terms of forest conditions and resources and how certain activities may affect them. |
| **PC 92** | **The Forest should create reliable forest planning and project documents, including Biological Evaluations and Environmental Assessments.** |
| Response: | We believe we have created reliable planning documents for this revision, including the Biological Evaluation and Environmental Impact Statement. |
| PC 92a | INCLUDING SOLID EMPIRICAL DATA RATHER THAN COMPUTER SIMULATIONS |
| Response: | For the EIS analyses, we used a combination of empirical data, computer modeling, personal experience, and professional judgment. |
| PC 92b | INCLUDING PROPER CITATIONS OF RELIABLE, UP-TO-DATE SOURCES |
| Response: | We believe that we have used reliable and up-to-date sources to support the conclusions in the EIS. Recognize that our reference section includes more material than what was cited in the text, but we did review and consider all of the references cited. |
| **PC 94** | **The Forest should be straightforward in its documents, including no confusing euphemisms and no unanswered questions, to reduce FOIA requests.** |
| Response: | We believe we have been straightforward and we have provided information when requested. As of this writing, we have not had any revision-related requests under the Freedom of Information Act. |
| **PC 287** | **The Forest should include additional information regarding the development of the forest plan.** |
| Response: | Besides the Forest Plan, EIS, Appendices, and map package, we have additional information in the project record to support the Forest Plan revision. We have made this information available to the public at various times, including posting some of the documents to our website. This information may be made available from the Forest Supervisors Office upon request. |
| PC 287a | INCLUDING WHAT SIGNIFICANT CHANGES HAD OCCURRED IN THE FOREST CONDITIONS AND DEMANDS THAT WARRANTED A REVISION OF THE FOREST PLAN |
| Response: | Need for Change related to plan revision is summarized in Appendix C to the Forest Plan, and more detailed information is presented in the Analysis of the Management Situation in the project record. |
| PC 287b | INCLUDING ADDITIONAL PROJECT-IMPLEMENTATION APPENDICES OR A SEPARATE "PROJECT PLANNING IMPLEMENTATION GUIDE" THAT IS SUPPORTED BY THE PROPOSED LAND AND RESOURCE MANAGEMENT PLAN |
| Response: | We are still considering a project implementation guide for various resources that could include many of the process or “how to” items that were in the 1986 Plan, and that could be adjusted as needed outside of the forest planning process. However, we still maintain that filling the Forest Plan with processes and procedures that may change over time is not a productive use of a strategic planning document, and can limit flexibility for effective planning and decision-making at the project level. |
| PC 287c | INCLUDING HOW THE FOREST PLANS TO MANAGE SUCCESS |
| Response: | Management success will be measured largely through the Monitoring and Evaluation Plan in Chapter |

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| | IV of the Forest Plan. Additional monitoring will likely occur at the project level. The new Planning Rule also has a strong emphasis on monitoring and accountability. |
| PC 287d | INCLUDING WHETHER OR NOT THE ACTIONS TAKEN IN THE FOREST PLAN WILL MOVE THE FOREST TOWARD ITS 50-YEAR GOALS OR AWAY FROM THEM |
| Response: | The Forest Plan does not implement any actions. However, the management goals, objectives, standards, and guidelines in the Plan are designed to move the Forest toward its desired conditions as described in Chapter II of the Plan. |
| **PC 632** | **The Forest should make information widely available to the public because many people are unfamiliar with the Forest.** |
| Response: | We have made information available about the Forest in many different ways during plan revision, including open houses, meetings, newsletters, and posting informational documents on the internet. |
| PC 632a | TO ENSURE THE PUBLIC'S OPINION IS HEARD |
| Response: | This appendix is designed to provide a forum for public opinion and comment. |
| PC 632b | INCLUDING PUBLIC FORUMS ON THE STATUS OF VARIOUS PROJECTS TO THE PUBLIC TO PROVIDE MORE OPPORTUNITIES FOR VOLUNTEER WORK |
| Response: | Although volunteer work is beyond the scope of plan revision, the Forest is interested in hearing from people who would like to volunteer. |
| **PC 439** | **The Forest should provide the specific results of the scoping process in the DEIS, including an accurate representation of public support for wilderness and backcountry recreation, because the DEIS's discussion of the public's support of non-logging management is misleading.** |
| Response: | The discussion on page 3-363 of the DEIS regarding Need For Change was merely intended to show that Backcountry Recreation was one of the major topics of interest in plan revision, and that we heard different opinions as to the amount of opportunity the Forest should provide. We were not trying "to mislead the public that wilderness is bad", as you have interpreted in your comments. You are correct that the majority of the 705 scoping comments were in favor of the Forest providing more wilderness and other backcountry recreation opportunities. However, we also received over 1,100 letters from the West Virginia Forestry Association prior to the release of the DEIS that were clearly in favor of no additional wilderness on the Forest. We did not mention this on page 3-363, either, because we were more interested in representing the diversity than the demographics of opinion. |
| **PC 240** | **The Forest should explain where its analysis of long-term needs is located.** |
| Response: | The "long-term needs" that are cited on page 3-418 of the DEIS refer specifically to the Chapter II Forest Plan direction for roads on pages II-50 through II-52. For example, Goal FR02 says to, "Provide developed roads to the density and maintenance level needed to meet resource and use objectives." Guideline RF08 says to, "Evaluate transportation needs based on existing uses and condition, environmental and economic impacts, and compatibility with management prescriptions." The Forest Plan is a strategic document and therefore does not attempt to define the long-term needs of each road on the Forest, or how each road would help achieve the needs of other resources. These decisions can only be made appropriately at the project planning level. |
| **PC 231** | **The Forest should explain how they will carry out the Forest Plan with a limited budget because there seems to be an assumption that the Plan is based on unlimited funding, and there is a danger that objectives that require money and personnel, such as timber sales, might not receive adequate attention.** |
| Response: | The Forest's budgeting process is described on page I-12 of the Proposed Revised Plan. We cannot assume that we will have a limited budget in Forest Plan revision, nor can we pretend we will have an unlimited budget. Instead we have focused on providing reasonable desired conditions, goals, and objectives, which will be used in preparing annual implementation budgets. It is up to Congress to appropriate funding, which may vary from year to year depending on a number of factors. We will pursue achievement of our goals, objectives and desired conditions as aggressively as we can based on the funding we receive. |
| **PC 618** | **The Forest should disclose the exact budget and staffing levels, as well as the percentage change from current budgets (by resource area) and staffing levels necessary to achieve the various alternatives, because the budget would have to increase dramatically to achieve the timber volumes and revenues predicted.** |
| Response: | Exact breakdowns of budget and staffing levels are more appropriately stored in the project record and |

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| | model inputs. They are available upon request. |
| PC 618a | INCLUDING A DISCUSSION OF THE BUDGET TO REACH THE ALLOWABLE SALE QUANTITY IN THE FOREST PLAN |
| Response: | We have added a brief discussion of budget and staffing levels to the economic analysis in the Final EIS in response to these comments. |
| PC 618b | INCLUDING A DISCUSSION OF WHETHER LEASING FOREST LANDS FOR COMMERCIAL TIMBER HARVEST AT BELOW MARKED PRICES DEGRADES THE VALUE OF PRIVATE TIMBER LANDS |
| Response: | Although timber pricing is beyond the scope of this plan revision, we felt that it should be clarified that the Forest does not lease lands to timber companies. We appraise timber in our sales at fair market value, and company bids often exceed the appraised value. |
| **PC 234** | **The Forest should use correct, up-to-date budget data.** |
| Response: | We have updated budget data for the FEIS. |
| PC 234a | BECAUSE IF THE BUDGET DATA PROVIDED IS CORRECT, WILDERNESS AREAS COULD BE MAXIMIZED WITH NO JUMP IN COSTS OR STAFF TO MANAGE THESE AREAS |
| Response: | We agree that recommended wilderness areas would likely be managed with no significant jump in costs or staff under Alternatives 2 or 3. If all areas were to be designated as Wilderness by Congress, additional costs and staffing may be needed over time, particularly under Alternative 3. However, we do not have the authority to designate Wilderness, and we cannot assume that Wilderness would be designated by Congress in our current budget estimates. |
| PC 234b | BECAUSE AS FEDERAL APPROPRIATION LEVELS STAY FLAT OR DROP, IT IS MORE LIKELY THAT GOALS AND OBJECTIVES IN NON-TIMBER RESOURCE AREAS CAN STILL BE MET |
| Response: | We do not necessarily agree with your assumption. Specific resource allocations within the budget can vary greatly, regardless of whether the overall budget stays flat or drops. |
| PC 234c | BECAUSE IF THE BUDGET DATA IS INCORRECT, THE EXPERIENCES OF VISITORS WILL BE NEGATIVELY AFFECTED |
| Response: | Different levels of staff and budget may or may not have effects on visitor experiences, depending on a number of factors, but they are less likely to affect the dispersed recreation experiences that you mention than developed recreation experiences. |
| **PC 579** | **The Forest should provide discussion of the Net Public Benefits used for selection of the preferred alternative** |
| Response: | The rationale for the selected alternative, including its net public benefits, is provided in the Record of Decision and at the end of Chapter 2 in the FEIS. |
| **PC 230** | **The Forest should provide discussion of the harmful effects of development on private and National Forest System lands, because the Forest Service seems to be unprepared to deal with the flood of people moving to the Forest area from urban areas.** |
| Response: | The effects of private and management-related development are discussed throughout Chapter 3 of the EIS. We have not yet seen a flood of people moving to the Forest from urban areas, although additional private development within the Forest proclamation boundary is always possible on private lands. |

| **LEGAL CONSIDERATIONS** | |
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| **PC 634** | **The Forest should have complied with laws and regulations related to information quality in the analysis.** |
| Response: | We believe we have complied with the National Environmental Policy Act with regard to the quality of information in the analysis, as represented in the Draft and Final EIS, and the project record. |
| **PC 464** | **The Forest should comply with National Forest Management Act regarding suitability.** |
| Response | The National Forest Management Act in 36 CFR 219 defines suitability as, "The appropriateness of applying certain resource management practices to a particular area of land, as determined by an analysis of the economic and environmental consequences…A unit of land may be suitable for a variety of individual or combined management practices." We have complied with this definition by assigning lands on the Forest to various Management Prescriptions. Each Management Prescription has specific |

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| | goals, objectives, standards, and guidelines, with defined management practices to achieve the desired conditions for multiple resource uses. See pages 3-335 through 3-337 in the DEIS for timber suitability determination. |
| PC 464a | INCLUDING UTILIZING THOROUGH, SOUND ANALYSES TO ENSURE THAT ALL AREAS THAT ARE PHYSICALLY UNSUITABLE FOR LOGGING (DUE TO SOIL, WATER, RESTOCKING, OR OTHER CONCERNS) ARE PROPERLY IDENTIFIED IN PLAN REVISION |
| Response: | Physical unsuitability is ultimately determined at the project level with site-specific information, rather than at the Forest-wide level with broad-scale information. Areas that are physically unsuited for timber production have been identified in the past through on-the-ground verification, and they have been carried forward as unsuited in Forest Plan revision. See Table TR-9 in the Timber Supply section of Chapter 3 in the FEIS that identifies lands that are not considered tentatively suited for commercial timber harvest. The Forest will continue to identify such lands at the project level as appropriate. |
| PC 464b | INCLUDING UTILIZING THOROUGH, SOUND ANALYSES TO ENSURE THAT ALL AREAS THAT ARE ECONOMICALLY UNSUITABLE FOR LOGGING (DUE TO TRANSPORTATION, LOGGING, ADMINISTRATION OR OTHER COSTS) ARE PROPERLY IDENTIFIED IN PLAN REVISION |
| Response: | The Forest has completed an analysis of "economic and environmental consequences…" as described in 36 CFR 19. The economic portion of the analysis involves "cost efficiency" as defined in CFR 219.3: "The usefulness of specified inputs (costs) to produce specified outputs (benefits). In measuring cost efficiency, some outputs, including environmental, economic, or social impacts, are not assigned monetary values but are achieved at specified levels in the least cost manner. Cost efficiency is usually measured using present net value…" The Forest conducted a present net value analysis in the DEIS (page 3-456), and has updated this analysis for the FEIS. This analysis used specified costs and benefits to compare how the alternatives achieved desired conditions in the least cost manner. |
| PC 464c | INCLUDING EXAMINING WHAT INVESTMENTS ARE REQUIRED FOR TIMBER PRODUCTION, INCLUDING PRE-COMMERCIAL THINNING, BRUSH CONTROL; INVASIVE SPECIES CONTROL, MITIGATION, ROAD MAINTENANCE, TREE PLANTING, ETC. |
| Response: | The investments needed for timber production are listed in the Economic Information Collection section of Appendix B to the EIS. They include sale preparation and administration, NEPA documentation, fencing, planting, site preparation (including invasive species control), stocking surveys, tree planting, vine control, and post-harvest tree release and non-commercial thinning. The investments do not include road maintenance, as sale road maintenance is generally conducted by the purchaser during the sale, and is addressed as a penalty to revenue that would otherwise be received by the Forest rather than a direct cost. These are typically Maintenance Level 1 or 2 roads that are closed to the public after the sale and that receive little or no maintenance until such time they are needed for another sale. |
| PC 464d | INCLUDING EXAMINING ALL PERTINENT FACTORS WHEN DETERMINING SUITABILITY, INCLUDING THAT OF PRECLUDING ALTERNATIVE USES OF LAND |
| Response | We examined the pertinent factors described above; as well what alternative uses of land may be precluded. The range of alternative uses is described in Chapter 2 of the EIS, in the "Development of the Reasonable Range of Alternatives" and the "Alternatives Considered in Detail" sections. The alternatives considered in detail and the alternatives considered but eliminated from detailed study describe a wide range of alternative uses that may occur or be precluded. |
| **PC 270** | **The Forest should subject any project involving significant environmental impacts to the NEPA (National Environmental Policy Act) process.** |
| Response: | We agree. We have stated as much on page II-1 of the Proposed Revised Plan. This process is also required by the NEPA for any major federal actions implemented on the Forest. |
| **PC 160** | **The Forest should not allow the National Environmental Policy Act and the Endangered Species Act to override the Organic Act and the Multiple-Use Sustained-Yield Act.** |
| Response: | As stated on page II-1 of the Proposed Revised Plan, we must follow all applicable federal laws, including those you have noted. |
| **PC 93** | **The Forest should adhere to the Multiple-Use Sustained-Yield Act to serve as a large demonstration area for a wide variety of uses.** |
| Response: | We adhere to the Multiple-Use Sustained-Yield Act, and we agree that we manage a large demonstration area for a wide variety of uses. |

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| PC 93a | INCLUDING CONDUCTING AN ADEQUATE RELATIVE VALUE ANALYSIS |
| Response: | The entire Environmental Impact Statement can be regarded as a "relative value analysis", as it describes various uses and resources on the Forest, and how they interact with each other. We have also analyzed the relative values of certain uses and resources in the Social and Economic Environment section of Chapter 3 in the EIS. These relative values have also been considered and disclosed in the Record of Decision. |
| PC 93b | BECAUSE A RELATIVE VALUE ANALYSIS WOULD SHOW THAT THE FOREST IS MORE VALUABLE LEFT AS A NATURAL FOREST TO PROVIDE HABITAT, RECREATION, SCENERY, WATERSHED PROTECTION, CARBON STORAGE, AND CLEAN AIR |
| Response: | All of the alternatives analyzed in detail would provide a variety of habitats, scenery, and recreation opportunities, just as they all would contribute to watershed protection, carbon storage, and clean air. We recognize there may be ecosystem service values associated with the amenities described above. Dollar values placed on these services may be obtained from a wide variety of sources, with widely varying results. Obtaining these values is generally very expensive and time consuming. In most cases, values of these services would not vary measurably between the alternatives presented in the EIS. If there is no significant difference, then there is not sufficient reason to expend tax-payers resources to estimate the values. That is not to say they will not be provided or protected under the Plan, and qualitatively valued in our decision process. The Responsible Official selects the alternative that he feels represents the best mix of uses, activities, and resource management, based on many factors, including the analysis of effects on relative resource values presented in the EIS. The rationale for this decision is included in the Record of Decision for this plan revision. |
| PC 93c | BECAUSE THE FIRST PRIORITY OF THE FOREST SHOULD BE PROTECTING THREATENED AND ENDANGERED SPECIES |
| Response: | The Revised Forest Plan contains ample direction to protect threatened and endangered species. The Forest Service Manual directs the Forest Service to place top priority on conservation and recovery of endangered, threatened, and proposed species and their habitats (FSM 2670.31). However, the Forest is subject to many different laws and regulations, and does not have the authority to prioritize one federal law above another. |
| **PC 625** | **The Forest should consider Executive Orders 11988, 11990, 12898, and 13112.** |
| Response: | We have considered these Executive Orders and we are legally required to meet their intent. Executive Orders 11988 and 11990 direct federal agencies to avoid, where possible, impacts associated with the destruction or modification of floodplains and wetlands. As stated on page 3-465 of the DEIS, "Revised Forest-wide management direction provides a broad spectrum of standards and guidelines designed to protect soil, water, riparian, and aquatic resources. The goals and intent of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) would be met through compliance with this direction."<br><br>Executive Order 12898 directs federal agencies to address equity and fairness to minorities and low income communities in resource decision making. As stated on page 3-450 of the DEIS, we found no indication that any of the alternatives would adversely or disproportionately affect racial minorities or low income communities.<br><br>Executive Order 13112 addresses non-native invasive species. The 1986 Forest Plan is essentially silent on this subject. For the Proposed Revised Plan we included Forest-wide management direction to address non-native invasive species (see page II-18), including a goal to develop a Forest Non-native Invasive Species Management Plan in coordination with county state, and federal agencies. |
| **PC 143** | **The Forest should implement ISO 14001 to make forest planning more efficient.** |
| Response: | The ISO 14001 concept has been incorporated into the 2005 Planning Rule. This Forest Plan revision was completed under the 1982 planning regulations, and therefore the 2005 Planning Rule and its directives did not apply. However, the Forest Plan will be transitioning to assimilate the new Planning Rule directives over the next few years, so the Forest will be adopting the Environmental Management System (EMS) form of ISO 14001 in the near future. |
| **PC 679** | **The Forest should explain how it intends to comply with the Clean Water Act.** |
| Response: | The Forest is obligated to comply with all laws. Actions specific to protecting clean water on the Forest include providing areas on the Forest where land management activities and potential disturbances are |

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| | minimized (e.g. wilderness, recommended wilderness, roadless areas, MP 6.2), development of standards and guidelines that protect soil, water, riparian and aquatic ecosystems when implementing forest management activities, implementation of projects designed to restore watershed conditions, and cooperation with other agencies, organizations and individuals to address soil, water and air related issues that affect water quality on the Forest. |
| PC 679a | INCLUDING THE DEVELOPMENT OF A LIST OF IMPAIRED WATER BODIES |
| Response: | The West Virginia Department of Environmental Protection (WVDEP) is the lead agency responsible for developing the list of impaired water bodies, known as the 303(d) list. |
| PC 679b | BECAUSE THE FOREST ADMITS THAT IT IS UNCLEAR HOW MANY STREAMS HAVE BEEN SAMPLED WITHIN THE FOREST PROCLAMATION BOUNDARY AND WHAT PERCENTAGES ARE CONSIDERED IMPAIRED |
| Response: | Information related to aquatic resources is often limited. Currently, the WVDEP recognizes five stream categories through the water quality assessment process. Category 3 streams are streams that have insufficient or no information to determine if the designated uses are being met. This category includes 43.3% of the streams in the state and is the largest of the five categories (WVDEP 2004). These streams are typically the smaller, headwater tributaries to larger systems that have been assessed and they contribute positively or negatively to the assessment of the larger system. When a stream is not on the 303(d) list, we do not want to assume it is because it is in compliance when it could be due to a lack of information. In the absence of complete information, compliance with the Clean Water Act is achieved through implementation of Best Management Practices (BMPs) to minimize non-point source pollution. These are applied to all streams within the project areas regardless of their designation. The intent is to recognize the importance of the drainage network and not just those streams that are considered impaired. Even streams that legally meet their water quality standards often do not meet their productive potential due to water quality or habitat related issues. |
| PC 679c | INCLUDING HOW THE FOREST WILL COMPLY WITH TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS |
| Response: | The EPA and the WVDEP are the lead agencies in the development of TMDLs. The Forest would be considered a stakeholder and could participate in the development of TMDLs for streams on NFS lands. In general, effects associated with forest management activities are non-point sources of pollution which are addressed through the implementation of BMPs and Forest Plan standards and guidelines. Direction to protect soil and water resources can be found in the Proposed Forest Plan (pages II-8 to II-13) with additional direction located in the Wildlife and Fish section (pages II-25 to II-27). Opportunities to improve streams on the 303(d) list are identified at the watershed assessment and project planning level. |
| **PC 840** | **The Forest should explain whether some cutting and yarding methods and prescriptions, including many clearcutting variants are consistent with NFMA and should be permitted because they are highly visible and the Forest's visual resources should be protected.** |
| Response: | The 1976 National Forest Management Act and its implementing regulations allow for clearcutting and other even-aged timber harvest silvicultural systems and harvest or yarding methods. In 1992, however, the Chief of the Forest Service issued a policy letter that stated that clearcutting should only be used when it is the optimal method of achieving management objectives, with a number of exceptions. This is the Forest's policy as well. We typically use other even-aged harvest systems—like shelterwoods, two-aged, and commercial thinning—far more often than clearcutting. Clearcutting with reserve trees is only used by the Forest when an interdisciplinary team of specialists determines, through site-specific analysis, that this is the optimum method for achieving objectives or meets one of the exceptions in the Chief's letter.<br><br>We agree that the Forest's visual resources should be protected, and we have a Scenic Management System in place to guide us in that protection. In many parts of the Forest, clearcutting with reserve trees would not meet the scenic integrity objectives for areas of high concern. Where it is considered acceptable, the visual effects of clearcutting with reserve trees would generally be short term, as trees regenerate and grow quickly in this part of the country. Measures can also be applied to mitigate visual effects, such as placement of harvest units, use of vegetative or terrain buffers, or modification of silvicultural prescriptions. See also responses to PC 637 and PC 163. |
| **PC 635** | **The Forest should use the best available science to comply with NEPA, because the forest plan fails to use much of the published wildlife and forestry research.** |

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| Response: | We believe that we have used the best available science that is appropriate for this area and this proposal. The EIS includes appropriate references to scientific literature to support the analyses. We have also considered additional science that people have sent us during the revision process, not all of which was appropriate. |
| **PC 841** | **The Forest should rewrite its revised plan to address the following:** |
| PC 841a | CHANGED CONDITIONS (GLOBAL WARMING AND STORMS, WORSENING HYDROLOGICAL CONDITIONS AND YOUR GOAL OF RECOVERY, ROADS AND IMPERVIOUS SERVICES AND THE NEED TO COMPENSATE WATERSHED BY WATERSHED FOR USE ON PRIVATE LAND, AND REDUCED EVAPOTRANSPIRATION BY A SLOWER GROWING FOREST.) |
| Response: | The Revised Plan does not address changed conditions through assessment of conditions. That assessment can be found in the Analysis of the Management Situation and the EIS that support the Plan. The Revised Plan does have direction that addresses hydrological elements and roads. See also the response to PC 392 on global warming. |
| PC 841b | NEW SCIENTIFIC INFORMATION (LIMIT IMPOSED ON HARVEST ON INFERTILE GEOLOGIES; AND THE HYDROLOGICAL DAMAGE FROM CLEARCUTTING AND ROADS). |
| Response: | We have reviewed the scientific information that you submitted on “infertile geologies”, clearcutting and roads, but we did not find anything that would cause us to rewrite the Revised Plan. |
| PC 841c | DIRECTION OF NEW AND OLD LAWS, REGULATIONS AND POLICIES, (THE DOMBECK PLAN DIRECTIVES). |
| Response: | Chapter I of the Revised Forest Plan and the Record of Decision summarize how the Plan relates to pertinent laws, regulations, and policies. We are not sure what is meant by “the Dombeck Directives, as there are no directives by this name in the Forest Service Manual or Handbook. The former Chief Dombeck had four priorities during his tenure, but these have since been superceded by the current Chief’s priorities. |

# Section 2: Alternatives, Forest Plan, and EIS

| ALTERNATIVES CONSIDERED IN DETAIL | |
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| **PC 300** | **The Forest should implement Alternative 1 because it leaves the current plan in place, and it provides the best balance among forest protection and forest use.** |
| Response: | We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. |
| **PC 301** | **The Forest should not implement Alternative 1 because the restrictions it places on the ability to enjoy the natural resources are too harsh.** |
| Response: | We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. |
| **PC 100** | **The Forest should implement Alternative 2:**<br>• **To manage the Forest for multiple uses, as required by law**<br>• **To benefit the many people who rely upon timber harvest for their employment**<br>• **To manage the Forest as a working forest**<br>• **To provide recreational opportunities**<br>• **Because it limits the amount of recommended wilderness**<br>• **To protect hunter access**<br>• **To allow active habitat management**<br>• **To protect habitat**<br>• **Because hunters help manage wildlife populations**<br>• **To provide a good mix of forestry, recreation, soil and water protection, endangered species protection, etc.**<br>• **To allow mountain biking**<br>• **Because it enhances the appeal of wilderness**<br>• **Including an areas set aside for limited all-terrain vehicle use**<br>• **Because it protects fish and wildlife resources**<br>• **Because it shows a positive trend of putting value on timber, wildlife, recreation, a wide range of biodiversity, and better scientific forest management**<br>• **Because it recognizes the importance of maintaining brook trout as a Management Indicator Species**<br>• **Because it increases riparian buffer zone protection on both perennial and intermittent streams**<br>• **Because it increases usage of helicopter logging to reduce road construction**<br>• **Because it allows for the need for large woody debris in the cold-water fisheries**<br>• **Because it provides adequate protection of Indiana Bats, Northern Flying Squirrels, and other species without curtailing the usefulness to hunters and fisherman**<br>• **Because it offers the most reasonable measure of effective compromise between timber and tourism interests**<br>• **To allow the harvest of mature trees**<br>• **Because of its emphasis on aquatic ecosystems**<br>• **Because it includes an aquatic monitoring strategy with brook trout**<br>• **Because it recognizes that aquatic conditions are lagging compared to forest and riparian areas**<br>• **Because it keeps the same definition of MP 6.2 as in past plans.** |
| Response: | We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. See also responses to PC 356, PC 183, PC 22, and PC 182. |
| **PC 182** | **The Forest should implement an amended Alternative 2 with areas designated as non-motorized backcountry recreation instead of wilderness, including Roaring Plains and Cranberry Expansion, in order to all for bicycle use and protect the tourism revenues from that use.** |
| Response: | Only Congress has the authority to designate wilderness. The Forest recommended four areas for |

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

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

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

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| PC 22d | BECAUSE IT POSES THE GREATEST THREATS TO FISH AND WILDLIFE, INCREASES THE RISK OF FLOODING, WEAKENS PROTECTIONS FOR RIVERS, STREAMS, FISH AND WILDLIFE HABITAT, AND IT FAILS TO PROTECT SOILS, WATERSHEDS, AND SCENIC RESOURCES |
| Response: | Management direction for fish, wildlife, streams, soils, watersheds, and scenic resources is the same under all action alternatives (2, 3, and 4). We believe that the combination of law, regulation, agency directives, and Forest Plan management direction would adequately protect these and all other resources, regardless of alternative or Management Prescription. |
| PC 22e | BECAUSE IT HARMS ROADLESS AREAS |
| Response: | The Forest conducted a new roadless area inventory for Forest Plan revision (see Appendix C to the EIS). All of the areas on the roadless inventory are assigned either a 5.1, 6.2 or 8.1 SPNM Management Prescription under Alternative 2. These prescriptions all provide management emphasis and direction that would maintain the roadless and undeveloped character of the roadless inventory areas. |
| PC 22f | BECAUSE IT WOULD LIMIT RECREATIONAL OPPORTUNITIES |
| Response: | As noted in part B, above, there are more backcountry recreation opportunity areas under Alternative 2 than there are under Alternative 1, which represents the 1986 Plan as amended, or the current situation. |
| PC 22g | BECAUSE IT WILL NEGATIVELY IMPACT TOURISM |
| Response: | We cannot accurately predict how any alternative will affect tourism. However, if you believe that tourism will be reduced by a loss of backcountry recreation opportunities or recommended wilderness areas, we remind you that there would be a net gain of these opportunities and areas under Alternative 2 as compared to the current situation under Alternative 1. |
| PC 22h | BECAUSE ADDING ROADS WOULD INVITE DAMAGE FROM OFF-ROAD VEHICLES |
| Response: | New roads may be constructed under all the alternatives. However, no roads or trails are designated as ORV routes under any of the alternatives, and no off-road vehicle use is allowed under any alternative. |
| PC 22i | BECAUSE IT FAILS TO RECOMMEND AREAS FOR WILDERNESS DESIGNATION, INCLUDING SENECA CREEK |
| Response: | Although Alternative 2 does not recommend Seneca Creek for wilderness study, it does recommend four other areas that comprise a total of 27,000 acres. |
| PC 22j | BECAUSE IT APPEARS THE FOREST SERVICE IS FAVORING INTEREST GROUPS OVER PUBLIC INTEREST |
| Response: | We heard from a variety of individuals and public interest groups during plan revision. Some favored Alternative 2 and some did not. Some favored more Wilderness and some did not. We considered all of the comments. |
| **PC 2** | **The Forest should implement Alternative 3**<br>• **Because it recommends wilderness designations for valuable wild areas**<br>• **Because Alternative 2 is highly biased toward logging and runs counter to public opinion**<br>• **To provide recreational opportunities**<br>• **Because Alternative 2 is too ecologically destructive**<br>• **To protect water resources**<br>• **To limit road-building**<br>• **Because it provides a good balance of extractive and conservation uses**<br>• **To benefit future generations**<br>• **Because the public favors it**<br>• **To protect the Forest**<br>• **To attract tourism**<br>• **To protect wildlife and habitat**<br>• **To limit logging**<br>• **To prevent flooding**<br>• **To protect our natural heritage**<br>• **To protect roadless areas**<br>• **Because it provides a better cost/benefit ratio than Alternative 2**<br>• **To protect fish populations**<br>• **To protect air quality** |

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| | • **To protect brook trout streams**<br>• **To limit clearcutting**<br>• **To prevent urban expansion**<br>• **To protect quality of life**<br>• **To provide more protection for riparian areas**<br>• **To provide economic opportunities**<br>• **To provide educational opportunities**<br>• **To provide more roadless areas**<br>• **To protect more backcountry (6.2) areas**<br>• **To limit off-road vehicle use**<br>• **Because it provides the least risk for non-native invasive species**<br>• **Because it has the same amount of spruce restoration as Alternative 2**<br>• **To protect the non-lumber uses of trees**<br>• **Because it provides the best combination of management prescriptions**<br>• **To limit the use of prescribed fire**<br>• **To comply with the Endangered Species Act and the Clean Water Act**<br>• **To protect bogs**<br>• **To protect peregrine falcons**<br>• **Because increased wilderness areas allows the Forest Service to concentrate time and money in other developed locations.** |
| Response: | We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. See also response to PC 62. |
| **PC 62** | **The Forest should implement Alternative 3 with changes or improvements.** |
| PC 62a | TO PROTECT CURRENT PUBLIC ACCESS TO THE FOREST, INCLUDING NOT RECOMMENDING MP 6.2 FOR AREAS THAT CONTAIN ROADS OPEN TO THE PUBLIC |
| Response: | The comments do not specify which roads in 6.2 areas are currently open to the public. The MP 6.2 and 5.1 areas in Alternative 3 came from a number of sources, most of which do not currently have roads open to the public. Wherever open roads may exist, they could be addressed in a number of ways. For example, roads could be physically closed, roads could be excluded from the 6.2 areas through boundary adjustments, or the Responsible Official could choose to reassign management prescriptions to areas that would exclude access in the Record of Decision. |
| PC 62b | TO PROVIDE MORE RECREATIONAL OPPORTUNITIES |
| Response: | Alternative 3 currently provides recreational opportunities, as do all the alternatives. |
| PC 62c | TO PROVIDE SOLACE |
| Response: | Solace is a feeling that comes from within, and beyond the scope of plan revision. Alternative 3 does provide abundant areas with the opportunity for solitude, however. |
| PC 62d | TO PROTECT NATURAL RESOURCES, INCLUDING SCENERY, WATER, WILDLIFE, HABITAT, AIR QUALITY, FISH, BOGS, AND SOIL |
| Response: | We have provided management direction for protection of these and other resources in Chapters II and III of the Revised Plan. |
| PC 62e | TO PROVIDE FLOOD PROTECTION |
| Response: | No alternative can provide absolute protection from flooding, which is a natural event and process. However, all alternatives would have management direction designed to protect riparian areas and to prevent over harvesting or road construction in riparian areas. |
| PC 62f | TO PROMOTE TOURISM |
| Response: | Promoting tourism is beyond the scope of plan revision. However, we expect that tourists will continue coming to the Forest and nearby destinations for a variety of reasons, regardless of which alternative is chosen for implementation. |
| PC 62g | TO PREVENT DEVELOPMENT, INCLUDING ROAD BUILDING, LOGGING, AND NATURAL GAS DEVELOPMENT |
| Response: | No alternative considered in detail would prevent road building, timber harvest, or natural gas development. These are all legitimate uses of national forests that are mandated by law, regulation, and |

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

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| Response: | See responses to PCs 3, 66, 167, and 345. |
| PC 62s | INCLUDING ADDITIONAL WILDERNESS AREAS, SUCH AS NORTH FORK MOUNTAIN, LOWER LAUREL FORK, LITTLE ALLEGHENY MOUNTAIN, LAUREL RUN, UPPER SHAVERS FORK, ROARING PLAINS, BIG DRAFT, SENECA CREEK, CANAAN MOUNTAIN, TEA CREEK, AND SPICE RUN |
| Response: | The Forest does not have the authority to designate Wilderness. Only Congress can provide the permanent Wilderness protections that you want. |
| PC 62t | INCLUDING ADDITIONAL 6.2 AREAS |
| Response: | Alternative 3 already has by far the most 6.2 areas of any alternative as a result of many areas we added due to comments we received prior to the Draft EIS. Some of these areas did not qualify for the Roadless Area Inventory, and would likely not have the necessary size and lack of development to make good backcountry recreation areas. |
| PC 62u | INCLUDING NO PORTION OF SENECA CREEK MANAGED UNDER MP 8.1 |
| Response: | Under Alternative 3, all of the Seneca Creek IRA is MP 5.1, Recommended Wilderness. |
| PC 62v | Including combining the existing Dolly Sods Wilderness Area with Dolly Sods Expansion, the eastern portion of Roaring Plains, and North Fork Mountain to create one large contiguous wilderness area |
| Response: | It is doubtful that the Dolly Sods area could ever be contiguous with North Fork Mountain because of the State Highway and private lands that separate them. However, the Dolly Sods, Dolly Sods North, and Roaring Plains areas already provide a fairly contiguous backcountry recreation area of around 27,000 acres, the second largest on the Forest. |
| **PC 920** | **The Forest should limit the scope of vegetation management to a smaller suited timber base in Alternative 3, but I see no reason why it should still include essentially half the forest area.** |
| Response: | We acknowledge your opinion. The suited timber base in Alternative 3 comprises only about 28 percent of the Forest. See Table TR-10 on page 3-336 of the DEIS. |
| **PC 133** | **The Forest should implement Alternative 4:**<br>• **To increase logging**<br>• **To provide jobs and income to West Virginia**<br>• **Because it offers more emphasis on wildlife management**<br>• **Because it offers more hunting access through newly created roads**<br>• **Because it maintains unique areas as Wilderness and Backcountry recreation without abusing these designations in a way that deter future types of forest harvest**<br>• **To ensure a continued supply of goods and services to the American people.** |
| Response: | We acknowledge your preference. The alternative selected for implementation is identified in the Record of Decision for this Forest Plan revision, along with the rationale for its selection. |

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

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

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

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

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

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| **PC 987** | **The Forest should have management direction to address flooding because the USFS is directed by the Organic Act to "secure objectives, standards and guidelines".** |
| Response: | The Organic Act includes language "for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States". There are several goals within the Proposed Forest Plan for improving watershed, floodplain and riparian conditions (SW20, SW21, SW29 and SW30) that contribute to "securing favorable conditions of water flows". Floods are an inherent part of watershed conditions, and the potential effects of timber harvesting on flooding are discussed in the DEIS on pages 3-73 to 3-74. |
| **PC 979** | **The Forest should add the following sentence to paragraph 2 on page II-8: "The addition of limestone sand to streams impaired by acid deposition can aid in the stream's removal from the 303(d) list".** |
| Response: | This paragraph describes desired conditions for Soil and Water, rather than the methods used to achieve them. Stream liming is a proven method for restoring productivity of aquatic resources, and we feel that it is provided for in the Proposed Revised Plan, particularly in the Wildlife and Fish section desired conditions, and in Forest-wide Goals WF03 and WF04 on pages II-25 and II-26. |
| **PC 898** | **The Forest should consider rewording Standard SW05 because the term "non-detrimentally disturbed" is undefined, and timbering should be defined as a detrimental disturbance.** |
| Response: | We have reworded this standard in the Final Revised Plan to say, "no more than 15% is allowed to be in a detrimentally disturbed condition." Detrimental disturbance is defined in the Glossary for the Revised Plan. It refers to specific types of soil disturbance, which may or may not occur as a result of timber harvest, depending on methods used. |
| **PC 870** | **The Forest should rewrite Standard SW07 as a standard.** |
| PC 870a | BECAUSE EACH SECTION OF THE STANDARD AS WRITTEN CONTAINS A LOOPHOLE OR OPTION FOR REVIEW AND CHANGE THAT MAKES IT READ LIKE A GUIDELINE |
| Response: | Standard SW07 is largely a carry over from the 1986 Forest Plan. It is currently written with the strength and commitment of a standard, with enough options to provide some flexibility to account for site-specific conditions and variations. This type of strength and flexibility is designed to contribute to successful and effective implementation. |
| PC 870b | INCLUDING:<br>• HOW WERE THE CATEGORIES OF SLOPE STEEPNESS, AND THE MANAGEMENT RESPONSES TO EACH, DERIVED?<br>• WHAT SOURCES, OUTSIDE EXPERTS AND MONITORING AND EVALUATION RESULTS FROM PAST PROJECTS WERE CONSULTED OR REVIEWED IN DEVELOPING THE GUIDANCE REGARDING TIMBER HARVEST AND RELATED ACTIVITIES ON SUCH STEEP SLOPES?<br>• WHAT SPECIFIC ROLE DID ASPECT PLAY IN DETERMINING THE ABILITY TO OPERATE SAFELY ON THE SENSITIVE SOILS LISTED IN PART D? |
| Response: | Slope categories for soils were derived from county soil survey reports produced by the USDA-Natural Resource Conservation Service Soil Survey Division. Often the categories are based on repeating landform slope breaks and changes in soil types. These categories also match limitations of mechanized equipment and operations on such slopes. The information for this limitation can be found in the interpretations of the county soil survey reports. The management responses are also derived by the USDA-Natural Resource Conservation Service Soil Survey Division and based on soil interpretations. |
| **PC 978** | **The Forest should revise Standard SW07 as follows: a. steep slopes 25 to 40 percent, b. very steep slopes more than 40 percent, because:**<br>• **Any good soils scientist knows that there is an erosion multiplier effect between the steepness of slope X, the length of slope X, and the amount of rainfall (soil scientists did the research)**<br>• **On the Monongahela Forest, where there are many rugged mountains with steep and very steep slopes in a 58-inch rainfall zone, erosion vulnerability is very severe from roads and timber developments**<br>• **Experience on the Coweeta National Forest Research Station in North Carolina has shown that these slope breaks are recommended to help control impacts from roads and timber development to soils and water.** |
| Response: | The request to change the slope management criteria is duly noted; however, the slope breaks used in |

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

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

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

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

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

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| | Service has strong mandates in law and regulation to use specific plan direction when necessary to maintain viability and contribute to recovery of TEPS species. No such mandate exists for game species, other than general mandates to provide for multiple uses and wildlife habitat. Forest-wide and MP direction contains numerous provisions for habitat diversity, mast production, snag and cull retention, road closures, den trees, etc. These provisions are intended to provide for the hundreds of species that are not mentioned by name in the Forest Plan. |
| PC 885b | INCLUDING MODIFYING GUIDELINE WF15 TO ALLOW PLANTING, PRUNING, AND RELEASE OF DESIRABLE (APPROVED) NON-NATIVE TREES AND SHRUBS OF HIGH WILDLIFE VALUE |
| Response: | We have modified Guideline WF15to allow the planting, pruning, and release of desirable non-native, non-invasive trees and shrubs. |
| **PC 493** | **The Forest should make changes to its management direction regarding wildlife habitat.** |
| PC 493a | INCLUDING IDENTIFYING WHAT IS OR WHAT CONSTITUTES A WILDLIFE OPENING |
| Response: | Wildlife openings are defined in the Glossary (DEIS, Appendix G). |
| PC 493b | INCLUDING PROVIDING SPECIFIC GUIDELINES ON DEVELOPMENT OF WILDLIFE OPENINGS, INCLUDING TYPE, SIZE, AND PLACEMENT/PROXIMITY TO BORDER CONFIGURATION, THE SEED MIXTURES TO BE PLANTED, THE LIME AND FERTILIZER APPLICATOR RATES, AND MULCHING |
| Response: | The specific characteristics of openings and methods of establishment can vary depending on landscape context, site conditions, habitat objectives, season, seed availability, etc. Therefore, these items should be addressed at the project level rather than in the Forest Plan. |
| PC 493c | INCLUDING PROVIDING STANDARDS FOR PLANTING MAST PRODUCING TREES, SHRUBS, AND DESIRABLE NON-NATIVE FRUIT TREES AND SHRUBS |
| Response: | The planting of mast-producing trees and shrubs is addressed in the Proposed Revised Forest Plan by Guideline WF15 on page II-26. |
| PC 493d | INCLUDING PROVIDING SUFFICIENT INFORMATION ABOUT ANIMAL SPECIES |
| Response: | The viability analyses used the best available information. |
| PC 493e | INCLUDING PROVIDING STRONG SPECIES VIABILITY STANDARDS AND MANDATORY MONITORING REQUIREMENTS |
| Response: | Maintenance of species viability is addressed in the Proposed Revised Forest Plan by Goal VE07, Standard VE11, Goal WF01, Goal WF05, Standard WF11, and Guideline WF17. Monitoring to support maintenance of species viability is addressed in the Proposed Revised Plan by Goal WF06 and a monitoring item in the monitoring plan (Proposed Revised Plan Chapter IV, Table 4-3b, item 44). |
| PC 493f | INCLUDING PROVIDING STANDARDS AND GUIDELINES FOR SNOWSHOE HARE HABITAT |
| Response: | No specific concern has been expressed that would warrant individualized direction for the snowshoe hare. Forest-wide and management prescription direction provides for habitat diversity, mast production, snag retention, and many other habitat features for the hundreds of species that are not mentioned by name in the Forest Plan. |
| PC 493g | INCLUDING PROVIDING STANDARDS AND GUIDELINES FOR FISHERIES |
| Response: | Direction for fisheries management is found in the 1986 Forest Plan (Fisheries Amendment No. 3) and in the Wildlife and Fish section (pages II-25 to II-27) of the Proposed Revised Forest Plan. Fisheries management is also dependent on protection of soil, water and riparian resources. This direction is located in the 1986 Forest Plan (pages 79 to 87) and the Proposed Revised Plan (pages II-8 to II-13). |
| PC 493h | INCLUDING PROVIDING MORE STANDARDS AND GUIDELINES UNDER MP 6.1 |
| Response: | See responses to parts b, c, e, f, g, I, and j of this concern statement. |
| PC 493i | INCLUDING PROVIDING STANDARDS OR GUIDELINES FOR SEEP MANAGEMENT |
| Response: | Seeps direction is covered in the Proposed Revised Plan by SW51 on page II-12. |
| PC 492j | INCLUDING PROVIDING STANDARDS ASSOCIATED WITH DEN TREE MANAGEMENT |
| Response: | Den trees are addressed by snag and cull retention direction in the Proposed Revised plan at 4109, 6107, 6130, TE22, TE30, TE31, TE33, and TE34. |
| **PC 886** | **The Forest should modify direction for fisheries and aquatic habitat.** |
| PC 886a | INCLUDING MODIFYING GOAL WF04 TO CALL FOR MAINTENANCE AND RESTORATION OF DESIRABLE NON-NATIVE AQUATIC COMMUNITIES |

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| Response: | We allow for desirable non-native species under Goal WF01. As a federal land management agency, we cannot promote the establishment, restoration, or maintenance of non-native aquatic communities. |
| PC 886b | INCLUDING MODIFYING OBJECTIVE WF10 TO INCLUDE HABITAT FOR DESIRABLE NON-NATIVE SPECIES |
| Response: | We allow for desirable non-native species under Goal WF01. The suggestion to add "and/or desirable non-native species" did not fit here because this objective pertains specifically to habitat for the aquatic MIS, which is native brook trout. |
| PC 886c | INCLUDING MODIFYING STANDARD WF12 TO REQUIRE CONSULTATION WITH A WVDNR FISHERIES BIOLOGIST FOR PROJECTS THAT MAY PRODUCE SEDIMENT NEAR TROUT STREAMS |
| Response: | WVDNR has the opportunity to comment on projects during scoping, the public comment period, and the informal coordination we do on a regular basis. However, we may want to consider revising our Memorandum of Understanding to refine the consultation process for our management activities. |
| **PC 892** | **The Forest should admit that Standard WF12 is too strict because over fishing is far more detrimental to trout populations than sediment.** |
| Response: | Similar language can be found in the 1986 Forest Plan, as amended, and our experience has been that it has not been too restrictive. |
| **PC 15** | **The Forest should revise the Forest Plan to say that fish habitat improvement structures should be constructed to function well while appearing as natural as possible, because fish structures built in the past failed to function because of strict visual requirements.** |
| Response: | We agree that habitat improvement projects should be designed and should function to meet the project objectives. A number of variables go into the success or failure of a stream improvement structure, including its design quality, construction quality, its location, and flow events. One difficulty in working in streams is the unpredictable nature of stream flows. Structures often fail shortly after they are built due to flood flows. Our intent is to build structures that function, knowing that they may be lost to a high flow event. Our preference is to use native and onsite materials that match surrounding material and help reduce project costs. See Guideline WF21 in Chapter II of the Proposed Revised Plan. |
| **Recreation Resources** | |
| **PC 534** | **The Forest should establish additional standards to minimize adverse impacts from recreational wheeled vehicles.** |
| PC 534a | INCLUDING PROHIBITING ALL-TERRAIN VEHICLES FROM TRAILS AND AREAS OTHER THAN EXISTING ROADS OPEN TO AUTO TRAFFIC |
| Response: | Public motorized vehicle use is permitted on roads and trails designated open for use. Off road use is not permitted (Proposed Revised Plan, page II-52, Standard FR16). |
| PC 534b | INCLUDING PROHIBITING MOUNTAIN BIKING IN POTENTIAL WILDERNESS AREAS |
| Response: | The intent of Management Prescription 5.1 is to maintain wilderness attributes and management options until Congress decides whether or not to designate the area as Wilderness. If Congress decides to designate, then mountain bikes would likely be prohibited in those areas. Until then, we do not believe that this use would compromise the current or potential wilderness attributes of MP 5.1 areas. |
| PC 534c | INCLUDING MOTORIZED VEHICLES AND MOUNTAIN BIKES IN THE EAST FORK OF GREENBRIER RIVER BASIN |
| Response: | A good portion of the upper East Fork Greenbrier River Basin is in MP 6.2, which prohibits public motorized use. Off road motorized use is not allowed. Mountain bike use is allowed; however, current use is estimated to be very low. |
| **PC 762** | **The Forest should revise standards, guidelines, goals, and objectives for activities related to backcountry recreation, including:**<br>• **Making backcountry recreational opportunities its management focus**<br>• **Prohibiting motorized conveyances in areas designated for backcountry recreation**<br>• **Making no changes to the management plan of the Forest and its backcountry areas**<br>**Because no other entity in the State can fulfill this role, and the changes in uses will only benefit a few people and cause a loss in tourism revenue.** |
| Response: | As part of a multiple-use agency, the Forest must manage the land for a wide variety of uses, settings, opportunities, resources, and services. We feel that the Revised Plan accommodates the diversity and sustainability of forest ecosystems, as well as a range of recreational and economic opportunity. The |

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

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

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| **PC 869** | **The Forest should define all even-aged and uneven-aged silvicultural treatments in the glossary, as the Forest Plan and glossary are currently deficient in defining these terms.** |
| Response: | We have fully described all even-aged and uneven-aged silvicultural treatments to be used on the Forest in Appendix A to the Proposed and Final Revised Forest Plans. |
| **PC 871** | **The Forest should make the acre projection in Objective TR04 consistent with other vegetation management objectives in the Plan.** |
| Response: | We have reviewed and updated our vegetation management objectives in the Final Revised Plan. |
| **Range Resources** | |
| **PC 922** | **The Forest should add a section d) to Guideline RA11 on page II-40 of the Proposed Revised Plan, one that addresses maintaining or improving wildlife habitat for woodcock and other early successional species.** |
| Response: | We believe that Goal RA01 and Guideline RA10 in the Proposed Revised Plan already address wildlife habitat. We do not believe that we need to specify which species or what type of habitat, as these areas would primarily be maintained as openings with a mixture of species that would benefit many wildlife species as well as livestock. |
| **PC 997** | **The Forest should modify management direction pertaining to range management.** |
| PC 997a | INCLUDING MODIFYING STANDARD RA14 TO REQUIRE FENCING OF ALL STREAM CHANNELS IN GRAZING ALLOTMENTS |
| Response: | This standard requires fencing where we determine that range management is contributing to stream bank instability, and allows us to prioritize effective mitigation over time. The suggested rewording could require us to fence all allotment stream channels before grazing may continue, whether we need site-specific fences or not. |
| PC 997b | INCLUDING ADDING STANDARDS AND GUIDELINES FOR HAWTHORN MANAGEMENT |
| Response: | See responses to PC 520b, PC 921, and PC 923. |
| **Mineral and Geology Resources** | |
| **PC 1001** | **The Forest should modify direction for mineral development to reduce the chances of adverse effects on threatened and endangered species**<br>• **Because pages 3-238 through 3-242 of the DEIS say that negative effects of mineral operations within TES habitats (e.g., small whorled pogonia and running buffalo clover) may occur, and this may require that potential impacts to these species be addressed through formal consultation under the Endangered Species Act**<br>• **Because suggested wording changes would help ensure that mineral development activities are not likely to adversely affect listed species.** |
| Response: | The Proposed Forest Plan direction for minerals (MG09) has been changed to state that mineral exploration and development may be restricted to prevent unacceptable impacts to threatened and endangered species. The text in the EIS has been modified to reflect the low likelihood of adverse effects on small whorled pogonia due to mineral activities. |
| **Lands and Special Uses** | |
| **PC 843** | **The Forest should list priorities under Guidelines LS04 and LS05 in the Lands and Special Uses section on Chapter II in the Revised Plan.** |
| Response: | We intentionally did not list the items in Guidelines LS04 and LS05 as priorities in order to maintain more flexibility over time, as priorities may change. |
| **Roads and Facilities** | |
| **PC 414** | **The Forest should write Standard RF06 to address any stream, not just "high risk" streams including stabilization of disturbed soils and installation of drainage features as a required component for high-risk areas and any stream.** |
| Response: | We agree. We have rewritten this standard for the Final Revised Forest Plan. |
| **PC 963** | **The Forest should consider organizing and tracking the road network and management activities in a matrix as part of its Desired Conditions on page II-50. A matrix could be used to organize and track transportation system needs by resource management needs as well.** |
| Response: | You are describing a tool to use rather than a desired condition. The Forest Service has a number of tools that can be used to organize and track road-related features, uses, and needs. Even better processes may be developed as time goes on, so there is no real need to commit ourselves to any one |

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

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

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

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

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| **PC 896** | **The Forest should consider providing the authority for allowing the actions described in Standard 5005; they can be found in FSM 2324.04(a-c).** |
| Response: | Although Forest Plan direction needs to be consistent with Forest Service Manual direction, we are not specifically referencing or providing that direction in the Forest Plan Management Prescriptions. |
| **PC 912** | **The Forest should modify Standards 5005 and 5105 to read, "Vegetation Management is allowed as a component of actions needed to protect the area and adjacent lands from fire, NNIS, and pests and pathogens".** |
| Response: | We modified this standard to read, "Vegetation Management is allowed as a component of actions needed to treat NNIS or to protect adjacent lands from fire, pests, and pathogens". Native pests and pathogens are generally considered part of the natural features in a wilderness or a wilderness study area, and would not typically be treated unless they are threatening adjacent lands. |
| **PC 913** | **The Forest should modify Standards 5038, 5039, and 5136 to include pest and pathogen control.** |
| Response: | We have added "pathogen" to what used to be Standards 5038 and 5136 in the Proposed Revised Plan. Standard 5039 did not need this addition, as it refers specifically to pesticide applications. |
| **PC 927** | **The Forest should change "Preserve wilderness attributes" on page III-17 to "Preserve wilderness character" because the Wilderness Act of 1964 charges federal land managing agencies to preserve the wilderness character of the areas (Sec.2 (a), 4(b).** |
| Response: | We used wilderness "attributes" rather than "character" to be more specific as to what defines wilderness. Attributes include the protection and perpetuation of wilderness character and values including, but not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences. We do not believe that changing "attributes" to "character" will have any affect on how we manage wilderness, and we feel that the combined attributes better define the area's wilderness character. |
| PC 927a | SINCE THE WILDERNESS INFORMATION STEERING GROUP OF THE FOREST SERVICE IS CURRENTLY WORKING ON A PROJECT TO DEFINE EXACTLY WHAT "WILDERNESS CHARACTER" IS, USING WORDING FROM THE WILDERNESS ACT OF 1964, THIS WILL NEATLY TIE THE NEW MONONGAHELA FOREST PLAN INTO NATIONAL LEVEL DEFINITIONS AND STANDARDS |
| Response: | It would be hard to imagine that any definition of wilderness character would not rely heavily on the incorporation of wilderness attributes from the Wilderness Act. |
| **PC 928** | **The Forest should change the last paragraph of page III-17 that states "… provides opportunities for semi-primitive non-motorized recreation where natural ecological processes occur" to "… provides opportunities for solitude or a primitive and unconfined types of recreation where natural ecological processes predominate," because:**<br>• **The Monongahela's wildernesses have progressed to the point where a primitive ROS class is not only possible, but fitting and desired**<br>• **Continuing to refer to them as SPNM is misleading about what the management goals of wilderness should be, and confuses the visitor about what to expect**<br>• **Many of the other management areas across the Forest are classed as SPNM for recreation; wilderness should be classified as primitive to provide for a greater range of experiences**<br>• **There is no better place than wilderness to provide for primitive recreation.** |
| Response: | We used "semi-primitive non-motorized" instead of "primitive" when referring to wildernesses in the Proposed Revised Plan solely for technical reasons. We recognize that we should be managing wilderness for primitive recreation opportunities, but under the Recreation Opportunity Spectrum (ROS) criteria, the Monongahela does not technically have any wildernesses that meet the criteria for primitive recreation because of their relatively small size. The criteria state that primitive areas should be greater than 3 miles from an open road or development, and we have little if any wilderness land that meets that criteria. In that sense, we felt that describing the areas as "primitive" would be misleading and setting up expectations for desired conditions that could not be met. On the other hand, recreational experiences are really in the mind of those who experience them. There are many people who feel that they are having a primitive experience when they step off the road pavement into the forest, irrespective of whether the area is in a designated wilderness or not. Others seek out wilderness areas for primitive recreation experiences, knowing that the sights and sounds of human development will be minimal. In that sense, we agree that the Forest's wildernesses can and will provide for primitive recreation. |

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| **PC 929** | **The Forest should change the Forest Service directive code 2350 on page III-20 to code 2320, "Wilderness Management", because 2350 is the code for "Trail, River, and Similar Recreation Opportunities".** |
| Response: | You are correct that 2320 is the file designation code for wilderness management. The file designation codes we are using in the Revised Forest Plan relate to specific Forest activities we are managing within the Management Prescriptions. Therefore, 2350 relates to the General Forest Activities (such as trails) that we are managing within Wilderness, just as 1900 relates to Vegetation we are managing within wilderness, etc. These file designation codes appear within all of the Management Prescription areas, not just MP 5.0. |
| **PC 930** | **The Forest should use the word "mechanical" rather than "mechanized" when referring to non-conforming uses in Wilderness, including in Management Prescription 5.0 – pages III-20, III-21 First paragraph, Standard 5002, and Guideline 5014, because:**<br>• **"Mechanized" has a slightly different meaning than "mechanical", the word actually used in the Wilderness Act**<br>• **If Howard Zahniser had really meant "mechanized" in the Wilderness Act of 1964, he would have used the word**<br>• **Agencies managing wilderness should keep to the actual words used in the legislation whenever and wherever possible. This is a small pet peeve and it has to do with language creep.** |
| Response: | We acknowledge your concern over language creep and retaining the original language of Wilderness legislation. However, terms such as "motorized equipment" and "mechanized transport" are now part of the commonly accepted vocabulary in the agency when referring to non-conforming uses in Wilderness. We do not make these changes but we are obligated to adopt them so that everyone in the agency is using a consistent and commonly understood language. |
| **PC 931** | **The Forest should change or drop the last sentence in the first paragraph on page III-20 of the Forest Plan that refers to special uses, because:**<br>• **Not all special uses are compatible in wilderness**<br>• **Special uses such as competitive events or motion picture/commercial production would not be permitted because, in the words of the Wilderness Act 1964 Sec. 4(d)(5): "Commercial services may be performed … to the extent necessary for activities which are proper for realizing the recreational or other purposes of the areas"**<br>• **Wilderness management should favor only those special uses that conform to Sec 4(d)(5) and cannot take place in a setting outside of wilderness.** |
| Response: | Our intent was not to imply that any special uses are allowed in wilderness, but rather that any special uses that occur would be compatible with the wilderness setting. This is a desired condition statement rather than an allowance standard. However, your interpretation is understandable given the ambiguity of the sentence. Therefore, we have changed this sentence in the Final Revised Forest Plan to read, "Special uses are compatible with the intent of the Wilderness Act." |
| **PC 931a** | REFERENCE FSM 2323.13(H) ON COMPETITIVE EVENTS, AND REFERENCE FSM 2323.14(G) ON OUTFITTER-GUIDES TO INCLUDE INFORMATION IN THE NEW FOREST PLAN AS DIRECTED |
| Response: | We do not feel it is necessary to reference the Forest Service Manual for this desired condition statement. We have to follow the Manual but we are not obligated to repeat it in our Forest Plan. |
| **PC 932** | **The Forest should delete Guideline 5013 on page III-20 of the Plan and start Guideline 5014 with, "Trails are constructed and maintained…"** |
| PC 932a | BECAUSE VISITORS MAY HAVE A VASTLY DIFFERENT PERCEPTION OF WHAT "REASONABLE PRECAUTIONS" ARE. FOR INSTANCE, THEY MAY THINK IT UNREASONABLE THAT YOU NOT BRIDGE A WILDERNESS STREAM IF THEY HAPPEN TO COME UPON IT DURING FLOOD STAGE, EVEN THOUGH IT MAY ONLY REACH THAT CONDITION ONCE OR TWICE A YEAR |
| Response: | We agree that visitors can have different ideas as to what a "reasonable precaution" might be. That is one reason we spelled out in Guideline 5013 that trail bridges are not normally provided. We do, however, want the flexibility to provide a bridge where chronic resource damage is occurring, or where safety issues might be an ongoing concern. |

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

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

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

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

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

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

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

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

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| | APPROPRIATE, AS THE FOREST SERVICE MANUAL (2324.22.7) SAYS "DO NOT USE PRESCRIBED FIRE IN WILDERNESS TO BENEFIT WILDLIFE, MAINTAIN VEGETATIVE TYPES, IMPROVE FORAGE PRODUCTION, OR ENHANCE OTHER RESOURCE VALUES" |
| Response: | MP 5.1 is not Wilderness, and thus FSM 2324.22.7 does not directly apply. |
| PC 947s | SECTION 5300 (MISSING): ADD A SECTION ON LAW ENFORCEMENT IN MP 5.1 IDENTICAL TO THE ONE IN MP 5.0 |
| Response: | MP 5.1 is not Wilderness, and thus Standard 5046 does not directly apply. These areas do not technically have non-conforming uses. |
| PC 947t | STANDARD 5140: CHANGE THE LANGUAGE TO REFLECT THAT LANDS ASSIGNED TO MP 5.1 ARE VERY SPECIAL, HAVING PASSED THROUGH THE TESTS FOR ROADLESS INVENTORY AS WELL AS WILDERNESS--WE DO NOT, THEREFORE, SUPPORT ANY EXCHANGES OF THESE PUBLIC NF LANDS, REGARDLESS OF THEIR FUTURE WILDERNESS STATUS |
| Response: | We have changed this standard in the Final Revised Plan so that it ends after the word "exchange". |
| PC 947u | STANDARD 5141: USE THE SAME SIGNAGE AS IN WILDERNESS TO AVOID HAVING TO ALTER THEM IN CASE OF WILDERNESS DESIGNATION, AND TO PREVENT IMPACTS ON WILDERNESS ATTRIBUTES, ESPECIALLY IF THE VERY UGLY, BLUE, PLASTIC BLAZES ARE EVER CONSIDERED FOR USE HERE |
| Response: | MP 5.1 is not Wilderness. If any of the areas become Wilderness, we will change the signage accordingly. For now, the change would be an unnecessary expense to taxpayers and could be confusing to recreationists who might think they are in a Wilderness but are not. We do not see how plastic blazes can have any permanent impact on wilderness attributes or potential. |
| PC 947v | SECTION 7460 (MISSING): REPLACE THE WORDING FROM THE 1986 PLAN, PAGE 163, WHICH PROVIDES THE PUBLIC WITH IMPORTANT WILDERNESS USE INFORMATION |
| Response: | MP 5.1 is not Wilderness, so we are not requiring wilderness latrines. We removed landfill direction in all MPs so that people do not get the mistaken impression that we may allow landfills somewhere on the Forest. We do not allow landfills anywhere on the Forest. The carry in/carry out philosophy is now a widely accepted practice in the backcountry that we advertise in signs and literature, so we do not need to have this direction in the Forest Plan. |
| PC 947w | STANDARD 5143: ADD THE STATEMENT "CERTAIN USES MAY BE LIMITED IN SOME AREAS TO PROTECT SOIL AND WATER RESOURCES AND TO MINIMIZE CONFLICTS AMONG USERS," BECAUSE SOME OF THE ACTIVITIES MENTIONED, ESPECIALLY MOUNTAIN BIKING, CAN RESULT IN SOIL DISTURBANCE AS RECOGNIZED ELSEWHERE IN THE DRAFT PLAN/DRAFT EIS |
| Response: | See response to 947i, above. |
| **Management Prescription 6.1 – Wildlife Habitat Emphasis** | |
| **PC 867** | **The Forest should change the title of MP 6.1 to Timber and Wildlife Habitat Diversity to reflect a greater emphasis on timber management because:**<br>• **This would better reflect the importance of timber harvesting , which is the driving force used to create habitat diversity**<br>• **Too often silviculture practices are modified to satisfy some perceived wildlife, aesthetic value that compromises silvicultural requirements, and this practice has resulted in regeneration failures.** |
| Response: | First and foremost, MP 6.1 focuses on wildlife habitat diversity and mast production. Silvicultural practices would be designed to meet those ends and would, for the most part, be consistent with commercial timber production. In other cases, prescribed fire or precommercial thinning may be used to achieve habitat objectives. However, giving timber production "top billing" in the MP title would fundamentally change the emphasis of the MP to something that it was never intended to be. |
| **PC 494** | **The Forest should provide a series of concise standards for grapevine management in Management Prescription 6.1 or in an appendix.** |
| Response: | The grapevine direction in Appendix P of the 1986 Plan is very detailed and convoluted, and it has proven difficult to implement in the field. Therefore, it is not appropriate to include it as programmatic direction in the Revised Forest Plan. Direction in Management Prescription 6.1 establishes the desirability of retaining grapevines (see 6108 in the Proposed Revised Plan on page III-35). More |

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

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

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

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

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

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

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

| **FOREST PLAN MONITORING AND EVALUATION** | |
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| **PC 645** | **The Forest should provide an adequate monitoring program that:**<br>• **Covers an ecologically appropriate scale**<br>• **Includes inventories evaluating biological diversity in terms of its prior and present condition**<br>• **Provides protection for all historic and prehistoric archaeological/cultural sites**<br>• **Includes recreational uses, like mountain biking and horseback riding**<br>• **Includes monitoring effects of logging hardwoods on wildlife habitat and age-class diversity**<br>• **Protects soil and water resources.** |
| Response: | The Forest's Monitoring and Evaluation Plan is presented in Chapter IV of the Proposed and Final Revised Plans. This monitoring plan covers all of the general resource areas described and more, and it includes as much detail as the monitoring prescribed for the 1986 Plan. Also, we are developing a Monitoring Implementation Guide that provides additional information as to how the monitoring should be done, who should do it, when it should occur, etc. This guide is considered separate from the Plan so that it can be adjusted and improved as needed during the planning period without amending the Plan. Monitoring is all about adaptation, learning from success and failure, and making adjustments, and that is why we have taken this adaptive approach to the Plan. |
| **PC 857** | **The Forest should have disclosed the results of required monitoring from the 1986 Forest Plan, including:**<br>• **Whether the items have been monitored on a regular basis**<br>• **Whether monitoring was evaluated at a representative range of sites, under representative conditions**<br>• **Whether monitoring was thorough**<br>• **Whether scientific protocols were used**<br>• **Whether adequate data was collected**<br>• **What the monitoring results say**<br>• **Whether monitoring efforts have been inadequate for any items**<br>• **What additional monitoring and analysis needs to take place to complete plan revision in an informed manner.** |
| Response: | Although there is no requirement to disclose the results of past monitoring in the Revised Forest Plan or EIS, monitoring results since 1986 have been disclosed periodically to the public in the form of Annual |

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

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

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

| ENVIRONMENTAL IMPACT STATEMENT | |
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| **PC 1003** | **The Forest should eliminate the paragraph on page S-5 that discusses revision topics because this term "topics" is confusing with the issues that are presented later in the document.** |
| Response: | We have provided more information on this "topic" in the EIS than the Summary. |
| **PC 926** | **The Forest needs to change "Laurel Fork East and West" on page S-20 to "Laurel Fork North and South".** |
| Response: | We have corrected this error in the FEIS. |
| **PC 297** | **The Forest should ensure that the affected environment is consistently defined and all effects are determined within identical assessment areas in order to adequately determine direct, indirect, and cumulative impacts to the forest.** |
| Response: | As stated on page 3-1 of the EIS, under Scope of the Analysis, the affected environment areas may vary in size and time depending on the resource, issue, or anticipated activities. There are other factors involved as well. We cannot, for example, analyze effects on a species that spends its entire life in one cave the same way we analyze effects on a species that flies around the Forest, or spends part of its life cycle in Central America. All resources and issues are looked at separately to determine the appropriate area of consideration for an effects analysis. See the Scope of the Analysis for each resource section in Chapter 3 of the EIS for the rationale used for determining areas. |
| PC 349 | **The Forest should examine the effects of forest management.** |
| Response: | Effects are analyzed and disclosed throughout Chapter 3 of the EIS, including effects to many of the items noted in the comments (see below). However, effects are presented somewhat differently in plan revision than they are in project-level NEPA documents, because the spatial and time scales are different, and the Forest Plan is not actually implementing any specific management activities to assess. Therefore, the effects discussions tend to focus more on general types of effects that may occur during plan implementation, and management direction that would reduce or neutralize potential adverse effects. Also, Environmental Impact Statements were never intended to be encyclopedic in nature, but rather concentrate on disclosing significant or differential effects to specific issues or resources from proposed management options. Consequently, if effects to some of the items noted do not appear in the EIS, it is likely because these items were not raised as issues, or are beyond the scope of what we can or need to analyze at this scale, or would not have differential effects on, or be differentially affected by, the alternatives in revision. |
| PC 349a | INCLUDING:<br>• IMPACTS TO THE ROLE OF THE FOOD CHAIN IN MAINTAINING DIVERSITY, VIABLE SPECIES AND FOREST HEALTH<br>• HOW THE REDUCTION OF ORGANISMS AT VARIOUS LEVELS IN THE FOOD CHAIN |

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| | AFFECT ORGANISMS THROUGHOUT THE FOOD CHAIN<br>• IMPACTS ON BIODIVERSITY |
| Response: | Species viability and diversity are examined in the Terrestrial Species Viability, Terrestrial Ecosystem Diversity, and Watershed, Aquatic, and Riparian Resources sections of EIS Chapter 3. Detailed species-by-species viability analyses are contained in the project record. Forest health is addressed in the Vegetation section of EIS Chapter 3. |
| PC 349b | INCLUDING:<br>• IMPACTS TO BIOLOGICAL, POTENTIAL BIOLOGICAL, AND HISTORICAL BIOLOGICAL CORRIDORS<br>• A REGIONAL APPROACH WHEN EXAMINING BIOLOGICAL CORRIDORS<br>• IMPACTS OF LOGGING AND ROAD BUILDING IN UNROADED AREAS AND IN ROADED AREAS PROVIDING CORRIDORS OR LINKAGES BETWEEN CORE ROADLESS AREAS<br>• IMPACTS ON UNDISTURBED AND INTERCONNECTED HABITAT |
| Response: | Landscape-level conservation biology issues are examined in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. |
| PC 349c | INCLUDING THE FULL COSTS AND BENEFITS OF VARIOUS HABITAT MANIPULATION METHODS USED |
| Response: | Economic data specific to wildlife openings and other habitat manipulations are not available for the Forest. |
| PC 349d | INCLUDING THE EFFECTS ON WATER QUALITY AND RESOURCES, AQUATIC ECOSYSTEM HEALTH, AND RIPARIAN AREAS |
| Response: | Potential and general effects to these resources are covered in the Watershed, Aquatic, and Riparian Resources section of Chapter 3 in the EIS. |
| PC 349e | INCLUDING THE IMPACTS ON THE PRIVATE PROPERTY OWNERS WHOSE LANDS ADJOIN OR ARE SURROUNDED BY THE FOREST |
| Response: | Plan revision is not creating any impacts on private property owners or their lands. |
| PC 349f | INCLUDING IMPACTS ON CAVES, BLOWHOLES, UNDERGROUND STREAM SYSTEMS, AND RECHARGE AREAS |
| Response: | The Terrestrial Species Viability Evaluation considered karst features through the examination of numerous cave-associated species. The Terrestrial Ecosystem Diversity analysis considered caves as a habitat component. |
| PC 349g | INCLUDING IMPACTS ON SOIL, STEEP SLOPES, EROSIVE SOILS, OTHER SENSITIVE SOILS ALONG CREEKS AND TRIBUTARIES , AND GEOLOGIC FORMATIONS THAT ARE ACIDIC, TOXIC OR HARMFUL WHEN DISTURBED |
| Response: | Potential and general impacts to soils are addressed in the Soil Resource section of Chapter 3 in the EIS, and management direction to protect soils is found primarily in the Soil and Water Resources section of Chapter 2 in the Revised Plan. We do not have any geological formations that are acidic, toxic or harmful when disturbed. |
| PC 349h | INCLUDING:<br>• IMPACTS ON WATERSHED QUALITY, WOODY DEBRIS, ORGANIC CONTENT OF SOILS, PIT AND MOUND TOPOGRAPHY, LARGE BOLES ON THE FOREST FLOOR, SNAGS, AND NURSE LOGS<br>• IMPACTS ON MAST PRODUCTION, DEN TREES, AND OTHER HABITAT COMPONENTS FOR WILDLIFE<br>• IMPACTS ON COVE HARDWOODS, NORTHERN HARDWOODS, BOULDER FIELDS, AND OTHER SPECIAL OR UNIQUE HABITAT<br>• IMPACTS ON CANOPY, CANOPY STRUCTURE, AND DISTURBANCE REGIMES |
| Response: | Habitats and habitat features are examined in the Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Terrestrial Management Indicator Species, and Watershed, Riparian, and Aquatic Resources sections of EIS Chapter 3. |
| PC 349i | INCLUDING FLOODING IMPACTS |
| Response: | The potential effects of canopy reduction on flood flows are presented in the DEIS, pages 3-73 to 3-74. |

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

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

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

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

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

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

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| | work involved. |
| **PC 866** | **The Forest should state that the 98,000 acres on page 3-426 of the DEIS should be at the top of the list to clearcut if they are available.** |
| Response: | Harvest decisions would be based on many factors, including Management Prescription emphasis and direction, current and desired conditions, scenery constraints, etc. |
| **PC 569** | **The Forest should consider that using total acreage to indicate the need for new roads distorts the comparison among alternatives.** |
| Response: | In the EIS analysis, we used acres of projected timber harvest by alternative, and Table RO-3 should have been labeled "maximum" timber harvest, as acres were based on maximum modeled outputs. We have expanded the roads analysis in the FEIS. See the Road Transportation System section in Chapter 3 of the FEIS. |
| **PC 573** | **The Forest should provide estimates of actual road/trail miles for each alternative.** |
| PC 573a | BECAUSE THE DEIS SAYS THAT INCREASED LOGGING LEADS TO INCREASED ROADS BUT NO INCREASED ROAD LEVELS WERE GIVEN |
| Response: | The cumulative effects analysis of the Road Transportation System section in Chapter 3 of the DEIS describes why the actual miles of road related to timber harvest are impossible to precisely predict. Other unknown factors affecting road system levels are discussed as well. However, we have expanded the roads analysis in the FEIS to give a rough approximation of roads that may be required for harvest based on harvest area distance from existing roads. We do not consider these estimates accurate predictions but rather a basis for showing potential relative differences between alternatives. See the Road Transportation System section in Chapter 3 of the FEIS. |
| PC 573b | BECAUSE, GIVEN THE EXTENT OF ROAD MAINTENANCE NEEDS, IT IS DIFFICULT TO IMAGINE THAT ROAD CONSTRUCTION COSTS WILL SUPPORT A JUMP IN ACRES HARVESTED FROM 498 ACRES PER YEAR TO AN AVERAGE OF 4,000 TO 5,500 ACRES PER YEAR IN THE FIRST PLANNING CYCLE |
| Response: | Road maintenance funds and road construction funds come from two entirely different sources, so it is not accurate to imply that one depends on the other. Road construction funds for timber sales typically come from the timber sales; i.e., the road construction is essentially funded by a portion of the timber value. Also, acres harvested do not directly translate to road miles constructed because much of the road transportation system is already in place, and options available to reduce construction and associated construction and maintenance costs include harvesting by helicopter, using existing roads, and using temporary roads that are obliterated following harvest-related activities. |
| PC 573c | BECAUSE THE DEIS SAYS THAT THE PLAN CONTAINS DIRECTION TO DEFINE A "MINIMUM ROAD SYSTEM" YET THE DESIRED CONDITIONS IN THE PLAN MAKE NO MENTION OF THE NEED TO REDUCE THE FOREST'S ROAD NETWORK TO STAY WITHIN THE AVAILABLE MAINTENANCE BUDGET |
| Response: | We did not base our Desired Conditions for roads on the available maintenance budget because budgets change over time. The Desired Conditions do include the statement, "Roads not needed for long-term objectives are decommissioned and stabilized" (Proposed Revised Plan, page II-50). In addition Goal RF02 on page II-50 says to:<br><br>"Provide developed roads to the density and maintenance level needed to meet resource and use objectives. During watershed or project-level planning:<br>a) Update inventory of area transportation system.<br>b) Determine the minimum transportation system necessary to achieve access management objectives.<br>c) Incorporate cost efficiency into construction, reconstruction and maintenance needs.<br>d) Identify roads to decommission, obliterate, replace, or improve that are causing resource damage.<br>e) Integrate needs for off-road parking."<br><br>We have added a Forest-wide objective for road decommissioning in the Final Revised Plan. Guidelines RF08 and RF09 in the Proposed Revised Plan further describe how decommissioning opportunities should be identified and prioritized. We believe that all of this direction clearly indicates the Forest's intent to reduce the road system where and when it is appropriate to do so, as opposed to basing reduction on a maintenance budget level that changes from year to year, or road densities that can vary widely from area to area depending on access needs. |

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

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

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

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

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

| ENVIRONMENTAL IMPACT STATEMENT APPENDICES | |
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| **Appendix C** | |
| **PC 883** | **The Forest should clarify that the wildlife openings in the Big Draft IRA are actually outside of the area, on the other side on CO 36/1 Road, on the lower slopes of Coles Mountain.** |
| Response: | We agree. This portion was excluded from the IRA prior to the DEIS to omit County Road 36/1, but we missed deleting the wildlife areas in the wilderness evaluation. This correction has been made in Appendix C to the FEIS. |
| **PC 948** | **The Forest should correct its page C-11 reference to an enclosure under Criteria 2 for Big Draft, because our understanding is that this enclosure is not in the roadless area.** |
| Response: | We have deleted this reference in the FEIS Appendix C description of the Big Draft area. |
| **PC 1008** | **The Forest should change "Spice Run" to "Big Draft" on page C-38 of Appendix C to the DEIS.** |
| Response: | We have corrected this error in Appendix C to the FEIS. |
| **PC 719** | **The Forest should provide information on mineral development activities in the Big Draft area and support wilderness designation for the area for the following reasons:**<br>• **To promote the local tourism economy**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **Because it is of sufficient size and has clear boundaries**<br>• **To protect scenic resources**<br>• **Because mountain biking is not popular in the area**<br>• **To protect rare and threatened plant species**<br>• **Because the existence of wildlife openings should not prevent wilderness designation**<br>• **Because fire management would not be hindered.** |
| Response: | As stated in Appendix C to the DEIS, page C-38, "There are no active private or federal gas leases or coal operations within the area". The Forest completed a Roadless Area Inventory and Wilderness Evaluations consistent with the planning regulations. Based on the wilderness evaluations in Appendix C and the Responsible Official's discretion, different amounts of areas were recommended for Wilderness in the range of alternatives considered in detail. The Big Draft area was recommended for Wilderness and given an MP 5.1 in Alternative 3. Under Alternatives 1 and 2, Big Draft would remain primarily in MP 6.2, which would provide similar management direction for resource protection as MP 5.1. MP 6.2 would also maintain the undeveloped character and backcountry recreation opportunities of the area. The Record of Decision identifies the areas the Responsible Official has chosen to recommend, and provides the rationale for the recommendations. |

# Section 3: Natural Resources Management

| GENERAL FOREST MANAGEMENT | |
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| **PC 448** | **The Forest should consider that nature can generate a stable, healthy, and productive ecosystem without human interference, because the DEIS's statements about the adverse effects of an aging forest seem in conflict with science.** |
| Response: | We believe that we have described effects that are supported by silvicultural and ecological science. Pathogens, mortality, shade-tolerant species, and fuel loading do increase as young to mature forests continue to age into older forests. A comprehensive description can be found in the Vegetation Management section of Chapter 3 in the DEIS. Also, we describe presettlement conditions in the Terrestrial Ecosystem Diversity section of Chapter 3, and used these estimated presettlement conditions as a benchmark for evaluating the effectiveness of our coarse-filter conservation strategy. Of course, presettlement conditions did not include highways, towns, non-native invasive species, a recreating public, and Congressional mandates, all of which we must consider in our management today. However, we agree that presettlement conditions did likely include large tracts of older forest, and our Minimum Dynamic Area analysis in Chapter 3 of the EIS shows that large areas of older forest would develop on the Monongahela under any of the alternatives considered in detail. |
| **PC 184** | **The Forest should provide appropriate management to federal lands, including:**<br>• **Fire management**<br>• **Pest and disease management**<br>• **Wildlife management**<br>• **Appropriate vegetation management**<br>• **Timber stand improvement**<br>• **Providing revenue to counties**<br>• **Providing access for hikers and hunters**<br>• **Maintaining a healthy forest**<br>• **Using scientific methods to harvest trees**<br>• **Promoting a healthy state economy**<br>• **Protecting quality of life**<br>• **Basing management applications on each area's natural characteristics, features, functions, and values.** |
| Response: | We believe that the Revised Forest Plan provides appropriate management direction for each of the management items listed. Other items, like the quality of life or a healthy state economy, are beyond our authority or control to manage, but we hope we can contribute to them through our management. |
| **PC 233** | **The Forest should explain how it intends to resolve disagreements over environmental and public land issues.** |
| Response: | We do not believe that we can resolve all disagreements over these issues, just as every Forest acre cannot provide every use for every person that wants to use it. However, we have attempted to provide a diverse and sustainable mix of opportunities, settings, goods, and services across the Forest to help meet the needs and wants of the public. |
| **PC 82** | **The Forest should prohibit mowing.** |
| Response: | Maintenance of herbaceous openings for wildlife species that use that type of habitat is a legitimate multiple-use goal. See also response to PC 85. |
| **PC 639** | **The Forest should meet or exceed all of West Virginia's Best Management Practices.** |
| Response: | We agree, and we have added a statement to this effect in the Final Revised Plan. Forest Plan standards and guidelines are intended to protect soil, water, and riparian resources during project design and implementation, and we believe that they will meet or exceed State BMP requirements. |
| **PC 79** | **The Forest should implement detailed and comprehensive forest management, because little should be left to discretion, and the detailed decisions for planning should not be left to the site or project level.** |
| Response: | We believe that the Revised Forest Plan is comprehensive and detailed in the strategic direction it provides. However, we also believe that there are many decisions that are more appropriately made at the project level with site-specific information for site-specific conditions and circumstances. All major |

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| | projects on the Forest undergo project-level planning, analysis, and decision-making by law, the National Environmental Policy Act. |
| **PC 511** | **The Forest should examine how natural forest succession would be set back by the various alternatives under the plan revision.** |
| Response: | The Revised Forest Plan is designed to manage for a variety of successional stages to provide habitat conditions needed by native West Virginia plants and animals. The Vegetation Management section in Chapter 3 of the EIS examines potential effects to age class distribution by alternative. Natural succession will continue to occur on the large majority of Forest in all of the alternatives. Many of the land management activities implemented on Forest suitable timber land mimic the natural processes of forest succession, although in a less chaotic fashion. |
| **PC 698** | **The Forest should provide the public and natural environment with the elements of the forest that are rare or unavailable on private lands.** |
| Response: | The Location and Description of the Forest in Chapter I of the Revised Forest Plan describes the special qualities of the Monongahela, including its biodiversity and hiking opportunities. Chapter 3 of the EIS analyzes effects on rare species and recreational opportunities by alternative. We identified those elements on the Forest that are relatively rare on nearby lands, but we did not identify any element that was completely unavailable. |
| **PC 107** | **The Forest should make recovery of the forest a stated goal and develop objectives and guidelines to detail this forest-wide goal.** |
| Response: | We have incorporated recovery into the Revised Forest Plan in a number of ways. For example, we have management direction that addresses the recovery of federally listed species. We have other direction that provides for the ongoing recovery of degraded stream channels. We have created a management prescription to promote the recovery of spruce and spruce-hardwood ecosystems. However, Forest management must address much more than recovery. See the EIS and Revised Plan for the scope of management issues, resources, opportunities, goods, and services that we address. |
| **PC 530** | **The Forest should consolidate pristine areas to increase potential for contiguous ecosystems or ranges.** |
| Response: | The Revised Forest Plan allocates many large blocks of the Forest to management prescriptions and other management categories that will not be subject to intensive active management. The combined effects of these land allocations create large blocks of forest that can develop into relatively pristine areas over time. This concept is analyzed in detail in the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS, in the subsection on Minimum Dynamic Area (MDA) reserves. |
| **PC 353** | **The Forest should conduct research to determine if many of the management restrictions in this forest plan are really necessary to protect other resources.** |
| Response: | Management restrictions in the Revised Forest Plan are based on a combination of scientific research, monitoring results, experience, and professional judgment. |
| PC 353a | BECAUSE RESEARCH INDICATES THAT THE CREATION OF OPENINGS AROUND STREAM CHANNELS CAN BE BENEFICIAL |
| Response: | Standard SW34 in Chapter II of the Proposed Revised Plan does not prohibit all timber harvest in stream channel buffers. It says that no programmed harvest shall occur, but it also allows tree removal for various needs or objectives, including riparian or aquatic resource management. So if a project interdisciplinary team identifies that an opening around stream channels would benefit riparian or aquatic resources, that opening would meet Forest Plan direction. |
| PC 353b | BECAUSE IT IS NOT CLEAR IF THE FIVE-MILE BUFFER AROUND BAT CAVES IS BASED ON SCIENCE |
| Response: | The 5-mile radius primary range around Indiana bat hibernacula is based on radio-tracking data. Vegetation management is not prohibited within primary range, but must be undertaken for the purpose of maintaining or improving habitat for the Indiana bat or other threatened or endangered species (see Standard TE29 in Chapter II of the Proposed Revised Plan). |
| **PC 638** | **The Forest should examine, monitor, inventory, and protect all biological, watershed, recreational and geological resources/values in the plan revision.** |
| Response: | We have provided management direction and a monitoring plan in the Revised Forest Plan to help protect the resources/values listed in this concern. We have also provided an examination of potential effects on these resources/values from alternative management options in the plan revision EIS. |

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| **PC 403** | **The Forest should complete a comprehensive association-level community classification for its lands, because there is a great need for further community ecology research and inventory across the Forest, including a plan and a goal developed analogous to SW02 for soils and water.** |
| Response: | The Forest has an Ecological Classification System (ECS) at the ecological landtype scale. The ECS is based on vegetation data collected along transects across the Forest and soil maps of the Forest. We agree that analysis of this ECS should be completed, a user's guide published, and new data added to the database to strengthen the classification system. A goal to address these needs for the terrestrial ecology program has been added to the Final Revised Forest Plan in the Vegetation section. |
| **PC 386** | **The Forest should include a strategy in the Forest Plan for obtaining information on biological diversity so that more information is available during future planning cycles.** |
| Response: | We agree. See response to PC 403. |
| **PC 831** | **The Forest should examine the impact that management activities will have on species within the Forest.** |
| PC 831a | INCLUDING LOCATIONS OF AND THREATS TO EXTIRPATED SPECIES, SPECIES AT RISK, DECLINING SPECIES, SPECIES AT THE EDGE OF THEIR RANGES, DISJUNCT SPECIES, SPECIES WITH LITTLE REMAINING HABITAT, SPECIES LISTED AS RARE BY NATURAL HERITAGE PROGRAMS, UNIVERSITIES, AND EXPERTS, AND THREATENED, ENDANGERED, SENSITIVE, STATE-LISTED, AND RARE SPECIES |
| Response: | The Forest is inhabited by thousands of species of plants and animals. A species-by-species analysis of management effects on all of these species would not be practical. Through the terrestrial and aquatic species viability analyses, we examined in detail 247 species that were determined to have potential viability concerns on the Forest. Lists of the species analyzed in detail are contained in the EIS Appendices D and E. These species were selected for individual analysis by screening lists of threatened and endangered species, Regional Forester's Sensitive Species, Natural Heritage Program rare species, and other similar lists. The screening process is described on pages 3-167 and 3-168 of the DEIS. The viability analyses considered threats posed by limited distributions, potential effects of Forest management, and a variety of factors beyond the control of the Forest. Results of the viability analyses are discussed in Chapter 3 of the EIS in the Water, Riparian, and Aquatic Resources section and the Terrestrial Species Viability section. The individual analyses on the 247 species are contained in the project record and are available upon request. |
| PC 831b | INCLUDING MANAGEMENT INDICATOR SPECIES |
| Response: | Management Indicator Species (MIS) were chosen to represent the major habitat types present on the Forest. Monitoring of MIS must be accomplished using established techniques and within realistic budgets and timeframes, so it was not practical to select MIS to represent every taxonomic group or minor habitat on the Forest. Effects to MIS were analyzed in the EIS by considering the projected amount of suitable or optimal habitat to be provided under each alternative. More detailed analyses that consider mobility, genetic diversity, access to specific feeding or breeding areas, etc. are not appropriate at the programmatic (Forest Plan) level. The Forest Plan does not specify or authorize site-specific activities, so such site-specific effects cannot be evaluated. |
| PC 831c | INCLUDING AQUATIC VERTEBRATES |
| Response: | Potential impacts of management activities on aquatic ecosystems and biota are discussed in the DEIS (pages 3-53 to 3-92 and Appendix E). |
| PC 831d | INCLUDING IMPACTS TO SPECIES OUTSIDE OF THE FOREST BOUNDARIES AND SPECIES DIRECTLY DOWNSTREAM OF THE FOREST |
| Response: | The planning area considered during the revision process was the fifth level watersheds within the proclamation boundary. The cumulative effects of activities on NFS, state and private lands and the potential downstream impacts is better addressed at the watershed assessment and project scale where site-specific conditions and species of concern can be considered. |
| PC 831e | INCLUDING IMPACTS ON AMPHIBIANS WHOSE POPULATIONS ARE SHOWING GLOBAL DECLINE |
| Response: | Global declines in amphibian populations are outside the scope of the Forest Plan revision. To the extent that such declines impact amphibians at the local level, they should be captured in any existing or ongoing population trend data, which were considered in the species viability analyses. |
| PC 831f | INCLUDING IMPACTS ON BLACK BEARS AND THEIR HABITAT |

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| Response: | Our analysis of black bear habitat did not include young stands in the optimum habitat indicator, so the analysis does not imply that recently logged areas provide bear habitat, despite the possibility that such areas could provide soft mast for bears. The optimum habitat indicator used in the analysis included only those management prescriptions with limited public motorized access. Therefore, concerns about the need for remote habitat are addressed in the analysis. Because several management prescriptions in the Revised Forest Plan provide remote habitat, separate management areas for bears are not needed. The analysis of black bear habitat is contained in EIS Chapter 3 in the section on Terrestrial Management Indicator Species and Other Species of Interest. |
| PC 831g | INCLUDING IMPACTS ON TROUT AND OTHER AQUATIC SPECIES |
| Response: | Potential impacts of management activities on aquatic ecosystems and biota are discussed in the DEIS (pages 3-53 to 3-92 and Appendix E). |
| PC 831h | INCLUDING IMPACTS ON NON-NATIVE PLANTS |
| Response: | The potential for roads to contribute to the spread of non-native invasive plants is addressed in EIS Chapter 3 in the Non-native Invasive Plant Species section. |
| **PC 385** | **The Forest should identify remaining tracts of all natural community types and maintain outstanding examples of each in relatively natural condition, because it is more reliable and cost effective compared to restoration.** |
| Response: | Management prescription allocations under all alternatives would provide for large core areas of contiguous forest where natural disturbance and recovery processes predominate. See EIS Chapter 3, Terrestrial Ecosystem Diversity section, subsections on Minimum Dynamic Area Reserves. While these areas were not created specifically to address the concern stated here, they contain areas of the Forest where active management is minimal (Wilderness and remote backcountry areas, as well as other areas not suitable for programmed timber harvest). These areas comprise about 42% of the Forest under Alternative 2 and are the areas where passive restoration will occur. That is to say, in these areas little to no active management will take place and natural community types will continue to change without human interference. These MDA reserves are the largest future old growth areas of the Forest<br><br>Very little of the land that was to become the Monongahela National Forest was unaffected by the turn-of-the-20th century logging, with subsequent fires and grazing. Some small areas have been identified as true old growth and are in MP 8.0 designation. |
| **PC 594** | **The Forest should serve as an example of sustainable production, hand-in-hand with recreation, wildlife, and environmental values.** |
| Response: | We agree, and we feel that we have designed the Revised Forest Plan to do just that. |
| **PC 36** | **The Forest should protect the Forest and its resources.** |
| Response: | We believe that the Revised Forest Plan does protect the Forest and its resources. Management direction designed to provide this protection can be found in Chapters II and III of the Revised Plan. |
| PC 36a | TO BENEFIT FUTURE GENERATIONS |
| Response: | See responses to PC 62h and PC 37a. |
| PC 36b | TO PROTECT PUBLIC HEALTH AND SAFETY |
| Response: | See response to PC 181. |
| PC 36c | TO PROTECT QUALITY OF LIFE |
| Response: | See response to PC 16b. |
| PC 36d | TO HELP MITIGATE GLOBAL WARMING |
| Response: | See response to PC 110c. |
| PC 36e | TO PROVIDE RECREATIONAL OPPORTUNITIES AND PROTECT TOURISM REVENUE |
| Response: | See responses to PC 18s, PC 50, PC 827, PC 994b, and PC 66f. |
| PC 36f | TO PROTECT PUBLIC INTERESTS RATHER THAN BUSINESS INTERESTS |
| Response: | We believe we are managing the Forest to address public interests. It is important to remember that our public includes a wide variety of people and organizations, including businesses, with a wide variety of interests. |
| PC 36g | BECAUSE OF THE OXYGEN IT PROVIDES |
| Response: | See response to PC 16ad. |
| PC 36h | INCLUDING WILDLIFE |

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| Response: | Protection for wildlife and their habitats is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction is primarily in the Wildlife and Fish and Threatened, Endangered, and Proposed Species sections of Chapter II. |
| PC 36i | INCLUDING ECOSYSTEMS, BIODIVERSITY, AND ECOLOGICAL QUALITIES |
| Response: | Protection for ecosystems, biodiversity, and ecological qualities is found in Chapters II and III of the Revised Plan. Most direction is assigned to smaller components of ecosystems or biodiversity so that we can implement protection measures in a more meaningful and effective way. |
| PC 36j | INCLUDING WILDERNESS AREAS, ROADLESS AREAS, AND BACKCOUNTRY AREAS, SUCH AS 6.2 AREAS |
| Response: | Protection for resources in these areas is found in Chapter II of the Revised Forest Plan. Additional protection for wilderness areas is in MP 5.0 in Chapter III of the Plan. Additional protection for roadless and backcountry areas is in MP 6.2 and MP 8.1 SPNM in Chapter III of the Plan. |
| PC 36k | INCLUDING WATER RESOURCES AND FISH POPULATIONS |
| Response: | Protection for water resources and fish populations is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction is primarily in the Soil and Water and Wildlife and Fish sections of Chapter II. |
| PC 36l | INCLUDING VEGETATION, WETLANDS, AND OTHER BARRIERS THAT MITIGATE THE EFFECTS OF STORMS AND FLOODING |
| Response: | Protection for vegetation and wetlands is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction for vegetation is primarily in the Vegetation section of Chapter II. Forest-wide direction for wetlands is primarily in the Soil and Water section of Chapter II. |
| PC 36m | INCLUDING NATIVE PLANTS |
| Response: | Protection for native plants is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction is primarily in the Vegetation section of Chapter II. |
| PC 36n | INCLUDING AIR QUALITY |
| Response: | Protection for air quality is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction is primarily in the Air Quality and Fire Management sections of Chapter II. |
| PC 36o | INCLUDING ENDANGERED SPECIES |
| Response: | Protection for endangered species is found primarily in Chapter II of the Revised Forest Plan, in the Threatened, Endangered, and Proposed Species section. |
| PC 36p | INCLUDING SOIL RESOURCES |
| Response: | Protection for soil resources is found in Chapters II and III of the Revised Forest Plan. Forest-wide direction is primarily in the Soil and Water section of Chapter II. |
| PC 36r | INCLUDING LIMESTONE COMMUNITIES |
| Response: | See responses to PC 203 and PC 474. |
| PC 36s | INCLUDING LARGE UNFRAGMENTED TRACTS OF FOREST |
| Response: | We address large, relatively unfragmented tracts of forest in the Minimum Dynamic Area analysis found in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. Under the preferred alternative, there would be 10 such areas on the Forest, comprising nearly 400,000 acres. |
| PC 36t | INCLUDING OLD GROWTH |
| Response: | There is very little “old growth” on the Forest at present, and most of it is currently protected in special areas. See Appendix B to the Revised Forest Plan for a comprehensive discussion of old growth and our management strategy for potential old growth on the Forest. |
| PC 36u | INCLUDING BACKCOUNTRY HABITAT AND OTHER REMOTE AREAS |
| Response: | Protection for resources in these areas is found in Chapter II of the Revised Forest Plan. Additional protection is in MP 5.0, MP 5.1, MP 6.1, MP 6.2, and MP 8.1 SPNM in Chapter III of the Plan. |
| PC 36v | INCLUDING THE SENECA CREEK AREA |
| Response: | Seneca Creek is a roadless and backcountry area (MP 6.2/8.1 SPNM). See response to PC 36j, above. |
| PC 36w | INCLUDING THE ROARING PLAINS AREA |
| Response: | Protection for resources in the Roaring Plains area is found in Chapter II of the Revised Forest Plan, and in MP 6.2 and MP 5.1 in Chapter III of the Plan. |
| PC 36x | INCLUDING THE DOLLY SODS AREA |
| Response: | Protection for resources in the Dolly Sods area is found in Chapter II of the Revised Forest Plan. |

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| | Additional protection for the Dolly Sods Wilderness is in MP 5.0 in Chapter III of the Plan. Additional protection for the Dolly Sods North area is in MP 6.2 in Chapter III of the Plan. |
| PC 36y | INCLUDING THE BIG DRAFT, SPICE RUN, AND EAST FORK OF GREENBRIER AREAS |
| Response: | Protection for resources in these areas is found in Chapter II of the Revised Forest Plan. Additional protection for these areas is in MP 6.2 in Chapter III of the Plan. |
| PC 36z | INCLUDING THE NORTH FORK MOUNTAIN AREA |
| Response: | Protection for resources in this area is found in Chapter II of the Revised Forest Plan. Additional protection for this area is in MP 8.1 SPNM in Chapter III of the Plan. |
| PC 36aa | INCLUDING THE LOWER LAUREL FORK AREA |
| Response: | Protection for resources in this area is found in Chapter II of the Revised Forest Plan. Additional protection for this area is in MP 6.2 in Chapter III of the Plan. |
| PC 36ab | INCLUDING INCREASING THE NUMBER OF PRESERVED AREAS |
| Response: | Preservation in the Forest Service typically entails congressionally designated areas such as Wilderness or Wild and Scenic Rivers, or historic properties listed on the National Register of Historic Places. However, we do have many special areas that have been assigned specific management prescriptions designed to protect specific resources. See MP 8.0 in Chapter III of the Revised Forest Plan. The number of these areas has not necessarily increased in plan revision, but the overall acreage has. |
| PC 36ac | INCLUDING THE LAUREL RUN AREA |
| Response: | Protection for resources in this area is found in Chapter II of the Revised Forest Plan. Additional protection for this area is in MP 6.1 in Chapter III of the Plan. |
| PC 36ad | INCLUDING UPPER SHAVERS FORK AND THE CRANBERRY BACKCOUNTRY |
| Response: | Protection for resources in this area is found in Chapter II of the Revised Forest Plan. Additional protection for this area is in MP 4.1 in Chapter III of the Plan. |
| PC 36ae | INCLUDING GREEN MOUNTAIN ALONG THE DRY FORK AND THE CONFLUENCE OF OTTER CREEK AND THE DRY FORK |
| Response: | Most of Green Mountain is in the Otter Creek Wilderness and is afforded the same protection as the Wilderness (see response to PC 36j). The National Forest System land at the confluence of Otter Creek and Dry Fork is in MP 4.1 (see response to PC 36 ad) |
| PC 36af | INCLUDING THE EAST FLANK OF SHAVERS MOUNTAIN |
| Response: | Shavers Mountain is a long mountain ridge that would be managed under a number of management prescriptions (3.0, 4.1, 6.1) in the Revised Forest Plan. Protection for resources in this area is found in Chapter II of the Revised Forest Plan, and in the appropriate MPs in Chapter III of the Plan. |
| PC 36ag | INCLUDING BLUE BEND |
| Response: | Blue Bend is a recreation area on the Forest consisting of a campground and other recreation facilities. It will continue to be managed as such under the Revised Forest Plan. |
| PC 36ah | INCLUDING THE ALLEGHENY RIVER, THE BIG SANDY RIVER AREA, AND THE NEW RIVER GORGE AREA |
| Response: | These areas on not on or near the Forest and we have no managerial authority over them. |
| PC 36ai | TO PROTECT WEST VIRGINIA'S ECONOMIC INTERESTS |
| Response: | We assume you are referring to economic interests related to recreation and tourism. See responses to PC 18s, PC 50, PC 827, PC 994b, and PC 66f. There are many other economic interests in the State. |
| PC 36aj | BECAUSE RESOURCE EXTRACTION CAN BE DONE ON PRIVATE LANDS |
| Response: | We agree that resource extraction can be done on private lands, but the Forest Service's multiple-use mandate allows resource extraction on National Forest System lands as well. Protection measures related to resource extraction are found throughout Chapters II and III of the Revised Forest Plan. |
| **PC 291** | **The Forest should support Minimum Dynamic Area Reserves, including more oak and pine-oak forests in Minimum Dynamic Areas.** |
| Response: | Although oak and pine-oak forests have lower proportional representation in MDA reserves compared to other communities, the Revised Forest Plan provides for two MDA reserves in the parts of the Forest that are largely dominated by oak and pine-oak forest. These are the North Fork Mountain-Cave Mountain area (36,000 acres) and the Middle Mountain area (13,000 acres). As the commenter noted, the MPs that contribute to MDA reserves restrict our active management options, which may cause difficulty in mimicking the natural disturbance regimes that are necessary to maintain oak and pine-oak |

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| | communities. Therefore, increasing allocations of oak and pine-oak areas to MPs 5.1 and 6.2 could make it more difficult to maintain the native biodiversity associated with these communities. |
| **PC 401** | **The Forest should incorporate and allow natural disturbance and processes to maintain and enhance diversity instead of logging and other habitat manipulation.** |
| Response: | Management prescription allocations under all alternatives would provide for large core areas of contiguous forest where natural disturbance and recovery processes predominate. See EIS Chapter 3, Terrestrial Ecosystem Diversity section, subsections on Minimum Dynamic Area reserves. |
| PC 401a | BECAUSE INTACT, LATE SUCCESSIONAL FOREST HABITAT AND THE NATURAL ECOLOGICAL PROCESSES THAT MAINTAIN SUCH HABITAT ARE CRITICAL TO THE SURVIVAL OF MANY SPECIES THAT ARE NATIVE OR ENDEMIC TO THE CENTRAL APPALACHIAN REGION |
| Response: | We agree that areas where natural disturbances and succession occur are important to have on the Forest for a variety of reasons. National Forests are managed by law for multiple uses and therefore our Forest plan does include intentional habitat manipulation for wildlife habitat and age class diversity, which produces commercial timber outputs. In management prescriptions where commercial timber harvest is allowed, there are goals for late successional forest habitat to provide this habitat type across the Forest. |
| **PC 293** | **The Forest should retain the natural, diverse, and semi-primitive nature of the forest found in the Desired Future Conditions of the 1986 Plan because it is consistent with the CFR regulations and desires of forest users.** |
| Response: | We believe that we have not only retained the natural, diverse, and semi-primitive nature of the forest reflected in the 1986 Plan, we have increased these qualities in the Revised Plan. The 30% old growth desired under the 1986 Plan will likely go well beyond that amount over time under the Revised Plan (see the Vegetation section in Chapter 3 of the EIS). The Forest will continue to look largely natural (see the Scenic Environment section in Chapter 3 of the EIS). Semi-primitive, backcountry recreation opportunities will increase compared to the 1986 Plan (see Recreation and Wilderness section in Chapter 3 of the EIS). The Desired Conditions for resources have also been expanded and better integrated in the Revised Plan compared to the 1986 Plan. |
| **PC 91** | **The Forest should not allow any scenic roadway projects.** |
| Response: | The Revised Forest Plan does not include any scenic roadway projects, but it does not prohibit them either, except in areas where road construction or reconstruction is restricted. |
| **PC 690** | **The Forest should advocate unbroken expanses of forest as the best management practice.** |
| Response: | Management prescription allocations under all alternatives would provide for large core areas of contiguous forest where natural disturbance and recovery processes predominate. See EIS Chapter 3, Terrestrial Ecosystem Diversity section, subsections on Minimum Dynamic Area reserves. |
| **PC 390** | **The Forest should not place too much emphasis on active management because:**<br>• **This underestimates or ignores the values of natural disturbances toward landscape and stand diversity**<br>• **The adverse effects and budget costs of active management need to be carefully weighed against any positive ecological results.** |
| Response: | The effects and costs of active management are analyzed and disclosed in Chapter 3 of the EIS. The active timber management cited as a concern would only take place on a maximum of 28-38 percent of the Forest over an extended period of 100 years. Thus, natural disturbance would still be the dominant influence on landscape and stand diversity over much of the Forest for the long term. |
| **PC 541** | **The Forest should use active management and ensure access for specific wildlife habitat management activities, regardless of the management area designation, to:**<br>• **Maintain a diversity of Forest age classes, species, and conditions to provide a wide variety of wildlife species**<br>• **Provide recreational opportunities**<br>• **Help the State's economy**<br>• **Protect Threatened and Endangered species.** |
| Response: | We agree that active management can be used to achieve a variety of goals and objectives, and can help contribute to the State's economy. We are not proposing to change the current access that is available for wildlife habitat management activities under any alternative. If Congress designates any area on the Forest as Wilderness or a Wild and Scenic River with a Wild classification, motorized access to that |

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| | area would likely be prohibited. Such designations are beyond our authority to make. See also responses to PC 686 and PC 93d. |
| **PC 563** | **The Forest should demonstrate the effectiveness of standard mitigation measures and design features.** |
| Response: | Forest Plans address strategic management direction and prescriptions rather than site-specific mitigation measures and design features. At the project level, mitigation measures and design features are typically tiered to Forest Plan direction and prescription area emphasis. The effectiveness of Forest Plan direction and project-level mitigation is based on a number of factors, including research, experience, professional judgment, and monitoring results. Chapter IV of the Revised Forest Plan contains a plan to monitor and evaluate the effectiveness of many different activities and management direction. Monitoring at the project level can also be used to validate or demonstrate the effectiveness of site-specific mitigation measures or design features. |
| **PC 648** | **The Forest should consider the non-destructive practices used by third world countries.** |
| Response: | We believe that the Forest Service uses some of the most environmentally responsible management practices in the world. |
| **PC 713** | **The Forest should proactively address forest-level threats, including non-native invasive species, pests, and pathogens.** |
| Response: | We agree. We have strengthened our desired conditions and goals in the Revised Plan to provide a better picture of how we want the Forest to look and function. We have also added management direction for certain resources or areas of concern, such as non-native invasive species and rare plant communities that were not addressed in the 1986 Forest Plan. |
| **PC 647** | **The Forest should intensively manage areas that are already disturbed.** |
| Response: | See the DEIS timber suitability discussion on pages 3-334 to 3-337. Those areas that are suitable and have been selected for timber management will be managed more intensively. |
| **PC 427** | **The Forest should allow adjoining property owners to cut dead trees for firewood and black locust for fence posts necessary for the maintenance of a homestead.** |
| Response: | Personal use firewood permits for fallen dead trees are available at local Forest District Offices. Permits for a limited amount of posts may be obtained as well. |
| **PC 649** | **The Forest should encourage businesses to recycle materials used for development.** |
| Response: | Although private business practices and choices are beyond the scope of this plan revision, Forest Service research stations do work with the forest product and construction industries to look for new ways of using wood and other materials to provide for the needs of the country. Research includes the use of recycled materials; however, recycled materials are not going to supply the current demand for wood products. |
| **PC 67** | **The Forest should extract coal and timber in an intelligent manner, because both the jobs and the resources are needed.** |
| Response: | The need for timber management and its economic and environmental impacts are discussed and analyzed in the EIS. The Forest would not extract coal. Any coal extracted from the Forest would occur as a result of a private coal owner exercising their right, or by lessees of federally owned coal. If and when the private mineral owner or lessee deems coal quality, quantity, and other physical and economic conditions warrant, private coal extraction would occur according to the mineral deed terms and law. Because coal deposits are scattered and costly to prove and develop, proposals to lease and develop federally owned coal are not foreseen in the next 10-15 years (Mineral Resources AMS, page 8). Should conditions change, a decision to lease federal coal would be analyzed in a project-specific analysis at which time the decision to lease, and lease terms to which coal development would be subject in order to protect forest resources, would be based on environmental analysis procedures, including public involvement. |
| **PC 95** | **The Forest should decrease biomass extraction.** |
| Response: | Multiple use management, including management of vegetation on forested land and providing a sustainable timber supply, is part of the mission of the USDA Forest Service. The amount of biomass removal has decreased over this last decade from the previous decade. See Table TR-14, page 3-342 in the DEIS. Future biomass trends will largely depend on our ability to achieve desired vegetation conditions as described in the Revised Forest Plan. |
| **PC 90** | **The Forest should prohibit the gathering of certain Forest products, including firewood, berries,** |

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| | **ginseng, goldenseal, mushrooms, ramps, and moss.** |
| Response: | Collection and removal of special forest products, such as berries and goldenseal, is a legitimate use of multiple-use national forest lands. Special forest products collection is prohibited in Wilderness areas and many areas with special designations, such as Botanical Areas. The Forest is reviewing the impacts from the collection of moss from the Forest, but as of this time, no moss harvesting is allowed on the Forest. Permits are required and fees are charged for the collection of special forest products, although no permit is needed to gather small amounts of products like berries or mushrooms for personal use. |
| **PC 268** | **The Forest should decrease logging and road building activities by 50 percent over the next five years, while substantially increasing protections for wildlife in addition to the protections for endangered species.** |
| Response: | The commenter did not specify what the levels are that should be decreased. Current harvest levels are already far below what is needed to begin moving toward desired age class distributions. Further reductions in harvest levels would not address the need for change associated with the vegetation management issue.<br><br>Projected harvest levels are just that—projections. These projections are based on modeled outputs of achieving desired vegetation conditions using specific management tools within a specific time frame. Only time will tell how close we approach these projections in reality, given factors that cannot be modeled, such as changing budgets, appeal and litigation activity, certain implementation constraints, and shifting Forest priorities.<br><br>Management direction in the Revised Forest Plan (primarily in Chapter II, TEP Species and Wildlife and Fish sections) provides extensive protection for wildlife and threatened and endangered species. |
| **PC 248** | **The Forest Service should close the Forest to all commercial interests to protect nature for the people of West Virginia and tourists.** |
| Response: | We acknowledge your preference, however your request is beyond the scope of our authority. The Monongahela is a multiple-use Forest, not a Park, and the laws and regulations under which we operate provide for a number of commercial uses, including timber harvest, mineral development, livestock grazing, campground concessions, and different types of special uses. The Forest Plan is designed to protect a wide variety of natural resources while accommodating these uses. |
| **PC 81** | **The Forest should prohibit certain industrial uses:**<br>• **Including mining and drilling**<br>• **Including communication sites**<br>• **Including utility corridors**<br>• **Including military use**<br>• **Including logging**<br>• **Including road building**<br>• **Including development**<br>• **To protect natural resources**<br>• **To prevent global warming**<br>• **To prevent flooding.** |
| Response: | See responses to PC 248 and PC 18. |
| **PC 18** | **The Forest should reduce industrial uses of the Forest, including logging, road building, mining, oil and gas exploration, and natural gas extraction.** |
| Response: | We acknowledge your preferences. National Forests are managed for multiple uses to benefit the public. These uses include timber for building materials and natural gas for home heating, as well as scenery and wilderness and wildlife habitat and recreation opportunities. Chapter II of the Revised Forest Plan provides management direction to protect natural resources from the potential effects of all management activities. Chapter III divides the Forest into Management Prescription areas with different management emphasis that represent a mix of uses, activities, settings, and opportunities. |
| PC 18a | INCLUDING CLOSING UNNECESSARY ROADS AND DECOMMISSIONING ROADS IN SENSITIVE AREAS |
| Response: | We intend to consider road closure and decommissioning options during watershed and project-level planning, regardless of what uses are occurring in the area. See Forest-wide management direction in |

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| | the Roads and Facilities section of Chapter II in the Revised Forest Plan. |
| PC 18b | INCLUDING THE TRAPPING AND SNARING OF ANIMALS |
| Response: | The trapping and snaring of animals is regulated by the West Virginia Division of Natural Resources. |
| PC 18c | INCLUDING THE USE OF ALL-TERRAIN VEHICLES |
| Response: | ATV use does not really qualify as an industrial use. However, there is no legal ATV use on the Forest at this time, and law enforcement officers are working on reducing the amount of illegal use. |
| PC 18d | INCLUDING HOUSE BUILDING |
| Response: | Although we may build or reconstruct administrative sites in localized areas of the Forest, we do not build residential houses or allow them to be built on National Forest System lands at this time. |
| | INCLUDING PROHIBITING LOGGING AND ROAD BUILDING IN THE TEA CREEK AREA |
| Response: | The Tea Creek area is on the Roadless Area Inventory and has a 6.2 Management Prescription under the preferred alternative in the Proposed Revised Plan. Therefore, no commercial logging or associated road building is expected. See management direction for MP 6.2 in Chapter III of the Revised Plan. |
| PC 18e | INCLUDING NO CLEARCUTTING |
| Response: | See responses to PC 637, PC 163, and PC 169. |
| PC 18f | INCLUDING NO NEW ROAD BUILDING OR LOGGING ON SLOPES OVER 15 PERCENT GRADE |
| Response: | See general response to PC 18 above. See also responses to PC 52 and PC 132f regarding building roads and logging on slopes over 15 percent. |
| PC 18g | INCLUDING NO NEW ROADS OR LOGGING ON GEOLOGICALLY SENSITIVE AREAS |
| Response: | See responses to PC 99, PC 470, and PC 832. |
| PC 18h | INCLUDING DESIGNATING STEEP AND SENSITIVE AREAS AND WATERSHEDS AS UNSUITABLE FOR RESOURCE USE AND PRODUCTION |
| Response: | We have the capability of identifying these types of areas as not suited for timber production at the project level based on site-specific information and analysis. |
| PC 18i | INCLUDING NO MANAGEMENT DISTURBANCE ABOVE 4000 FEET |
| Response: | See page 2-5 of the DEIS for the No Management Disturbance Above 4,000 Feet alternative that we considered but did not develop or analyze in detail. |
| PC 18k | TO PROTECT ECOSYSTEMS AND LARGE CORE AREAS OF OLD GROWTH |
| Response: | Large core areas of ecosystem and old growth protection would be maintained under all alternatives considered in detail. See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. |
| PC 18l | TO PROTECT WATER QUALITY, AIR QUALITY, AND PUBLIC HEALTH |
| Response: | As a federal agency, we must comply with the Clean Water Act, Clean Air Act, and federal and state public health rules and regulations. We believe we have appropriate management direction in the Revised Forest Plan to help us do that. |
| PC 18m | TO PROTECT SCENIC RESOURCES AND THE ECONOMIC BENEFITS OF TOURISM |
| Response: | The Revised Forest Plan has direction designed to protect scenic resources, and potential effects to the Scenic Environment are disclosed in Chapter 3 of the EIS. We believe that the Forest will maintain a predominantly natural-appearing scenic backdrop under all alternatives that should continue to benefit tourism in the local area. |
| PC 18n | TO PROTECT WILDLIFE AND FISH AND THEIR HABITATS |
| Response: | The Revised Forest Plan has direction designed to protect wildlife and fish and their habitats (see Chapter II, primarily sections for Wildlife and Fish, TEP Species, and Soil and Water Resources). |
| PC 18o | TO PROTECT CAVES AND THE UNDERGROUND KARST ENVIRONMENT |
| Response: | See response to PC 474. |
| PC 18p | TO PREVENT EROSION AND FLOODING |
| Response: | Although erosion and flooding are natural processes that cannot really be prevented, the Revised Forest Plan has management direction designed to reduce the potential risks that management activities can have related to these processes. See Chapter II, primarily the Soil and Water Resources section. See also responses to PC 52, PC 106, PC 23, PC 29, and PC 833. |
| PC 18q | TO PREVENT GLOBAL WARMING |

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| Response: | See response to PC 110c. |
| PC 18r | TO PREVENT THE SPREAD OF NON-NATIVE, INVASIVE SPECIES |
| Response: | The Revised Forest Plan contains direction to address the establishment and spread on non-native invasive species, something that the 1986 Plan generally lacked. Potential effects from these species are disclosed in Chapter 3 of the EIS. See also responses to PC 280 and PC 168. |
| PC 18s | TO PROVIDE RECREATIONAL OPPORTUNITIES |
| Response: | Recreational opportunities are provided throughout the Forest, regardless of Management Prescription or the types of uses that are occurring. Driving on roads for pleasure is a recreational opportunity, as is collecting firewood from a timber sale, as is hiking in a Wilderness area. |
| PC 18t | TO PRESERVE WILDERNESS QUALITIES |
| Response: | We completed a roadless area inventory and wilderness evaluations for plan revision, in which we identified those areas that have the best potential for Wilderness. These areas were given Management Prescriptions (5.1, 6.2, 8.1 SPNM) under the preferred alternative that would preserve their wilderness qualities until Congress decides to designate them as Wilderness or not. |
| PC 18u | BECAUSE THE FOREST IS PUBLIC PROPERTY, AND THE AMERICAN PUBLIC SPENDS ITS TAX DOLLARS TO PROTECT THE NATIONAL FOREST, NOT TO GIVE IT AWAY TO CORPORATIONS |
| Response: | We have no intention or direction to give the National Forest away to corporations. Protection methods for various resources are described above. |

| **FIRE MANAGEMENT** | |
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| **PC 664** | **The Forest should state specific fire objectives in terms of measurable results, monitor the results carefully, and integrate the lessons learned into the fire program.** |
| Response: | When prescribed fire is used at the project level, specific objectives of the project and the reason for using fire as a management tool will be given and should include desired results and subsequent monitoring. Lessons learned will be integrated into the fire program and other program areas where fire is used. |
| **PC 663** | **The Forest should develop a fire program that mimics the natural (non-anthropogenic) regime for fire occurrence and intensity.** |
| Response: | There is extensive ecological research showing the need to consider past impacts that burning by Native Americans had on the landscape. An annotated bibliography on fire history, fire effects, prescribed fire use, and oak ecology has been prepared and is part of the project record. The one study that you cited (Gragson, in press) concludes that 3% of the fires in the study area (mountains of North Carolina) were caused by lightning and that these were generally less than one acre in size. This figure is misleading because the percentage of fires that are the result of arson is unknown. If the incidences of arson increase, then the percent of lightning as part of the total of all causes goes down. The small size of fires reported is not surprising given that the data are reported from 1920 to the present. During this time suppression of all fires as fast as possible was likely the practice on lands of all ownerships, especially in the early 1900s when slash from extensive timber harvest was present. It is illogical and ecologically unsound to use this one study of fire causes to plan a prescribed fire program in light of all the evidence showing the link between decline in oak regeneration and recruitment. |
| **PC 802** | **The Forest should allow only the removal of small underbrush for fuels treatment, rather than larger fuels.** |
| Response: | Since the ecological concern for the Forest is the change in forest structure and composition in some areas with fire suppression, re-introduction of fire, through prescribed fire, is likely to be the focus of our fire program and not fuel reduction. However, fuels in the immediate fire area would be reduced. Fuels such as rhododendron, mountain laurel, and red cedar are those most likely to be treated mechanically to reduce fuel loads or reduce fire intensity before prescribed fire is used. These are generally small- to medium-sized understory species. |
| PC 802a | INCLUDING PROHIBITING COMMERCIAL LOGGING FOR FUELS REDUCTION PURPOSES |
| Response: | We plan to treat fuels mainly through prescribed fire; however we do not feel it necessary to limit our management. For example, if gypsy moth mortality increased in an area of the Forest, removal of the |

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| | affected overstory trees could be warranted. |
| PC 802b | BECAUSE WHEN LOGS LIE DIRECTLY ON THE GROUND SURFACE, THEY CAN WICK UP SOIL MOISTURE AND RETAIN HIGHER FUEL MOISTURE LEVELS FOR A SIGNIFICANT PORTION OF THE FIRE SEASON |
| Response: | Large woody debris on the forest floor is an important component of the forest for amphibians, reptiles, fungi, insects, as nurse logs for tree regeneration, etc. Our intention with our prescribed fire program is not to remove this important component of the forest floor. |
| **PC 794** | **The Forest should use roads on private property when fighting fires, because it is not necessary to construct a fire road every time a new cabin is built on adjacent property.** |
| Response: | The Forest Plan does not address this level of detail, although under the emergency need of fire control, any legal access is used for control measures. Where the Forest has legal access, we will use existing roads for fire control or for prescribed burn actions. Statements made about roads being used for fire control were made to show the multiple uses of the road system of the Forest. No road has been built specifically for fire control on the Forest since the 1986 Forest Plan.<br><br>As we plan for prescribed fire actions, we also use natural fire breaks such as stream channels as fire control lines. The Forest does participate with the State in the FireWise program to educate landowners in areas where fire risk is a concern. |
| **PC 665** | **The Forest should provide the details of its future Fire Management Action Plan.** |
| Response: | A Fire Management Plan is written every year for that year and details how the fire management goals, both suppression and prescribed fire, of the Forest Plan will be implemented when a wildfire occurs or a prescribed fire is planned. The Fire Management Plan is available to the public. The annual Fire Management Plan is not a decision document and is not subject to NEPA analysis. |
| PC 665a | INCLUDING THE PROCESS FOR PRIORITIZING AND SELECTING SITES FOR PRESCRIBED FIRE PROJECTS IN AN ADDENDUM TO THE FINAL LAND RESOURCES MANAGEMENT PLAN BEFORE ANY FIRE PROJECTS ARE PROPOSED |
| Response: | There are several ways an area could be identified as needing prescribed fire. For example, watershed assessments may document a need for prescribed fire to help maintain oak species in certain areas. Areas where landscape-scale prescribed fire is desired may be selected by reviewing the fire regime map and selecting areas where access and ownership would make prescribed burning safe and effective. Forest-wide objectives FM09 and FM01 in the Proposed Revised Plan also address prioritization. |
| PC 665b | INCLUDING WHETHER THE FIRE PLAN HAS UNDERGONE NEPA ANALYSIS |
| Response: | The Fire Management Plan cannot be finalized until there is a signed Forest Plan. No new decisions are made in a Fire Management Plan, as it documents how we will implement the Forest Plan in terms of fire suppression and prescribed fire. When an area is selected for management by prescribed fire, the effects the fire will have on resources in the area will be analyzed and disclosed to the public through a NEPA document. The Fire Management Plan would then be used as a reference document on how to conduct a prescribed fire. |
| PC 665c | INCLUDING CLARIFYING WHAT HAVE BEEN AND WHAT ARE ANTICIPATED TO BE THE IMPACTS OF FIRE AND FIRE SUPPRESSION ACTIVITIES ON THE SOILS, WATERSHEDS, WILDLIFE, BUDGET, AND OTHER RESOURCES |
| Response: | General impacts of fire suppression activities to various resources (other than budget) are described in the DEIS. Site-specific impacts to a given site chosen for management by prescribed fire will be discussed when those sites are chosen. Once sites are selected, then an analysis of impacts to natural resources of the given area will be assessed and disclosed in the appropriate NEPA documents and shared with the public. The level of detail of impacts given in the DEIS is appropriate since the Forest Plan is a strategic framework that does not commit resources or make project-level analysis or decisions. |
| PC 665d | INCLUDING CLARIFYING HOW FIRE POLICY PRIORITIES ARE CHANGING |
| Response: | We clarified some of the changes in the use of prescribed fire in the Analysis of the Management Situation, which is part of the project record. Priorities are always changing; however, the Revised Forest Plan does not commit us to use prescribed fire in any specific location. The Plan sets forth generally where prescribed fire can or cannot be used and gives guidance on how. |
| **PC 781** | **The Forest should not overstate the threat of fire.** |

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| PC 781a | BECAUSE FIRE IS A RARITY ON THE FOREST |
| Response: | The fire descriptions in the EIS describe fire occurrences and intervals as accurately as possible based on available information. Although fire is not nearly as common on the Monongahela as on many drier national forests in the West, it can and does occur on an annual basis. |
| PC 781b | BECAUSE IT IS MISLEADING TO STATE THAT FIRE CONTROL WILL BE ALTERED SIGNIFICANTLY AS A RESULT OF WILDERNESS DESIGNATION |
| Response: | We agree that wilderness designation does not necessarily prevent the use of power tools and mechanized equipment for fire suppression, if the proper approval can be obtained. However, using these tools and equipment requires Forest Supervisor or Regional Forester approval, which requires justification that would extend response and suppression time. The Forest Service Manual 2324.23 provides direction to conduct all fire management activities within wilderness in a manner compatible with overall wilderness management objectives, giving preference to using methods and equipment that cause the least alteration of the wilderness landscape, disturbance of the land surface, disturbance to visitor solitude, reduction in visibility and air quality related values. Considering the above factors, we believe that wilderness designation would restrict motorized and mechanized equipment use for fire suppression. |
| PC 781c | BECAUSE FIRE IS NOT PART OF THE NATURAL ECOSYSTEM EXCEPT PERHAPS IN THE OAK/PINE FORESTS IN THE SOUTHEASTERN PART OF THE FOREST |
| Response: | Fire was more prevalent on parts of the Forest at certain times in the past. See response to PC 662. |
| PC 781d | BECAUSE IN THE MIXED MESOPHYTIC FOREST, A CLOSED CANOPY RETAINS HUMIDITY AND FALLEN LOGS AND THE ASSOCIATED PLANTS IN OLD GROWTH WOODS RETAIN MOISTURE THROUGH A DRY SPELL, BUFFERING THE EFFECTS OF DROUGHT |
| Response: | We recognize that fallen logs in older forests serve as important habitat for animals, plants, fungi, and nutrient cycling. Prescribed fire or other fuel reducing activities will not be applied to much of the Forest and will not be used on all forest types or landscapes. There are many unknowns in terms of fuel loads and reduction needs across the Forest. The main reason for increasing the use of prescribed fire on the Forest is to return an important disturbance regime to areas where results would be most beneficial. Here the concern is more of ecological change than fuel reduction. In some areas of the Forest it is hypothesized that mountain laurel and rhododendron are increasing in numbers with the suppression of fires, however we do not have clear knowledge of the amounts of these shrubs in pre-settlement forests. Again, this is mostly a concern in the fire-adapted areas of the Forest, not the entire Forest. These shrubs are quite flammable, containing volatile oils, and can increase fire intensity in areas where they are found in abundance. In other areas of the Forest the gradual shift in tree species composition from oaks to maples and birches presents the opposite problem. Oak leaves are quite "fluffy" and tough, persisting through the winter and creating a loose cover of leaves in the spring. These characteristics make fire more likely to spread and carry in the understory as opposed to maple and birch leaves that pack down under snow and decompose more rapidly. In these areas we may be losing the ability to use prescribed fire to aid in oak regeneration as the ground level fuels change in composition. |
| PC 781e | INCLUDING ACKNOWLEDGING THAT DECREASING FUEL LOADS IS A MINOR CONCERN IN MOST OF THE FOREST |
| Response: | Some of the language used in the DEIS pertaining to fuels has been changed to reflect these details. The discussions in the DEIS were often more general in nature. |
| **PC 662** | **The Forest should improve its process for assigning fire regime and condition class values.** |
| PC 662a | BECAUSE THE PROCESS USED IS NOT REPRODUCIBLE |
| Response: | The process used for assigning fire regimes and condition classes is reproducible. The process and its resulting map were presented during a poster session at the *Fire in Oak Ecosystems Conference* in November 2005. The process used and resulting assignment of fire regimes were reviewed by the Regional Ecologist before the information was used in the revised Forest Plan. The Regional Ecologist also provided input on the rankings used in the model. The resulting map of fire-dependent communities is a graphic representation of what is generally known about the Forest in terms of relative fire adaptation. The east side of the Forest, in the Ridge and Valley section, is the driest and contains fire-adapted communities of oak-pine and cedar barrens. There is a transition area on the Forest between landforms influenced by the Ridge and Valley section and the effects of the Allegheny Front |

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| | (Eastern Continental Divide) and the mesic Allegheny Mountains. In these areas, aspect is a strong factor in determining potential natural vegetation and is where fire-adapted species such as oaks are found along with more mesic species. On the western side of the Forest, in the Allegheny Mountains section, the average climatic conditions create a mesic climate where fire and fire dependant or adapted vegetation is unusual. Here, fire was not the dominate disturbance regime. The model, since it was based on biophysical characteristics of the sections and nested landtype associations, reflects these general trends. |
| PC 662b | BECAUSE THE FIRE PRESCRIBED FOR THE RESULTING "OPPORTUNITY AREAS" HAS NOT BEEN TESTED IN THE FIELD ON THE FOREST FOR ITS EFFECTS |
| Response: | Documentation of the creation of the fire regime model is available and part of the public record. Also part of the public record is an annotated bibliography of historic fire regimes, fire effects, fire and oaks, and other related topics. Researchers at Fernow Experimental Forest, located within the Monongahela Forest, are studying prescribed fire when applied in Central Appalachian forests. |
| PC 662c | INCLUDING PROVIDING PEER REVIEW OF THE FIRE REGIME AND CONDITION CLASS PLANNING FRAMEWORK WITH PUBLIC DISCLOSURE OF THE RESULTS OF THE REVIEW |
| Response. | See responses to PC 595 and PC 662a. |
| **PC 801** | **The Forest should only allow fuel reduction treatments within the wildland-urban interface zone and not in areas far into the interior of the Forest where they would be inefficient and ineffective.** |
| Response: | The wildland-urban interface will be priority areas to identify for fuel reductions needs. There may be other areas where reducing fuel loads before attempting a prescribed fire may be appropriate, such as woodland areas with encroaching cedar. These areas are likely to be a small part of the fuel reduction program. |
| **PC 505** | **The Forest should use fire as a management tool.** |
| Response: | We agree and have included management direction for such use in the Revised Forest Plan. |
| PC 505a | TO MAINTAIN WILDLIFE OPENINGS |
| Response: | We address use of fire in the Vegetation Management section of Chapter 3 in the DEIS. The Proposed Revised Plan addresses use of prescribed fire for the maintenance of wildlife openings and savannah habitat (see management direction FM06, WF15, 5139, 6233, and 8607). |
| PC 505b | TO BENEFIT BOBWHITE QUAIL |
| Response: | While we don't mention bobwhite quail specifically, our use of fire for savannah and woodland habitat will benefit species requiring open or brushy habitat. |
| PC 505c | TO MIMIC FOREST GAPS WHILE REDUCING THE ESTABLISHMENT OF NON-NATIVE PLANTS |
| Response: | Typically, prescribed fire on the Forest will be low intensity or moderate intensity ground fires with mortality of overstory trees unlikely. Gaps may form after repeated burns if used to create desired conditions. These types of fires will not create all the habitat and age class conditions desired in those areas where vegetation is actively managed. Prescribed fire has the potential to facilitate invasion by non-native invasive plants. This potential will be addressed during project analysis for all types of management activities (see NNIS direction in the Proposed Revised Plan at VE15 through VE21). |
| PC 505d | INCLUDING INCREASING PRESCRIBED BURNING WHILE DECREASING COMMERCIAL LOGGING |
| Response: | Commercial and non-commercial timber harvests will still be used to achieve desired conditions in areas where such actions are allowed, which is not the entire Forest. There are still many reasons to use commercial timber harvest to create diversity in age classes across the Forest. Not all areas of the Forest are suitable for application of prescribed fire. |
| **PC 671** | **The Forest should provide information about prescribed fire use and areas with soils of medium and high nutrient sensitivity.** |
| PC 671a | INCLUDING WHAT RESEARCH HAS BEEN DONE ON THE EFFECTS OF FIRE OF VARYING INTENSITY ON SOILS WITH THESE NUTRIENT SENSITIVITY LEVELS |
| Response: | In general, there have been extensive studies conducted on various soil types looking at nutrient cycling. The description of the sensitivity for nutrients on specific geologies within the Forest is new science. Therefore, these relationships have not yet been specifically studied here. However, existing research elsewhere indicates that low-intensity burns release nutrients back to the soil from the ignition of the decomposing leaf litter and organic material on the soil surface. See Chapter 3 in the EIS, Soils Section |

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| | under Effects From Fire for further information. |
| PC 671b | INCLUDING WHAT MANAGEMENT STANDARDS WILL BE ADDED TO ADDRESS PRESCRIBED FIRE USE IN THESE AREAS |
| Response: | The existing standards and guidelines provide adequate direction to address concerns for prescribed fire as well as for performing this management task in nutrient sensitive areas. SW08, SW10 and SW12 in the Proposed Revised Plan provide direction that requires planners to survey and address the issue prior to implementation of a project. Standard FM12 also requires preparation and approval of a prescribed burning plan that addresses protection of watershed resources prior to implementation. |
| PC 671c | INCLUDING WHAT MONITORING AND EVALUATION ACTIVITIES WOULD BE CARRIED OUT TO ASSESS THE EFFECTS |
| Response: | Forest-wide monitoring can occur to assess fire effects under the Monitoring and Evaluation Plan provided in Chapter IV of the Proposed Revised Plan, particularly items 6, 16, and 17. In addition, the Forest typically develops project-level monitoring to assess specific effects in proposed projects. |
| **PC 211** | **The Forest should explain how it is going to address the lack of a coordinated prescribed burning program on private land.** |
| Response: | We have no authority over private land activities. However, we will continue to work with the State and local cooperators on fire issues. |
| **PC 124** | **The Forest should not use prescribed burns.** |
| Response: | There is a large and growing body of published literature on the need for fire in oak forests to retain and perpetuate oaks. In implementing the prescribed burn program, we will continue to inform local citizens of our actions. Prescribed fire is not appropriate on all areas at all times on the Forest. Places such as schools, towns, highways, and hospitals are considered smoke sensitive areas when planning prescribed fires and fires are not conducted under conditions that would lead toward smoke accumulating in those areas. This is standard procedure and has been used in previous prescribed burn efforts. |
| PC 124a | BECAUSE IT DISTRESSES CITIZENS AND CAUSES AIR QUALITY PROBLEMS |
| Response: | In areas where it is determined that prescribed fire use is ecologically appropriate, the best available smoke management techniques will be employed when conducting burns. While prescribed fires do emit various pollutants, utilizing smoke management tools and techniques allows land management agencies to mitigate air quality impacts associated with those emissions while achieving management goals. As Forest-wide standards FM13, FM14 and FM15 demonstrate, the Forest is concerned about local and regional impacts to air quality from prescribed fires. From a regional perspective, the Forest will comply with any and all air quality regulations promulgated by the federal and state air quality regulatory agencies when coordinating, planning and implementing burning programs. From a local perspective, the Forest will identify smoke sensitive areas within the vicinity of a specific burn (e.g., communities, schools, hospitals). If smoke sensitive locations are identified, the Forest can mitigate the impacts in these areas by only burning under meteorological conditions that allow adequate smoke dispersion away from sensitive locations. Determining the meteorological conditions under which a burn should be conducted would include identifying the optimum combinations of transport and surface wind speeds and direction, as well as appropriate mixing heights to disperse the smoke. Depending on the level of concern, dispersion modeling can be used to identify these optimum weather conditions as well as predict air quality impacts. Additionally, while smoke from prescribed fires is often visible (sometimes called nuisance smoke), it does not always mean that pollutant concentrations have reached levels that are harmful or hazardous for human health. Air quality monitors can be deployed in smoke sensitive locations to address human health concerns and ensure that mitigation goals are achieved. Recognizing that abrupt, unpredictable changes in weather conditions can occur, smoke monitoring can also be used in sensitive areas to evaluate the level of impact. |
| PC 124b | BECAUSE SELECT HARVEST SHOULD BE USED INSTEAD |
| Response: | Selective harvest will not always create the desired forest structure and composition. Single tree and group selection harvests are planned for use in certain areas of the Forest, particularly those where disturbance factors such as wind throw and ice/snow storms were the main influences on pre-European contact forests. |
| **PC 267** | **The Forest should use cameras and satellites to monitor for forest fires to help prevent fires and smoke from polluting the air and water.** |

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| Response: | See response to PC 124a regarding prescribed fire and air pollution. |
| **PC 803** | **The Forest should examine all impacts of fire suppression and prescribed burn activities** |
| Response: | Any prescribed fire proposed will have to go through site specific review and documentation of effects under NEPA. The species viability evaluation considered the landscape-level effects of prescribed burning on species that occur in fire-adapted communities, which are the highest priority areas for applying prescribed fire. Site-specific effects to biodiversity and species viability are better addressed at the project level. The Revised Forest Plan permits prescribed fire, and the accompanying EIS displays potential effects above the site level; however, when and if fire is used is an area is a site specific decision with site specific effects analysis. Impacts of fire suppression are disclosed in the DEIS in Chapter 3, pages 3-38 (Soils), 3-81 (Watershed, Riparian, and Aquatic Resources), 3-12-123 (terrestrial Ecosystem Diversity), 3-179 (Species Viability Evaluation), 3-208, 3-209 (Management Indicator Species), 3-238, 240, 243, 249 (Threatened and Endangered Species), 3-272 (Non-native Invasive Species), and 3-404 (Scenic Environment). |
| PC 803a | INCLUDING ANALYZING THE IMPACTS OF PRESCRIBED BURNING AT TIMES OF THE YEAR WHEN FIRES DO NOT USUALLY OCCUR, BECAUSE THIS IMPACTS BIOLOGICAL DIVERSITY AND THE VIABILITY OF SPECIES |
| Response: | The Revised Forest Plan permits prescribed fire, and the accompanying EIS displays potential effects above the site level; however, when and if fire is used is an area is a site-specific decision based on a site-specific effects analysis. Impacts of seasonality of fire on plants and animals in the given project area would be addressed at that time. |
| PC 803b | INCLUDING THE UNDER REPRESENTATION OF LATE SUCCESSIONAL FORESTS AND THE UNCERTAINTIES SURROUNDING THE USE OF PRESCRIBED FIRE WHEN TRYING TO MAINTAIN OR RESTORE LONG-TERM ECOSYSTEM HEALTH AND INTEGRITY |
| Response: | Prescribed fires on the Forest are expected to have little impact to the overstory trees and therefore any late successional forests would retain their overstory trees. We will be using prescribed fire mainly on those areas considered to be fire adapted (there may be small exceptions to this, such as our use of fire to keep the Cheat Summit Fort site in open conditions). Based on current research and study of fire in oak and oak-pine forests that our proposed use of prescribed fire in those areas will help restore long-term ecosystem health.<br><br>The comments used to create this concern statement also address the resiliency of late-successional forests and comments on the habitat, structure, and diversity supplied by these forests. We agree. Please see the Minimum Dynamic Areas reserves analysis in the DEIS. Also, the desired condition for areas where commercial timber harvest is allowed includes goals for the amount of forest in late-successional habitat. The comments also addressed the ecological basis for the use of prescribed fire on the Forest. See also the responses to PC 124 and PC 662. |
| **PC 731** | **The Forest should provide information about how its prescribed fire program was formed and what its effects will be.** |
| PC 731a | INCLUDING HOW THE 10,000 TO 30,000 ACRES GOAL WAS DERIVED AND HOW IT RELATES TO THE FIRE "OPPORTUNITY AREAS" |
| Response: | The fire regime model was used to determine those forest communities where fire could be used and may be missing as a disturbance regime. The acreage goals represent a level we felt was attainable given current staffing and expected prescribed burning opportunities in an average year. Based on published literature (annotated bibliography part of the project record) we expect prescribed fire to create conditions where oak species are more competitive and to slow succession to more mesic species. |
| PC 731b | INCLUDING HOW THE AT-RISK ECOSYSTEM COMPONENTS WERE DETERMINED AND HOW THE FIRE PROGRAM WILL BENEFIT THOSE COMPONENTS |
| Response: | See responses to PC 662 and PC 665. |
| PC 731c | INCLUDING FULLY DISCLOSING THE EFFECTS FIRE COULD HAVE ON DESIRABLE SPECIES AND HABITATS |
| Response: | Each major resource area discussed in Chapter 3 of the EIS, including those sections addressing the various species and ecosystems of management interest, contains a subsection that analyzes the potential effects of prescribed fire. |
| PC 731d | INCLUDING DISPLAYING WHERE FIRE "OPPORTUNITY AREAS" OCCUR WITH HABITAT |

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| | FOR SENSITIVE OR PROTECTED ANIMALS AND PLANTS AND WHAT THE EFFECTS ON THOSE SPECIES WILL BE |
| Response: | The potential effects of the prescribed fire program to wildlife species and habitats and threatened and endangered species and their habitats are described in the DEIS at the programmatic level (see DEIS, Chapter3, Threatened and Endangered Species and Terrestrial Species Viability sections, General Effects. As the Forest Plan is implemented, the requested effects analyses will be completed for the site-specific action being proposed in a specific location. |
| PC 731e | INCLUDING HOW THE FOREST WILL ENSURE THAT THE FIRE PROGRAM WILL AVOID CAUSING HARM TO SPECIES AT RISK |
| Response: | See response to 731d, above. |
| PC 731f | INCLUDING DISCLOSING IF THERE ARE "OPPORTUNITY AREAS" THAT ARE RISKIER IN REGARD TO SPECIES AT RISK AND OTHERS THAT ARE LESS RISKY WHERE FIRE COULD BE REINTRODUCED IN AN INITIAL TRIAL PHASE |
| Response: | See response to 731d, above. |
| **PC 320** | **The Forest should increase the amount of acreage recommended for prescribed burning in Alternative 3 to restore the declining oak-hickory-pine forests.** |
| Response: | The overall theme of Alternative 3 was to reduce disturbance levels and active management across the Forest, so a reduction (as compared to Alternative 2) in prescribed fire acres was part of this theme for Alternative 3. If conditions are favorable and staffing levels are sufficient, we could use prescribed fire on more acres than in the Forest Plan goal, however this would require re-consultation with the USDI Fish and Wildlife Service on our Incidental Take Statement for Indiana bats. |
| **PC 218** | **The Forest should give attention to affected areas following prescribed burns and wildfires because areas are vulnerable to invasive vegetation in such situations.** |
| Response: | Any prescribed fire proposed will have to go through site-specific review and documentation of effects under the NEPA process. The Revised Forest Plan permits prescribed fire, and the accompanying EIS displays potential effects above the site level; however, when and if fire is used in an area is a site-specific decision with site- specific effects analysis. Included in that analysis will be the potential for invasion by non-native plants and impacts to vegetation. |
| PC 218a | INCLUDING RESTRICTING PUBLIC ACCESS TO AREAS IN WHICH PRESCRIBED FIRE HAS BEEN USED TO ALLOW THE VEGETATION TO GROW BACK TO A MORE ATTRACTIVE APPEARANCE |
| Response: | Public access is restricted during prescribed fire activities and it is likely that most of our future activities will be in areas with restricted public access (MP 6.1). We will advertise the plans to burn an area to reduce the likelihood that local fire departments are impacted by reports of fire. We also may want to invite the public to view recently treated areas to raise awareness for the need for and use of this management practice. We agree with the comment that the unattractive appearance of burned areas is temporary. |
| **PC 670** | **The Forest should provide information about its capacity to fully fund the prescribed fire program.** |
| Response: | Because funding availability and opportunities vary greatly from year to year, and because we do not have specific projects planned for the entire planning period, we have not provided project-specific funding information in the EIS or Proposed Revised Plan. However, we have responded generally to your information requests below. |
| PC 671a | INCLUDING WHICH BUDGET LINES WILL BE USED TO COVER THE COSTS OF PRESCRIBED FIRE AND ASSOCIATED PROJECT PLANNING AND MONITORING |
| Response: | Prescribed fire can be funded through different program budgets, depending on the resource objective the fire is designed to meet. For example, fuels reduction can be funded from one budget code, habitat improvement from another code, and regeneration site preparation from a different code. If the fire can achieve multiple objectives, multiple budget codes may be used. |
| PC 671b | INCLUDING WHETHER THE FOREST INTENDS TO PURSUE FUNDING AVAILABLE NATIONALLY TO SUPPORT THE PRESCRIBED FIRE PROGRAM |
| Response: | National funding for prescribed fire use has been available in the past and will likely be available in the future. If prescribed fire proposals on the Forest qualify for the funding, we would likely pursue it. |
| PC 671c | INCLUDING DESCRIBING THE ROLE OF OTHER AGENCIES IN PROPOSING AND FUNDING |

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| | FIRE PROJECTS |
| Response: | Under the National Fire Plan, state agencies are involved in prioritizing fire projects. For instance, the West Virginia Division of Natural Resources would be a likely cooperator in joint ventures for habitat improvement. We may also have opportunities to work with adjacent land owners, such as The Nature Conservancy, or local municipalities. |
| **PC 669** | **The Forest should provide information about air pollution and the prescribed fire program.** |
| PC 669a | INCLUDING HOW THE PRESCRIBED FIRE PROGRAM WILL CONTRIBUTE TO AIR POLLUTION ON THE FOREST, AND HOW THE INFORMATION GAINED FROM MONITORING AIR QUALITY ON THE FOREST WILL INFLUENCE THE FIRE PROGRAM |
| | Information on air quality effects from prescribed fire alone can be found in the Air Quality Section of the EIS under Direct and Indirect Effects by Alternative. Additionally, you referenced table S-5 on page S-33 of the DEIS Summary, which shows the estimated cumulative emissions from all management activities on the MNF and their contribution to the regional pollution load. We noted there is a typographical error in the last column heading of this table; currently this column reads "Percent Rx Fire of Total Regional Emissions" when it in fact it should read "Percent MNF Management Emissions of Total Regional Emission". We apologize for any confusion this typographical error may have caused. Referencing this table, you expressed concern over increases in estimated cumulative emissions from MNF management activities over current levels under Alternative 2; while acknowledging that estimated cumulative emissions from Forest management activities decrease under Alternative 3.<br><br>The Forest currently addresses air quality concerns related to prescribed fire on a local and regional level. From a regional perspective, emissions from prescribed fire activities are being considered by the Regional Planning Organizations (RPOs) when developing emission reduction strategies to meet visibility (glide path) goals. Both current and projected future prescribed burns have been included in the base case and out year emission inventories for the VISTAS RPO. If projections from RPO efforts or air quality monitoring data show that emissions from prescribed fire are hindering the State's ability to attain the glide path or attainment of the NAAQS, the Forest will collaborate with the West Virginia Department of Environmental Protection to address these issues. With all regulatory requirements being met, from a local perspective, the Forest will employ smoke management techniques to mitigate negative impacts from prescribed fire pollution in local communities. For a more detailed description of possible smoke management techniques, see the response to Public Concern 124. |
| **PC 206** | **The Forest should identify rare and unique ecological communities and make their boundaries easily retrievable so decisions can be made quickly and easily when a natural fire breaks out or when prescribed burns are being planned.** |
| | Many of our rare communities are mapped and in GIS. A goal for the terrestrial ecology program has been added. The goal includes direction to collect, interpret, and display information on terrestrial ecosystems to:<br>a) Determine the kinds and intensities of inventories needed,<br>b) Identify and classify rare communities to aid in conservation of threatened, endangered, and sensitive plants and animals,<br>c) Add to the Terrestrial Ecological Unit Inventory (TEUI) of the Forest,<br>d) Predict locations of rare plants or their habitats from the TEUI, and<br>e) Predict effects to terrestrial ecosystems from various management options at the project level.<br><br>Any prescribed fire proposed will have to go through site-specific review and documentation of effects using the NEPA process. The potential impacts to rare and unique communities are better addressed at the project level when specific areas are identified for prescribed fire. |
| **PC 789** | **The Forest should develop guidelines as part of a fire management plan that protect rare and unique communities.** |
| Response: | We will continue to work with the local volunteer fire departments to make them aware of sensitive, rare, and unique communities on the Forest. The Revised Forest Plan goals and guidelines that address rare communities will be a part of the Fire Management Plan for the Forest. Guideline VE12 addresses this issue, as well as standard VE11, goals VE06 and VE07, and objective VE09. |

| AIR QUALITY | |
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| **PC 438** | **The Forest should intervene when air quality permitting decisions may adversely affect visibility in Otter Creek or Dolly Sods or when permits will increase acid deposition on the Forest to protect forest health.** |
| Response: | Based on your comments, it appears you are concerned about two issues. First, you feel the Forest fails to recognize the adverse impact that acid deposition has on forest growth. Please refer to the Soils, Current Conditions Section of the EIS for a discussion of soil nutrient depletion as it relates to acidic deposition and the potential effects to vegetation. Second, you feel the Forest should adopt expanded Forest-wide management direction for aggressively intervening in air permits that will increase acid deposition on the Forest. While the Clean Air Act Amendments of 1977 gave the Forest Service the affirmative responsibility to protect Air Quality Related Values (AQRVs) in the Class I Areas it manages, that role was limited by Congress to one of consultation. This means that the Forest has no direct regulatory authority over sources of air pollution. This authority was given to the United States Environmental Protection Agency (EPA) under the Clean Air Act. EPA was given the opportunity to delegate this authority to a respective state agency, which is the case in West Virginia. While the Forest plans to continue consulting with both EPA and state agencies regarding sources of air pollution that impact Class I Areas through the Regional Planning Organizations for Regional Haze and the PSD process, we do not have the legal authority under the law to expand our role beyond one of consultation. We feel our commitment to this responsibility is adequately captured in the Forest-wide Management Direction for Air Quality. |
| **PC 110** | **The Forest should improve its analysis of air quality.** |
| PC 110a | BECAUSE THE CURRENT ANALYSIS UNDERESTIMATES THE AMOUNT OF AIR POLLUTION |
| Response: | Your comment indicates that you are concerned the Air Quality analysis understates the amount of acid deposition occurring on the Forest. You feel the analysis should say that we have the worst air in the nation. While the analysis does state that Forest receives some of the highest sulfate deposition inputs in the country, we do not feel that current deposition monitoring data reflects your assertion (EIS, Air Quality Section, Sulfur Dioxide, Sulfur Dioxide and Acid Deposition). For example, Annual Data Summaries from the National Atmospheric Deposition (NADP) monitoring network show that site WV18 located in Parsons, WV received 26.17 kg/ha of sulfate in 2004 while site OH49 in Noble County, OH received 34.80 kg/ha of sulfate in 2004. Likewise, site PA15 in Centre County, PA received 29.09 kg/ha of sulfate in 2004. (Estimated Sulfate Ion Deposition Rates During 2004; Source, NADP 2004). While we certainly agree that acidic deposition is high in this region of the country, we do not feel it qualifies as the worst. |
| PC 110b | INCLUDING CONSIDERING THE HISTORIC IMPACTS OF POOR AIR QUALITY |
| Response: | The effects of acid deposition on stream chemistry and aquatic resources are discussed under Current Conditions in the Air Quality, Soil Resource, and Watershed, Riparian and Aquatic Resources Sections. |
| PC 110c | INCLUDING ADDRESSING THE IMPACTS OF THE ALTERNATIVES ON GREENHOUSE GAS EMISSIONS |
| Response: | Global climate change is beyond the scope of this analysis or plan revision. We recognize that there is research pointing to potential effects of global climate change on the health and vitality of national forests and rangelands. And we also recognize that many localized management decisions on National Forest System lands potentially could have a cumulative effect on the global climate. However, the cause and effect relationships of most anthropogenic and natural influences on global climate change are complex, and interactions with sensitive ecosystem components currently are not fully understood. The onus of addressing such large-scale phenomena at a time when all of the cause and effect mechanisms are not understood should not be placed on individual National Forests. Rather, the issue of global climate change has been addressed at regional and national levels.<br><br>The Forest and Rangeland Resources Planning Act of 1974 places this responsibility at the national level by requiring that Renewable Resource Assessments (RPAs) address “the potential effects of global climate change on the condition of renewable resources” as well as include “an analysis of the rural and urban forestry opportunities to mitigate the buildup of atmospheric carbon dioxide” (16 U.S.C 1601). |

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| | The most recent RPA utilized current Forest Service research on the issue. This document discusses global climate change, its effects on forest resources, and potential implications for management actions regarding carbon sequestration potential of forest biomass and soils.<br><br>Additionally, various research efforts related to global climate change, ecosystem effects and response, utilizing integrated modeling approaches to predict future impacts and carbon sequestration potential of North American forests are ongoing at the national and regional scales through the research branch of the Forest Service. The following links describe some of these ongoing efforts:<br><br>1) http://www.fs.fed.us/ne/global/index.html - Northern Global Change Research Program (NGCRP)<br>2) http://www.sgcp.ncsu.edu/research.htm - Southern Global Change Research Program (SGCP)<br>3)http://www.carbonsequestration.us/Websites/htm/Forest-Service-FSGCRP.html - USDA Forest Service Global Change Research Program (FSGCRP)<br><br>Through these programs, Forest Service Research is addressing both research needs, i.e. the unanswered scientific questions related to ecosystems and global climate change, and the management implications related to these questions, including carbon sequestration potential. One goal of these research efforts is to equip land managers with the tools needed to address global climate change at the land management planning and project levels. Since these tools are not widely available to forest managers at this time, the Forest felt it was more appropriate to leave this issue within the national and regional scope. |
| PC 110d | INCLUDING ACKNOWLEDGING THE PROBLEM OF ATMOSPHERIC HAZE AND HOW MUCH SHORTER VISTAS ARE NOW |
| Response: | The issue of regional haze has been addressed in the Current Conditions, Sulfur Dioxide and Regional Haze section under Air Quality in the DEIS (pages 3-8 through 3-9). |
| **PC 676** | **The Forest should provide information about ozone pollution on the Forest, including:**<br>• **How it will reduce ground-level ozone on the Forest**<br>• **Whether it expects to see a rise in ground-level ozone as more people move into neighboring communities**<br>• **Whether prescribed fire on the Forest will lead to a rise in regional haze**<br>• **Whether counties in the region, other than Greenbrier County, have non-attainment problems**<br>• **Explaining the ramifications of designating an area as smoke sensitive**<br>• **Whether the rise in particulate matter under Alternative 2 is due to prescribed fire**<br>• **Whether there are any plans to implement more air quality monitoring stations.** |
| Response: | The West Virginia Department of Environmental Protection (WV DEP) has been delegated the authority under the Clean Air Act (by EPA) to regulate, control, and monitor air pollution in West Virginia (please see response to PC 438a). Programs or plans to regulate pollution sources and abate air pollution are within the power of the state, not the Forest. The Forest can, and does communicate the negative effects of air pollution on Forest resources to WV DEP, but regulatory authority lies in their jurisdiction. Likewise, air quality monitoring networks used to determine attainment status of a given area are also within the jurisdiction of WV DEP, not the Forest.<br><br>Estimated increases in particulate matter as a result of prescribed fire under Alternative 2 can be found in the Air Quality section of the DEIS under Environmental Consequences, Direct and Indirect Effects for Prescribed Fire Emissions. For a detailed description of how the Forest identifies and addresses smoke sensitive areas and utilizes smoke management techniques, see the responses to Public Concerns 124 and 669. This information has also been added to the FEIS for clarification purposes. |
| **PC 176** | **The Forest should make oxygen production its highest priority, including providing an in depth study of the clean water and oxygen production levels in the Forest Plan, and providing recommendations based on oxygen production and a healthy, balanced forest community rather than recommendations based on dollar profits.** |
| Response: | We understand your concern; however we disagree with your opinion that oxygen production should be the Forest's highest priority. Additionally, we believe that oxygen production is not a major air quality concern in this region. |
| **PC 674** | **The Forest should cut back on air pollution wherever it can to set a positive example for polluters** |

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| | **in the region, because the proposed ten-fold increase in particulate matter is significant when you consider how close to non-attainment many of the Forest's neighboring communities are.** |
| Response: | You expressed concern over increases in estimated cumulative emissions from Forest management activities over current levels under Alternative 2, and you pointed out that estimated cumulative emissions from Forest management activities decrease under Alternative 3. We recognize that while this statement is true, the current levels of pollution from Forest activities are relatively small compared to regional emissions, and in effect are negligible. It would take substantial increases in emissions from Forest activities (over current levels) to see effects that are not negligible. Given this, the total increases in emissions from activities in Alternative 2 comprise a very small percent of the total pollution load in the region; 0.26% for particulates and 0.07% for NOx. While Alternative 3 shows reductions in particulate matter pollution from current levels, this only constitutes a 2.53% reduction. However, regardless of increases or decreases of emissions from its activities, the Forest is still required to comply with all Federal and State air quality regulations. This requirement is captured in the Forest-wide management standards for Air Quality and Fire Management in Chapter II of the Draft Plan. The Forest is currently meeting these requirements. |
| PC 674a | TO PROTECT STREAMS AND OTHER FOREST RESOURCES, AND TO REDUCE ACID RAIN AND ACID DEPOSITION |
| Response: | See responses to PC 438 and PC 676. |
| **PC 672** | **The Forest should consider that the mitigation proposed in the Longview power plant air permit could have the perverse effect of having Longview "subsidize" acid deposition at Class 1 Areas in the Forest, rather than mitigate the impact of their acid deposition.** |
| Response: | The outcome of an individual PSD permit, particularly one that has already been permitted, is beyond the scope of this plan revision. |
| **PC 313** | **The Forest should put increased emphasis on the potential ecological threat of acid deposition.** |
| PC 313a | INCLUDING ENGAGING IN AND SUPPORTING ADDITIONAL RESEARCH AND MONITORING TO EVALUATE ACID DEPOSITION'S EFFECTS ON FOREST HEALTH, PARTICULARLY ON HIGH-ELEVATION SPRUCE ECOSYSTEMS |
| Response: | The Forest Service has a special branch that is responsible for conducting research for both federal and private lands. The Forest works closely with our research counterparts, including academia, to help characterize and learn about acid deposition and its effects to land resources. Research related to acid deposition has been occurring on the Forest since the 1970s. The latest research was conducted in the summer of 2004 and 2005 by West Virginia University. A new study is under way by Virginia Tech University in partnership with the Northeastern Research Station (Fernow Experimental Station), Forest Health Monitoring, USDA NRCS, and the Forest. Results from this work will be made available in 2008. Also, the Forest conducts a large amount of monitoring. Currently the soil chemistry monitoring database holds data for approximately 250 soil pits that are located within the proclamation boundary. This is estimated to be one of the largest soil chemistry bases of its kind addressing acid deposition and the effects on soil. Several theses have been produced (Jenkins, 2002; Schnably, 2003; Sponaugle, 2005) and many professional papers have been published from work that has been done on the Forest.<br><br>In 2006, a new monitoring project for the Forest will be initiated with Forest Service State and Private. Currently there are 12 red spruce plots on the Forest that were monitored approximately 20 years ago for forest health parameters. These plots were revisited in 2005. We are working with State and Private to expand the plots to 20, take foliar samples for chemical analyses, soil samples, root tissue samples, and through fall measurements for air quality. This monitoring project would be long term.<br><br>The use of liming to mitigate soil disturbance is not for the purpose of addressing acid deposition or for the purpose of accounting for loss base cations from a system from a proposed management activity. The liming is done for the purpose of establishing a quick vegetative cover to prevent erosion and soil loss. Much of this lime is used by the new crop as well as it is leached from the soil profile within 3 to 5 years depending on climatic conditions. Therefore, the long-term soil benefits from this activity are, overall, negligible to the project area. Also, the areas disturbed within a proposed project are limited to no more than 15 percent soil disturbance based on SW05. |
| PC 313b | BECAUSE HARVESTING TIMBER IN ACID SENSITIVE SOILS WILL CREATE HIGHER PH LEVELS THAN OCCUR NATURALLY |

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| Response: | Current research shows that timber harvesting contributes to base cation removal from the system, causing soils to become more acidified. This additional acidification can raise the risk of regeneration failure; therefore mitigations need to be considered to address potential effects. Chapter 3, Soil Resource section, goes into a detailed description about the effects of liming soils and the possibility of using lime to neutralize acid deposition impacts. |
| PC 313c | INCLUDING ACID MINE DRAINAGE PROBLEMS |
| Response: | Acid mine drainage exists on the Forest but only in limited amounts, especially when compared to areas of past mining use outside of the proclamation boundary. The coal seams mined on the Forest in the past produce water quality that is impaired for heavy metals but not to such a degree that it has been identified as a top priority. |
| PC 313d | INCLUDING USING LIMING TO LIMIT THE IMPACT OF ACID DEPOSITION |
| Response: | There have been several research projects focusing on the liming of forest soils. However, the results from these studies have been mixed, and many could not be replicated (Rengel 2003). If liming is used for mitigation, there are considerations that should be taken into account. Pelletized lime and limestone sands are the only products that can currently be used in ground spreading equipment (Mizel 2005). The liming materials that have worked the best in the studies have been dolomitic limestone (Rengel 2003), and coarse limestone sands have been found to be more cost efficient than pelletized lime (Mizel 2005). Detrimental effects of liming forest soils have been noted in these studies as well. Liming has been seen to cause the leaching of organic carbon and nitrogen from the soil due to increased microbial activity (Rengel 2003). Therefore, liming is a possible mitigation for these high risk soils; however, due to the associated unknowns, more research is needed before liming could be recommended as a common practice. |
| PC 313e | INCLUDING CONSIDERING THE IMPACTS ON MYCORRHIZAE |
| Response: | Research with mycorrhizae is very new and complex. The Forest is starting a new spruce ecosystem monitoring project in association with the NE Forest Service Research branch out of Morgantown, WV. One of the multiple goals of that project is to analyze the mycorrhizae of red spruce. It is easier to study conifers than hardwoods due to the nature of mycorrhizae associated with conifer species. This project is scheduled to begin in summer FY 06. |
| PC 313f | INCLUDING RETAINING CALCIUM AS A BUFFERING AGENT |
| Response: | Forest-wide management direction has been designed to provide a range of tools and options to help land managers address risk to soils and soil productivity, which is a bigger picture than just retaining calcium as a buffering agent. However, the magnitude and type of risk still needs to be assessed at the project level, based on site-specific soil conditions and proposed activities, before the appropriate tools and options can be determined and applied. Soil Standard SW08 and Guideline SW10 direct land managers to collect the appropriate level of soil information at the project level to help assess risk.<br><br>Risk assessments for soils can lead to various management implications, including adjustment of management activities or the addition of site-specific mitigation. There are several mitigations for retaining calcium as a buffering agent in sensitive areas. For example, timber harvest practices can be modified to take into account areas with low Ca:Al molar ratios. Harvest methods affect the nutrient cycling of the forest floor differently (Elliott and Knoepp 2005). Methods such as whole-tree harvesting that remove excess organic material have more detrimental effects on nutrient availability than stem-only harvests that leave organic material (branches, leaves, tree crowns) at the harvest site (Elliott and Knoepp 2005). Short harvest rotations also have shown decreases in soil base cations due to the lower accumulation of organic matter and higher soil disturbance (Grigal 2000). Likewise, soil-disturbing activities, including skidding and log yarding, decrease soil productivity by removing soil organic matter and compacting the soil (Berger et al. 2004). Thus, the Ca:Al molar ratio can be used to guide the placement of soil-disturbing activities and determine harvest method and rotation length.<br><br>The majority of tree roots occur within 90 centimeters of the surface of the soil, with feeder roots in the upper 60 centimeters (McDaniel 1997; Oettinger 2005). The upper B horizons of the some soils sampled on the Forest were above 60 centimeters in the zone of the feeder roots. The upper B horizon chemistry also has been correlated most strongly with foliar chemistry in sugar maple (Bailey et al. 2004). Thus, the upper B horizon data can be used for making management recommendations as well. |

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| | Because the majority of the base cations in a watershed come from litter fall, soil disturbance and litter removal can be limited in areas of high risk for cation depletion. Harvest methods can leave woody debris and slash material on site to augment nutrient and organic matter input (Mann et al. 1988). Whole-tree harvesting can be replaced by stem-only or sawlog harvesting. An effective way to preserve organic matter on the soil surface is by helicopter or skyline logging. On average, helicopter and skyline logging disturb only 2.5 percent of a site compared to 10 percent or greater for ground-based conventional harvest methods (Grigal 2000).<br><br>Harvest rotations in areas of high risk can be extended in order for the base cations in the soil to be replenished, and longer rotations have higher percentages of base cation return (Blanco et al. 2005). Soil disturbance can be prohibited or limited on landscape positions that have higher Ca:Al molar ratios. For landscape positions with low Ca:Al ratios--such as the shoulders, benches, and back slope positions--the mitigation costs for forest productivity may be high. Because forest productivity is at the highest risk on these positions, they can be the best places to place skid roads and log landings, because further disturbing these areas would have less effect on productivity than detrimental disturbance on more productive sites. The positions with lower risk tend to have better potential for vegetative growth, and therefore, the soil should not be disturbed (Mann et al. 1998; Grigal 2000). On particularly high-risk sites, the Forest has the ultimate option of avoiding management-related disturbance, shifting project activities to safer locales, and removing the site from the suitable timber base.<br><br>Due to the variability of the soil conditions across the Forest, site-specific management recommendations cannot be made without a site-specific risk assessment. Although the soil chemistry data set for the Forest is increasing, the density of sampling is not yet sufficient to use the information for project-level decisions. More soil samples will likely need to be taken within project boundaries, with an adequate sample density. Soil sampling can be used in cumulative effects analyses, as the samples indicate past effects and current conditions, and the sampling data can also be used in project design and mitigation to help reduce future impacts. The revised Forest monitoring plan (Revised Forest Plan, Chapter IV) incorporates the probability for such sampling. |
| PC 313g | INCLUDING DEVELOPING SPECIFIC DIRECTION ON HOW THE FOREST WILL USE THE OVERLAY OF SOIL NUTRIENT SENSITIVITY AND MANAGEMENT PLANS IN PLANNING NEW TIMBER PROJECTS |
| Response: | The soil nutrient sensitivity map is reliable to a scale of 1:63,000. It is used in project planning as a tool to indicate whether a more detailed look into soil productivity issues may be warranted. This map is not a stand alone tool. It is used in conjunction with water chemistry data, existing soil chemistry databases, geologic information, other information about the soils from past project records, and personal experience from soil scientists. Depending on the data, a small survey may be conducted with chemical sampling to verify soil chemistry conditions, or a large-scale monitoring project may be conducted to examine several parameters of chemical characteristics of the soils. Results then help guide in the planning of the project, which may include avoidance of the area to full implementation of the project with mitigations added for resource protection. However, all of this is determined at the project level and not the plan level due to the scale of the information and the variability of soils on the landscape as described on pages 3-40, 3-49, 3-29 – 3-31 of the DEIS. |
| **PC 392** | **The Forest should consider the possible impacts of global warming, including the possibility of cooler ridge tops becoming refuges for various species like Cheat Mountain salamander, and the possibility of carbon sinks, such as mature ecosystems, being turned into carbon sources.** |
| Response: | See response to PC 110c. The DEIS analyses for Terrestrial Ecosystem Diversity and Terrestrial Species Viability acknowledged that the projections of effects beyond the first few decades are tenuous due to the uncertain effects of climate change and other external factors (pages 3-98 and 3-167). Such external effects were determined to be too speculative and uncertain to be incorporated into the analysis accurately. Forest Plan direction under all alternatives gives full protection to the Cheat Mountain salamander. Although climate change could affect this species, Forest management would not add to these effects under any alternative. |
| **PC 673** | **The Forest should consider whether expanding its role in the PSD (prevention of significant deterioration) process would allow it to better protect the air quality related values on the Forest, because expanding the review process to include new pollution sources within 200 kilometers** |

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| | **would give the Forest Service more power to protect air quality, air quality related values, and stream chemistry on the Forest.** |
| Response: | You are concerned that the Forest's PSD review process is limited to new pollution sources within 100 km of the Forest and feel this process should be expanded to include all new sources within 200 km. There are no distance restrictions regarding the PSD permits that should be reviewed in the standards and guidelines for Air Quality in the FPR. The Forest currently reviews and comments on new pollution sources that are in some instances greater than 200 km away from the Dolly Sods and Otter Creek Class I Areas. Additionally, it is the responsibility of the state air quality regulatory agencies to send information on PSD permits to the Federal Land Manager for the Forest. [Note: A 100 km limit was originally proposed in draft EPA guidance for interpreting New Source Review and PSD regulations, the New Source Review Workshop Manual (EPA 1990)]. However, this guidance was never formalized and was written prior to improvements in air quality dispersion modeling capabilities. At the time, current air quality dispersion models were only thought to be accurate out to 100 km. Now a long-range transport puff model is available for use in situations where the source is between 100 and 300 km away. |

| **SOIL AND GEOLOGY** | |
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| **PC 470** | **The Forest should provide information about the methods used to identify and rank "sensitive" geological areas.** |
| PC 470a | INCLUDING HOW THE SOIL SENSITIVITY RANKINGS ARE DETERMINED |
| Response: | The soil nutrient sensitivity map is reliable to a scale of 1:63,000. It is used in project planning as a tool to indicate whether a more detailed look into soil productivity issues may be warranted. This map is not a stand alone tool. It is used in conjunction with water chemistry data, existing soil chemistry databases, geologic information, other information about the soils from past project records, and personal experience from soil scientists. Depending on the data, a small survey may be conducted with chemical sampling to verify soil chemistry conditions, or a large-scale monitoring project may be conducted that examines several parameters of chemical characteristics of the soils. This decision would be made by the line officer or deciding official, based on input from a Forest soil scientist. Results can help guide the planning of the project, and adjustments may range from avoidance of the area to full implementation of the project with mitigation measures added for resource protection. However, all of this is determined at the project level due to the scale of the information and the variability of soils on the landscape as described on pages 3-40, 3-49, and 3-29 to 3-31 in the DEIS. |
| PC 470b | INCLUDING WHAT PEER REVIEW THE SOIL RANKING SCHEME RECEIVED |
| Response: | The ranking scheme was developed by the Forest Soil Scientist and Forest Geologist. It was internally reviewed by the watershed staff and air quality specialists. Other peer review from outside sources included scientists from the Fernow Experimental Station and West Virginia University. The project record includes a list of documented contacts that the Forest Soil Scientist worked with in developing the approach to assessing soil sensitivity on the Forest. The information was shared with other national forests in the region as well as the Regional Office, where it was reviewed by their staff and scientists. |
| PC 470c | INCLUDING HOW THE RANKINGS WILL AFFECT FOREST PLAN IMPLEMENTATION |
| Response: | The soil sensitivity rankings will not affect forest plan implementation. The sensitivity analysis was utilized in analyzing potential effects from different land allocations by alternative in the effects section (pages 3-45 through 3-51) of the DEIS. The sensitivity map is a tool to be used at the project or watershed level of planning, and Standard SW08 (page II-9, Proposed Revised Plan) requires that the sensitivity of an area be reviewed for those management actions that can affect soil nutrient depletion. |
| PC 470d | INCLUDING WHETHER THERE ARE AREAS WHERE SOIL CONDITIONS ARE SO EXTREME THAT A LIST OF ACTIVITIES IS, OR SHOULD BE, PROHIBITED |
| Response: | There may be areas on the Forest where soil conditions indicate that certain activities should be restricted; however, they could only be identified through site-specific analysis. This is addressed on page 3-49 of the DEIS. Utilizing the Forest's most current dataset, the highest risk areas on the Forest exist in the Otter Creek Wilderness and possibly some areas of the Dolly Sods Wilderness. Other areas on the Forest, where stream chemistry would indicate a potential terrestrial problem, have shown ranges of variability in soil chemistry depending on the landscape. Therefore, sectioning out large areas within |

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| | a watershed would be difficult and inappropriate at the Forest-wide scale. Potential mitigation does exist that can be used to ameliorate conditions and allow management activities to continue. |
| PC 470e | INCLUDING HOW NUTRIENT SENSITIVITY WAS ADDRESSED IN THE TIMBER SUITABILITY DETERMINATION |
| Response: | See the Soil Resource section in Chapter 3 of the DEIS, particularly page 3-49. |
| PC 470f | INCLUDING INFORMATION TO USE WHEN SELECTING TARGET LOADS TO HELP DETERMINE DESIRED CONDITIONS ON THE FOREST, INCLUDING WHAT SUITABLY CONSERVATIVE TARGETS SHOULD BE USED UNTIL THIS INFORMATION IS AVAILABLE |
| Response: | To address your concern in part, we would first like to clarify the definition of a Critical Load. A critical load is a quantified estimate of pollutant exposure or loading below which harmful effects to environmental receptors do not occur. A critical load can be developed for a variety of pollutants and receptors within a particular ecosystem and is a scientific number based on modeled or measured dose-response data. Given the current pollution loadings or exposures in an area, this number may or may not be exceeded. Because the critical load(s) may or may not have been exceeded, target loads are selected to reflect policy or management goals, using scientific information along with social, economic, spatial and temporal considerations. "Federal area managers are beginning to use critical loads as tools for quantifying harmful pollution levels and setting goals for resource protection or restoration on federal lands" (Porter et al. 2005). Using this definition, target loads would be set for areas on the Monongahela based on the critical load(s) and the current levels of deposition in the area. Land management goals may be a factor in choosing the target load, but because this is a pollutant exposure or loading it would not be chosen to reflect management decisions, but rather to reflect air quality goals. As such, they will help the Forest define the effects of acidic deposition from new and existing pollution sources on aquatic and terrestrial ecosystems as we continue to work with state and federal air quality regulators to reduce regional levels of deposition. This is potentially the most beneficial application of critical and target loads, because it will demonstrate to air regulators the level of pollution reductions needed to restore or maintain ecosystems of concern. For more information on critical loads, please see the Air Quality section of the FEIS. While the DEIS discussed critical loads under both the Soil Resource (page 3-31) and Air Quality (page 3-20) sections, this information has been clarified and consolidated under Air Quality in the FEIS.<br><br>Additionally, you asked "what suitably conservative targets will be used in the meantime?" Currently, in terms of PSD applications and air quality goals, the Forest can use two sources of information. The first is General Technical Report NE-151, Screening Procedure to Evaluate Effects of Air Pollution on Eastern Region Wildernesses Cited as Class I Air Quality Areas (Adams et al. 1991). This document defines "red and green line" values for stream pH, ANC and deposition loadings of sulfur (S) and nitrogen (N) for eastern Class I Areas. However, this document tells us that, based on data that was currently available at the time, total deposition loadings of S and N are already exceeding red line values of 11-13 kg/ha/yr for S alone, and 14-16 kg/ha/yr for S plus N in Dolly Sods and Otter Creek Wildernesses. Because of this, a reasonably conservative concern threshold was needed to compare single-source impacts with for PSD sources. Currently the Forest uses a concern threshold of 0.01 kg/ha/yr for S and .005 for N, which is based on minimum detection limits of changes in stream chemistry resulting from S and N deposition. It is similar to the Deposition Analysis Thresholds the National Park Service uses.<br><br>Finally, the Forest is working with Forest Service Research on a demo-project to assess the applicability of a methodology used to determine critical loads in European countries for sites in the United States. This demonstration site is located on the Fernow Experimental Forest and results will be representative of Otter Creek Class I Area. As the data collection period is wrapping up, the results from this project should be available within the next few years. |
| **PC 472** | **The Forest should explain the appropriate intensity level needed for soil inventories, including who decides and when.** |
| Response: | See response to PC 470a. |
| **PC 155** | **The Forest should acknowledge that Maunch Chunk soils are not a problem for roads and are the best and most productive soils on the Forest.** |
| Response: | Interpretations concerning soils that derive from the Mauch Chunk geologic formation are taken from |

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| | the USDA- NRCS Soil Survey County Reports, and more information can be found at: http://soildatamart.nrcs.usda.gov/ and from the NRCS soils database NASIS. Although these soils may be very productive for growing vegetation, the NRCS interpretations indicate that soils forming in these parent materials have moderate to high risk of slope failure or mass wasting, and they pose limitations for mechanized equipment and construction. These soils have high to severe erosion potential and they are susceptible and prone to compaction. Slope is also an influential factor for management activities on these soil types. The combination of all these factors increases the inherent risk of road construction on these soil types. There are several areas on the Forest where roads have been constructed on these soils types resulting in failures of the roadbed and small mass wasting events. Although it is not always feasible to avoid road construction on soil forming from the Mauch Chunk geologic formation, the Forest is aware of the inherent risk and we try to minimize the effects of road construction through various mitigations applied at the project level. |
| **PC 203** | **The Forest should explain what the "high hazard" areas in areas of shale and limestone are and give these their own special section of detailed management plans.** |
| Response: | High hazard with regard to limestone refers to karst formations and caves. Sinks and land subsidence can occur and pose a risk, and ground disturbance within these areas can introduce sediment into the under workings of the karst formations. High hazard areas with regard to shale refer to shale formations that have exposed dips that can sometimes result in large mass wasting events. Also, often soil types forming from these shales are shallow, droughty, and difficult to keep vegetated. Therefore, operating in these areas could result in substantial loss of sensitive habitat (i.e. shale barrens) or result in a loss of soil productivity that could prevent the return of vegetation. |
| **PC 473** | **The Forest should reconsider the strict slope limitation standards because there is no evidence that landslides are a problem on the Forest.** |
| Response: | Slope limitations are set due to concerns for operator safety, resource protection for soil and water, mechanized equipment limitations, and higher soil risks associated with steep slopes, like erosion potential. Although landslides are not a common occurrence on the Forest, they do occur. When a large landslide occurs in an area of management, or in an area where a risk to human safety or facilities exists, the cost of repair and maintenance can be very large. Therefore, avoiding potential landslides is often the best course of action. Providing standards and guidelines that require site-specific review of these areas prior to management is a valuable tool the Forest can use to reduce the risks to Forest resources and operator safety. |
| **PC 350** | **The Forest should acknowledge that its discussion of the impacts of soil disturbance on nutrient export and loss of productivity are overstated and not supported by science.** |
| Response: | The discussion of effects of soil disturbance and nutrient loss and potential loss of soil productivity within the EIS is well researched and referenced. There are some 200 plus references utilized in the construction of the discussion either directly by citation or indirectly through the accumulation of the knowledge base about effects and past and current research. That bibliography is available upon request. Many of the citations are in the references section of the DEIS. In addition to the use of references and research, the discussion and analysis underwent peer review. The project record includes a list of documented contacts that the Forest Soil Scientist worked with in developing the approach to assessing the soil nutrient sensitivity on the Forest. The information was shared with other national forests in the region as well as the Regional Office, where it was reviewed by their staff and scientists. |
| **PC 538** | **The Forest should develop a management prescription that emphasizes soil and water quality protection and assign the portion of the Forest north of Parsons to this prescription:**<br>• **To benefit local residents**<br>• **To minimize clear cuts**<br>• **To minimize road construction**<br>• **To increase run-off control from disturbed areas**<br>• **To provide adequate stream buffers.** |
| Response: | During the revision process, there were discussions about developing a management prescription for streams and riparian areas. One of the main difficulties in developing this MP was the accuracy of the stream mapping and how to include intermittent and ephemeral channels that were unmapped. Rather, the team elected to provide Forest-wide direction that would be applied in all MP's and through all alternatives. The direction provides protection for soil and water resources that is flexible to site-specific conditions and concerns. If future projects pose additional risks, additional mitigation measures |

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| | can be identified at the project level, or the project design can be modified to address the concerns.<br><br>We feel that Forest-wide direction is adequate to protect soil and water resources without changing the management prescription in the area north of Parsons. |
| **PC 832** | **The Forest should consider the impacts that management activities will have on soil nutrient depletion, including what indicators will be used to determine the effects of soil nutrient depletion in such sites.** |
| Response: | Management actions that can contribute to nutrient depletion are described on pages 3-39 and 3-45 to 3-49 of the DEIS. To reiterate, soil disturbance and vegetation removal can potentially affect soil nutrient depletion. The indicators used to determine effects are not to a level of certainty that they can yet be defined. There are several indicators that the current literature suggests, but as the science progresses, views are changing. This is an area of multiple scientific opinions. Therefore, the Forest has chosen not to list criteria or indicators at this time in order to stay current with the science as it progresses. Some items of potential interest include base saturation of the effective cation exchange capacity, calcium to aluminum ratios through plant available extraction methods (SrCl2 method), and sulfate absorption capacity. Also, foliar chemistry or tree chemistry may provide clues in conjunction with other data sets as to what the status of site productivity may be. However, it is clear that at this time there is little agreement within the scientific community as to what should be monitored and how. |
| **PC 833** | **The Forest should examine what areas of the Forest have soils, slopes, and other soil or geologic or watershed conditions that are susceptible to serious or irreversible damage.** |
| Response: | We have identified and examined areas within the Forest that have soils, slopes, and watershed conditions that are susceptible to serious or irreversible damage. We have utilized many tools including a soil sensitivity map that looks at soil interpretations for such concerns as hydric soils, flood plains, karst topography, mass wasting, prime farmland, steep slopes, and soils with seasonal water tables. This information is and will be used at the project scale to determine risk and potential effects, and to help prioritize locations within a project area that need to be ground-verified or surveyed to greater detail. See also response to PC 470. |
| **PC 99** | **The Forest should map all watersheds with infertile geologies as definitely as possible and put them in a management prescription that prevents disturbance.** |
| Response: | We do not use the term “infertile geologies” in the Forest Service, as we do not know of any geologies or soils on the MNF that are infertile in the sense that they are incapable of growing vegetation. However, we are concerned with the effects that acid deposition may be having on soil productivity, and that concern has led to map geologies on the Forest for their capacity to buffer or neutralize the effects of acid deposition. The result was the soil nutrient sensitivity map described in Chapter 3 of the DEIS. Scale is a limitation of this map. The finest scale that the data can be relied upon is 1:63,000. Page 3-49 in the DEIS provides information as to why the Forest determined that removing these areas from the suitable timber base is not appropriate at this scale. Standards SW08 and SW10 in the Proposed Revised Plan provide direction on how to proceed with management and address soil productivity concerns in sensitive areas where acid buffering capacity may be limited. We also have existing management prescriptions that feature little or no management-induced disturbance, and we have analyzed how those prescriptions have been applied by alternative in relation to the soil sensitivity mapping of the Forest. This analysis can be found in the Soil Resource section in Chapter 3 of the EIS. |
| **PC 474** | **The Forest should examine whether the Forest contains any karst areas, and if karst areas exist, the Forest should avoid development in these areas because roads, traffic, sedimentation, contaminants, and debris could affect the sensitive areas.** |
| Response: | Many of the effects discussed and protection measures for watershed, riparian, and aquatic resources in the DEIS also apply to protection of caves and karst resources, as these are influenced by hydrologic systems generally. Geologic maps of the Forest show an approximation of the known locations of limestone bedrock. These maps are used at the project level, along with field reviews of project areas where actions are planned, to determine the potential for effects to caves and karst resources including those effects listed in the comment. Our sensitive species list contains many cave obligate species, and all projects are reviewed for potential effects to these species during the Biological Evaluation process. We also use the detailed direction on cave resources in the Region 9 supplement to FSM 2356 as appropriate during projects. |

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| **PC 52** | **The Forest should not allow the timbering of slopes greater than 30% grade in order to prevent erosion, siltation, and flash flooding.** |
| Response: | We acknowledge your preference. Standard SW07 in the Proposed Revised Plan limits certain types of timber harvest equipment of steep slopes, although we generally consider "steep" to be in the 40-50% range. Harvesting on steep slopes is mainly a concern due to soil disturbance and the increased propensity for exposed soil to move downhill, either as mass movement (such as landslides) or as stream sediment. We have a number of mitigation measures that we can apply to timber harvesting at the project level to reduce the potential for soil disturbance and movement, including not allowing heavy equipment on steep soils, limiting road construction and the use of skid trails, using helicopters to yard logs, and changing silvicultural prescriptions to leave more trees. See also response to PC 106 regarding the potential effects of flooding. |
| **PC 842** | **The Forest should reconsider the statement that Pottsville geology is inherently acid.** |
| PC 842a | BECAUSE MOST OF THE POTTSVILLLE SANDSTONES I HAVE HAD ANALYZED FOR SURFACE MINE PERMITS HAVE HAD A PH OF 7 OR ABOVE |
| Response: | The Pottsville Group is extensive throughout the Pennsylvania, Ohio, West Virginia, western Virginia, Kentucky, and Tennessee region. The geologic group consists of several formations and the geochemistry of these formations within the group can be dramatically different. The portion of the group that underlies the Forest is inherently acidic. The portion of the group that is associated with the southern coalfield region is alkaline with pH values of 7 or greater. However, in the northern coalfields of West Virginia, eastern Ohio, and southwestern Pennsylvania, the geochemistry of the geology is quite different and extremely acidic. This is often reflected in acid-base accounting measurements of core samples (WV Geological Survey Database and personal communication with Dr. Jeff Skousen, WVU Extension Reclamation Specialist, 2005.) |
| PC 842b | BECAUSE BOGS AND SUCH ARE YOUR GREAT CONTRIBUTORS. OUR SETTING TO THE GREAT AGRICULTURAL AREAS THAT SPAWN MUCH OF THE AMMONIA AND NITROUS OXIDES NEED CONSIDERATION...IF THERE IS REALLY AN ACID RAIN PROBLEM. CURRENTLY, AND AGAINST COMMON KNOWLEDGE, THERE IS LITTLE FROM COAL-FIRED PLANTS. |
| Response: | Agriculture in West Virginia is minimal and cannot explain the large inputs of pollutants in the atmosphere, particularly in association with the sulfur compound concentrations that are associated with the coal-fired power plants. |
| **PC 861** | **The Forest should explain what they intend to do about the effects of from logging and mining, related to the ongoing effects of acid rain. Because chemically, you must note in 50 years 250 lbs/acre of plant available nutrients have been dissolved away. This amount is equal to the calcium in the trunks of acres of forest. If the harvest is trucked off-site, the soil nutrient reserve is further impoverished by another 250 lbs/acre. In contemplating chemically a third harvest on infertile geologies, the total "loss" is 500 lbs/acre, and there is no assurance that a new crop can grow to maturity in 20 years when 750 lbs/acre are required. In this era of acid rain, the Eastern Forest is not at steady state. It is impoverished at 5 lbs/acre/year.** |
| Response: | These comments seem to assume that there is a clear understanding of calcium or nutrient cycles in the forest ecosystem. Current scientific findings from Dr. Scott Bailey (personal communication 2004) with regard to calcium oxalate reveal that calcium pools are not completely understood. Conducting mass balance calculations of calcium pools for the Forest would be difficult at best and a true guess at the reserves of calcium in the reserve. As well, loss of calcium from a system is based on the vegetation with in the ecosystem, climate, geochemistry of the system, and pollutant amounts. It may be possible in several years to look at calcium pools and predict how much calcium is removed during a harvest. However, terrestrial mitigations are currently being researched as well, and research may provide future mitigations for effects from acid deposition (see EIS, Chapter 3, Soil Resources section). This mitigation may potentially offset acidification of soils both natural and induced. |
| **PC 976** | **The Forest should consider soil supplements or lime-limestone treatments for nutrient-poor geologies and acid sensitive soils, including applications from roads and in cutover areas as timber operations are finishing but before the skid and haul roads are restored.** |
| Response: | See responses to PC 313, parts b and d. |

| WATER AND RIPARIAN AREAS | |
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| **PC 415** | **The Forest should implement standards that will prevent water temperatures from rising.** |
| Response: | There are a number of variables that influence stream temperatures including stream aspect, topography, type of vegetation, channel size, and management history. The variable we have the greatest influence on is the management of riparian areas and streamside vegetation. One goal of the Proposed Revised Plan (SW29) is to maintain, enhance or restore vegetation conditions, in part, for the purposes of providing canopy conditions that regulate riparian and stream temperatures for native and desired non-native flora and fauna (page II-11). To account for site-specific conditions, channel buffers will be determined during project-level planning and implementation (Standard SW37). One function of the channel buffers is to protect streamside vegetation and stream shading to maintain stream temperatures. Opportunities also exist to restore riparian conditions to increase stream shading and reduce stream temperatures. These opportunities are identified during watershed assessments and project-level planning efforts. |
| PC 415a | INCLUDING FIVE DEGREES FOR STREAMS |
| Response: | This concern is consistent with requirements to comply with the Clean Water Act (Governing Water Quality Standards - 46CSR1). Protection of riparian areas and streamside vegetation (Standard SW37) is intended to protect stream shading to meet this requirement. |
| PC 415b | INCLUDING THREE DEGREES FOR LAKES AND RESERVOIRS |
| Response: | The greatest potential for forest management activities to influence water temperatures in lakes and reservoirs is to affect the temperature of the streams that feed the lake or reservoir. This is due to the large surface area that is exposed to direct sunlight and the minimal influence lakeside vegetation plays in shading the surface area. Protection for water temperatures in the streams that feed the lakes and reservoirs is described above in the first two responses to this concern statement. |
| **PC 189** | **The Forest should prohibit canopy reduction in fragile stream channels.** |
| Response: | The sensitivity of any stream or subwatershed to canopy reduction is best determined at the project planning level where site-specific conditions can be considered. Each project is evaluated for its potential effects on watershed and aquatic conditions, effects that are largely dependent upon the scope and magnitude of the proposed project and the existing conditions of the project area. Mitigation measures and modification of project designs can be used to address the site-specific concerns, including not implementing projects, or portions of projects, due to the sensitivity of the area. Project-level decisions are not based solely on what is best for aquatic resources, so effects can and do occur to aquatic resources in order to achieve other resource management objectives. Those effects are considered tolerable as long as they are within the limits of the applicable laws and regulations. |
| PC 189a | TO PREVENT FLOODING |
| Response: | A discussion of the potential effects of canopy reduction on flood flows is presented in the DEIS (pages 3-73 to 3-74). |
| PC 189b | TO PROTECT FISH HABITAT |
| Response: | Channel buffers are intended to protect fish habitat by protecting stream canopies and sources of large woody debris (see Standard SW37 on page II-11 of the Proposed Revised Plan). |
| PC 189c | TO PROTECT AESTHETICS |
| Response: | Protection of visual quality and aesthetics is best evaluated and addressed at the project level where the scope of the project, existing conditions, and scenic management objectives can be considered. |
| **PC 318** | **The Forest should acknowledge that current West Virginia law on turbidity would protect streams on the Monongahela National Forest.** |
| Response: | The concern statement is consistent with direction found in the Requirements Governing Water Quality Standards (46CSR1) to comply with the Clean Water Act. Forest Plan direction is intended to minimize soil disturbance, control erosion, and protect filter strips to trap sediment before it reaches the channel network (Proposed Revised Plan, pp. II-8 to II-13). Opportunities also exist to correct existing erosion and sediment sources and to restore watershed conditions. |
| **PC 48** | **The Forest should not allow earth-disturbing activity in and around streams and creeks:**<br>• **To protect water resources** |

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| | • **To protect wildlife**<br>• **To prevent flooding**<br>• **To protect brook trout**<br>• **To benefit future generations**<br>• **To protect mollusks.** |
| Response: | Direction in the Forest Plan is intended to minimize and rehabilitate the amount of soil disturbance around streams and creeks, but it does not prohibit activities. Currently, there are earth-disturbing activities all across the Forest in close proximity to streams and creeks including roads, road crossings, trails, dispersed camping sites, picnic areas and more. Given the existing conditions and the likelihood that stream channels will need to be crossed for access purposes in the future, a prohibition of disturbance is not feasible. Instead, direction is given to minimize the potential impacts associated with earth-disturbing activities (see SW35, SW40, SW44, SW45, SW54, and SW62 in the Proposed Revised Plan) and the rehabilitation of disturbed sites (see SW03, SW11, SW14, SW33, SW36, and SW58 in the Proposed Revised Plan). Project-level design and planning can also be used to prescribe additional mitigation measures to protect riparian areas and floodplains. Existing problems and opportunities to restore riparian and watershed conditions, including sources of erosion and sedimentation, should also be identified during watershed assessments and project planning. |
| **PC 106** | **The Forest should address the problem of flooding.** |
| Response: | A number of commenters expressed concerns about flooding. Flooding is a natural disturbance that occurs in all watersheds and the Forest cannot "prevent" flooding as some have requested. The potential effect of land management activities on flooding is discussed in the DEIS, pages 3-73 to 3-74. Large-scale storms are the primary influence on large-scale floods, but land management activities can affect smaller scale, higher frequency floods in smaller drainage areas. Effects are typically greatest during the growing season when streams are normally at their lowest flow. As a result, the effects on actual flows may be small, but appear large relative to the expected flow.<br><br>For example, one commenter cited a study where storm flows were nine times greater than expected in a recently clearcut watershed than that of the control watershed (Reinhart et al. 1963). The commenter states that "such rare large floods are important as they leave a lasting imprint." While the flow was nine times greater than expected, it occurred during the summer when flows are normally at their lowest so the relative increase appears large, but in relation to the hydrology of the watershed the flood was neither that "large" nor that "rare". The peak flow of the event cited was measured at 13.56 cubic feet per second per square mile (csm). During the six-year calibration period prior to clear cutting the watershed, there were 44 peak flows that exceeded 13.56 csm, the greatest being 140.6 csm in October, 1954.<br><br>The potential effects of timber management activities on flooding depend on the type and magnitude of harvesting. These are best addressed at the project planning level considering site-specific conditions. |
| PC 106a | INCLUDING RECOVERY OF FLOODPLAINS |
| Response: | Floodplain stability and function can help reduce the impacts of flooding, and floodplain restoration is a stated goal in the Proposed Revised Plan (see SW30). Other Forest-wide goals, standards and guidelines are intended to protect or restore riparian areas, channel morphology, and floodplains (see SW29, SW32, SW 34, SW35, SW37, SW45, and SW 46 in Chapter II of the Proposed Revised Plan). |
| PC 106b | INCLUDING CONSULTING WITH SPECIALISTS AND THE PUBLIC |
| Response: | In addition to conducting literature reviews, specialists with state and federal agencies, including researchers at the Fernow Experimental Forest, and universities are often consulted on a range of soil and water related issues. Projects that have the potential to affect watershed and aquatic conditions are made available for public comment through the NEPA process. |
| **PC 729** | **The Forest should use geology and stream chemistry to determine the watersheds in which timber harvest will be allowed, to prevent soil nutrient loss from acid deposition.** |
| Response: | It has been determined that acid deposition is causing soil nutrient loss and acidification (Drohan and Sharpe, Bailey et al. 2005; Lawrence, 2005). The Forest took a hard look at the existing condition on the Forest and used geochemistry, water chemistry, and air quality data to conduct an assessment. The effort resulted in a soil nutrient sensitivity map. The soil nutrient sensitivity map is reliable to a scale of |

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| | 1:63,000. It is used in project planning as a tool to indicate whether a more detailed look into soil productivity issues may be warranted. This map is not a stand alone tool. It is used in conjunction with water chemistry data, existing soil chemistry databases, geologic information, and other information about the soils from past project records and personal experience from soil scientists. Depending upon the data, a small survey may be conducted with chemical sampling to verify soil chemistry conditions, or a large-scale monitoring project may be conducted examining several parameters of chemical characteristics of the soils. Results then help guide in the planning of the project which may range from avoidance of the area to full implementation of the project with mitigations added for resource protection. However, all of this is determined at the project level rather than the plan level due to the scale of the information and the variability of soils on the landscape, as described on pages 3-40, 3-49, 3-29 through 3-31 in the DEIS. |
| **PC 342** | **The Forest should provide protection for streams by placing them in the 5.1 or 6.2 Management Prescriptions.** |
| PC 342a | TO PROTECT BROOK TROUT |
| Response: | Brook trout populations in MP 5.1 and 6.2 are passively protected because the management prescriptions should have relatively limited management actions. This reduces the potential impacts to watershed and aquatic conditions associated with land management activities, but also limits the potential restoration opportunities. We believe the standards and guidelines in the 1986 Forest Plan (primarily pp. 79 to 89) and in the Proposed Revised Plan (pp. II-8 to II-13 and II-25 to II-27) provide adequate protection for brook trout populations in management prescriptions that are actively managed. |
| PC 342b | INCLUDING ALL THE TRIBUTARIES ON THE NORTH SIDE OF WILLIAMS RIVER FROM TWIN BRANCH TO SAWYER RUN |
| Response: | The area north of the Williams River between Twin Branch and Sawyer Run is within active management prescriptions in all alternatives. We feel the management direction in the 1986 Forest Plan and Proposed Revised Plan is adequate to protect trout populations without having to change the management prescription in the area. |
| PC 342c | INCLUDING ALL THE TRIBUTARIES ON THE SOUTH SIDE OF WILLIAMS RIVER FROM THE PROPOSED CRANBERRY EXTENSION TO CRAIG RUN ROAD (INCLUDING CRAIG RUN) |
| Response: | The area south of the Williams River between the Cranberry Extension and Craig's Run (including Craig's Run) is within active management prescriptions in all alternatives. The exception is a small area of MP 8.0 in Alternative 1. We feel the management direction in the 1986 Forest Plan and Proposed Revised Plan is adequate to protect trout populations without having to change the management prescription in the area. |
| PC 342d | INCLUDING BIG RUN |
| Response: | The Big Run subwatershed was in MP 6.1 and MP 8.2 under the preferred alternative in the DEIS and Proposed Revised Plan. Much of the MP 6.1 was changed to MP 4.1, based on comments on the drafts. Limited management activities will occur in MPs 8.2 and 4.1, and we feel the direction in the 1986 Forest Plan and Proposed Revised Plan is adequate to protect trout populations without having to change the management prescription in the rest of the subwatershed. |
| **PC 703** | **The Forest should examine the cost of watershed restoration with and without various forms of logging.** |
| Response: | Analyzing the cost of watershed restoration was not identified as an issue and is beyond the scope of Plan Revision. Watershed restoration projects are typically identified at the watershed assessment or project level. Analysis of the costs and benefits of activities within the watershed, including restoration activities, is done as part of the NEPA process at the project level. |
| **PC 675** | **The Forest should provide information about restoration of acidified streams, including:**<br>• **How the Forest Plan will reduce emissions in order to restore degraded streams and protect streams that have yet to be degraded**<br>• **Whether the Forest Plan expands stream liming to restore streams as they become degraded**<br>• **How much of a reduction in sulfur dioxide and sulfite emissions it will take to restore acidified streams to healthy levels, and**<br>• **Whether the Forest's streams can be restored to healthy levels if new coal fired power plants continue to be built upwind of the Forest.** |

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| Response: | Monitoring information or modeling analyses used to evaluate the impacts of current and historic air pollution levels on Forest resources can be used as an effective tool in communicating the levels of reductions needed to restore or maintain these sensitive resources to air regulatory agencies. However, the Forest has no direct regulatory authority under the Clean Air Act to reduce air pollution. See also the responses to PCs 438a and 676 for a discussion of the Forest's role in the air quality regulatory arena.<br><br>The WVDNR and WVDEP are also the primary agencies adding limestone sand to acid-impaired streams, although the Forest contributes funding for the treatment of Buck Run, Glade Run and Summit Lake. The WVDNR is currently trying to expand their program on and off-Forest. |
| **PC 413** | **The Forest should perform TMDLs (total daily maximum loads) on impaired streams and collaborate with state agencies responsible for TMDLs, including Wild and Scenic Study Rivers.** |
| Response: | WVDEP and the EPA are the lead agencies in the development of TMDLs, and the Forest would be considered a stakeholder in their development. Completed TMDLs and a schedule for future TMDLs can be found on the WVDEP website.<br><br>In general, effects associated with forest management activities are non-point sources of pollution that are addressed through the implementation of BMPs and Forest Plan standards and guidelines. Opportunities to improve streams on the 303(d) list, including those studied for Wild and Scenic River eligibility, are addressed at the watershed assessment and project planning level. Most of the streams on the Forest that are on the 303d list are there due to impacts associated with acid deposition. The Forest has limited opportunities to correct acid deposition, but we do participate in the mitigation of effects with the addition of limestone sand to acid-impaired waters, and we address the potential cumulative impacts of soil nutrient and base cation depletion at the project scale. |
| **PC 678** | **The Forest should provide information about water quality issues, including:**<br>• **Whether the Forest acknowledges that timber management activity should protect against practices that create too much sediment**<br>• **Whether activity within the Forest will be managed so it does not create exceedences of the State's numeric standard for turbidity**<br>• **How the Sediment Control Act of 1992 will be addressed in the goals, standards, and guidelines of the new Forest Plan**<br>• **Developing standards and guidelines that set the West Virginia Water Quality Criteria for turbidity as a minimum on the Forest**<br>• **Laying out a program to assess, prioritize, and ameliorate the chronic and catastrophic sources of sediment and turbidity on the Forest in a timely manner**<br>• **Because trout and other aquatic species suffer from the effects of sedimentation and turbidity.** |
| Response: | The Forest recognizes that timber management activities are likely to create sediment in streams. Whether or not the amount of sediment generated by these activities is identified as "too much" depends on the analysis of the proposed activities at the project level.<br><br>The Forest Plan does not repeat direction already required by other authorities (see Proposed Revised Plan, page II-1), including the Sediment Control Act of 1992 and West Virginia State Water Quality Standards. Activities within the Forest are already required to meet all State water quality standards.<br><br>The Forest recognizes that trout and other aquatic species can suffer from the effects of sedimentation and turbidity. The direction outlined in Chapter II of the Proposed Revised Plan, specifically the direction for Soil and Water Resources beginning on page II-8, is intended to protect and maintain trout and other aquatic species populations.<br><br>The Proposed Revised Plan includes a Monitoring and Evaluation Plan (Chapter IV) that outlines monitoring items of various resource activities. Item 41 specifically relates to forest management activities that affect soil erosion and stream sedimentation processes that impact watershed, riparian, and aquatic ecosystem health. |
| **PC 682** | **The Forest should reconsider its use of "dosing stations" when treating streams with lime fines.** |

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| Response: | The limestone dosing stations are operated and maintained by the West Virginia Division of Natural Resources. The WVDNR and WVDEP are also the primary agencies adding limestone sand to acid-impaired streams, although the Forest contributes funding for the treatment of Buck Run, Glade Run and Summit Lake. |
| PC 682a | BECAUSE USING SLIGHTLY LARGER SAND PARTICLES DEPOSITED DIRECTLY IN THE UPPER REACHES OF STREAMS IS PREFERABLE FROM AN AESTHETIC STANDPOINT |
| Response: | Your preference is noted. All applications have some localized effects on aesthetics |
| PC 682b | BECAUSE THE DOSING STATION MAY NOT BE THE MOST COST EFFECTIVE OR ECOLOGICAL METHOD |
| Response: | Dosers, or limestone drums, were initially installed at three sites on the Forest to treat acidic conditions in the Cranberry River and Otter Creek watersheds. Today, the doser on Otter Creek has been eliminated and the stream is treated with the direct application of limestone sand. The two remaining dosers continue to be maintained and operated by the WVDNR. Direct application of limestone sand has been found to be a cost-effective means for acid remediation and is the primary method of treatment of acidic streams on the Forest. One advantage dosing stations have over limestone sand is they are self adjusting for flows, where limestone sand is applied once a year based on an estimate of an annual acid load. During very high runoff events, or high water years, directly applied limestone sand may be distributed quicker than estimated, where dosing stations adjust to the annual conditions. |
| **PC 681** | **The Forest should recognize the Greenbrier River, Upper Greenbrier River, and Williams River watersheds as priority areas in analyzing existing watershed problems and deal with them in a proactive and defined manner, because these watersheds support large numbers of species of concern.** |
| Response: | As pointed out in the DEIS (p. 3-92), the Greenbrier River 1, Upper Greenbrier River, and Williams River watersheds are considered hot spots for aquatic species of concern. There are other factors and values associated with these and other watersheds that also need to be considered when setting watershed restoration priorities, such as current conditions, designated uses, ownership patterns, restoration potential, and potential costs. The aquatic diversity values associated with the Upper Greenbrier River and Williams River watersheds are part of the reason why recent watershed assessments and restoration efforts have been targeted in those watersheds. Road improvements, road decommissioning, and culvert inventories have all been conducted in the Upper Greenbrier River in recent years. A watershed assessment in the upper Williams River watershed was completed in 2000, and watershed improvement projects are being planned and designed for implementation in 2007.<br><br>Watershed, riparian, and aquatic resource management direction is similar for the alternatives and provides protection of aquatic resources at the project level based on site-specific conditions. Mitigation measures and modification of project design can be used to address the site-specific concerns, including not implementing projects due to the sensitivity of the area or the potential impacts on aquatic species of concern. Project-level decisions are not based solely on what is best for aquatic resources, so effects can and do occur to aquatic resources in order to achieve other resource management objectives. Those effects are considered tolerable as long as they are within the limits of the applicable laws and regulations. |
| **PC 131** | **The Forest should monitor streams, mitigate acid rain impacts, and limit the cumulative impacts of soil-disturbing activities within the Forest.** |
| Response: | The Revised Forest Plan includes a Monitoring and Evaluation Plan (Chapter IV) that outlines monitoring items of various resource activities. Items 40-43 in the Proposed Revised Plan specifically relate to forest management activities that affect streams as well as watershed, riparian, and aquatic ecosystem health. See also responses to PCs 645 and PC 313. |
| **PC 84** | **The Forest should not allow the construction of dams.** |
| Response: | Dams and impoundments are proposed for a number of reasons, such as municipal water supplies, recreational developments, or flood control. The Forest does not have direction to prohibit their development, but any proposal would be subject to a NEPA analysis to disclose the purpose and need of the project and the potential effects. Public comments are solicited during the NEPA process to determine public issues and concerns related to the potential project and to develop alternatives, including no action. |
| **PC 316** | **The Forest should allow the mitigation of any streams considered for wilderness designation that** |

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| | **is or could foreseeably be acidified in the future.** |
| Response: | Mitigating the effects of acidification in streams is not specifically prohibited by the Proposed Revised Plan. The management direction for 5.1 (Recommended Wilderness) includes Guideline 5123 that identifies when water quality could be maintained through actions other than ecological processes. |
| **PC 383** | **The Forest should provide adequate provisions for the protection of streams in wilderness areas, because many proposed wilderness areas contain streams that are threatened by acid rain.** |
| Response: | Streams are protected by Forest-wide management direction in the Soil and Water section of Chapter II in the Revised Forest Plan, regardless of what Management Prescription they are in. The current access to treat those streams has not been changed by this plan revision. See also response to PC 316. |
| PC 383a | INCLUDING EITHER DRAWING WILDERNESS BOUNDARIES SO THAT HEADWATERS OF BROOK TROUT STREAMS ARE NOT CUT OFF FROM ACCESS FOR TREATMENT OR ALLOW TREATMENT VIA HELICOPTER |
| Response: | Treatment via helicopter is not prohibited in areas recommended for Wilderness study, but it could be if these areas were designated as Wilderness by Congress. That decision, along with the way the areas' boundaries are drawn, would belong to Congress. |
| **PC 810** | **The Forest should examine the potential for sludge and slurry pond spills on waterways.** |
| Response: | There are no coal sludge and slurry ponds on the Forest. If there are any coal sludge and slurry ponds on private lands, they are regulated and permitted by the West Virginia Department of Environmental Protection. |
| **PC 188** | **The Forest should conduct a clear-felling experiment at one of its experimental catchments.** |
| Response: | National Forests are generally not allowed to conduct research. The Forest Service has a special research branch that is responsible for conducting essential needed research for both federal and private lands. The effects of forest management on streams are studied at the Fernow Experimental Forest. One of the earlier reports, Effect on Streamflow of Four Forest Practices in the Mountains of West Virginia (Reinhart et al. 1963), addressed the effects of clear cutting and different harvest intensities on stream flows. Future research efforts on the Fernow are beyond the scope of this planning effort. |
| PC 188a | BECAUSE PREVIOUS EXPERIMENTS RESULTED IN STREAM-CHANNEL EROSION WITH NO SURFACE WATERSHED DISTURBANCE |
| Response: | There are a number of studies that have looked at the effects of logging on water yield and water quality. These studies and other literature are typically reviewed and cited during project-level analysis based on site-specific issues and concerns. At the programmatic scale of Forest Planning, direction in the plan is intended to minimize the potential effects of future management actions on the hydrology and sediment budgets within project areas. |
| **PC 282** | **The Forest should continue to do analysis by watersheds rather than political boundaries in order to promote management practices that reduce flooding.** |
| Response: | One change in the Revised Plan from the 1986 Forest Plan is the intent of conducting analyses based on watersheds rather than Opportunity Areas. For watershed, riparian and aquatic resources, planning based on watershed boundaries allows us to better target our management activities to avoid or mitigate critical areas within a watershed, and it is conducive to cumulative effects analysis. Planning timber harvest within a watershed also allows us to evaluate the level of harvest and its potential influence on flooding and to schedule harvest activities to avoid potential flooding impacts. |
| **PC 416** | **The Forest should clarify its intentions for watershed management, including how watershed analyses will be carried out.** |
| Response: | Watershed assessments are a mid-level planning tool used to identify existing watershed conditions and opportunities to move watersheds toward their desired conditions. The approach is patterned after the process described in Ecosystem Analysis at the Watershed Scale – Federal Guide for Watershed Analysis. It is a multi-step process that considers natural variables, existing conditions, key issues and reference conditions to formulate management recommendations. An interdisciplinary team is used to address the range of resources and program opportunities within the watersheds. Completion of watershed assessments and implementation of the recommendations are based on Forest priorities, funding, personnel, and workloads. Watershed assessments are neither a requirement nor a decision document, but rather a useful tool for setting program priorities and direction. |
| **PC 419** | **The Forest should provide information regarding the impacts of forest management on wetlands.** |
| Response: | The discussion of potential impacts associated with forest management activities on riparian and aquatic |

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| | resources (DEIS pg 3-68 to 3-83) was intended to include potential impacts to wetlands, seeps, and springs. We have clarified this in the FEIS, with more description of the wetlands on the Forest. |
| **PC 424** | **The Forest should maintain water quality pH above 5.0 to protect native brook trout populations.** |
| Response: | The decision to maintain water quality above pH 5.0 is a project-specific decision based on site conditions and management objectives. For example, some streams on the Forest are naturally acidic and it may be undesirable to maintain them at levels above pH 5.0. Other streams that are acidic are difficult to access and would be costly to treat. Native brook trout streams that are impaired due to acid deposition are often treated with limestone to increase the pH level and trout productivity, but not all potential brook trout streams are treated due to stream access and funding constraints. |
| **PC 539** | **The Forest should revise the Forest Plan to include discussion of land use and its effect on waterways.** |
| Response: | The primary discussion of land management activities and their potential effects on waterways can be found in the DEIS (pp. 3-53 to 3-92). Direction to protect soil and water resources can be found in the Proposed Revised Plan (pp. II-8 to II-13), with additional direction located in the Wildlife and Fish section (pp. II-25 to II-27). |
| **PC 23** | **The Forest should protect watershed and water resources, including soil, groundwater, aquatic habitats and drinking water:**<br>• **To prevent flooding**<br>• **To protect water quality**<br>• **To protect fish populations**<br>• **Because the cost of cleaning water is increasing**<br>• **To provide recreational opportunities**<br>• **To save communities and government money**<br>• **To protect ecological diversity**<br>• **To provide water for livestock.** |
| Response: | This public concern is a combination of statements related to resource values and potential effects of land management activities. The primary discussion of land management activities and their potential effects on waterways can be found in the DEIS (pp. 3-53 to 3-92). Direction to protect soil and water resources can be found in the 1986 Forest Plan (pp. 79 to 87, and the Fisheries Amendment – Amend. 3) and the Proposed Revised Plan (pp. II-8 to II-13), with additional direction located in the Wildlife and Fish section (pp. II-25 to II-27). By implementing direction for soil and water resources, implementing mitigation measures at the project level, and restoring and improving existing soil and water conditions, the range of values and benefits associated with healthy aquatic ecosystems should be protected. The Forest is also obligated to the Clean Water Act and to protect water quality and streams for their designated uses such as public water supplies, cold water fisheries and recreation. |
| **PC 591** | **The Forest should use Forestry Best Management Practices as the basis for protection of water courses on the Forest rather than an eclectic mix of limits and prohibitions with apparently little research-based validation, because:**<br>• **It is not necessary to ban logging from slopes over 50 percent**<br>• **Buffers for ephemeral stream channels have no basis in science**<br>• **Excessive restrictions reduce the allowable sale quantity.** |
| Response: | We agree that West Virginia Forestry Best Management Practices should be adhered to as a minimum on all projects. We have added a statement to this effect in the Final Revised Plan.<br><br>Decreased trout productivity can occur when levels of fine sediment exceed 20-25 percent of the sample. Of the 222 spawning gravel samples collected on NFS lands from 1994-1999, 64% exceeded 20 percent fine sediment (DEIS, page 3-60). Once sediment reaches a channel it can stay in the system for months, years, and even decades depending on flow and channel characteristics (DEIS, page 3-78). Since ephemeral and small intermittent channels can carry sediment to trout-producing streams, it is justifiable to protect these channels from sedimentation. It is well documented that buffers are effective in reducing the amount of sediment in runoff. In addition, there is greater risk of stream sedimentation when logging on slopes over 50 percent. Sediment from activities on steep slopes is more likely to reach nearby stream channels without the protection of buffers. |
| **PC 29** | **The should protect rivers and streams and aquatic biodiversity from siltation by limiting road** |

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| | **building and clearcutting, providing adequate buffer zones, and providing the necessary funding for stream clean-up:**<br>• **To attract tourism**<br>• **To protect brook trout**<br>• **To protect drinking water**<br>• **To protect recreational opportunities**<br>• **To protect plants and animals**<br>• **Including Tier 3 and Tier 2.5 segments**<br>• **Including headwaters and upper reaches of streams.** |
| | The primary discussion of land management activities and their potential effects on waterways can be found in the DEIS (pages 3-53 to 3-92). Direction to protect soil and water resources can be found in the 1986 Forest Plan (pages 79 to 87 and the Fisheries Amendment 3) and in the Proposed Revised Plan (pages II-8 to II-13), with additional direction located in the Wildlife and Fish section (pages II-25 to II-27). Direction for soil, water and fisheries resources is intended to protect the range of values associated with healthy watershed and aquatic ecosystems.<br><br>A number of commenters have expressed their preference for Alternative 3 because it better protects rivers and streams. The direction for riparian and aquatic resource protection is actually the same for all the action alternatives (2, 3, and 4). The direction in the No Action Alternative is similar to the action alternatives but the language is a little more permissive. What is different between the alternatives is where projects may potentially occur. Management Prescriptions that are actively managed vary by alternative, but projects implemented within any of the action alternatives have the same direction that is applied at the project level given site-specific conditions.<br><br>Commenters also mentioned the lack of emphasis on Tier 2.5 streams during the revision process. The two main reasons why Tier 2.5 streams did not receive emphasis are 1) the Tier 2.5 list is likely incomplete and does not account for all streams that support wild or native trout on the Forest, and 2) forest management activities are generally considered exempt if Best Management Practices are properly applied and we feel that the direction in the Revised Plan meets or exceeds BMPs.<br><br>The Tier 2.5 list is a useful tool during watershed assessments and project planning for identifying high quality streams in the planning areas, but we do not consider it all-inclusive. Rather than focus on the various values associated with specific streams or stream reaches, the forest planning focus was on addressing aquatic system processes such as minimizing soil disturbance within watersheds, protecting channel buffers along all channel types, and reducing aquatic habitat fragmentation. All channels deserve a level of protection regardless of their resource value because ultimately they are connected in a drainage network that has a range of values. The specific values associated with a stream, such as native trout, municipal water supply, species of concern or 303(d) listing, can be factored in at the project level to reduce the risk to these resources even further. |
| **PC 228** | **The Forest should seek a longer-term solution for watershed improvements than rock gabions.** |
| Response: | Rock gabions are seldom used for watershed restoration projects, but there may be instances where project-specific conditions may warrant their use or they are viewed as a viable alternative to accomplish management objectives. |
| **PC 980** | **The Forest should recognize that many streams (e.g. upper Shavers Fork) would benefit from various types of stream/habitat improvements, and these improvements could be accomplished by a number of methods such as log dams, deflectors, etc., as well as natural stream channel design using Rosgen methodology.** |
| Response: | We agree, and we have added objectives in the Final Revised Forest Plan to address riparian and fish habitat improvements, including instream structures. In order to meet site-specific conditions and management objectives, the specific types of structures or corrective measures are best described during project planning and development. |
| **Riparian Areas** | |
| **PC 551** | **The Forest should deduct riparian areas from the timber base if it is going to exclude these areas from timber harvesting.** |

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| Response: | We deducted perennial and intermittent stream channel buffers from the suitable base in the DEIS and Proposed Revised Plan. These buffer areas are not excluded from timber harvest, but rather harvest may only occur for reasons described in Standard SW34 in the Proposed Revised Plan. However, it was not feasible to determine the amount of very small intermittent and ephemeral channels that are actually on the ground, so some of these areas remain in the suitable timber base for now. There is a concern that this unmapped area may affect the suitable base. Monitoring the effects of these riparian buffers on suitable acres over the planning period should help us to make any needed adjustments. |
| **PC 154** | **The Forest should not prohibit large tree harvesting in riparian areas.** |
| Response: | Forest Plan direction does not prohibit the harvesting of trees in riparian areas. Tree cutting within channel buffers may take place as outlined in SW34 on page II-11 of the Proposed Revised Forest Plan. Rather than remove timber from riparian areas, the preference may be to directionally fell trees to provide large woody debris recruitment while meeting other silvicultural objectives. |
| **PC 145** | **The Forest should establish buffer zones around Cherry River, Dobbins Trail, and the North Fork of the Blackwater River in order to promote tourism.** |
| Response: | We have established buffer zones for all stream channels on the Forest and management direction for those buffers. See the Soil and Water section of Chapter II in the Revised Forest Plan. We have not established buffers around trails, but we do have trail management direction in the Recreation Resources section of Chapter II. |
| **PC 417** | **The Forest should take in to account the recent Clinton executive orders on riparian areas and floodplains.** |
| Response: | The Forest must comply with all laws and regulations governing the management of National Forest System lands, including applicable executive orders that are in effect from the current and past administrations. |
| **PC 102** | **The Forest should consider that its proposed stream channel buffers are too restrictive and not based on the best available science.** |
| PC 102a | BECAUSE REMOVING SELECTED TREES FROM A RIPARIAN ZONE DOES NOT INCREASE SEDIMENT OR NUTRIENT FLOW TO A STREAM AND MAY BENEFIT AQUATIC ORGANISMS |
| Response: | We recognize that removing selected trees from riparian areas may not necessarily increase sediment so long as ground disturbance does not occur during tree removal. However, leaves and branches from riparian areas are important sources of food and organic inputs in headwater streams (DEIS, p. 3-72). The removal of riparian trees is not necessarily a benefit to aquatic organisms from a nutrient standpoint. In addition, riparian forests provide shade to maintain viable stream temperatures for cold water species and they provide large woody debris (LWD), which is important for channel stability, habitat complexity, and the retention of sediment, moisture, and organic matter. |
| PC 102b | BECAUSE THE BUFFERS WILL ADVERSELY AFFECT THE ABILITY TO MANAGE THE TIMBER STAND ADEQUATELY |
| Response: | Stream buffers have not eliminated the ability to manage timber stands in the past. Recent projects designed under the 1986 Plan typically had buffer strip widths similar to those prescribed in the Revised Plan to protect stream channels and provide sources of LWD. |
| PC 102c | BECAUSE FEARS OF CALCIUM DEPLETION ARE UNFOUNDED DUE TO CALCIUM RECHARGE FROM ROCK |
| Response: | Natural processes should slowly add nutrients and calcium to the soil; the concern is that we are removing them faster than they are added due to acid deposition, and harvest removal of nutrients and calcium can further accelerate this process. Likewise, soils naturally acidify due to physical and chemical weathering. The rate of weathering of parent materials has not been modeled on this Forest; however data collected from various soil types on multiple geologies from the USDA-NRCS Soil Survey Division does show that certain soil types are not replenishing calcium from weathering of parent materials. Bailey et al. (2005) have shown that soils underlain by the Pottsville geologic formation in Pennsylvania within the study area have acidified at accelerated rates within the last 30 years and have lost significant measurable amounts of base cations. This same geologic formation and other acidic sandstones and shales exist with the Forest. Therefore, the same concerns about accelerated loss of base cations should be considered. |

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| | In general, the Forest uses an Order 2 Soil Survey, which is mapped at a scale of 1:24,000 or more with more detail in some counties. This mapping allows for the delineation of a soil map unit down to 5 acres. The intensity level needed is determined by the scope of the project, including the type and amount of management proposed, and the soil-related characteristics in the project area. The Line Officer responsible for the project makes decisions about the detail of analysis and inventory required. The Forest Soil Scientist provides expertise as to whether the data available is adequate to analyze the effects of a project in a given area. |
| **PC 51** | **The Forest should protect riparian areas to protect aquatic ecosystems, water quality, drinking water, and trout populations.** |
| Response: | Forest-wide Management Direction for Soil and Water Resources in the Proposed Revised Plan includes protection of riparian areas through the implementation of channel buffers (SW37). These buffers shall, at a minimum, encompass the riparian area defined on the basis of soils, vegetation and hydrology and the ecological functions and values associated with the riparian area. The management within these buffers is designed to help protect the riparian ecosystem, water quality, and aquatic resources, including trout. |
| **PC 111** | **The Forest should describe its protection of riparian areas.** |
| Response: | Primary direction for protection of riparian areas is found in the 1986 Forest Plan under FSM 2500, Water and Soil, pages 79-82b. In the Proposed Revised Plan, primary direction for riparian protection is located in pages II-11 to II-13. Forest-wide directions within the 1986 Forest Plan and Proposed Revised Plan are intended to maintain or enhance riparian vegetation and the role it plays in aquatic ecosystem health. The plans differ in language, but both allow for adjustments to riparian protection according to site-specific conditions. |
| PC 111a | INCLUDING THE LIMITS TO TIMBER REMOVAL IN BUFFER AREAS |
| Response: | The Proposed Revised Plan includes a standard for buffer strip widths that restricts programmed timber harvest in order to protect riparian and aquatic conditions. The language in the 1986 Plan is more permissive, but does allow for buffer strips with no harvest. The language regarding no programmed harvest does not preclude cutting trees within channel buffers, but is intended to limit those actions to meeting riparian objectives, health and safety concerns, and a narrow range of activities (e.g. cable logging corridors, road crossings, and utility right-of-ways) that facilitate other management objectives. |
| PC 111b | BECAUSE RIPARIAN BUFFER WIDTHS SHOULD BE DOUBLED WHERE SLOPES ARE GREATER THAN 45 DEGREES |
| Response: | Channel buffer widths are determined at the project planning level based on site-specific conditions such as slope, vegetation type, and floodplain width. Channel buffers are intended to encompass riparian areas and their ecological functions and values, but their widths can be adjusted to address other resource management objectives. The default channel buffers can also be adjusted based on site-specific conditions. See also response to 111d, below. |
| PC 111c | INCLUDING WHAT ARE THE SCIENTIFICALLY BASED SOURCES OF THE FIGURES FOR BUFFER WIDTHS USED AND HOW THEY ARE VALIDATED AND ADJUSTED OVER TIME |
| Response: | Channel buffer widths depend on a number of variables, site-specific conditions, and resource management objectives. Consequently, there are a number of studies that address different forms and functions of buffer widths that come to differing conclusions on what a desired or suitable width is. First and foremost, project-level decisions on buffer widths need to ensure that actions comply with all laws and regulations. Then, the decision has to weigh the various resource management objectives and economic trade-offs of buffer widths. Scientifically based sources of information are used at this point to support the NEPA analysis and disclose the potential effects. A good general reference for riparian areas in the East is the book Riparian Management in Forests of the Continental Eastern United States, edited by Elon S. Verry, James W. Hornbeck and C. Andrew Dollof. |
| PC 111d | INCLUDING WHAT EVIDENCE IS THERE THAT THE PRESCRIBED BUFFER WIDTH WILL BE ADEQUATE OVER TIME TO RECRUIT THE LARGE WOODY DEBRIS NECESSARY TO RESTORE NATURAL STREAM FUNCTION |
| Response: | Most riparian studies have focused on the role and function of large woody debris (LWD) in stream channels, but there are a few dealing with buffer widths and recruitment potential. In general, the probability of a tree hitting a channel depends on the height of the tree and its distance from the channel. Trees along the bank have a greater probability of hitting the channel, and the probability decreases the |

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| | further away from the stream a tree is, until a tree has no potential to hit the stream if it falls. Because of this principle of diminishing probability, a doubling of buffer widths does not necessarily translate into a doubling of LWD recruitment to a stream channel.<br><br>McDade et al 1990, evaluated the source distance of LWD in 39 streams in the Pacific Northwest and found that 70% of the LWD that was recruited from riparian areas originated from within 66 feet of the stream channel. For hardwood species, 83% of the recruitment came from within 33 feet, and all hardwood LWD originated from within 82 feet. For conifers with taller average stand heights, the source distances were greater. Approximately 53% of the conifer LWD recruitment originated from within 33 feet of the channel, and 87% originated within 82 feet. A similar study in Oregon by May and Gressel, 2003, found 80% of LWD recruitment in headwater streams came from source distances of 30-50 meters (98-164 ft).<br><br>Channel buffers are intended to be designed at the project level to provide for a variety of functions, including recruitment of LWD. In the event that the default buffer widths are used, we feel, based on the available literature, that an adequate source of potential LWD will be retained. We can speculate that our default buffers along perennial channels would provide similar rates of recruitment potential in hemlock and spruce stands as those observed in the studies. It would be closer to 100% of the recruitment potential in hardwood stands. For small, intermittent and ephemeral channels, the default channel buffers are reduced to 50 feet and 25 feet along both sides of the channel respectively. These represent a decrease in the recruitment potential within the treated areas, but these streams typically have less stream energy and transport of LWD is reduced. |
| PC 111e | TO PROTECT WATER RESOURCES AND ECOSYSTEM HEALTH |
| Response: | Direction within the 1986 Forest Plan and the Proposed Revised Forest Plan is intended to protect water resources, their designated uses and the health of aquatic ecosystems. |
| PC 111f | INCLUDING WHY THERE ARE NO BASAL RETENTION REQUIREMENTS IN THE DEIS |
| Response: | The harvest prescriptions and residual basal area for stands inside or outside of the channel buffers are best determined at the project planning level given site-specific conditions and vegetation management objectives. |
| PC 111g | BECAUSE GUIDELINES AND STANDARDS MUST BE DEVELOPED THAT INCORPORATE THE FACT THAT RIPARIAN BUFFERS CANNOT OPERATE AS THE SOLE MEANS OF PROTECTING STREAMS AND AQUATIC RESOURCES |
| Response: | There are a number of standards and guidelines throughout the 1986 Forest Plan and Proposed Revised Plan that directly or indirectly protect soil and water resources. They go well beyond the channel buffers and can be found in a range of program areas and management prescriptions. The primary direction to protect soil and water resources in the 1986 Forest Plan can be found from pages 79 to 87, and the Fisheries Amendment – Amend. 3. Primary direction is found in the Proposed Revised Plan (pg II-8 to II-13) with additional direction located in the Wildlife and Fish section (pg II-25 to II-27). |
| PC 111h | INCLUDING WHY THE FOREST REMOVED THE REQUIREMENTS UNDER WHICH IT HAS BEEN OPERATING IN THE RECENT PAST |
| Response: | Riparian requirements have not changed since the 1986 Forest Plan and our direction has remained the same since then. The riparian requirements implemented in the recent past are an example of our ability to build upon the 1986 Forest Plan direction at the project level. Riparian prescriptions developed during project planning in recent years are similar to the standards and guidelines incorporated in the Proposed Revised Plan. |
| PC 111i | INCLUDING PROVIDING MONITORING AND EVALUATION EVIDENCE THAT RIPARIAN BUFFERS ARE NOT NEEDED |
| Response: | We never stated that channel buffers are not needed. Channel buffers will be designed at the project level to address site-specific conditions and objectives. Residual basal area for stands beyond the channel buffer will also be based on site-specific conditions and vegetation management objectives. |
| PC 111j | BECAUSE UNDER NO CIRCUMSTANCES SHOULD ROADS BE ALLOWED TO BE BUILT IN THE RIPARIAN BUFFERS |
| Response: | Your preference would be highly impractical for actual Forest management or access opportunities. Opportunities exist to eliminate existing roads within riparian areas, either through closures or |

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| | relocation, but there is no direction within the 1986 Forest Plan or Proposed Revised Plan to preclude future access through riparian areas. Rather, direction is provided to minimize the potential impacts associated with any new road construction (Proposed Revised Plan; Chapter II, SW25, SW35, SW36, SW44, SW45, SW46 and SW51). |
| PC 111k | INCLUDING EXPLAINING WHY THERE IS NO QUALITATIVE COMPONENT TO THE STANDARDS AND GUIDELINES ADDRESSING RECONSTRUCTION, INTENSITY OF USE, TIME FRAMES FOR TEMPORARY ROAD USE, ETC. |
| Response: | We have added direction for temporary roads to the Final Revised Plan, Chapter II, Roads and Facilities section. |
| PC 111l | INCLUDING HOW THE FOREST WILL ADDRESS RIPARIAN DEGRADATION AND INCREASED SEDIMENT MIGRATION IF PROJECT LEVEL MITIGATION MEASURES ARE NOT PROTECTING SENSITIVE RIPARIAN RESOURCES |
| Response: | Project-level planning is intended to reduce the impacts associated with land management activities through project design and identification of mitigation measures. In addition to these measures, standard contract clauses and contract administration protect project areas during project implementation. When adverse conditions exist, implementation can be terminated until favorable conditions return. When unintended impacts occur, corrective measures are also taken. See also response to PC 111n, below. |
| PC 111m | INCLUDING WHY THERE ARE NO PROVISIONS IN THE FOREST PLAN GIVING THE FOREST THE POWER TO ALTER OR SUSPEND TIMBER CONTRACTS THAT ARE SIGNIFICANTLY DEGRADING RIPARIAN RESOURCES |
| Response: | The Forest has the ability, through contract clauses, to suspend management activities that are having an adverse impact on soil and water resources until conditions allow for a continuation of operations (e.g. drier conditions or freezing conditions), or until corrective measures are taken (e.g. adding gravel to a road surface). It is not necessary for the Forest Plan to grant authorities we already have. |
| PC 111n | INCLUDING HOW THE FOREST EXPECTS TO ACCURATELY UNDERSTAND THE EFFECT THEY ARE HAVING ON RIPARIAN RESOURCES IF THEY ONLY MEASURE IT EVERY 1-5 YEARS |
| Response: | Project level monitoring, Forest-wide monitoring, cooperating with researchers, and reviewing current literature are a few of the ways we develop our understanding of riparian resources, their current conditions, and potential management effects. Field reconnaissance during project planning and implementation gives us a picture of the existing riparian conditions within a project area and the potential effects associated with implementing the project. Forest-wide monitoring of water quality and stream temperatures provides an indication of riparian conditions in sampled streams. Information on riparian conditions is also collected during aquatic habitat surveys to develop an aquatic ecological classification system on the Forest. While the monitoring element targets a 1-5 year frequency on determining the effects of forest management on ecosystem health, the information to support that evaluation is collected annually with water quality data, fish population data, sediment sampling and other efforts. |
| PC 111o | BECAUSE THE FOREST SHOULD USE THE EAST GAULEY MOUNTAIN SETTLEMENT RIPARIAN MONITORING PROTOCOLS AS A GUIDELINE FOR MONITORING DURING ALL TIMBER SALES |
| Response: | The East Gauley Mountain Settlement was specific to ten streams in the East Gauley Mountain project area. We are not bound by this agreement to apply these riparian requirements on other parts of the Forest. With that said, the direction within the 1986 Forest Plan and the Proposed Revised Plan does not preclude us from applying similar riparian prescriptions. The riparian requirements are best determined at the project level given the site-specific conditions. If you look at the minimum buffer widths in the East Gauley Mountain Settlement (ephemeral channels 50 feet on either side of the channel, 50 feet on either side of intermittent channels and 100 feet on either side of perennial streams), they are very similar to the default buffer widths identified in the Proposed Revised Plan (SW37). |
| PC 111p | BECAUSE THE FOREST SHOULD FOREST SERVICE SHOULD COLLECT DATA FROM RIPARIAN AREAS EXPECTED TO BE EFFECTED BY TIMBER HARVEST, INCLUDING MACRO-INVERTEBRATE POPULATIONS, TURBIDITY, FISH POPULATIONS, CHANNEL MORPHOLOGY, AND TROUT SPAWNING GRAVEL QUALITY |

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| Response: | The Forest uses a range of aquatic resource information during project level planning and analysis. Depending on the issues, scope and magnitude of the project, the data collection may include fish population sampling, water quality sampling, sediment sampling and habitat data. Existing information is also used, including data from the WVDNR, universities and researchers with the Forest Service. General observations on riparian and aquatic conditions are also made during project area reconnaissance.<br><br>In addition to project-level data collection, aquatic resource information is also collected as part of a Forest-wide effort to assess and classify existing aquatic conditions. These efforts include stream surveys, water quality sampling and fish population sampling. The data collection is typically done by Forest personnel, and often in partnership with other groups and agencies. |
| PC 111q | INCLUDING HOW THE FOREST EXPECTS TO ASSESS WHAT EFFECT TIMBER HARVEST ARE HAVING ON THE FOREST'S RIPARIAN RESOURCES IF YOU DON'T KNOW WHAT THE CONDITIONS WERE BEFORE THE HARVEST |
| Response: | This element is similar to Public Concern 111n (see above). Forest-wide monitoring, field reconnaissance during project planning and project area inspection during implementation are ways we understand existing riparian conditions and the potential impacts associated with land management activities. Chapter IV in the 1986 Forest Plan and Proposed Revised Plan includes the monitoring objectives for riparian and aquatic resources. Site-specific information is also collected during project planning and implementation. |
| PC 111r | INCLUDING WHY THE FOREST HAS NOT NOTED THE SPECIAL MONITORING IT MUST FACILITATE IN THE EAST GAULEY MOUNTAIN AREA IF IT IS DESIGNATED 4.1 AND OPEN TO TIMBER HARVESTS |
| Response: | The monitoring in the East Gauley Mountain area is part of the East Gauley Mountain settlement, and is independent of this plan revision. The monitoring is ongoing and will continue, regardless of what prescription the area is given by plan revision. |
| **PC 611** | **The Forest should consider whether or not present buffer zones around streams are adequate because road-related sedimentation and turbidity continue to be a problem.** |
| Response: | Buffers and filter strips serve a number of functions along stream channels, so they may be adequate in some functions, but inadequate in others, especially where existing problems occur. In the case of road related problems, existing roads in close proximity to stream channels can impact streams and water quality. Opportunities exist to close problematic roads, relocate them away from channels, or make improvements to minimize erosion and sedimentation impacts. These opportunities are best determined at the project level to account for site-specific conditions and management objectives. |
| **PC 418** | **The Forest should clarify what percentage of the Forest falls in the riparian areas.** |
| Response: | We estimate that approximately 8% of the Forest lies within the stream channel buffers as described in SW37 on page II-11 of the Proposed Revised Plan. These channel buffers are not directly equivalent to riparian areas, however, which vary widely on the landscape. This variance is one reason why we have chosen to make the stream channel buffer widths flexible.<br><br>One commenter mentioned protection of wetlands, which represent less than 1% of NFS lands. The direction for riparian areas applies to wetlands, as well as SW51, which mentions wetlands specifically. |
| **PC 423** | **The Forest should consistently enforce its standard regarding channel buffers to protect and maintain the riparian areas, ecological functions, and values of streams.** |
| Response: | The Forest is required to implement and abide by all standards set forth in the Forest Plan. Channel buffers, as outlined by SW 37 in the Proposed Revised Plan, will be implemented at the project level. |
| **PC 132** | **The Forest should implement a Forest-wide plan for riparian protection.** |
| Response: | Primary direction for protection of riparian areas is found in the 1986 Forest Plan under FSM 2500, Water and Soil, pages 79-82b. In the Proposed Revised Plan, the primary direction for riparian protection is located on pages II-11 to II-13. |
| PC 132a | INCLUDING A 100-FOOT MINIMUM BUFFER ZONE ON ANY SLOPE OVER 20 PERCENT |
| Response: | Standard SW37 (page II-11, Proposed Revised Plan) states that channel buffer widths will be designed at the project level based on site-specific conditions. Adjustments to buffer widths would be due to factors such as slope (as suggested), soil types, vegetation type, or floodplain width. |

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| PC 132b | INCLUDING NO LOG LANDINGS OR HAUL ROADS WITHIN BUFFER ZONES |
| Response: | SW40, SW44 and SW 45 (page II-12, Proposed Revised Plan) address skid roads, log landings and haul roads within riparian areas. The intent of this direction is to avoid soil-disturbing activities within close proximity of channel networks. |
| PC 132c | INCLUDING REQUIRING SUITABLE CULVERTS AT STREAM CROSSINGS TO HANDLE HIGH WATER |
| Response: | SW46 (page II-12, Proposed Revised Plan) addresses the ability of stream crossing structures to pass storm flows. |
| PC 132d | INCLUDING A REQUIREMENT FOR 85 PERCENT CANOPY |
| Response: | Channel buffers are intended to protect streamside vegetation and stream canopy. This is especially important along perennial channels and coldwater streams. We acknowledge the preference for an 85% canopy, but feel that buffers 100 feet on either side of perennial channels will adequately protect stream temperatures and existing canopy conditions. |
| PC 132e | INCLUDING REQUIRING ALL HAUL ROAD SLOPES OVER 20 PERCENT GRADE BE SEEDED AND MULCHED |
| Response: | SW14 and SW19 (page II-9 and II-10, Proposed Revised Plan) are intended to protect soils and minimize soil erosion on disturbed soils, not just haul roads over 20 percent grade. Additional mitigation measures may be prescribed during project planning and design as needed. |
| PC 132f | INCLUDING REQUIRING NO HAUL ROADS OVER 30 PERCENT GRADE |
| Response: | This requirement would be consistent with West Virginia BMPs that recommend haul roads should be 10% or less, and not exceed 15%. We will meet or exceed state BMPs. |
| PC 132g | INCLUDING REQUIRING WATER BARS NOT EXCEED 200 FEET AND CLOSER ON STEEPER SLOPES |
| Response: | West Virginia BMPs recommend culvert spacing of 200 feet on road grades of 2-10%, 150 feet on 12% grades, and 100 feet on 14% grades. The frequency of drainage structures, including water bars, can be increased based on site-specific conditions such as soil types, slope, vegetative cover, etc. |
| PC 132h | INCLUDING A 150-FOOT BUFFER ON EACH SIDE OF PERENNIAL STREAMS |
| Response: | Buffer widths are determined during project-level planning and may exceed 150 feet based on site-specific conditions (see Standard SW37 in Proposed Revised Plan, page II-11). |
| PC 132i | INCLUDING 100-FOOT BUFFERS ON EACH SIDE OF LARGE AND SMALL INTERMITTENT STREAMS |
| Response: | Buffer widths are determined during project-level planning and may exceed 100 feet on intermittent channels based on site-specific conditions (see Standard SW37 in Proposed Revised Plan, page II-11). The default buffer widths of 50 feet on small intermittent streams should provide large woody debris recruitment, organic inputs, and bank stability along the smaller channels with less stream energy. |
| PC 132j | INCLUDING 50-FOOT BUFFERS ON EACH SIDE OF EPHEMERAL STREAMS |
| Response: | Buffer widths are determined during project-level planning and may exceed 50 feet based on site-specific conditions (see Standard SW37 in Proposed Revised Plan, page II-11). The default buffer widths of 25 feet on ephemeral channels should provide large woody debris recruitment, organic inputs, and bank stability along these lower energy systems. |
| PC 132k | INCLUDING FORMAL MONITORING OF ALL FOREST PROJECTS AND ACTIVITIES TO EVALUATE STREAM AND WATERSHED IMPACTS |
| Response: | Given existing workloads and funding levels, it is not possible to formally monitor all Forest projects and activities for stream and watershed impacts. We also know through past experience and professional judgment that not all projects or activities result in an impact to streams and watersheds. Rather, projects are generally monitored during implementation to ensure protection of soil and water resources. Formal monitoring of aquatic resources occurs on specific projects, such as the East Gauley Mountain, or as part of a Forest-wide effort to assess resource conditions, such as water quality. We also work with the Fernow Experimental Forest to understand the potential effects of land management on watershed and stream conditions. |
| PC 132l | INCLUDING ADOPTING ALL THE RIPARIAN AREA MANAGEMENT STANDARDS AGREED UPON IN THE EAST GAULEY SETTLEMENT AGREEMENT |
| Response: | Although those guidelines did not apply to riparian areas outside of the East Gauley Mountain project area, we feel the direction in SW37 is similar, and these guidelines can be exceeded based on site- |

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| | specific conditions. |
| PC 132m | INCLUDING PROHIBITING CLEARCUTTING |
| Response: | Regeneration harvests, including clearcuts with reserve trees, may be used to achieve a range of vegetation and wildlife management objectives in the Revised Forest Plan. We feel the riparian and associated vegetation management and soil and water direction in the Revised Forest Plan allows us to avoid or mitigate the potential effects of clearcutting on aquatic resources. |
| **PC 76** | **The Forest should increase the buffer areas near rivers and streams:**<br>• **To protect watersheds, fish and wildlife habitat, fisheries, and drinking water**<br>• **To protect the biological and geochemical importance of natural water systems**<br>• **To prevent erosion, run-off and flooding, and the spread of invasive plants**<br>• **To limit fire risk**<br>• **To protect recreational opportunities and attract tourism**<br>• **To improve water quality and the viewshed**<br>• **To benefit wilderness areas**<br>• **To at least 100 feet**<br>• **Including doubling the widths where the slope is greater than 45 degrees**<br>• **Including doubling the widths where the slope is greater than 15 degrees**<br>• **Including more than doubling the width on steep slopes**<br>• **Including prohibiting ground disturbing activities in these areas other than timber harvest**<br>• **Including tailoring the buffer width to the specific site**<br>• **Including a 300 to 600-meter buffer for drainages occupied by wood turtles**<br>• **Because large trees provide streambank stabilization and the extended root wads provide stream habitat for fish** |
| Response: | This public concern is a combination of statements related to resource values, riparian function, and potential effects of land management activities on riparian areas and buffer strips. Primary direction for protection of riparian areas is found in the 1986 Forest Plan under FSM 2500, Water and Soil, pages 79-82b. In the Proposed Forest Plan, the primary direction for riparian protection is located in pages II-11 to II-13. Forest-wide direction is intended to maintain or enhance riparian vegetation and the role it plays in aquatic ecosystem health. The plans differ in language, but both allow for adjustments to riparian protection according to site-specific conditions. The Proposed Revised Plan includes a standard for default buffer strip widths (SW37) based on channel flow regimes.<br><br>Channel buffers are intended to encompass riparian areas and their ecological functions and values, but their widths can be adjusted to address other resource management objectives. Channel buffer widths are determined at the project planning level based on site- specific conditions such as slope, vegetation type, and floodplain width. First and foremost, project-level decisions on buffer widths need to ensure that actions comply with all laws and regulations. Then, decisions have to weigh the various resource management objectives and economic trade-offs of buffer widths.<br><br>There were a number of public comments related to doubling the default buffer widths, either in general or related to site-specific conditions such as slope. The intent is to identify buffer widths during project planning based on site-specific conditions. In some cases, default buffer widths can be prescribed and adjusted based on existing information. By following the riparian direction, we feel the various functions of riparian areas and their associated values will be protected within project areas. Protection of riparian areas also occurs within those management prescriptions that do not have active management (e.g. MP 5.0, MP 6.2), or in the extensive areas within active management prescriptions that will not be treated during the planning period. |
| **PC 387** | **The Forest should apply stream buffer zones to the floodplain because floodplains are much wider than the recommended buffers and their ecological diversity will not be protected by the standards in the Forest Plan.** |
| Response: | Forest-wide management direction for Soil and Water Resources in the Proposed Revised Plan includes protection of riparian areas through the implementation of channel buffers (SW37). These buffers shall, at a minimum, encompass the riparian area defined on the basis of soils, vegetation and hydrology and the ecological functions and values associated with the riparian area. Floodplains will be included at the |

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| | project level as needed on the basis of hydrology. Floodplains may or may not be wider than channel buffers, depending on the stream and the topography around it. |
| **PC 983** | **The Forest should place areas that are in more sensitive riparian areas—such as high quality trout streams, excessively steep slopes, and areas with the potential of highly erodible soils—in "Shade Strip Zones". Shade Strip Zones are defined as a no-cut or light cut area that provide adequate shading of perennial or intermittent streams so as to stabilize and preserve the biological integrity of the stream.** |
| Response: | The application of channel buffers is intended to protect all surface channels within a project area, not just those considered to be sensitive or high quality. The widths of the buffers are determined during project planning and design, and factors such as slope, vegetation type, and aquatic resource management objectives are considered at that time in prescribing site-specific management objectives. Alternative logging methods, such as helicopters or cable logging, may also be employed where conventional logging methods pose a resource management concern that cannot be mitigated. We feel the term "shade strip" focuses too much on one role of channel buffers and may not apply in some situations such as aspect, topography, flow regime or wide river channels. |

| **WILDLIFE AND FISH** | |
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| **PC 834** | **The Forest should provide adequate management and protection for the black bear, including:**<br>• **Protection from logging and roads**<br>• **Protection for den trees**<br>• **Protection from poaching**<br>• **Analyzing the negative impacts to populations that would foreseeably result from the proposed plan.** |
| Response: | We acknowledge the potential for Forest roads to facilitate access by hunters and poachers, thereby negatively impacting bear populations. Because of this potential, the Forest's management strategy for bears focuses on providing remote habitat through allocations to management prescriptions with a non-motorized emphasis (MPs 4.1, 5.0, 5.1, 6.1, 6.2, and 8.1 SPNM), as well as an emphasis on hard mast production in MP 6.1. Land allocations to these MPs under Alternative 2 total over 70 percent of the MNF. Potential den trees are provided by snag and cull retention direction in the Proposed Revised Plan (TE22, TE30, TE31, 4109, 6107), the lack of programmed timber harvest in MPs 5.0, 5.1, 6.2, and 8.1, and the general aging trend of the Forest (see forest development stage and successional stage analyses in EIS Chapter 3, Terrestrial Ecosystem Diversity and Vegetation Management sections). Potential effects of the alternatives on bear populations were analyzed by integrating the need for remote habitat and the reliance on hard mast into one indicator of optimum habitat (see discussion of black bear in EIS Chapter 3, Terrestrial Management Indicator Species and Other Species |
| **PC 483** | **The Forest should provide appropriate management for grouse.** |
| Response: | We created a new management prescription (MP 8.6) to emphasized grouse management. Management for grouse would also benefit a variety of other early successional species. Grouse and other early successional species also would benefit from the young regenerating forest provided by management for age class diversity on suitable timberlands in MPs 3.0, 4.1, and 6.1. |
| PC 483a | INCLUDING THE SEEDING OF ROADS WITH A VARIETY OF CLOVERS AND OTHER LEGUMES TO ENHANCE HABITAT QUALITY |
| Response: | We have added a new guideline to MP 8.6 to address the seeding of legumes to benefit grouse. |
| PC 483b | INCLUDING REVISING STANDARD 8603 TO ALLOW PUBLIC TRAVEL OF SUITABLE ROADS FOR THE PURPOSE OF GROUSE HUNTING |
| Response: | Standard 8603 from the Proposed Revised Plan has been modified in the Final Revised Plan to allow enough motorized access to ensure adequate hunter distribution during the grouse hunting season. However, the modified direction does not allow unlimited motorized access. Management recommendations developed as part of the Appalachian Cooperative Grouse Research Project state that motorized access should be limited in areas of high hunting pressure due to the potential for impacts on productivity and survival. |
| **PC 824** | **The Forest should evaluate crayfish as a terrestrial species.** |

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| Response: | The viability analysis for *Cambarus monongalensis* has been re-evaluated from a terrestrial perspective. |
| **PC 488** | **The Forest should provide information about the area-sensitive birds that exist in the Forest:**<br>• **Including the habitat needs of the birds**<br>• **Including providing clear standards and guidelines to prevent the taking of birds protected by the Migratory Bird Treaty Act**<br>• **Because the Migratory Bird Treaty Act protects many of these birds.** |
| Response: | Area-sensitive bird species with potential viability concerns were analyzed in the terrestrial species viability evaluation (EIS Chapter 3 Terrestrial Species Viability; EIS Appendix D; individual species analyses are included in the project record and are available upon request). The species viability evaluation considered habitat needs, including forest area requirements.<br><br>The application of the Migratory Bird Treaty Act take prohibition to incidental take associated with land management is a complicated issue. Various courts have issued conflicting rulings on the applicability of the take prohibition to incidental take by federal agencies. However, Executive Order 13186 clarifies the responsibilities of federal agencies in protecting migratory birds (Federal Register 66(11):3853-3856). The EO directs agencies to "…identify where unintentional take reasonably attributable to agency actions is having, or is likely to have, a measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. With respect to those actions so identified, the agency shall develop and use principles, standards, and practices that will lessen the amount of unintentional take…" To fulfill our responsibilities under this EO, the MNF has included direction on the following topics in the Revised Forest Plan:<br>• Identification and prioritization of habitat maintenance, enhancement, and restoration opportunities for Birds of Conservation Concern (BCC) (Goal WF01).<br>• Identification of ongoing and proposed activities that are likely to affect populations of BCC (Goal WF05).<br>• Monitoring of BCC populations sufficient to inform watershed and project planning of potential negative effects and habitat enhancement opportunities (Goal WF06).<br>• Incorporation of avoidance and minimization measures into activities that are likely to have a negative effect on BCC populations (Standard WF11).<br>• Implementation of habitat maintenance, enhancement, and restoration for BCC (Goal WF05, Guideline WF23). |
| **PC 285** | **The Forest should do something to deal with the deer overpopulation problem:**<br>• **Including limiting the herd to a level that is compatible with the long-term health of the Forest**<br>• **Including setting a management goal of less than or equal to 18-20 deer per square mile**<br>• **Including supporting the reduction of the deer herd to 1940 levels and discouraging the stocking of elk**<br>• **Including supporting the reduction of the deer herd to no more than 15,000 animals or about 10 per square mile**<br>• **Because deer adversely impact forest biodiversity**<br>• **Because deer exacerbate the non-native invasive plant problem**<br>• **To protect the timber supply.** |
| Response: | The Forest Service cooperates with state agencies in the management of wildlife and wildlife habitats on National Forest land, but the ultimate responsibility for management of the deer population in West Virginia rests with the West Virginia Division of Natural Resources (WVDNR). The Forest has worked cooperatively with WVDNR on wildlife management issues for decades, and will continue to do so in the future. Should the Forest conclude that deer populations are high enough to cause a substantial impact on tree regeneration or biodiversity, we can make suggestions to WVDNR on population objectives and hunting regulations, and we can work with WVDNR to ensure adequate access for deer hunters. However, it would be inappropriate for the Forest to include goals, objectives, or other direction for deer population reduction in the Forest Plan when we do not have authority over wildlife populations or hunting regulations. |
| **PC 42** | **The Forest should not allow the State Division of Natural Resources to have the power to let the over-population of any animal destroy small game populations.** |

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| Response: | See response to PC 285. |
| **PC 85** | **The Forest should not allow game management.** |
| Response: | Federal agencies, including the Forest Service, are required by law to cooperate with the states in the management of wildlife. Providing habitat for game species is a legitimate multiple-use goal. |
| **PC 506** | **The Forest should take an aggressive approach to re-establishing game populations.** |
| Response: | The Proposed Revised Plan addresses habitat improvements for game and non-game species in direction found in Chapters II and III (see WF01, WF03, WF04, WF05, WF15, WF21, WF23, 3015, 3016, 3017, 4107, 4131, 4132, 5027, 5124, 5125, 6101, 6102, 6104, 6115, 6126, 6128, 6131, 6133, 6134, 6135, 6136, 6137, 6138, 6144, 6145, 6219, 6224, 8601, 8602, 8606, and 8607). Management of wildlife populations is the responsibility of the State, not the Forest Service. |
| **PC 836** | **The Forest should acknowledge that wildlife openings have a negligible impact on wilderness attributes.** |
| Response: | The openings themselves probably do not have a significant impact on wilderness attributes, although many openings feature a relatively high composition of non-native species. However, the wilderness evaluations in Appendix C to the EIS recognize that maintaining wildlife openings through mechanized means would be a non-conforming use in wilderness areas. The WVDNR considers that mechanized activity necessary for opening maintenance. Therefore the openings, which will likely disappear over time without maintenance, are considered values foregone if the areas encompassing them were to be designated as Wilderness. See also response to PC 395. |
| **PC 514** | **The Forest should ensure that wildlife assessments are conducted.** |
| Response: | The Forest conducted a comprehensive species viability evaluation for those species that were determined to have potential viability concerns. See EIS Chapter 3, Watershed, Riparian and Aquatic Resources section; Terrestrial Species Viability section; EIS Appendices D and E. Evaluations for individual species with potential viability concerns are contained in the project record and are available upon request. The Forest also assessed potential effects to wildlife in the EIS, Chapter 3, Terrestrial Management Indicator Species and Other Species of Interest section. |
| PC 514a | INCLUDING ASSESSING THE IMPACTS THAT FISH STOCKING HAVE ON NATIVE FISHES, AMPHIBIANS, INVERTEBRATES, AND OTHER AQUATIC SPECIES |
| Response: | The WVDNR is the agency responsible for stocking fish and assessing the potential impacts on native and desired non-native species. As cooperators, we work with the WVDNR to identify common resource goals and objectives and provide input to their stocking program. |
| PC 514b | INCLUDING DEVELOPING A METHOD TO REMOVE INTRODUCED FISH FROM NATIVE REFUGE AREAS IN THE LEAST ECOLOGICALLY DAMAGING MANNER POSSIBLE |
| Response: | The WVDNR is the lead agency in projects related to fish population management. As cooperators, we would work with them to identify areas of potential concerns with introduced species and alternatives for their removal. |
| PC 514c | INCLUDING IDENTIFYING AND ADDRESSING AREAS OF HIGH AQUATIC BIODIVERSITY THROUGH CREATION OF REFUGIA OR APPROPRIATE STANDARDS AND GUIDELINES |
| Response: | The identification of aquatic diversity refugia is a good idea that can be addressed outside of this planning effort. Watersheds and subwatersheds that occur in management prescriptions that have limited management activities (primarily MP 5.0, 5.1 and 6.2), provide opportunities for relatively undisturbed aquatic refugia depending on the parent geology and the susceptibility of the area to acid deposition. For potential refugia within management prescriptions that are actively managed (primarily MP 3.0 and 6.1), protection is provided by standards and guidelines identified in the 1986 Forest Plan (primarily pages 79 to 89) and in the Proposed Revised Plan (pages II-8 to II-13 and II-25 to II-27). |
| PC 514d | TO PROTECT ENDANGERED SPECIES |
| Response: | Biological assessments for endangered species are required for projects that would affect endangered species or their habitats. A biological assessment was also completed for this Forest Plan revision, and is available on request. |
| PC 514e | INCLUDING ANALYSIS OF THE LINK BETWEEN FOREST MANAGEMENT AND THE NEEDS OF WILDLIFE |
| Response: | The effects of forest management on wildlife habitat were analyzed as part of the species viability evaluation and Management Indicator Species analysis, as cited above. |
| PC 514f | INCLUDING EXAMINING THE EXTENT TO WHICH BREEDING BIRD SURVEYS HAVE |

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| | TAKEN PLACE |
| Response: | Breeding bird surveys that have occurred on and near the Forest were used in the viability analyses for birds. The detailed, species-by-species analyses are contained in the project record. |
| PC 514g | INCLUDING ASSESSMENT OF THE IMPACTS TO SITE-SENSITIVE CREATURES SUCH AS SALAMANDERS |
| Response: | The general thrust of the comment seems to be that most salamander species do best in old forests. All plan alternatives would increase the amount of young forest through timber harvesting, but all alternatives also would provide a substantial increase in old forests due to the continued aging of today's mostly middle-aged stands. The provision of an ample amount of old forest serves as a "coarse filter" method of conserving species associated with that habitat, including many salamanders (see discussion in the EIS, Chapter 3, Ecosystem Diversity section and Vegetation Management section). The species viability evaluation analyzed in detail four salamander species that were determined to have potential viability concerns. These analyses serve as a "fine filter" for addressing concerns for those rare species that may not be adequately conserved by a coarse filter strategy alone. |
| **PC 9** | **The Forest should protect wildlife and habitat—including wild turkey, deer, wood turtle, and all listed species—to provide recreational and hunting opportunities.** |
| Response: | Main PC statement, C, D, E, J, M, O, and T) Many comments expressed a general concern for protection of habitat for particular species or for all wildlife species. All alternatives considered in detail provide for protection, maintenance, enhancement, and restoration of wildlife and habitat, as documented in EIS Chapter 3 in the sections on Water, Riparian, and Aquatic Resources; Terrestrial Ecosystem Diversity; Terrestrial Species Viability; Terrestrial Management Indicator Species and Other Species of Interest; and Threatened and Endangered Species. |
| PC 9a | INCLUDING TROUT STREAMS |
| Response: | See response to PC 831. |
| PC 9b | INCLUDING BLACK BEAR |
| Response: | See responses to PC 831h and PC 834. |
| PC 9c | INCLUDING *TAXUS CANADENSIS* (CANADA YEW), *CROTALUS HORRIDUS* (TIMBER RATTLESNAKE), *AGKISTRODON CONTORTRIX* (COPPERHEAD), AND HERPS |
| Response: | The commenter did not make a substantive comment; (s)he merely stated a position against the "current plight" of these species without elaborating on how Forest management relates to them. |
| PC 9d | INCLUDING THE INDIANA BAT |
| Response: | The Proposed Revised Plan contains direction to protect the Indiana bat and its habitat [see TE21 through TE53 in the Threatened, Endangered or Proposed (TEP) Species section of Chapter II]. |
| PC 9e | INCLUDING THE CHEAT MOUNTAIN SALAMANDER |
| Response: | Direction in the Proposed Revised Plan prohibits ground and vegetation disturbance in occupied Cheat Mountain salamander habitat unless such disturbance would have no adverse effect on populations or habitat (Standard TE56 in the TEP Species section of Chapter II). |
| PC 9f | INCLUDING THE NORTHERN FLYING SQUIRREL |
| Response: | Direction in the Proposed Revised Plan protects the West Virginia northern flying squirrel and its suitable habitat from nearly all management-related adverse effects (TE61 through TE64). |
| PC 9g | TO PROVIDE TOURISM REVENUE |
| Response: | The Forest does not provide tourism revenue, but we would provide habitat for a variety of wildlife species that may attract tourists under all alternatives considered in detail. |
| PC 9h | TO PROTECT AREAS THAT PRODUCE OXYGEN |
| Response: | All alternatives would maintain almost all National Forest System (NFS) lands in forest cover, which would preserve their oxygen-producing capability. |
| PC 9i | INCLUDING DESIGNATION OF LARGER SEGMENTS OF PROTECTED LAND |
| Response: | See response to PC 530. |
| PC 9j | INCLUDING SPECIES THAT REQUIRE EARLY SUCCESSIONAL RIPARIAN HABITAT |
| Response: | Direction in the Proposed Revised Plan for stream channel buffers allows habitat management to benefit riparian species (SW34). |
| PC 9k | INCLUDING SPECIES THAT RELY ON THE BIOLOGICAL AND ECOLOGICAL RESOURCES OF CAVES |

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| Response: | Many locally endemic cave species are on the Regional Forester's Sensitive Species list and are protected by direction in the Proposed Revised Plan (WF01, WF06, WF11, and WF17) and Forest Service Manual direction (FSM 2670). A Region 9 supplement to the Forest Service Manual provides broad protection for cave and karst resources (FSM 2356). |
| PC 9l | INCLUDING THE PINK-EDGED SULFUR BUTTERFLY |
| Response: | The commenter suggested that we change the habitat groups for this species in the species viability evaluation. We have made the change and have updated the analysis accordingly. |
| PC 9m | INCLUDING THE RUFFED GROUSE |
| Response: | See response to PC 483. |
| PC 9n | INCLUDING PROTECTING WILDLIFE CORRIDORS |
| Response: | The vast majority of NFS lands, including those in the suitable timber base, will remain forested at any given point in time. These buffer lands can serve as corridors between reserve areas where natural forces predominate. See discussion of the buffer effect of NFS lands in the Minimum Dynamic Area Reserve discussion on pages 3-113 and 3-114 of the DEIS. However, the Forest's ability to provide for corridors in many areas is limited by land ownership patterns. |
| PC 9o | TO PROTECT BIRDS |
| Response: | See response to PC 488. |
| PC 9p | INCLUDING SALAMANDERS |
| Response: | See response to PC 514g. |
| PC 9q | INCLUDING PROPER MONITORING AND ASSESSMENT |
| Response: | See response to PC 668. |
| PC 9r | INCLUDING THE SNOWSHOE HARE |
| Response: | The commenter suggested that we develop management direction in the plan specifically for the snowshoe hare. Plan direction focuses on species that need special attention during management and monitoring. Accordingly, species-specific direction in the revised plan focuses on threatened and endangered species, sensitive species, and management indicator species. Forest-wide and management prescription direction contains ample provisions for habitat diversity, mast production, snag retention, and other habitat features that is intended to provide for the hundreds of species that are not mentioned by name in the Forest Plan. |
| PC 9s | INCLUDING AMENDING STANDARD WF11 TO BETTER PROTECT SENSITIVE SPECIES AND BIRDS OF CONSERVATION CONCERN |
| Response: | Standard WF11 in the Proposed Revised Plan allows for the accomplishment of project purposes, but requires avoidance and minimization of negative impacts to the maximum extent practical. It also requires mitigation of unavoidable impacts. The purpose and practicality qualifiers are consistent with the planning regulations, which provide for diversity of plant and animal communities within the context of overall multiple-use objectives. Trends toward federal listing are prohibited by higher level manual direction (FSM 2670). |
| **PC 359** | **The Forest should consider the management problems that deer create, including threats to vegetation and rare and endangered plants.** |
| Response: | The issue of excessive deer browsing has become a concern in recent years, as vegetation inventory and stocking surveys have shown an increasing lack of advance regeneration and inadequate species stocking in some areas on the Forest. High density populations of deer have negative effects on the quantity, growth, diversity, and composition of understory forest vegetation (Horsley et al. 2003). Silvicultural treatments prescribed during project-level planning can be implemented to encourage regeneration and/or deter deer browsing but these treatments are costly. The Forest cooperates with WVDNR, the state agency that manages the wildlife management and hunting programs in West Virginia. Decisions to control the deer herds such as extending deer season, or increasing the allowable number of deer to be harvested ultimately rests with WVDNR. We work with WVDNR to open selected Forest roads to facilitate hunter access during deer season. See also response to PC 285. |
| **PC 193** | **The Forest should promote increased scientific study of mammal and bird species in the Forest and its wilderness areas, including protecting plots surveyed by the Brooks Bird Club so they can serve as a basis of comparison for future bird surveys.** |
| Response: | We recognize the value of long-term research and monitoring plots. However, management decisions for areas that are used by others for research or monitoring are best left for case-by-case consideration at |

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| | the project level. See also response to PC 668. |
| **PC 405** | **The Forest should provide protection for species of special concern.** |
| PC 405a | INCLUDING NEST BOXES FOR BARN OWLS WITH A MAINTENANCE PROGRAM IN PLACE |
| Response: | Specific habitat improvement measures are best addressed at the project level. |
| PC 405b | INCLUDING MIGRATORY BIRDS AND BIRDS OF CONSERVATION CONCERN |
| Response: | See response to PC 488. |
| PC 405c | INCLUDING AQUATIC SPECIES OF CONCERN |
| Response: | Protection of aquatic species of concern is primarily tied to the protection of Soil and Water Resources in the Proposed Revised Plan, pages II-8 to II-13. Additional direction is located in the Wildlife and Fish section (pages II-25 to II-27). |
| **PC 482** | **The Forest should reduce squirrel populations.** |
| Response: | The State is responsible for wildlife population management, not the Forest Service. |
| **PC 487** | **The Forest should promote beaver populations where turtles exist by working with WVDNR to close the trapping season.** |
| Response: | The State is responsible for trapping regulations, not the Forest Service. |
| **PC 485** | **The Forest should provide adequate protection for wood turtles.** |
| PC 485a | INCLUDING LISTING THEM AS AN AQUATIC SPECIES |
| Response: | Wood turtles use terrestrial and aquatic habitats. Including them in the terrestrial analysis was a judgment call; one could argue for including them in the aquatic or terrestrial analysis. Although they were included in the analysis for terrestrial species, the aquatic habitat component was considered |
| PC 485b | Including preventing openings created after intensive logging and promoting old growth areas |
| Response: | The commenter states that wood turtles require mature or old forest habitat and that recently logged areas are not good habitat for this species. We generally agree with this contention, and our viability analysis for the wood turtle considered mature and old riparian forests to constitute the primary habitat (EIS Appendix D, Table D-2). |
| PC 485c | INCLUDING PROVIDING SUFFICIENT AMOUNTS OF LARGE AND COARSE WOODY DEBRIS IN STREAMS |
| Response: | All streams large enough to serve as wood turtle habitat are protected by 100-foot-wide buffers on both sides where no programmed timber harvest is allowed (see Standards SW34 and SW37 in the Proposed Revised Plan). One of the main functions of these buffers is to allow trees to mature and die naturally so they can contribute woody debris to the streams. |
| PC 495d | INCLUDING PROVIDING INFORMATION ABOUT TURTLE POPULATIONS AND CAUSES OF POPULATION LOSSES |
| Response: | The commenter asked for detailed data on populations and vital rates for wood turtles on the Forest. As is the case for most species with potential viability concerns, such data do not exist. Conducting the extensive research that would be necessary to provide such data is outside of the mission of the National Forest System. The viability analysis (contained in the project record) fully considered the limited occurrence data that exist. |
| PC 495e | INCLUDING:<br>• RESTRICTING LOGGING OPERATIONS AND ROAD USE IN WOOD TURTLE HABITAT TO THE 3 TO 4 MONTHS IN THE WINTER WHEN TURTLES ARE IN STREAMS<br>• TRAINING LOGGERS IN IDENTIFYING WOOD TURTLES ON-SITE SO THAT THEY CAN BE AVOIDED<br>• ENSURING THAT ADEQUATE MITIGATION EFFORTS ARE CARRIED OUT BY LOGGING OPERATIONS<br>• ACKNOWLEDGING THAT WOOD TURTLE HABITAT EXISTS OUTSIDE OF NARROWLY DEFINED RIPARIAN AREAS<br>• CONSIDERING THE DIRECT, INDIRECT, AND CUMULATIVE IMPACTS OF INTENSIVE LOGGING AND ROAD BUILDING IN TURTLE HABITAT |
| Response: | The riparian corridor that forms the core of wood turtle habitat is protected from programmed timber harvest (see SW34 and SW37 in the Proposed Revised plan), and new roads in this habitat are limited to essential crossings (see SW44 in the Proposed Revised plan). Wood turtles may use habitats outside the protected riparian buffer. However, the majority of Forest land within the known range of the wood |

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| | turtle is in the National Recreation Area, where programmed timber harvest is not allowed. Therefore, we believe that timber harvest and associated motorized equipment use on the Forest pose little risk to wood turtle populations, and that programmatic restrictions on timber harvesting are not warranted. |
| PC 495f | INCLUDING ENSURING THAT WOOD TURTLES ARE PROPERLY, FAIRLY, AND EXPLICITLY CONSIDERED, INVENTORIED, SURVEYED FOR, AND MONITORED |
| Response: | The Monitoring and Evaluation Chapter of the Proposed Revised Forest Plan includes a monitoring item for species viability (Chapter IV, Table 4-3b, item 44). Should Forest management activities pose a potential threat to the wood turtle, viability monitoring would collect the information necessary to ensure that management does not lead to loss of viability or a trend toward federal listing. |
| PC 495g | TO COMPLY WITH NEPA AND NFMA |
| Response: | The viability analysis considered relevant factors and used the best available data, as required by NEPA and NFMA. The viability analysis is summarized in the Terrestrial Species Viability section of EIS Chapter 3 and EIS Appendix D. The detailed viability analyses are contained in the project record and are available upon request. |
| PC 495h | INCLUDING CONSIDERING THE IMPACT ON TURTLES FROM INCREASED RECREATIONAL OPPORTUNITIES |
| Response: | The viability analysis for the wood turtle has been updated to include consideration of potential recreation-related impacts. |
| PC 495i | INCLUDING CONSIDERING THE IMPACTS ON TURTLES FROM THE STOCKING OF TROUT STREAMS |
| Response: | The suggestion that trout stocking increases removal of individual turtles is speculative; we are not aware of any existing research to support this speculation. Regardless, the Forest has no authority to regulate trout stocking, which is conducted by the State of West Virginia. |
| PC 495j | INCLUDING CONSIDERING IMPACTS ON TURTLES FROM MOTOR VEHICLES |
| Response: | The viability analysis for the wood turtle has been updated to include consideration of potential motor vehicle impacts. |
| PC 495k | INCLUDING CONSIDERING IMPACTS ON TURTLES FROM SMALL PREDATORS |
| Response: | The commenter contends that logging will increase predator populations. See response to subconcern e, above. |
| **Wildlife Habitat** | |
| **PC 269** | **The Forest should allow the Forest to remain an island of older, wilder, richer habitat, because there is plenty of private forest land that provides early successional habitat.** |
| Response: | There is very little old forest habitat here at this time. However, much of the Forest would be allowed to grow older under the alternatives analyzed in detail. See the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS. See also responses to PC 530 and PC 690. |
| **PC 699** | **The Forest should examine what areas of remote habitat exist on the forest for primitive, semi-primitive non-motorized, and backcountry recreation.** |
| Response: | The Forest has no areas that are considered primitive under the ROS system. Semi-primitive non-motorized and backcountry recreation areas are identified in the Recreation and Wilderness section of Chapter 3 in the EIS. |
| PC 699a | TO BENEFIT BEARS |
| Response: | See response to PC 834. |
| **PC 404** | **The Forest should prevent fragmentation of habitat because of the effects on habitat quality for the mammal, reptile, bird, and amphibian species found in forests.** |
| Response: | Fragmentation is addressed by the combined effects of land allocations to all of the Management Prescription where large-scale even-aged management is prohibited or unlikely. See the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS. See also responses to PC 530 and PC 690. |
| **PC 323** | **The Forest should prohibit maintaining wildlife openings in all areas designated 5.1 Recommended Wilderness, 6.2 Backcountry Recreation, 8.0 Special Areas, and other roadless areas.** |
| Response: | Maintenance of herbaceous openings for wildlife species that use that type of habitat is a legitimate multiple-use goal for providing a diversity of wildlife habitats. New wildlife openings can only be constructed in MPs 5.1 and 6.2 if they are compatible with the recreational setting and are need for |

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| | ecosystem restoration or TEP/RFSS species (see standards 5124 and 6220 in the Proposed Revised Forest Plan). Wildlife habitat management in MP 8.0 areas would be consistent with the management emphasis and direction of each individual area (see Guideline 8012 in the Proposed Revised Forest Plan); therefore, construction of wildlife openings in 8.0 areas would be unlikely if they have the potential to damage the special features. |
| PC 323a | BECAUSE THIS APPROACH TO WILDLIFE MANAGEMENT LEADS TO FRAGMENTATION OF OTHERWISE INTACT FOREST, WHICH FAVORS "EDGE" WILDLIFE LIKE DEER, CROWS, BROWN-HEADED COWBIRDS, BLUE JAYS, COYOTES, ETC. |
| Response: | Management prescription allocations under all alternatives would provide for large core areas of contiguous forest where natural disturbance and recovery processes predominate. See EIS, Chapter 3, Terrestrial Ecosystem Diversity section, subsection on Minimum Dynamic Area reserves. |
| **PC 496** | **The Forest should allow 1 to 2 acre wildlife openings and 5 to 10 acre savannahs in Management Prescription 8.1 to provide a continued diversity of habitats for wildlife species and hunting opportunities.** |
| Response: | Guideline 8103 from the Proposed Revised Forest Plan has been rewritten to indicate that openings may be maintained or developed for wildlife habitat. |
| **PC 212** | **The Forest should explain why direction does not protect all habitats instead of "most rare habitats".** |
| Response: | Guideline VE12 in the Proposed Revised Forest Plan provides nearly complete protection for rare communities. However, at the programmatic level it is not possible to ensure that all potential impacts are completely avoidable. |
| **PC 113** | **The Forest should consider land 50 miles beyond its proclamation boundary with its coarse filter.** |
| Response: | The species viability requirement applies to lands within the proclamation and purchase unit boundaries. The purpose of the coarse filter is to gauge the potential for maintenance of habitats across this landscape to provide for the viability of most of the common species. |
| **PC 477** | **The Forest should limit the number of wildlife openings created, including in 3.0 areas.** |
| Response: | The desired condition for wildlife openings calls for 3 to 8 percent of the landscape in openings in MPs 3.0 and 6.1, and up to 5 percent of the landscape in openings in MP 4.1. The other MPs do not have desired conditions for wildlife openings; little or no development of new openings is expected in these MPs. Therefore, wildlife openings will be limited to a relatively small portion of the landscape. Regeneration harvests are not counted toward wildlife opening objectives because they do not provide the same type of long-term herbaceous habitat that is provided by maintained openings. |
| **PC 515** | **The Forest should examine the biological carrying capacity of larger blocks of habitat.** |
| Response: | The Minimum Dynamic Area (MDA) reserve size threshold was established based on natural disturbance regimes rather than carrying capacity for particular species. Carrying capacity is a difficult parameter to evaluate accurately; therefore, we used a coarse-filter approach that provides for ample representation of the major natural communities in MDA reserves. These reserves are surrounded by buffers of managed National Forest land that provide additional habitat for most species and further enhance the function of the reserves. See MDA discussion in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. |
| **PC 112** | **The Forest should acknowledge that it does not have to provide a mix of diverse habitats if those habitats predominate off the Forest and surround the Forest.** |
| Response: | Providing a diversity of habitats is a legitimate multiple-use goal and is in keeping with the diversity requirements of the National Forest Management Act implementing regulations [36 CFR 219.26, 219.27(a)(5), 219.27(g)]. Diverse habitats on private lands may not provide adequate hunting and wildlife viewing opportunities for members of the public who do not have access to those lands. Private land timber harvest may also result in the creation of commercial development or agricultural tracts that do not function as early successional habitat. |
| **PC 348** | **The Forest should provide well-distributed habitat for species that require unique habitat, including old growth forests, high-quality riparian forests, remote habitat, high-elevation forests, mature mixed mesophytic forests northern hardwood forests, northern evergreen forests, oak-hickory forests, grass balds, glades and bogs, floodplain communities, cliffs and rocky places, cave habitats, karst habitats, and shale barrens.** |
| Response: | Habitat variety and distribution are addressed in the Terrestrial Ecosystem Diversity section of Chapter |

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| | 3 in the EIS. Due to their rare nature and the specific conditions under which some unique habitat types are formed, they will never be well-distributed. |
| **PC 352** | **The Forest should reduce the projected future maintained openings to less than 15,000 acres across all alternatives.** |
| PC 352a | BECAUSE OPENINGS CONCENTRATE ANIMALS, ENCOURAGING THE DEVELOPMENT OF DISEASE |
| Response: | Maintained openings on National Forest System land do not include supplemental feeding or baiting of animals, which is believed by many wildlife scientists to increase disease and parasite transmission. We have seen no evidence to suggest that maintained openings by themselves concentrate animals enough to affect disease transmission. |
| PC 352b | BECAUSE OPENINGS PROMOTE THE ESTABLISHMENT OF NON-NATIVE INVASIVE PLANTS |
| Response: | Risks associated with non-native invasive plants are addressed by Proposed Revised Plan direction VE15 through VE21, and VE05. The Non-native Invasive Plants section of the EIS, Chapter 3 addresses the potential for maintained openings to contribute to the spread of non-native invasive plants. |
| **PC 65** | **The Forest should protect large, continuous, and contiguous areas of habitat to prevent species from becoming endangered or extinct, including connecting roadless areas with roadless corridors.** |
| Response: | See responses to PC 530 and PC 690. |
| **PC 512** | **The Forest should restrict wildlife openings along the Northridge trail to the north ridge top of the basin.** |
| Response: | The site specificity of this request is beyond the scope of plan revision. |
| **Fish and Aquatic Habitat** | |
| **PC 702** | **The Forest should provide the same sediment protection to potential trout fisheries as high quality trout streams.** |
| Response: | Direction within the 1986 Forest Plan and the Proposed Revised Forest Plan is applied to functioning channels within the Forest. This includes perennial, intermittent and ephemeral channels, as well as fish-bearing and non-fish-bearing streams. Streams that are currently acidic but could be treated with limestone fines will also have sediment protection applied to them. |
| **PC 422** | **The Forest should provide sensitive management to the Shavers Fork south of U.S. Highway 250 to restore the native brook trout fishery.** |
| Response: | The Forest shares the concern and interest in the management of the Upper Shavers Fork watershed, and the restoration of the native brook trout fishery. Efforts in recent years include contracting a watershed assessment, planning and implementing a number of watershed improvement projects, riparian improvements, road crossing improvements, and acid remediation. Efforts are also underway to evaluate the potential for instream habitat improvements and rehabilitation of an old strip mine.<br><br>During the revision process, the Upper Shavers Fork has primarily been placed in management prescriptions that emphasize the protection and restoration of natural ecosystems. The management prescriptions vary by alternative, but the main emphasis is on the restoration of the spruce ecosystem (MP 4.1) in Alternatives 2 and 4, and a combination of spruce restoration and remote backcountry (MP 6.2) in Alternative 3. In the 1986 Forest Plan, the Upper Shavers Fork is primarily within MP 8.0 (Special Areas) and MP 6.3 (Indiana bat management emphasis). The management emphasis of the area, coupled with standards and guidelines for the protection of soil and water resources, and the continuing efforts to restore watershed conditions should facilitate the recovery of the aquatic ecosystem and native brook trout. |
| **PC 583** | **The Forest should try to bring back the native vegetation and water quality and restore the once great native brook trout fishery in the upper basin of the Shavers Fork to the extent possible.** |
| Response: | See response to PC 422. |
| **PC 257** | **The Forest Plan revision should emphasize doing direct fish and wildlife improvements.** |
| Response: | The Forest Plan allows for the implementation of fish and wildlife habitat improvements throughout the Forest. Projects implemented within MP 5.0, Designated Wilderness, would be the most restricted, but opportunities to improve fish and wildlife habitat exist. Examples of management direction that addresses habitat improvement in the Proposed Revised Plan include WF01, WF03, WF04, WF05, |

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| | WF15, WF21, WF23, 3015, 3016, 3017, 4107, 4131, 4132, 5027, 5124, 5125, 6101, 6102, 6104, 6115, 6126, 6128, 6131, 6133, 6134, 6135, 6136, 6137, 6138, 6144, 6145, 6219, 6224, 8601, 8602, 8606, and 8607. Our ability to implement fish and wildlife projects is also influenced by annual workloads, personnel, budgets, and Forest priorities. |
| **PC 680** | **The Forest should provide information about its protection of trout streams.** |
| Response: | The protection of trout habitat, as well as all aquatic species, begins with the protection of soil and water resources. Forest-wide direction to minimize erosion and to protect soil productivity, riparian conditions and water quality is found in the Proposed Revised Plan, pages II-8 to II-13. Forest-wide goals and additional direction for protecting aquatic species are found on pages II-25 to II-27. |
| PC 680a | INCLUDING WHY THE FOREST PLAN'S GOAL OF MAINTAINING 560 MILES OF STREAM HABITAT CAPABLE OF SUPPORTING WILD, NATURALLY PRODUCING BROOK TROUT IS LESS THAN THE CURRENT NUMBER OF NATIVE, WILD, AND STOCKED STREAMS |
| Response: | This goal has been corrected to read 570 miles in the Final Revised Plan. |
| PC 680b | INCLUDING WHAT KIND OF RESTORATION NEEDS TO HAPPEN AND IN WHAT TIMEFRAME |
| Response: | Identification of restoration opportunities is addressed during watershed assessments and project level planning. In general, restoration opportunities primarily address reducing stream sedimentation, improving channel structure and fish habitat, improving water quality (e.g., riparian planting, fencing, or additions of limestone sand), and correcting passage problems. The exact restoration needs and the timeframe for accomplishment largely depends on the site-specific conditions of the stream channels being assessed, the scope and magnitude of the restoration needs. and the funds available for restoration activities. |
| PC 680c | INCLUDING HOW MUCH THE ACID DEPOSITION IS AFFECTING TROUT POPULATIONS AND WHAT THAT MEANS FOR THE PROTECTION OF TROUT STREAMS ON FOREST AREAS NOT HEAVILY IMPACTED BY ACID DEPOSITION |
| Response: | An estimated 41% of the Forest is underlain by geologies that are sensitive to acid deposition. Due to the variability of the buffering capacity within the geology, not all streams within the acid sensitive areas are acidic. Many of the streams draining these areas support or historically supported trout populations. The EIS has been updated to include an estimate of the number of stream miles located on acid sensitive geology and an estimate of trout streams that are potentially impaired. Impacts to trout populations within acid-impaired streams elevate the importance of protecting and restoring the populations that are not immediately threatened by acid deposition. These are variables that would be considered in project-level planning as well as when setting aquatic resource program priorities. |
| PC 680d | INCLUDING WHY ALTERNATIVE 2 WAS CHOSEN, GIVEN THE EFFECTS OF TIMBERING AND ROADING ON TROUT |
| Response: | Alternative 2 is identified as the preferred alternative in the DEIS. The deciding official considered a variety of issues, not just aquatics, in selecting an alternative for implementation. The effects of timber and roads are discussed in the DEIS (pages 3-53 to 3-92). The potential effects are similar for all alternatives. The alternatives differ primarily in where potential effects may occur, but we have estimated that we have sufficient and appropriate direction in place to avoid or mitigate those effects at the project level under Alternative 2. |
| PC 680e | INCLUDING WHY RECOVERY OF FISH COMMUNITIES IS LAGGING WHILE RIPARIAN AREAS ARE RECOVERING |
| Response: | Recovery of aquatic systems often lags behind the recovery of terrestrial systems because of the dependence of aquatic ecosystems on terrestrial systems. In this case, riparian forests were harvested around the turn of the last century, reducing stream shading and large woody debris recruitment. Conditions likely favored more tolerant fish species, which expanded their range in many drainages. Initial regrowth in riparian areas increased stream shading, and riparian timber stands are now maturing to a point where large woody debris recruitment will begin to restore other functions in stream channels. As the aquatic ecosystems continue to recover, fish communities may begin to expand their range and reclaim former habitats if they have a competitive advantage over existing fish communities. |
| PC 680f | INCLUDING ADDRESSING THE ROAD SYSTEM AS PART OF THIS PROCESS AND PROVIDING AN ASSESSMENT AND PLAN TO DEAL WITH STREAM CROSSINGS |
| Response: | Management direction related to roads and stream crossings is provided primarily in Chapter II of the |

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| | Proposed Revised Plan in the Soil and Water Resources, Wildlife and Fish, and Roads and Facilities sections. |
| PC 680g | INCLUDING EXPLAINING WHAT IS BEING USED AS A SURROGATE MANAGEMENT INDICATOR SPECIES IN STREAMS OTHER THAN COLD WATER |
| Response: | The only aquatic indicator species (MIS) identified is native brook trout. The purpose of MIS is to develop a link between our land management activities and the biota. Most of our management activities occur in headwater areas and in closer proximity to cold water systems than the lower cool and warm water stream reaches. We feel that brook trout are a good MIS because of their sensitivity to potential impacts associated with land management activities, their broad distribution and their location within headwater reaches. If we see changed conditions for brook trout we can assume species located downstream may also be affected. The difficulties in identifying a cool or warm water MIS are:<br>• Species that are broadly distributed are likely to be fairly tolerant and therefore less sensitive to our management actions,<br>• If the species are limited in distribution, then management activities in much of the Forest would not potentially influence them, and<br>• Lower stream reaches typically have more mixed land ownership within the watersheds, which can mask the influence of our management actions. |
| PC 680h | INCLUDING WHAT THE PRIORITY WILL BE TO TREAT THE PH LEVELS FOR THE BENEFIT OF THE BROAD ARRAY OF AQUATIC SPECIES IN INSTANCES WHERE STREAMS ARE NOT TARGETED TO SUPPORT NATIVE BROOK TROUT BUT ARE SUFFERING FROM ACID DEPOSITION |
| Response: | WVDNR and WVDEP are the lead agencies in treating acid impaired streams with limestone. To date, streams that support potential sport fisheries and are readily accessible have been the priority for treatments. The addition of limestone fines often occurs high in the headwaters so that a wide range of aquatic organisms, both in the headwaters and downstream reaches, benefit from the acid remediation efforts. Setting priorities for future treatments is beyond the scope of the revision process. The Forest will cooperate with the respective agencies in setting priorities based on aquatic program management objectives and funding. |
| PC 680i | INCLUDING WHAT OTHER AQUATIC SPECIES WILL SUFFER BECAUSE BROOK TROUT ARE THE SINGLE AQUATIC MANAGEMENT INDICATOR SPECIES |
| Response: | We believe that the protection of brook trout habitat sets the stage for protection of other aquatic species upstream and down. If we are taking care of brook trout, then species located downstream should benefit. And, in order to protect brook trout habitat, small headwater streams, including streams that do not support fish, need to be protected because of their influence on brook trout habitat downstream. It is also important to note that the selection of native brook trout as an MIS does not mean we have a singular focus on brook trout. Project-level analysis includes addressing potential effects on Regional Forester Sensitive Species and other species of concern. |
| **PC 317** | **The Forest should include the issue of siltation in any management plan for brook trout.** |
| Response: | The Forest recognizes fine sediment and siltation as one of the major factors limiting trout productivity. Sediment sampling has shown that nearly 2/3 of the streams on the Forest have levels of fine sediment at or exceeding levels that impair trout production (DEIS, p. 3-60). Much of the analysis within the DEIS discusses the potential impact of sedimentation associated with forest management activities (see Watershed, Riparian and Aquatic Resources section, Chapter 3), and management direction within the 1986 Plan and Revised Plan is intended to minimize and mitigate potential effects associated with land management activities (see Forest-wide management direction for Soil and Water Resources and Wildlife and Fish, Chapter II of the Revised Plan). |
| **PC 366** | **The Forest should prevent over fishing from August through April because the year-long fishing season is harming brook trout.** |
| Response: | Fishing regulations, including angling restrictions, are the responsibility of the West Virginia Division of Natural Resources. |
| **PC 210** | **The Forest should provide information about fish habitat restoration.** |
| Response: | In recent years, our focus has been less on instream structural improvements, which can have a high failure rate, and more on addressing aquatic impacts associated with roads. We have also been providing funding for treatment of acidic streams and lakes including Summit Lake, Buck Run, and |

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| | Glade Run. In addition to continuing these efforts, future fish habitat improvement projects include riparian planting, fencing, and instream habitat structures. |
| **PC 609** | **The Forest should restrict fishing on streams that have brook trout in them, because fishing pressure is much more detrimental to brook trout populations than sediment.** |
| Response: | The State is responsible for fishing regulations, including angling restrictions. Forest management could have an indirect effect on angling pressure through access management. There are a number of variables that influence brook trout populations and their relative influence can vary between drainages, even within drainages. Angling pressure may reduce brook trout populations in some stream reaches, but in other areas sedimentation, poor habitat quality, or acidic conditions may be the limiting factor. |
| **PC 409** | **The Forest should address fish passage issues and other issues commonly known to be associated with dam and impoundment operation, including:**<br>• **Dissolved oxygen levels, in-stream flows, alterations in stream temperatures, and other types of habitat effects resulting from the drastic changes in aquatic function associated with dam construction and impoundment operation**<br>• **Problems related to undersized culverts**<br>• **Impacts on aquatic species viability.** |
| Response: | There are only four significant impoundments on the Forest: Summit Lake (43 ac.), Lake Buffalo (22 ac.), Sherwood Lake (165 ac.) and Spruce Knob Lake (25 ac.). These lakes were built primarily to provide recreational opportunities. Issues dealing with operations of the dam, fish passage, and impacts to species or habitat would be addressed at the project level. |
| **PC 806** | **The Forest should provide appropriate management of brook trout, including recognizing the effect of fine sediment on trout productivity and the need for large woody debris for trout productivity.** |
| Response: | In addition to identifying brook trout as a Management Indicator Species through the revision process, much of the direction within the Revised Forest Plan deals with: a) controlling sedimentation impacts on aquatic ecosystems, especially brook trout streams, and b) the protection of streamside vegetation to provide a source of large woody debris recruitment (Proposed Revised Plan (pages II-8 to II-13 and II-25 to II-27). Potential impacts of erosion, sedimentation and loss of bank vegetation are also addressed in the DEIS (pages 3-53 to 3-92). |
| **PC 330** | **The Forest should explore the economic benefits of reduced flooding and trout fishing on the Monongahela.** |
| Response: | A recent report prepared by the American Sportfishing Association for the U.S. Forest Service identifies the economic impact of sportfishing on NFS lands in West Virginia, which would include a small portion of the George Washington N.F. An estimated $37.7 million was spent statewide for USFS oriented fishing, with an estimated $15.7 million spent within 50 miles of a USFS managed unit. This information is included in the FEIS.<br><br>We believe that the Forest-wide direction for streams and riparian areas found in Chapter II of the Revised Forest Plan will help reduce the potential for flooding over time on the Forest. Of course, if steep areas of the Forest receive enough precipitation in a brief enough time period, some flooding may occur under any forest conditions. However, Plan direction limits management activities in stream buffer areas and provides for large woody debris recruitment, which would help dissipate stream energy during high flows. Hunting and fishing and other recreation benefits are incorporated into the economic impact analysis in the Social and Economic Environment section of Chapter 3 in the EIS. |
| **PC 730** | **The Forest should use helicopters to deliver lime to acidic and infertile watersheds to promote potential trout populations.** |
| Response: | The WVDNR has an extensive program to treat acidic streams with limestone. Further expansion of the program could potentially use helicopters to treat streams in more remote locations. However, the comment was made that helicopter logging could provide opportunities to treat such remote streams. This coordination could be looked into during project planning, but difficulties could arise in scheduling so that the planned treatment coincides with the timing of the logging operation, and future treatments might be foregone if no additional logging occurred in the area. |
| **PC 873** | **The Forest should explain how brook trout is to be used as a Management Indicator Species.** |
| Response: | The discussion of brook trout as a Management Indicator Species is in the DEIS on pages 3-66 to 3-67. |

| THREATENED AND ENDANGERED SPECIES AND MANAGEMENT INDICATOR SPECIES | |
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| **PC 722** | **The Forest should acknowledge that buffer zones protecting Threatened and Endangered species are based on an unproven premise, because both Indiana bat and West Virginia Northern Flying Squirrel have been found in, and may actually be attracted to, areas disturbed by past management such as timbering and burning.** |
| Response: | The 2-mile radius buffer around Indiana bat maternity colonies does not prohibit all management activity. Standard TE25 in the Proposed Forest Plan stipulates that protection measures are to be determined at a site-specific level. This could allow for beneficial habitat management or activities that are compatible with protection of the maternity colony.<br><br>Current scientific information indicates that even-aged timber harvesting and prescribed burning likely would have negative rather than positive effects on the West Virginia northern flying squirrel. Forest Plan direction for West Virginia northern flying squirrel allows for research on habitat enhancement techniques, as well as implementation of habitat enhancement after research has demonstrated effective enhancement techniques (Standard TE 61). |
| **PC 481** | **The Forest should review data regarding the Virginia big-eared bat:**<br>• **Because the data cited from West Virginia Division of Natural Resources (WVDNR) regarding Virginia big-eared bats is not data from WVDNR**<br>• **Including the increase in population and the year that the population exceeded 8,000.** |
| Response: | The data reference for the longest known movement has been changed in the FEIS. The population data that is referenced in the comment is Indiana bat data, not Virginia big-eared bat data. The 2005 hibernacula survey data for Indiana bats were not available when the DEIS was written. In the FEIS, the reference to Indiana bats in Hellhole Cave has been updated to include these data. |
| **PC 500** | **The Forest should conduct timber harvest activities that are beneficial to the Virginia big-eared bat, including:**<br>• **Avoiding the creation of large areas receiving total tree removal in one cut**<br>• **Using regeneration harvests that result in grass/herbaceous cover similar to old field conditions.** |
| Response: | Vegetation management, including timber harvest, may occur in Virginia big-eared bat habitat to maintain or improve habitat conditions (see Standard TE12 on page II-21 of the Proposed Revised Plan). Habitat needs, and the silvicultural prescriptions to address those needs, would be determined at the project level. The EIS text has been changed to clarify the contribution of timber harvest to Virginia big-eared bat habitat. |
| **PC 408** | **The Forest should clarify how Indiana bat "primary range" differs from "Zone of Concern".** |
| Response: | Primary range consists of all land within a 5-mile radius of Indiana bat hibernacula. It is equivalent to the hibernacula Zone of Immediate Concern (ZIC) defined by the USFWS in their Biological Opinion for the 1986 Forest Plan as amended. |
| **PC 406** | **The Forest should develop definitions and guidelines for what constitutes suitable habitat for West Virginia northern flying squirrel so that "importance values" can be used in establishing standards and guidelines for the application of appropriate silvicultural systems.** |
| Response: | Research to describe habitat use and preferences by the West Virginia northern flying squirrel is ongoing. At this time, we believe it is prudent to retain the flexibility for USFWS, FS, and WVDNR biologists to use professional judgment in delineating suitable habitat. More research is needed to determine silvicultural techniques for enhancing suitable habitat. Therefore, at this time we believe it is premature to develop specific standards and guidelines for identifying and managing suitable habitat. |
| **PC 161** | **The Forest should protect species that could be candidates for Endangered or Sensitive status, including the Canada yew and the balsam fir.** |
| Response: | As a result of the species viability evaluation, Canada yew will be added to the Regional Forester's Sensitive Species list for the Monongahela Forest. Balsam fir was screened out during the first phase of the viability analysis because it was previously addressed by a RFSS risk evaluation and was |

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| | determined not to warrant RFSS status. Balsam fir is considered vulnerable in the state (S3) and globally secure. Species ranked S1 or S2 (critically imperiled or imperiled) undergo a risk evaluation to determine if they should be added to the RFSS list. Species listed as G1, G2, G3 and N1, N2, and N3 are automatically added to the RFSS list. Balsam fir is threatened by the balsam wooly adelgid on the Forest, regardless of the alternative chosen for the Forest Plan. |
| **PC 283** | **The Forest should make the protection of rare and endangered flora and fauna its top priority in order to preserve West Virginia's natural heritage for future generations.** |
| Response: | Protection of rare and federally listed flora and fauna is certainly a high priority on the Forest, and likely always will be. However, we have to be careful about not favoring one law, like the Endangered Species Act, over all the other laws and regulations we must meet. That is one reason we have a goal (TE02) to "Integrate TEP habitat management with other resource objectives." |
| **PC 178** | **The Forest should make protection of Threatened and Endangered species its highest priority.** |
| Response: | See response to PC 283. |
| **PC 215** | **The Forest should acknowledge that its suggestion that Indiana bats could possibly collide with vehicles during the night lacks merit.** |
| Response: | While it is true that Indiana bats are agile when conducting foraging maneuvers, their forward flight speed is actually quite slow and it is entirely possible that they could be struck by vehicles moving at normal speeds. |
| **PC 315** | **The Forest should continue to monitor Threatened and Endangered species, including West Virginia northern flying squirrels, coupled with periodic review and refinement of the monitoring approach.** |
| Response: | The monitoring chapter of the Proposed Revised Plan (Chapter IV) contains an item for threatened and endangered species that requires the Forest to monitor the Forest's contribution to the protection and recovery of these species (monitoring item 31). For the foreseeable future, we expect current monitoring of threatened and endangered species to continue, including West Virginia northern flying squirrel. We welcome collaboration with USFWS and WVDNR in assessing and refining monitoring protocols. |
| **PC 273** | **The Forest should continue to coordinate with the appropriate State and Federal agencies regarding threatened and endangered species and their habitat within the Forest.** |
| Response: | We will. |
| PC 273a | INCLUDING CONDUCTING MONITORING OF THREATENED AND ENDANGERED SPECIES IN CONJUNCTION WITH THE FISH AND WILDLIFE SERVICE |
| Response: | See response to PC 315. |
| PC 273b | INCLUDING WORKING WITH WVDNR BIOLOGISTS, ACCORDING TO THE 1988 MEMORANDUM OF UNDERSTANDING, TO DEVELOP STANDARDS AND GUIDELINES FOR MANAGEMENT OF FISH AND WILDLIFE RESOURCE |
| Response: | The Forest worked with WVDNR throughout the plan revision process through meetings, telephone calls, e-mails, etc. WVDNR was instrumental in reviewing and providing input on early drafts of the revised management direction pertaining to fish and wildlife. |
| PC 273c | INCLUDING DIRECTION TO ADDRESS TEMPERATURE STANDARDS AND AQUATIC HABITAT ISSUES IN TROUT STREAMS |
| Response: | Direction for aquatic habitat is found primarily in the Wildlife and Fish, and Water and Soil sections of Chapter II in the Revised Forest Plan. There are no water temperature standards in the Revised Plan. Water temperature is addressed through the maintenance and enhancement of stream channel buffers that provide for stream shading and sediment regulation over the long term. |
| PC 273d | INCLUDING ADDRESSING THE WEST VIRGINIA NATURAL HERITAGE PROGRAM LIST OF RARE, THREATENED AND ENDANGERED SPECIES |
| Response: | See response to PC 831. |
| PC 273e | INCLUDING PROVIDING A PROCESS FOR PUBLIC INPUT ON WILDLIFE HABITAT IMPROVEMENT PROJECTS THAT OCCUR UNDER THE DIRECTION OF THE WEST VIRGINIA DIVISION OF NATURAL RESOURCES, BUT IN COOPERATION AND UNDER THE LAWS THAT GOVERN THE MANAGEMENT OF THE FOREST. |
| Response: | The Forest works cooperatively with WVDNR in planning and implementing new wildlife habitat improvements such as waterholes and wildlife openings; however, these developments are considered |

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| | federal actions that are performed by the Forest. These developments may be included with larger projects that are analyzed through an Environmental Assessment or Environmental Impact Statement, or they may be conducted individually under a Categorical Exclusion. Either way, they are subject to public notice, comment, and appeal. |
| PC 273f | INCLUDING CLARIFYING THE REDUCED PROTECTION FOR INDIANA BAT HABITAT |
| Response: | One commenter expressed concern that the Revised Plan appears to eliminate the management emphasis for the Indiana bat within 5 miles of hibernacula (primary range). However, management direction for primary range has not been eliminated; it has been converted from a Management Prescription (MP 6.3) to Forest-wide direction (see Proposed Revised Forest Plan direction TE27 through TE39). The Indiana bat will still be the major management emphasis within primary range, even though primary range is no longer depicted on the MP maps. |
| **PC 593** | **The Forest should determine whether or not limiting acreage in young age classes actually protects the Indiana bat, because this practice does not appear to have support in the scientific literature.** |
| Response: | The Indiana bat's use of forested habitats and large-diameter roost trees is well-established in the scientific literature. Emphasizing older age classes within primary range is intended to provide potential roost trees over a large portion of the landscape. This emphasis does not preclude the use of thinning or uneven-aged harvesting to create the semi-open canopy conditions that the Indiana bat is believed to prefer. |
| **PC 489** | **The Forest should include bat circles and West Virginia northern flying squirrel habitat on the Management Prescription and action alternative maps.** |
| Response: | Indiana bat primary range and WV northern flying squirrel suitable habitat are not depicted on the maps for the action alternatives because, under the Revised Forest Plan, we manage habitat for these species through Forest-wide direction rather than separate management prescriptions. It makes little sense to limit management for these species to specific areas on the ground when we know that these areas are likely to change over time. |
| **PC 613** | **The Forest should acknowledge that there is no indication that even-age regeneration creates foraging habitat for Virginia big-eared bats.** |
| Response: | The EIS text has been changed to clarify the contribution of timber harvest to Virginia big-eared bat habitat. |
| **PC 308** | **The Forest should repair bat gates that have been vandalized within a reasonable time frame.** |
| Response: | Standard TE10 in the Proposed Revised Forest Plan has been modified to incorporate this suggestion. |
| **PC 715** | **The Forest should clarify its management intent for the Indiana bat.** |
| PC 715a | INCLUDING A SET OF MAPS IDENTIFYING HABITAT TO AID FOREST STAFF IN PROJECT PLANNING |
| Response: | Such maps would have to change if new hibernacula are discovered; we do not want to have to amend the plan to account for changes in primary range. Primary range maps are already used in project planning as standard operating procedure. If we plan or implement vegetation management in primary range, the projects would have to be designed to enhance or maintain bat habitat. Therefore it is highly unlikely that primary range would get lost in the shuffle. |
| PC 715b | INCLUDING MONITORING AS OUTLINED IN THE U.S. FISH AND WILDLIFE SERVICE BIOLOGICAL OPINION |
| Response: | Monitoring specified in the terms and conditions of a Biological Opinion is considered mandatory and would be conducted regardless of whether it is specifically stated in the Forest Plan. |
| **PC 734** | **The Forest should provide information about its management of West Virginia northern flying squirrel habitat.** |
| PC 734a | INCLUDING WHY THE FOREST SERVICE HAS CREATED A NEW MANAGEMENT PRESCRIPTION FOR RED SPRUCE FORESTS |
| Response: | The rationale for the creation of MP 4.1 is explained in the Management Emphasis section of the MP on page III-9 of the Proposed Revised Forest Plan. |
| PC 734b | INCLUDING WHY LOGGING IS ALLOWED IN MP 4.1, WHEN LOGGING WILL CAUSE A TAKE OF THIS ENDANGERED SPECIES |
| Response: | Logging associated with active spruce restoration and management of hardwood communities in MP 4.1 is focused primarily outside of suitable habitat for the West Virginia northern flying squirrel (WVNFS). |

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| | Standard TE61 in the Proposed Revised Plan (page II-24) limits active vegetation management in WVNFS habitat to research, management to benefit WVNFS or other TEP species, minor projects that would not cause a take, and management needed for public safety. |
| PC 734c | INCLUDING WHETHER THE FOREST SERVICE INTENDS TO DESIGNATE MP 4.1 AS CRITICAL HABITAT |
| Response: | Only the Secretary of the Interior has the authority to designate critical habitat for threatened and endangered species. |
| PC 734d | INCLUDING WHETHER THE FOREST SERVICE WILL DEDICATE RESOURCES TO RESEARCH THE NEEDS OF THIS ENDANGERED SPECIES |
| Response: | Research on the spruce ecosystem and WVNFS habitat is a major emphasis in MP 4.1 in the Proposed Revised Plan (See Management Emphasis, Desired Conditions, and Goal 4104). |
| **PC 549** | **The Forest should be cautious and use only light management to reduce the risk of erosion and non-native species degrading Running Buffalo Clover habitat, because the use of prescribed fire to manage Running Buffalo Clover habitat is not sound science.** |
| Response: | While the DEIS does state that prescribed burning could create conditions favorable for running buffalo clover, it is not our intention to make this a main part of running buffalo clover habitat creation or maintenance. We understand through review of the literature and information on NatureServe that there is disagreement over the statement that fire suppression has led to a decrease in habitat for running buffalo clover. The analysis of effects at the Forest Plan scale (as presented in the DEIS) is not specific to any given project nor is it meant to imply that such action will take place, just describe possible outcomes. We agree that non-native invasive species and loss of habitat through erosion or road use are threats to the clover. Any management proposed for running buffalo clover habitat will go through site-specific analysis and will likely be small in scale and scope. We did not mean to imply that prescribed burning would be used to manage running buffalo clover habitat. |
| **PC 1002** | **The Forest should include definitions for "Key Areas" and "Maternity Sites" in the Glossary.** |
| Response: | We have added these two definitions to the Glossary for the Final Revised Forest Plan and FEIS. |
| **Management Indicator Species** | |
| **PC 420** | **The Forest should continue to use Management Indicator Species.** |
| Response: | We anticipate continuing the use of Management Indicator Species for the foreseeable future. |
| **PC 499** | **The Forest should provide information about and make changes to its list of Management Indicator Species:**<br>• **To provide proper representation of various habitat types**<br>• **To avoid causing harm to other species**<br>• **Including additional indicator species for botanical resources**<br>• **To properly address biodiversity**<br>• **Including adding at least one aquatic plant and one terrestrial plant**<br>• **Including more non-game species**<br>• **To provide accurate monitoring and assessment of management impacts to salamander populations**<br>• **Including information on what threatened species, endangered species, sensitive species, special interest species, special habitat, biological community, and demand species the Management Indicator Species are intended to represent and how accurately they are represented**<br>• **Including explaining what Management Indicator Species will be used to gauge impacts to ground nesters such as warblers and turtles and how they will be monitored** |
| | The purpose of Management Indicator Species (MIS) is not to monitor every possible species, taxonomic group, or habitat type. We selected MIS to represent the major wildlife habitats that are likely to be affected by forest management activities. The rationale for selection of the major habitats and their representative MIS is given on pages 3-194 – 3-195 of the DEIS and in Appendix D of the Proposed Revised Plan. |
| PC 499a | INCLUDING REMOVING THE WEST VIRGINIA NORTHERN FLYING SQUIRREL |
| Response: | A commenter stated that the West Virginia northern flying squirrel (WVNFS) should not be selected as a (MIS) because it does not represent snowshoe hare habitat or the black cherry component of mixed |

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| | spruce-hardwood forests, and could result in management that does not favor these habitat components in Management Prescription (MP) 4.1. We chose WVNFS as the best overall representative of the central Appalachian spruce forest ecosystem. This is an ecosystem that is largely limited to the higher elevations of the Forest; thus, we bear a great responsibility for its maintenance and restoration. The snowshoe hare would represent only scattered disturbed patches within this ecosystem and would not be a good representative for the entire community. Black cherry is an important food source for many species that occur in mixed spruce-hardwood forests, and it could decline somewhat as spruce continues to recover. However, we recognize the importance of black cherry in these forests and we have no intention of eliminating it. Also, cherry and other mast-producing species will continue to be emphasized on suitable timberlands across the Forest (a little more than a third of the Forest, about the same as the current plan). Suitable timberlands include about 17 percent of the acres in MP 4.1. |
| PC 499b | INCLUDING ADDING EARLY SUCCESSIONAL SPECIES, SUCH AS RUFFED GROUSE OR AMERICAN WOODCOCK |
| Response: | Several commenters suggested that the ruffed grouse, American woodcock, or another species should have been selected as an MIS to represent early successional habitats. We considered ruffed grouse as a possible MIS, but did not select it because of concerns about our ability to collect adequate monitoring data on this species. In the Allegheny Mountains, woodcock tend to occur in or near localized wetland habitats and would not be a good broad-scale indicator of management effects on habitat. In an effort to keep our MIS list short so that all MIS can be monitored with a realistic level of effort, we decided not to select a specific early successional MIS. The wild turkey will give some insight into early successional habitats because it uses young regenerating stands for nesting and herbaceous openings for brood-rearing. Although the cerulean warbler does not represent early successional habitats, it is likely to be monitored using breeding bird point counts, which will provide ancillary data on many bird species, including those that use early successional habitats. |
| PC 499c | INCLUDING REMOVING CERULEAN WARBLER |
| Response: | A commenter suggested that the cerulean warbler should not be an MIS because it spends the winter in the neotropics; therefore, its populations could be affected by factors other than Forest management activities. We acknowledge this fact; however, all species are affected by confounding factors. Game species are subject to hunting mortality. High elevation species may be affected by climate change and acid deposition. Wide-ranging species are affected by management actions on private land. For all species, the key to isolating management effects is conducting controlled, replicated monitoring at the project or watershed scale.<br><br>One commenter felt that the DEIS had erroneously characterized the cerulean warbler as an old-growth species. The term “old-growth” was used in Table MIS-1 to describe some of the habitat characteristics that are associated with high-quality cerulean warbler habitat (large trees, gaps, complex canopy layering). The intent was not to imply that cerulean warblers occur only in old-growth, but to note that they appear to prefer certain habitat features that occur in old-growth stands. This does not preclude the occurrence of those habitat features in other stands depending on site characteristics, management history, etc. The text makes clear that ceruleans occur in non-old-growth by including stands over 80 years old in the optimal habitat indicator (Indicators section, page 3-196; Optimum Habitat for Cerulean Warbler section at the bottom of page 3-197). |
| PC 499d | INCLUDING ADDING BLACK BEAR |
| Response: | The black bear was not selected as an MIS because it is a wide-ranging species that cannot be monitored using a controlled, replicated study design at the project or watershed scale. This rationale is explained on page 3-193 of the DEIS and in Appendix D of the Proposed Forest Plan. |
| PC 499e | INCLUDING ADDING SPECIES WHOSE PRIMARY HABITAT IS UNDISTURBED UPLAND MIXED MESOPHYTIC FOREST, SUCH AS ONE OF THE PLETHODON SALAMANDERS |
| Response: | The cerulean warbler represents mature and old mixed mesophytic deciduous forest (DEIS page 3-195 and Proposed Revised Forest Plan Appendix D). |
| PC 499f | INCLUDING ADDING BROOK TROUT |
| Response: | Brook trout was selected as an MIS (see DEIS, page 3-195 and Proposed Revised Plan, Appendix D). |

| VEGETATION MANAGEMENT | |
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| **PC 893** | **The Forest should reconsider even-aged vegetation management at this time.** |
| **PC 893a** | BECAUSE IT DOES NOT NEED MANAGEMENT |
| Response: | We acknowledge your opinion, but we feel that it is important to begin managing some stands now so that we can start moving toward the overall desired conditions for vegetation and habitat diversity. |
| PC 893b | WE HAVE NOT YET LEARNED ENOUGH ABOUT THIS FIRST FOREST TO AGGRESSIVELY MANAGE IT, AND SHOULD HAVE A CITIZEN'S POLL ON HOW TO MANAGE THE FOREST |
| Response: | Forest management planning and implementation is a long-term process. Public opinion may change in the next 10-30 years, as it has in the past 10-30 years. We cannot manage the forest based solely on public opinion (since that may change over time); we must use proven scientific research and principles as well. |
| PC 893c | DISEASE IS NOT YET MUCH OF A PROBLEM, AND MAY BE OK AS PART OF FOREST DYNAMICS |
| Response: | Native insects and diseases are a natural part of ecosystem processes found in a forest. However, introduced non-native insects and diseases have had, and continue to have, a significant impact on forest health and diversity (see pages 3-286 to 3-289 of the DEIS). For example, chestnut blight, dogwood anthracnose, and beech bark disease have greatly reduced the populations of these once abundant forest tree species. |
| PC 893d | DECREASED MAST HAS NOT YET TAKEN PLACE; NOR HAS DOWNED TIMBER INCREASED, AND THIS MIGHT BE NEEDED FOR RECOVERY |
| Response: | Although long-term mast declines have not yet happened, they will occur based on what we know about the present condition of the aging forest and the mast production capabilities of various tree species. To wait until the mast declines are occurring would substantially increase the impact since it takes 30 to 50 years for newly regenerated forest stands to return to optimum mast production capacity. Downed wood is increasing all the time. The results of the ice storm last October is an excellent example. |
| PC 893e | A SHIFT TO SHADE TOLERANT SPECIES AND ASSOCIATED WILDLIFE MAY NOT BE A BAD THING |
| Response: | The shift is already occurring, and it is having negative effects on shade-intolerant species. We acknowledge that ecosystems dominated by shade-tolerant vegetation also have value, and we have provided for these ecosystems in the nearly two thirds of the Forest that is not in the suited timber base. |
| PC 893f | THE "DECAYING FOREST" IS A SOCIAL CONCEPT THAT HAS SO FAR BEEN UNDEVELOPED. DISCUSSIONS MIGHT BEGIN, BUT IT IS A CITIZEN DECISION 50 YEARS FROM NOW |
| Response: | An aging forest, dominated by natural mortality and decay processes, will occur on a large majority of Forest lands over the next several decades if the present management trends continue. This forest will provide an excellent comparison with those lands that are actively managed. |
| PC 893g | MANAGEMENT THAT IS AT ALL AGGRESSIVE IS NOTICEABLE AND CONTRIBUTES TO THE UNNATURAL APPEARANCE PROBLEM FOR CITIZENS |
| Response: | Impacts to the scenery will occur, but should be relatively minor at the Forest scale due to limited harvest scheduling and project-level mitigation. See the Scenic Environment analysis in Chapter 3 of the EIS. |
| **PC 492** | **The Forest should make changes to its management direction regarding vegetation, because there is a great need for further community ecology research and inventory across the Forest, including:**<br>• **Developing management guidelines for rare communities at the Forest and Regional scales rather than on an ad hoc basis**<br>• **Identifying and preserving outstanding occurrences of more common communities**<br>• **Developing a goal analogous to SW02 for soils and water**<br>• **Developing standards for proactive identification, conservation, and management of rare communities and sensitive plant species.** |
| Response: | We have added a goal for terrestrial ecosystems in the Final Revised Plan. Forest-wide goals for rare plants are given in Goals VE06 and VE07 as well. Objective VE09 also recognizes the importance of Botanical Areas. Guideline VE14 addresses the Forest's role in Conservation Strategies and |

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| | Assessments for rare plants, which usually involves a Forest or Regional scale. The general direction given for threatened, endangered, and proposed species in the Forest-wide Direction section of the Forest Plan applies to listed plants as well as animals. Rare communities are addressed in the Forest Plan in Forest-wide direction for protection of soil and water resources. Rare communities in riparian areas and wetlands are addressed in Forest-wide standards, guidelines, and goals for stream channels, lakes, and wetlands; specifically Goals SW29 and SW30, Guideline SW 51, and Standard SW37 in Chapter II of the Proposed Revised Plan. Preservation of common communities is achieved through the large areas of land that are allocated to MPs with little or no active management (see MDA analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS). See also response to PC 403. |
| **PC 601** | **The Forest should acknowledge that five culls per acre is too many because leaving this many trees will inhibit regeneration of desirable species.** |
| Response: | Proposed Revised Plan Standards TE31, 4109, and 6107 require retaining at least five cull trees per acre, if they are available, in areas on the Forest that are primarily managed for wildlife habitat. The purpose of these standards is to ensure that existing and potential den trees will be available, after a timber sale unit is harvested, for cavity nesting species on Forest land that is actively managed. While cull trees may inhibit regeneration of shade-intolerant trees in the immediate vicinity of the culls, regeneration will still occur throughout most of the harvest unit. This is considered an acceptable trade-off for providing an adequate number of den trees in these areas where wildlife habitat is the primary management emphasis. |
| **PC 520** | **The Forest should provide protection for forest vegetation.** |
| Response: | See also responses to PC 403 and PC 492. |
| PC 520a | INCLUDING THE BLUEBERRY SHRUB AREAS |
| Response: | The comment on blueberry areas listed the specific patches on Roaring Plains. This area is assigned to Management Prescription 6.2 under Alternative 2 where active management will be minimal. These areas feature backcountry recreation in a semi-primitive, non-motorized setting. The areas dominated by blueberries likely expanded after the timber harvest at the turn of the 20th century and associated fires. Forest succession may gradually reduce the area dominated by blueberries; however, based on MP 6.2 management goals, the area will be protected from road construction, timber harvest, and major development. |
| PC 520b | INCLUDING PATCHES OF HAWTHORN |
| Response: | Standard RA19 on page II-40 of the Proposed Revised Plan requires hawthorn management to be addressed in range allotment plans Forest-wide. The hawthorn inventory requirement from Appendix P of the 1986 Forest Plan (as amended) has been included in RA19. The other two hawthorn standards in the amended Appendix P merely listed potential options to consider during allotment management planning and thus were not included in the Revised Plan. Guidelines 4126 and 6133 in the Proposed Revised Plan encourage retention of trees and shrubs beneficial to wildlife, including hawthorn, during timber stand improvement in Management Prescriptions 4.1 and 6.1. |
| PC 520c | INCLUDING INITIATING INVENTORY AND CONSERVATION RANKING OF ITS ECOLOGICAL COMMUNITIES USING THE NATIONAL VEGETATION CLASSIFICATION |
| Response: | See response to PC 403. |
| PC 520d | INCLUDING A PLAN FOR FINDING, MAPPING, AND CONSERVING RARE PLANT SPECIES, WHILE MAPPING AND ERADICATING INVASIVE PLANT SPECIES |
| Response: | See responses to PC 403 and PC 280. |
| PC 520e | INCLUDING FLOWERING DOGWOODS |
| Response: | Flowering dogwoods are not normally harvested or removed from the Forest. Individual trees may be cut when trails, roads, or skid trails are built. Guidelines 4126 and 6133 in the Proposed Revised Plan address the need to retain dogwood and other trees and shrubs beneficial to wildlife in areas where trees are harvested or where timber stand activities (such as pre-commercial thinning) take place. The area where this guideline applies is a small part of the overall area where flowering dogwoods are found. We believe this guideline is the only protection needed for flowering dogwood. |
| **PC 605** | **The Forest should manage existing red spruce stands, including thinning, before creating new red spruce stands.** |
| Response: | In addition to restoration of spruce, Management Prescription 4.1 allows for enhancement of existing young spruce stands (see 4103, 4110, and 4122 in the Proposed Revised Plan), which may include |

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| | thinning. However, such enhancement is further governed by Forest-wide direction for the West Virginia northern flying squirrel, which requires that management in suitable habitat be preceded by research demonstrating its effectiveness as a habitat enhancement technique (Standard TE61 in the Proposed Revised Plan). |
| **PC 823** | **The Forest should provide additional analysis of hemlock forest and older mixed mesophytic hardwood forests as they relate to small whorled pogonia habitat.** |
| Response: | The comment asks us to consider dry, mature oak and oak-pine forests as the primary habitat for small whorled pogonia. We have reassessed the impacts to small whorled pogonia habitat with this habitat type for the FEIS. |
| **PC 484** | **The Forest should reconsider the idea that the regional level shifts in oak age classes will have an effect on the decline of the wood rat.** |
| Response: | Research has suggested that reduced mast availability may be a factor in wood rat population declines (see viability analysis in the project record, available upon request). In light of the tremendous shift away from the optimum mast-producing age classes that is projected for the later decades of the planning horizon, it is not unreasonable to hypothesize a decline in the amount of high-quality wood rat habitat. |
| **PC 510** | **The Forest should increase deadwood and snags.** |
| Response: | See response to PC 493l. |
| **PC 388** | **The Forest should provide a meaningful analysis of terrestrial ecosystem diversity that includes better estimates of the types, size, and geographical distribution of natural (and other pre-settlement) disturbance regimes across the forest.** |
| Response: | To the extent such data exist, estimated presettlement disturbance regimes were used to develop estimates of presettlement forest age class distributions (see DEIS discussions in the paragraph at the bottom of page 3-98 and the Presettlement Period section on page 3-100). Estimated disturbance regimes also were used to establish the size threshold for Minimum Dynamic Area reserves (see table ED-3 on page 3-114 of the DEIS). |
| PC 388a | BECAUSE THE CURRENT ANALYSIS SEEMS TO IGNORE THE FACT THAT NATURAL SUCCESSION IS ALREADY ACHIEVING RESTORATION OF CERTAIN AGE CLASSES OF SPRUCE FOREST WITHOUT THE ADVERSE EFFECTS OF ACTIVE MANAGEMENT |
| Response: | The Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS has been updated to include a discussion of the potential for spruce restoration through natural succession (see discussion under Direct and Indirect Effects by Alternative, Amount and Development Stages of Major Forest Communities, Spruce Forest. Also see Cumulative Effects, Amount and Development Stages of Major Forested Communities. |
| PC 388b | BECAUSE THE ECOLOGICAL BASES OF PRESCRIBED FIRE PROGRAMS ARE OFTEN WEAK AND TOO OFTEN DRIVEN BY BUDGETS AND A FASCINATION WITH FIRE |
| Response: | We disagree with your opinion. See responses to PC 662 and 663 for a discussion of the ecological base for our prescribed fire program. |
| **PC753** | **The Forest should examine whether or not the Monongahela may be a permanent, uneven-aged forest.** |
| Response: | The Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS describes many presettlement ecological communities as being largely dominated by old, uneven-aged forest (see description of the old forest development stage on page 3-99 of the DEIS, also the discussion of presettlement forest development stages on page 3-100 of the DEIS). The effectiveness of coarse-filter community conservation was measured against this old-growth-dominated presettlement benchmark (see discussion and tables on pages 3-148 through 3-151 of the DEIS). However, it is an historic fact that the large majority of the land in what is now the Monongahela NF was clearcut from 1880 to 1930. Extensive vegetation inventories and historical records have verified that the forest that is here today is largely even-aged. |
| **PC 793** | **The Forest should leave a slim border with understory along timber cuts near roads and private property to alleviate general bad feelings and property value depreciation concerns.** |
| Response: | Although there is no evidence that timber harvesting on National Forest System land depreciates the value of private property, we can work with property owners to address concerns at the project level. More trees are often left along roads to help meet the scenic quality objectives of the road corridor. |

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| **PC 292** | **The Forest should broaden the definition of glades and barrens to include glade woodlands because they are locally prevalent in part of the Forest and differ substantially from "savannahs" as defined in this DEIS.** |
| Response: | The resolution of current community mapping is not sufficient for separating glade woodlands from surrounding forests at this scale of planning. |
| **PC 529** | **The Forest should allow black cherry to grow for its timber and wildlife value.** |
| Response: | We agree that black cherry is valuable for both wildlife and wood products. Without active management, black cherry will begin to decline in abundance over the next few decades in those MPs that allow only passive management. However, management for black cherry and other valuable timber and mast-producing species is a major emphasis in MPs 3.0 and 6.1. |
| **PC 716** | **The Forest should leave understory trees and shrubs along road cuts, timber cut plot edges, and around reserve trees because they help protect from wind damage.** |
| Response: | Understory trees and shrubs are usually only cut to enhance germination and growth of seedlings in regeneration harvests. The large majority of the land on the Forest will retain understory trees and shrubs along roads, in intermediate harvests, and in reserve clumps. See also response to PC 793. |
| **PC 919** | **The Forest should clarify the extent of Norway spruce plantations on the Forest.** |
| Response: | Norway spruce was planted in many high elevation areas of the Forest (e.g., Canaan Mountain, the Mower Tract on Cheat Mountain) as part of reforestation and mine reclamation efforts in the decades after the Forest's establishment. |
| **Age Class and Habitat Diversity** | |
| **PC 123** | **The Forest should not have a mixed mosaic of vegetation as a desired future condition because regeneration harvests and clear cuts are not hydrologically or visually acceptable.** |
| Response: | We acknowledge your preference. A mosaic of vegetation is diverse vegetation, which is a desired condition and goal for the Forest. All regeneration harvests are not clearcuts, and clearcuts may only be used when they are the optimal method for achieving management objectives. |
| **PC 606** | **The Forest should ensure that at least 10 percent of the Forest is in 0 to 14 year age class.** |
| Response: | A one-size-fits-all approach to age class distribution would not accommodate the different management emphases of the various management prescriptions. However, the Proposed Revised Plan does provide management direction to increase young forest stands in areas where we are actively managing. |
| **PC 522** | **The Forest should examine the range of variability for early successional habitat.** |
| Response: | Presettlement amounts, historical trends, and current amounts of young forest habitat, shrub habitat, and grass/forb habitat are discussed in the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS. See the discussions under Current Conditions of presettlement forest development stages, glades and barrens, high elevation grassland, shrub balds, and woodlands/savannas/grasslands. |
| **PC 523** | **The Forest should strive to obtain an even distribution of age classes across the forest.** |
| Response: | We are striving to provide a better mix of age classes across the Forest, however our desired condition is not an even distribution. |
| PC 523a | INCLUDING SETTING TARGETS FOR AGE CLASS DISTRIBUTION IN APPROPRIATE AREAS |
| Response: | Land allocations under the Revised Forest Plan set aside extensive areas where old growth is expected to develop over the long term. See also response to PC 530. |
| PC 523b | TO ACCOMPLISH OTHER FOREST GOALS SUCH AS FOREST HEALTH IMPROVEMENTS AND WILDLIFE ENHANCEMENTS WITHOUT SIGNIFICANT DISRUPTION OF RECREATIONAL USES |
| Response: | See response to PC 686. |
| **PC 686** | **The Forest should provide early successional stages of vegetation to create an even distribution of age classes across the Forest.** |
| Response: | Age class diversity, including providing young forest habitat, is a major emphasis in Management Prescriptions 3.0 and 6.1 (see desired age class distributions for MPs 3.0 and 6.1 in the Proposed Revised Plan). Given the relatively low percentage of suitable acres on the Forest, it is doubtful that we would ever achieve an even distribution of age classes, but by increasing the amount of regeneration harvest in future decades, we can move toward a better mix of age classes than currently exists. |
| **PC 524** | **The Forest should examine how natural disturbance regimes can provide early successional habitat.** |

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| Response: | The Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS acknowledges that natural disturbances may provide early successional habitat. See discussion under Current Conditions, Amount and Development Stages of Major Forested Communities, Amount and Development Stage Breakdown. Also see discussion of young spruce forest under Direct and Indirect Effects by Alternative, Amount and Development Stages of Major Forested Communities. |
| **PC 274** | **The Forest should allow mature forest ecosystems to develop.** |
| Response: | Land allocations under the Revised Forest Plan set aside extensive areas where old forests are expected to develop over the long term. |
| PC 274a | TO ENHANCE VISITORS' WILDERNESS EXPERIENCE |
| Response: | We agree that old forests can enhance a visitor's wilderness experience. |
| PC 273b | TO GIVE THE FOREST A CHANCE TO REGAIN ITS ORIGINAL VIGOR |
| Response: | The word "vigor" can have different connotations. A silviculturist would point out that as a forest matures and becomes overcrowded with trees it will lose some of its vigor due to competition for sunlight, moisture, and nutrients. Decay and mortality continue to increase as the forest ages and growth decreases. Indeed, the amount of annual mortality as a percentage of total growing-stock volume is higher on the Monongahela Forest than the rest of West Virginia (USDA Forest Service Northeastern Research Bulletin NE-161). |
| PC 274c | TO GIVE THE FOREST MULTIPLE LAYERS OF DIVERSE VEGETATION |
| Response: | We agree that old forests can have multiple layers of diverse vegetation, depending how they grow and develop over time. This can be referred to as vertical diversity. Large tracts of old forest often lack horizontal diversity, though, or a variety of age class structure and composition used by a variety of wildlife species. See also responses to PC 530 and PC 614. |
| **PC 614** | **The Forest should acknowledge that the forest is more resilient to stresses of all kinds when it is in a later successional state.** |
| Response: | "Forest health" is a difficult term to define, and it can mean different things to different people. Where timber production and game species habitat are primary management emphases, a healthy, resilient forest can be defined as one that has maximum tree growth and vigor with a diversity of age classes, structure, and species composition. By this definition, health and resiliency begin to decline as availability of nutrients, sunlight, and moisture become limited when a forest becomes overcrowded with trees and other vegetation. Usually a young, growing, natural forest in the early and mid-successional stages is the most resilient to environmental stresses until those factors mentioned above become limited in supply. Older trees in a late successional forest do not recover as rapidly to insect and disease infestations. For example, defoliation of a young mixed oak forest by gypsy moth results in less mortality than defoliation in an older forest (Gottschalk and Liebhold 2000).<br><br>However, "forest health" can also be defined more broadly to include maintenance of the full range of native biodiversity, nutrient cycling, topsoil formation, and other ecosystem functions. This type of forest health is best maintained in large core reserves where natural successional and disturbance processes are the primary forces affecting forest development. From this perspective, the increased structural complexity, scattered tree mortality, and increased "decadence" that accompany an aging forest create additional ecological niches and actually contribute to forest health. As a multiple-use agency, we believe both views of forest health have merit. Accordingly, the Revised Forest Plan allocates large areas of the Forest to MPs where passive management will be emphasized, but it also allocates a substantial portion of the Forest to MPs that will emphasize age class diversity through active vegetation management. |
| **PC 447** | **The Forest should balance forest age conditions in the context of prevalent land uses within its eco-region, because younger age classes are over-represented on private land.** |
| Response: | USDA Forest Service Resource Bulletins NE-157 and NE-161 containing the West Virginia and Forest statistics from the Forest Inventory Analysis (1989-2000) show seedling/sapling stands on all forested land in WV increased by only 1% from the previous inventory period. While the Forest contains 4% of forest land in seedling/sapling stands, West Virginia has 8%. The growth to removal ratio for West Virginia is 1.7 to 1, showing that West Virginia grows nearly twice as much volume as is removed. See also response to PC 547. |
| **PC 555** | **The Forest should provide early and mid-successional habitat because sustainable mast** |

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| | **production is not possible when a majority of the stands are late successional.** |
| Response: | Sustainable mast production is a major management emphasis in MP 6.1, and also a component of MP 3.0. The desired age class distribution for MP 6.1 emphasizes the optimum mast-producing age ranges (see desired age class distributions in the Proposed Revised Forest Plan on page III-33. Also see response to PC 686. |
| **PC 389** | **The Forest should explain how the estimates of existing age classes were determined.** |
| Response: | Age classes were determined through historical records and vegetation inventories conducted over the past 30+ years. The age of the stand is determined by obtaining core samples of trees and counting the rings on the core or by knowing the year the stand was cut by a regeneration harvest method. This information is entered into the database. Some stands may appear to be uneven-aged because they have different size trees in them. We know from historical records that most of the Forest was clearcut 70 to 120 years ago. As the forest grew back some trees grew more rapidly than others, eventually creating a canopy that shaded out the smaller growing trees. Many of the smaller trees that are the same species as the larger trees in the upper canopy are actually the same age as the larger trees. Most canopy gaps created by wind, ice, or snow storms are small in size (usually less than 2 acres). Although seeds will germinate and grow in these small gaps they are not considered stands by themselves but inclusions of the larger stand. |
| **PC 261** | **The Forest should address the problem of declining tree species diversity in the hardwood forests.** |
| Response: | Over the past 70+ years the Forest has seen a reduction due to disease in the number or size of some tree species such as American chestnut, American elm, flowering dogwood, American beech, hickories, black walnut, and butternut. Other trees--such as aspen, Table Mountain pine, and other yellow pine--are declining in numbers due to fire suppression and/or lack of active management. Some species of oak trees are declining in number, most likely due to gypsy moth and fire suppression. Hemlock trees are beginning to decline in number due the hemlock woolly adelgid. To this date no tree species has become extirpated that we know. Active management and planting can begin to raise the numbers of some of these species toward historic levels. To maintain the health of a forest it is important to retain as much of the diversity as possible. Planting monocultures of a single tree species over large areas has rarely been done on the Forest. We have addressed this issue in management prescriptions where active management of vegetation is allowed. In these management prescriptions, retaining diversity is included in the goals for species and wildlife habitat management. |
| **PC 120** | **The Forest should not create early seral habitat because it would destroy the Forest's natural appearance.** |
| Response: | Providing young forest and herbaceous openings for species that use those habitats is a legitimate multiple-use goal. We have been creating early seral habitat for decades on the Forest, and from your comments it would appear that the natural appearance still exists. |
| **Old Growth** | |
| **PC 685** | **The Forest should acknowledge that preserving old growth is a reasonable component of multiple-use.** |
| Response: | We have acknowledged this with the inclusion of old growth and late-successional forests in our management prescriptions, management direction (including desired conditions), analysis of Minimum Dynamic Areas (future old growth), and with the inclusion of Appendix B to the Forest Plan. |
| **PC 289** | **The Forest should acknowledge that additional old growth exist in areas that were historically difficult to log, including areas in the Smoke Hole and on North Fork Mountain.** |
| Response: | We agree that additional patches of old growth likely exist on the Forest. Mention of these areas has been added to Appendix B to the Revised Plan. Acknowledgement of this will not change the management of the Smoke Hole and North Fork Mountain areas. Both are in the National Recreation Area where commercial management of timber and other resources is limited. The emphasis in these areas is on recreation; however, these areas also serve as future old growth because little active management of vegetation will occur in the area. |
| **PC 661** | **The Forest should strengthen its old growth management strategies, including a strategy for identifying and preserving undocumented occurrences of old growth, and a strategy for increasing late successional conditions during watershed and project assessments.** |
| Response: | In areas where commercial timber harvest is allowed, desired conditions include late-successional forest conditions. On the large portions of the Forest where commercial timber harvest is not allowed or |

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| | heavily restricted, the forest will continue to age, and late-successional forest conditions will result. Please see the Minimum Dynamic Area analysis in the DEIS for the descriptions of these areas. Existing old growth will continue to be looked for during project development, watershed assessments, and from public or agency contacts. We have a land suitability code for old-growth and this would be assigned to old-growth stands found so that the areas are identifiable through our database and GIS for protection purposes. It is likely that areas with management prescriptions that do not include active vegetation management already protect unknown old-growth patches. |
| **PC 517** | **The Forest should provide forest managers with the necessary tools to identify new old growth patch candidates.** |
| Response: | We have provided a number of tools in Appendix B to the Revised Forest Plan. |
| **PC 449** | **The Forest should provide an accurate description of the Forest's old growth, including old growth's benefits as wildlife habitat and old growth's fire prevention benefits.** |
| Response: | See the Minimum Dynamic Area analysis in Chapter 3 of the EIS and Appendix B of the Revised Forest Plan. |
| **PC 752** | **The Forest should provide protection for old growth to provide clean air and water, and because large patches of oak pine and oak hickory are under-represented in Alternative 2.** |
| Response: | See the Minimum Dynamic Area analysis in Chapter 3 of the EIS and Appendix B of the Revised Forest Plan. We believe that there will be several large patches of old oak-pine or oak-hickory forests under Alternative 2 over time, perhaps less than there would be under Alternative 3, but more than there are currently. |
| **PC 838** | **The Forest should examine the natural range of variability for old growth.** |
| Response: | Please see Chapter 3, Terrestrial Ecosystem Diversity, of the DEIS where we describe the range of variability in age class/forest structure on the Forest and compare it to what we know of presettlement conditions. |
| **Non-Native Invasive Species** | |
| **PC 615** | **The Forest should promote native tree species within the Max Rothkugel Plantation because promoting the regeneration of exotic species on Forest Service land is contrary to the Forest-wide Management Direction.** |
| Response | The Plantation is more of a cultural or historic interest area than a true botanical area. The area was planted by Max Rothkugel in 1907 and is considered by some the first plantation in West Virginia. The seed for the Norway spruce and European larch came from Austria. Regeneration is not being promoted in this plantation by any management action even though this has been a goal in the MP 8.0 direction. Norway spruce is regenerating as well as native hardwoods. Norway spruce plantations have been included in West Virginia northern flying squirrel habitat in other areas of the Forest. Active management of the plantation is not likely. |
| **PC 280** | **The Forest should address the spread of non-native invasive species, including:**<br>• **The monitoring and treating of power-line right-of-ways, oil and gas access roads, and other corridors which the Forest does not have the authority to discontinue**<br>• **Managing species such as Japanese stilt grass, garlic mustard, bush honeysuckle, and tree-of-heaven**<br>• **On diverse limestone habitats**<br>• **Avoiding the expansion of fragmenting corridors**<br>• **Avoiding the planting of non-native seed sources for soil stabilization**<br>• **Maintaining and restoring rare plants and communities**<br>• **Benefits fish and wildlife resources**<br>• **Threats to shale barren rockcress populations such as bromegrasses**<br>• **Japanese spiraea (Spiraea japonica), Multiflora rose (Rosa multiflora), autumn olive (Eleagnus), purple loosestrife (Lythrum salicaria), and Japanese knotweed (Polygonum cuspidatum)**<br>• **Threats to native species**<br>• **Efforts to eliminate the non-natives**<br>• **Privet, Russian olive, multiflora rose, and perwinckle vinca**<br>• **Using native shrubs to mitigate the effects of non-native invasive species on grazing areas.** |

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| Response: | Non-native invasive species management on the Forest will be addressed in a separate document and in environmental assessments or environmental impact statements as control methods are implemented. Many of the items noted in the comments will be addressed in this management plan. Many of the species listed are on the Forest list of invasive plant species. This list is not part of the Forest Plan so that it can remain flexible as new species are determined to be threats. As projects are implemented, the threats to native species from non-native species are included in the project analysis.<br><br>The Revised Forest Plan does include guideline VE05 on page II-17, addressing the use of native species in revegetation actions on the Forest, and general direction for non-native invasive species management on page II-18.<br><br>A specific comment in this concern statement said that a reference to coltsfoot made in the Analysis of the Management Situation (AMS), summarized in Appendix C of the Revised Plan, was misleading. In the AMS, the invasion of coltsfoot was generalized to colonial times. This was not meant to be specific to the invasion of this species in West Virginia or the Forest. Coltsfoot was used as an example of a naturalized weed species that was introduced in the Eastern United States by early settlers. |
| **PC 200** | **The Forest should provide an accurate indicator of the results of its past efforts in managing non-native invasive species.** |
| Response: | Management of non-native invasive species is largely a new endeavor on the Forest, aside from pasture management. Treatment areas will be monitored to gauge the success of methods used. |
| **PC 525** | **The Forest should avoid the use of non-native sod-forming grasses because of their destructiveness to the brood habitats needed by bobwhite quail, ruffed grouse, and turkey.** |
| Response: | The Proposed Revised Plan favors the use of native vegetation wherever possible (see VE05, RA22, MG15, LS33, 6113, 6203, and 8102 in Chapter II). |
| **PC 688** | **The Forest should map current non-native invasive species areas and areas most vulnerable to non-native invasive species, because this information is necessary to develop a highly effective non-native invasive species management plan and is called for in the Proposed Revised Plan.** |
| Response: | Mapping efforts are underway and ongoing, and they will be used in developing a non-native invasive species management plan for the Forest. |
| **PC 750** | **The Forest should examine the potential for and effects of the release of genetically-modified and genetically-altered organisms.** |
| Response: | We are unaware of any genetically modified or genetically altered organisms on the Forest, and specific proposals would be beyond the scope of this plan revision. |
| **PC 168** | **The Forest should acknowledge that non-native plants are not a problem if good forestry practices are followed.** |
| Response: | There is evidence that non-native plants can be harmful to unmanaged forests where neither good nor bad forestry practices are followed. For example, Japanese stiltgrass (Microstegium vimineum) can invade a forest floor under a generally closed canopy of an unlogged forest, reducing the ground floor vegetative diversity and inhibiting tree regeneration. The potential for purple loostrife (Lythrum salicaria) to spread into wetland areas is a non-forest example of the threat of non-native invasive plants that are a concern for the Forest. Mitigation such as using straw or coco fiber mats instead of hay is being practiced on the Forest. Good forestry practices, such as using native species, are part of the solution to controlling non-native plants. |
| **PC 138** | **The Forest should consider introducing new plant species to the Forest to help wildlife.** |
| Response: | Many introduced plant species can cause ecological damage; therefore it is now Forest Service policy to use native plant species whenever possible. |
| **PC 894** | **The Forest should institute aggressive control of non-native invasive species in maintained openings.** |
| Response: | Management direction addressing the control of non-native invasive plants is contained in the Vegetation section of the Forest-wide Management Direction in the Revised Plan. |
| **Rare Plants and Communities** | |
| **PC 528** | **The Forest should modify the species included in the Fine Filter analysis, including adding balsam fir, Allegheny onion, prairie redroot, chestnut lipfern, Bentley's carralroot, Steller's cliffbrake, prairie flax, limestone adder's-tongue, bog bluegrass, Southern Blue Ridge mountain-mint, bog** |

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| | **camas, and death camas, and deleting Fraser fir and shinleaf.** |
| Response: | Prior to Forest Plan revision, balsam fir (*Abies balsamea*), prairie redroot (*Ceonothus herbaceous*), Chestnut lipfern (*Cheilanthes castanea*), Steller's cliffbrake (*Cryptogramma stelleri*), prairie flax (*Linum lewisii*), death camas (*Zigadenus elegans*), and bog camas (*Zigadenus leimanthoides*) were evaluated for possible Regional Forester's Sensitive Species (RFSS) status on the Forest. Through the region's standard risk evaluation process, these species were determined not to warrant RFSS status. Therefore, they were screened out of the detailed, species-by-species fine-filter analysis according to the process described on page 3-168 of the DEIS.<br><br>Allegheny onion, Bentley's coralroot, limestone adder's tongue, bog bluegrass, and southern Blue Ridge mountain-mint are not shown as occurring within the Forest boundary in any of the data sources we used to develop our list of species for detailed analysis. The Nature Conservancy provided occurrence information for these species and the viability analysis has been updated to include them.<br><br>We acknowledge that Fraser fir has been planted on the Forest and does not occur naturally. However, because of its global abundance ranking, Region 9 risk evaluation criteria require automatic inclusion on the Regional Forester's Sensitive Species list. The RFSS list was one of the screening criteria used to select species for detailed viability analysis.<br><br>Shinleaf was included in the detailed viability analysis because it met the screening criteria. The analysis for shinleaf has been updated to reflect The Nature Conservancy's opinion that it probably is secure on the MNF.<br><br>The commenter also suggested that we modify habitat associations for several plant species. In Appendix D and the Species Viability Evaluation: *Aconitum reclinatum* we added MN and ON, *Cornus canadensis* we added BF, RO, *Cornus rugosa* we added GB, ON, and deleted ML, *Diervilla lonicera* we added MN, ON, *Hexalectris spicata* we added GB, *Isotria medeoloides* we added MO, OO, we deleted HF, *Monarda fistulosa brevis* we added RO, *Sanguisorba canadensis* we added CH, and *Spiranthes lucida*, we added CH.<br><br>In Appendix D and SVE: *Hypericum mitchellianum* we added MS, OS, MN, ON to the list but did not include them in the numeric estimates of habitat abundance as habitat appears to be seep/riparian areas within these habitat types.<br><br>In Appendix D and SVE: *Juglans cinerea* we did not add MO, OO as suggested. Our break out of oak forests includes mainly the drier oak types, not typical of habitat for this species.<br><br>In Appendix D and SVE: *Paxistima canbyi* we added MO and deleted YO, RO already in table and database. We did not add HF as these represent mainly riparian forests and, while eastern hemlock may be a component of habitat, the limiting factor appears to be limestone rock outcrops. For this reason, while oak forests were added to the habitat associations table, but the acre figures were not used to numerically describe current and future habitat for this species.<br><br>In Appendix D and SVE: *Phlox buckleyi* we added MO and OO but did not use acreage estimates to quantify habitat as this would seem to greatly overestimate potential. Habitat appears to be shalely open areas within oak forests. In the species diversity database, the notation that habitat includes glades and shale barrens is explained; rarely occupies shale barrens proper, but may be found in open woods bordering shale barrens and disturbed areas such as shalely road banks (Norris and Sullivan 2002 and references therein).<br><br>In Appendix D and SVE: *Gaylussacia brachycera* we did not delete WS. Our estimate of woodland/ savannah includes hayfields and pastures so this habitat type was not included in the numerical estimates of habitat. However, the species is found in woodland/savannah habitats and under the Revised Forest Plan, more of this habitat type could be created through an increase in prescribed fire. |
| **PC 805** | **The Forest should provide information about its management of the illegal harvesting of** |

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| | **medicinal plants and other species of economic value, including:**<br>• **Whether such harvesting has taken place**<br>• **How these species will be protected**<br>• **Whether the removal of forest cover and other management activities affect these rare and threatened plants.** |
| Response: | The harvest of medicinal plants for commercial sale without a permit is illegal. We have anecdotal reports of illegal moss harvesting from the Forest. Law enforcement records of illegal collection of plants are, unfortunately, aggregated under the broad topic of forest products. We do not have a good measure of the amount of illegal medicinal plant harvest on the Forest.<br><br>Medicinal species are not generally in need of protection on the Forest. Collection of ginseng, cohosh, and goldenseal is allowed on the Forest with purchase of a permit. Review of the viability of ginseng at a regional level is made every year by the USDI Fish and Wildlife Service. We will continue to allow harvest of ginseng following their rulings and State laws.<br><br>The potential impacts to rare and threatened plants are covered in the DEIS under Terrestrial Ecosystem Diversity and Terrestrial Species Viability. |
| **PC 290** | **The Forest should include pine woodlands and barrens to the list of rare and unique communities, including native red pine forests.** |
| Response: | The resolution of current community mapping is not sufficient for separating pine woodlands and barrens from surrounding forests at the Forest-wide scale. |
| **Restoration and Regeneration** | |
| **PC 707** | **The Forest should create a new 4.2 Management Prescription for White Pine and Oak Pine Restoration to ensure that a full representative example of the oak and oak-pine forests of the southern are in a management prescription that ensures minimum dynamic areas of these forest types will remain relatively unfragmented and can be restored and maintained.** |
| Response: | Pine-oak and oak forests in the southern part of the Forest are represented in the Minimum Dynamic Area reserve associated with the Middle Mountain Management Prescription 6.2 area. This area forms an unfragmented core reserve. It is surrounded by MP 6.1 land where oak and pine-oak restoration is emphasized. Management direction has been added to MP 6.1 to address white pine restoration. |
| **PC 507** | **The Forest should look at spruce restoration areas with the needs of hunters in mind, because these areas are too focused on threatened and endangered species to the detriment of game species.** |
| Response: | The Revised Forest Plan has a balanced approach toward wildlife habitat, with threatened and endangered species being emphasized in West Virginia northern flying squirrel habitat, Cheat Mountain salamander habitat, and Indiana bat habitat. Game species are emphasized in Management Prescription 3.0 and much of MP 6.1. |
| **PC 717** | **The Forest should examine the success of regeneration and restocking of trees.** |
| Response: | The National Forest Management Act (NFMA) at 36 CFR 219.27 (c) (3) requires national forests to examine regeneration units after harvesting to certify if adequate stocking is established by the fifth growing season. Regeneration success has generally been very good over the years we have tracked stocking. There has been a recent concern of inadequate stocking due to deer browsing, but the concern is more related to the tree species that are regenerating, rather than a lack of trees being regenerated. |
| **PC 205** | **The Forest should consider restoring the American chestnut to the Forest because trees are now able to produce mast for years before the possibility of blight.** |
| Response: | The Forest Service has signed a Memorandum of Understanding with The American Chestnut Foundation to plant blight resistant chestnut seedlings on national forest system land when the seedlings become available. The chestnut issue is briefly discussed on pages 3-288 and 3-289 in the DEIS. |
| **PC 600** | **The Forest should not use two-age and group selection as the preferred regeneration system in 6.1 areas because it will reduce the amount of mast production species in future stand, and clear cutting and shelterwoods should be the preferred regeneration methods in 6.1 areas.** |
| Response: | Generally, the group selection harvest method should not be used in MP 6.1, as even-aged management is the more efficient silvicultural system to restore oak communities, especially where deer browsing has been identified as a major concern (USDA Forest Service Agriculture Handbook 445). Where |

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| | excessive deer browsing and lack of adequate regeneration are concerns, the shelterwood method combined with other silvicultural treatments such as fencing (to keep the deer out) and herbicide (to control competing vegetation) are recommended. The two-age (or deferred rotation) harvest method has been used more frequently in the past decade in response to Forest Service policy initiated in 1992 to reduce the amount of clearcutting by 70%. The two-age harvest method can be a useful tool to achieve desired results in some settings but should not be used where it is not appropriate. |
| **PC 328** | **The Forest should not over-emphasize spruce restoration.** |
| PC 328a | BECAUSE SPRUCE IS VERY RESILIENT |
| Response: | One commenter questioned the wisdom of using scarce resources to actively restore spruce because spruce can eventually recover without active management. We note that MP 4.1 allows for passive as well as active management. Also, allocation of land to a MP does not automatically give the management emphasis of that MP higher priority over the activities emphasized in other MPs. Such priorities are sorted out during the Forest's annual budgeting process. |
| PC 328b | BECAUSE OTHER SPECIES, SUCH AS WHITE PINE, BLACK CHERRY, AND AMERICAN CHESTNUT ALSO NEED ATTENTION |
| Response: | MP 6.1 has been modified to include direction for white pine restoration on ecologically appropriate sites. Black cherry is emphasized where a seed source exists on mixed mesophytic hardwood sites in MPs 3.0, 4.1, and 6.1. |
| PC 328c | BECAUSE SPRUCE IS FAR SOUTH OF ITS PREFERRED RANGE AND IS ENDANGERED BY CLIMATE SWINGS |
| Response: | East-central West Virginia is within the native range of red spruce, and by some accounts is the location where red spruce once reached its optimal development. Red spruce in the central Appalachians is threatened by a number of factors, including climate change. Such threats can be viewed as a justification for restoration management so that the unique biodiversity associated with this community is not lost. |
| PC 328d | BECAUSE ONLY A LIMITED AMOUNT OF SPRUCE IS NEEDED FOR THE SURVIVAL OF THE NORTHERN FLYING SQUIRREL |
| Response: | While different subspecies of the northern flying squirrel in other regions are not always closely tied to conifers, studies in West Virginia suggest that the West Virginia subspecies generally is found in association with red spruce or hemlock. |
| **PC 589** | **The Forest should consider that the restriction on regeneration harvests to no more than 15 percent in 10 years is overly restrictive, given the degree to which the majority of the Forest is restricted from harvest, because the restriction makes it unlikely that long-term age class distribution goals will be achieved.** |
| Response: | We have changed this standard in the Final Revised Plan to allow for no more than 20 percent. The change was made not so much for increased capability to attain desired conditions, but rather 1) to tie to a 20 percent limitation that was applied during output modeling for forest plan revision, and 2) to tie to research in watershed effects related to even-aged management. The 15 percent figure in the Proposed Revised Plan had no such ties of which we were aware. |
| **PC 587** | **The Forest should reconsider regeneration acreage caps because in many cases relatively small regeneration areas are vulnerable to regeneration failure due to deer depredation.** |
| Response: | The NFMA (36 CFR 219.27(d)(2) requires that even-aged regeneration units on national forest lands in all forest types found in West Virginia not be larger than 40 acres except as provided in paragraphs (d)(2)(i) through (iii). Exceptions to increase the size of regeneration harvests are allowed but must be approved by the Regional Forester. |
| **PC 260** | **The Forest should conduct spruce restoration activities, because the montane red spruce ecosystem is endangered in the central Appalachians and only active restoration management will improve the situation.** |
| Response: | Management Prescription 4.1 was designed for spruce restoration. Forest-wide direction restricts active management in suitable northern flying squirrel habitat to research and other activities with minimal effects. Therefore, passive management is emphasized in the large majority of the existing montane red spruce ecosystem, whereas active restoration is emphasized in northern hardwood areas that formerly supported spruce. |
| **PC 46** | **The Forest should try to regenerate oak species through burning in the fall rather than using** |

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| | **fencing.** |
| Response: | The preferred alternative would provide for additional prescribed burning to help achieve oak regeneration, among other reasons. |
| PC 46a | BECAUSE FALL BURNING HELPS REDUCE INSECTS AND DISEASE |
| Response: | Prescribed burning, whether done in the spring or the fall, can help reduce insects and disease. |
| PC 46b | BECAUSE FENCING IS INEFFECTIVE AND PREDATORS NEED TO BE ALLOWED TO REDUCE DEER HERDS |
| Response: | Fencing has proved to be an effective tool to regenerate forest stands where deer browse is a concern. Fencing does not deter predators from reducing deer herds because the deer are usually not found within the fenced areas. |
| **PC 755** | **The Forest should develop management prescriptions that include active restoration in former roadless areas and areas that have been impacted by ground-disturbing activities.** |
| Response: | Alternatives 2 and 4 in the DEIS have assigned an active restoration Management Prescription (6.1) in some former roadless areas or former 6.2 areas that have been affected by past ground-disturbing activities. |
| **PC 255** | **The Forest should revegetate old roadways and help restore the degraded areas in the Forest to functioning condition.** |
| Response: | We have provided management direction in Chapter II of the Proposed Revised Plan to address this concern. See, for instance, Goal RF02 and Guideline RF12 in the Roads and Facilities section, and Goal SW01, Standard SW03, and Guideline SW11 and SW14 in the Soil and Water Resources section. |
| **PC 513** | **The Forest should reconsider limiting regeneration on low quality sites to 25 acres.** |
| Response: | The 40-acre regeneration harvest limit is in effect for all Management Prescriptions in the Revised Forest Plan. This is a maximum limit; treatment units can always be smaller for project implementation due to site-specific conditions. |
| **PC 116** | **The Forest should conduct oak regeneration by planting in cleared gaps and not using fire.** |
| Response: | Forest Plan direction does not limit the planting of native species to reach regeneration goals. The use of prescribed fires has many benefits other than oak regeneration (Brose et al. 2001). It has been an established use by humans on this landscape for thousands of years (Delcourt and Delcourt 1997). |
| **PC 115** | **The Forest should not conduct spruce harvest in nutrient-poor soil.** |
| Response: | Spruce restoration efforts will be mostly passive (except for research projects) on sites that are suitable habitat for the northern flying squirrel. That means that very little spruce harvest will likely occur, and most spruce would be allowed to grow older into uneven-aged stands regardless of soil nutrient status. |
| **PC 557** | **The Forest should conduct spruce restoration on poorer sites where spruce will be more competitive.** |
| Response: | Historical accounts indicate that spruce once dominated or co-dominated on a wide variety of sites above 3,000 feet elevation, including high-quality sites. |
| **PC 446** | **The Forest should use passive spruce restoration to provide habitat for the West Virginia northern flying squirrel, Cheat Mountain salamander, and other species.** |
| Response: | Management Prescription 4.1 provides for both passive and active restoration of spruce and spruce-hardwood ecosystems. MP 4.1 also emphasizes collaborative research so we can learn more about what may or may not be effective techniques to address specific concerns. |
| **PC 756** | **The Forest should consider that oak regeneration cuts are valuable for game birds because young oaks hold their leaves longer than mature trees.** |
| Response: | Management Prescriptions 3.0 and 6.1 emphasize age class diversity, which involves regeneration harvesting. Oak regeneration is emphasized on sites with oak potential. |
| **PC 89** | **The Forest should prohibit site conversions, including prohibiting the release of desirable commercial species.** |
| Response: | We acknowledge your preference. Small-scale site conversion (such as converting forest to wildlife openings) and release of commercial species are management activities that are allowed in certain MPs in the Proposed Revised Plan. They would occur on a relatively small portion of the Forest. |
| **PC 535** | **The Forest should acknowledge the benefits of active/aggressive vegetation management in providing wildlife habitat and managing wildlife populations.** |
| Response: | We agree that active vegetation management can provide wildlife habitat diversity to benefit a number |

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| | of species and populations. |
| **PC 516** | **The Forest should consider the need for protection and reintroduction of native species to counteract the overpopulation of deer.** |
| PC 516a | INCLUDING:<br>• NATIVE GRASSES SUCH AS BEAKGRAIN AND TALL NUTRUSH<br>• NATIVE WILDFLOWERS SUCH AS YELLOW LEAF-CUP FLOWER, NATIVE DAYFLOWERS, SPIDERWORTS, MEMBERS OF THE LILY FAMILY, AND MEMBERS OF THE PEA-BEAN FAMILY<br>• USING NURSE CROPS TO CONTROL EROSION AND PROVIDE PROTECTION FOR THE SEED AND YOUNG SEEDLINGS OF NATIVE PLANTS |
| Response: | Native species with concerns for sustainability are addressed in the Species Viability Evaluation. The Proposed Forest Plan and national direction encourages the use of native plants for revegetation efforts. We will work toward finding truly local commercial sources of native grasses forbs, legumes, and other plants for our revegetation efforts. In some areas a temporary, non-persistent cover crop could be used as the local native plants regenerate naturally while the cover crop serves to control erosion. The species listed in the original comments will be reviewed for additions to our seed mixes; thank you for the suggestions. |
| PC 516b | INCLUDING THE REINTRODUCTION OF SPECIES SUCH AS RED WOLF, GRAY WOLF, FISHER, ELK, BISON, EASTERN COUGAR, PEREGRINE FALCON, AND EXTIRPATED AQUATIC SPECIES |
| Response: | The Forest Service does not manage wildlife populations. Any reintroductions would need to be initiated and conducted by the West Virginia Division of Natural Resources or the U.S. Fish and Wildlife Service. The Proposed Revised Plan contains direction to coordinate with WVDNR on any proposed stocking or reintroduction of species (WF22). The fisher has already been reintroduced by WVDNR and has established a self-sustaining population on the Forest and surrounding areas. |
| PC 516c | INCLUDING DETERMINING WHETHER EXISTING HABITAT BLOCKS HAVE SUFFICIENT SIZE, DISTRIBUTION, AND CONNECTIVITY ACROSS THE LANDSCAPE IN ORDER TO MAINTAIN SPECIES VIABILITY AND BIOLOGICAL DIVERSITY |
| Response: | See responses to PC 530 and PC 690. |
| **PC 646** | **The Forest should encourage mining and logging companies to plant as many trees as they remove.** |
| Response: | Planting trees is typically not necessary in harvest units on the Forest. Natural regeneration from seeds stored in the soil and from root or stump sprouts is usually more than sufficient to replace those trees that are removed.<br><br>Forest review of an operating and rehabilitation plan submitted for mine proposals (Standard MG10 in the Proposed Revised Plan) would consider revegetation needs and objectives, and could include specifying planting trees. The Forest-wide Management Direction Mineral goal to "emphasize appropriate mitigation and reclamation of environmental disturbance (MG02)," and standards such as "reclamation shall include revegetating the site with native or desirable non-native, non-invasive species to control erosion and improve the visual quality of the site" (MG15), as well as the ecological objectives for the area, would help determine reforestation needs. In most cases, given the size and amount of earth disturbance associated with typical mineral operations within the Forest, trees will re-establish themselves on many sites nearly as fast as they would if they were planted. |
| **PC 757** | **The Forest should consider the oaks' ability to re-establish and maintain themselves, because scientific research shows that many other factors besides the size of artificial openings fabricated by logging determine whether or not oaks can re-establish and sustain themselves.** |
| Response: | We agree. This point is one of the reasons we intend to use prescribed fire in some areas to help give oaks a competitive advantage. Oaks on very dry sites are able to re-establish themselves. The DEIS (pages 3-289-290) summarizes the oak regeneration concern. This section and its referenced literature acknowledge that creating an opening in the canopy may not by itself create oak seedlings. The project record includes an annotated bibliography of fire history, fire effects, oak ecology, and prescribed fire that includes research (including some of the citations listed by the commenter) addressing the regeneration and ecology of oaks. |

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| | Most of the oak species that grow in West Virginia are generally classified as intermediate in shade tolerance or intolerant of shade (USDA Forest Service Agriculture Handbook 654). Although these species can germinate and grow as young seedlings in dense shade, they eventually need to be released from the shade in order to grow into the upper canopy (USDA Forest Service Agriculture Handbook 445). Although it is possible to regenerate oaks in small gaps in the forest, it is not the most efficient or effective method, especially if deer browse is a concern. The oak-hickory forest, as we know it today, is the result of thousands of years of manipulation by humans through fire, agriculture, grazing, and logging (Delcourt and Delcourt 1997, Brose et al. 2001). To maintain the oak-hickory forest it is necessary to continue the disturbance regimes that created and perpetuated oaks and hickories (see USDA Forest Service Southeastern Forest Experiment Station General Technical Report SE-84, 2002). |
| **Forest Pests, Pathogens, Pesticides, and Herbicides** | |
| **PC 689** | **The Forest should map areas infested with pests and pathogens and areas most vulnerable to pests and pathogens, because this information is necessary to develop a highly effective plan to control pests and pathogens.** |
| Response: | The Forest cooperates with the West Virginia Department of Agriculture and the State & Private branch of the Forest Service to locate and map areas infested with pests and pathogens. We also utilize forest vegetation data, collected on a regular basis, to determine which areas may be at risk of infestation. |
| **PC 552** | **The Forest should not leave a 100-foot buffer for broadcast sprays of pesticide next to private lands because it greatly reduces the ability to manage these areas.** |
| Response: | The Forest-wide standard leaving a 100-foot buffer for broadcast sprays of pesticides next to private lands allows for adjacent landowners to waive this restriction. The scoping process for project planning should include informing adjacent landowners of advantages and disadvantages when there is a potential for pesticide application. The 100-foot buffer does not apply to individual stem treatments. |
| **PC 180** | **The Forest should prohibit the use of poisonous chemicals—including insecticides, herbicides, fungicides, and pesticides—to prevent water pollution and exposure to forest users, and to protect habitat.** |
| Response: | Pesticide use is a valuable tool in forest management. Certified pesticide applicators are trained to use pesticides in a responsible manner according to label directions and federal and state laws to protect non-target species, water, habitat, and people. The State of West Virginia requires that pesticide application on public lands be supervised by a certified pesticide applicator. Any use of pesticides on the Forest will be proceeded by a site-specific project NEPA analysis and public disclosure. The analysis would look at potential effects to water quality, habitat, and forest users. |
| **PC 604** | **The Forest should use herbicides to control vegetation on roadways.** |
| Response: | Although the Forest currently does not use herbicides along roadways, that option may be available based on site-specific situations. |
| **PC 714** | **The Forest should analyze the impacts of chemical treatment methods, including social effects, impacts on water resources and aquatic species, and the possibility of increased resistance to these substances.** |
| Response: | Analysis of the effects of pesticide use is conducted in site-specific projects through an environmental assessment or environmental impact statement. Risk assessments have been completed for many of the herbicides presently used on the Forest. Numerous research studies have been completed describing the effects of herbicide use. Also see response to PC 180. |
| **PC 217** | **The Forest should explain how pesticides are getting into the Forest.** |
| Response: | Pesticides are used on the Forest to control competing vegetation, noxious plants, and non-native invasive species. Pesticide use has historically been very low on the Forest, except for the rare broad-scale spraying for gypsy moth. |
| **PC 712** | **The Forest should discuss the severity of the balsam fir decline from the balsam adelgid.** |
| Response: | Several insects and diseases were discussed in the DEIS (pp. 3-286 to 289). The balsam woolly adelgid is a sap-sucking insect similar to the hemlock woolly adelgid discussed on page 3-288 of the DEIS. The balsam woolly adelgid usually attacks mature true fir trees in natural stands, thereby allowing some regeneration. The hemlock woolly adelgid attacks all ages and sizes of eastern hemlock trees. Balsam fir is an extremely minor component of the Forest. |

| TIMBER MANAGEMENT | |
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| **PC 265** | **The Forest should harvest mature timber areas before they are destroyed by storms to promote a sound forest management plan for everyone.** |
| Response: | Harvest units are selected during site-specific project analysis to meet specific silvicultural objectives. Storms are sporadic, with varying intensities in both time and place. It is not possible to predict when or where or storm will hit or the intensity of a storm in time to harvest all mature trees prior to the storm. Storm damage is also a natural process that contributes to the Forest's habitat diversity. |
| **PC 809** | **The Forest should provide information about the culmination of mean annual increment.** |
| Response: | NFMA regulations 36 CFR219.16 (a)(2)(iii) state that even-aged stands that are scheduled for harvesting will generally have reached the culmination of mean annual increment of growth based on forest type and site quality. To reduce the imbalance of age classes that has resulted from the extensive timber harvesting and other land management practices that occurred here from 1880 to 1930, the 1986 Plan allowed for even-aged regeneration harvest to occur any time after a stand reached 70 years of age in order to better attain multiple use and sustained yield objectives. |
| **PC 319** | **The Forest should acknowledge that the increased probability of timbering in Alternative 2 will decrease rather than increase the amount of large woody debris that might be recruited to streams.** |
| Response: | Direction for riparian protection is the same for all action alternatives, and therefore we would not expect to see a measurable difference in the amount of trees available for large woody debris recruitment in these alternatives. While Alternative 2 allows harvest to potentially occur in more areas of the Forest than Alternative 3, commercial harvest is similarly restricted in riparian areas under both of these alternatives, and thus large woody debris recruitment opportunities should also be similar. |
| **PC 322** | **The Forest should base its timber harvest goals on maintaining historic forest ecosystems and not on regional economics.** |
| Response: | Timber harvest goals and objectives are based on achieving desired conditions for vegetation and habitat, not on regional economics. |
| **PC 502** | **The Forest should not justify timber sales as "wildlife management" because many species require mature, unfragmented landscapes.** |
| Response: | Species that require mature, unfragmented landscapes would be provided for by the nearly two-thirds of the Forest that is not in the suitable timber base. Timber harvest provides habitat for those species that prefer young forest habitat. |
| **PC 376** | **The Forest should consider the benefits of timber harvesting, including economic and wildlife benefits.** |
| Response: | The economic benefits of timber production are considered in the Social and Economic Environment section in Chapter 3 of the EIS. Benefits to wildlife or wildlife habitat are considered in the Terrestrial Species Viability, Terrestrial MIS and Other Species of Interest, and Threatened and Endangered Species sections in Chapter 3 of the EIS. |
| **PC 244** | **The Forest should focus attention on how appeals and litigation of timber sales are preventing it from reaching its goals, including examples of how delays and man-hours are expended for questions of principle.** |
| Response: | We agree that appeals and litigation have resulted in delays and man-hour expenditures, not only on this Forest but across the nation. Both the Timber Supply and Social and Economic Environment sections in Chapter 3 of the EIS note that appeals and litigation are one of the reasons that we cannot predict or guarantee specific timber production levels on an annual basis. To try to analyze or compute these impacts is beyond the scope of this revision, however. The Forest Service may have more information on these effects at the regional or national scale. |
| **PC 264** | **The Forest should provide habitat that will support all game species and provide adequate cover by harvesting timber in a way that promotes early stem growth and early successional stands.** |
| Response: | Benefits to wildlife or wildlife habitat are considered in the Terrestrial Species Viability, Terrestrial MIS and Other Species of Interest, and Threatened and Endangered Species sections of Chapter 3 in the EIS. The use of timber management to create age class diversity that benefits many wildlife species is emphasized in Management Prescriptions 3.0 and 6.1 in the Revised Forest Plan. |
| **PC 372** | **The Forest should explain its proposed logging methods.** |

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| Response: | Silviculture systems and harvest methods are described and explained beginning on page 3-328 in the DEIS, and in Appendix A to the Revised Forest Plan. Harvest and logging methods (conventional, helicopter, cable, etc.) are determined during site-specific project analysis. |
| **PC 608** | **The Forest should acknowledge that timber harvest on slopes over 50 percent does not create landslide problems:**<br>• **Because landslides are caused by storm events.**<br>• **Because tens of thousands of acres are harvested on private land and landslides are not a problem.** |
| Response: | Landslides on the Forest are uncommon; however, they do occur both as part of natural erosion processes and as an unexpected part of land management. Landslides are typically triggered by storm events associated with heavy precipitation and saturated soils. Often soil type, geology, vegetative cover, aspect, and soil moisture play a role in the susceptibility of a hillside to a potential slide. Timber harvest alone rarely triggers mass movement. However, road building associated with timber harvest can trigger mass movement on usually a small scale, with cut bank slumping and some larger full bank slope failures. This is often due to the removal of the toe slope and a change in the slope of the bank to something less stable than what existed prior to excavation. We acknowledge your concern that the Forest overstates the risk; however, analyses projecting this concern are based on site-specific investigations that have had interdisciplinary review from the geologist, hydrologist, and staff engineer. Standard SW07 in the Proposed Revised Plan requires the Forest to take precautionary measures in areas susceptible to landslides. These areas are defined by geology, soil type, slope, landscape position, and past management history. See also response to PC 473. |
| **PC 98** | **The Forest should keep logging at its current level to protect water resources, because there is plenty of private forested land in West Virginia that can be logged.** |
| Response: | The Revised Forest Plan allows for timber management, and provides an allowable sale quantity that management is not expected to exceed. We are not sure what you mean by "current level" because the amount of timber produced varies from year to year, based on many factors. The amount produced in 2007 will likely not be the same as the amount in 2006, nor will it likely be the allowable sale quantity. The Forest Service has a responsibility and an opportunity to be an example of good stewardship for multiple use and sustained yield management for private landowners. Management direction ensures resources are protected, maintained, restored, or enhanced. |
| **PC 725** | **The Forest should ask the State to make mandatory rules for timbering.** |
| Response: | The Forest has no control over West Virginia legislation on logging. Numerous laws or regulations pertaining to logging already exist in the State. West Virginia also has voluntary Best Management Practices on logging jobs inspected by professional foresters. |
| **PC 660** | **The Forest should map as many areas as possible that are unsuitable for timber production and create a detailed list of unsuitable characteristics to:**<br>• **Identify those acres that might be hard to accurately map**<br>• **Help Forest staff ensure that they are not proposing commercial harvest in these areas**<br>• **More easily resolve areas of possible disagreement between the public and Forest staff when controversial projects are proposed.** |
| Response: | Lands unsuitable for timber production are listed on pages 3-334 through 3-337 in the DEIS. Many of these areas are mapped in GIS layers that are available to Forest personnel. Site-specific project analysis and field checks will continue to identify any lands that are or are not suitable for timber production, as the suitability determination may change over time due to advances in technology, new legislation, changes in land allocation, etc. |
| **PC 653** | **The Forest should consider that should road construction, reconstruction, or maintenance costs rise, and the cost of timber harvest may exceed revenues in many acres of suitable timber land.** |
| Response: | Road costs may well rise, and so may the value of the timber harvested. We have to base our analysis on the best available information at the time of the analysis. Also, timber harvest may still occur if road costs exceed revenue. The Forest Service is directed to complete an economic analysis for alternatives considered in detail during project planning. The alternative selected for implementation does not need to be above cost if there are other benefits that meet the purpose and need of the proposal, and the desired conditions in the Forest Plan. In addition, other resources besides timber may benefit from road construction, reconstruction, or maintenance. |

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| **PC 651** | **The Forest should determine lands to be unsuitable for timber production if it would not be cost-efficient to harvest them, to comply with NFMA.** |
| Response: | Cost efficiency is one of several criteria we use to determine the suitability of lands for timber production. See also response to PC 653. |
| **PC 652** | **The Forest should provide estimates of salvage or non-charged volume predicted over the planning period.** |
| Response: | Salvage volume usually comes from catastrophic events that cause tree mortality and are unpredictable in nature. The Vegetation Analysis of the Management Situation (in the project record for this plan revision) contains information on the amount of salvage harvest that occurred on the Forest from 1986 through 1999. The Final Revised Plan does include objectives for vegetation management on lands not suited for timber production, but volumes were not calculated because of the uncertainty of silvicultural prescriptions that would be used in management. |
| **PC 150** | **The Forest should harvest timber in an economical manner, including:**<br>• **Harvesting trees before they are over mature**<br>• **Using roads instead of helicopters when no harm would result.** |
| Response: | An economic analysis is done for every timber harvest project on the Forest, and economics is taken into consideration in project decisions, along with potential resource impacts. See also responses to PC 364 and PC 607. |
| **PC 619** | **The Forest should provide an alternative that has an allowable sale quantity lower than the current Forest Plan in order to have an alternative that is based on an accurate assessment of the local, regional, and State economies.** |
| Response: | Both Alternatives 2 and 3 have lower allowable sale quantities than Alternative 1, which represents the current (1986) Forest Plan as amended, with the ASQ remodeled based on current growth and yield information. There is no alternative that represents current production because production can change widely from year to year. In fact, we have seen variations from over 40 million board feet to under 1 million board feet since the 1986 Plan was released. We did, however, compare the ASQ production levels to the average production over the past 10 years in the Social and Economic Environment section in Chapter 3 of the DEIS. These averages are built into the current outputs as displayed in Tables S0-11 through SO-14 in the DEIS. |
| **PC 72** | **The Forest should stop all logging in the Forest:**<br>• **Because the State of West Virginia does not benefit from it**<br>• **To protect wildlife and habitat**<br>• **Because it fragments habitat**<br>• **Because it destroys scenery**<br>• **Because it pollutes streams**<br>• **Because it increases deer habitat**<br>• **Because it decreases habitat for interior species, such as the cerulean warbler, the wood thrush, and ovenbirds**<br>• **Because locals receive minimal benefits from logging**<br>• **Because the country needs to move away from unnecessary and outdated industries such as logging**<br>• **To create an ecologically healthier region**<br>• **To prevent flooding**<br>• **Because timber production is no longer a highest or best use for the National Forest**<br>• **To prevent non-native invasive species**<br>• **Because lands outside the National Forests are already responsible for most of our wood products**<br>• **Including commercial logging**<br>• **Because forests are needed for oxygen**<br>• **Because tree farming should be used instead**<br>• **To benefit future generations**<br>• **Because it wastes taxpayer dollars**<br>• **To prevent global warming** |

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| | • **To protect recreational opportunities**<br>• **To restore and protect spruce and various hardwoods**<br>• **To prevent erosion**<br>• **To protect soil**<br>• **Because allowing timber harvest in the Forest undercuts private landowners/tree farmers by unduly competing with them.** |
| Response: | We acknowledge your preference; however, it is beyond the scope of this plan revision to stop all logging on this or any other national forest. National forests are mandated by law to provide multiple use management. The analysis for plan revision therefore focuses on how much timber management is appropriate and where it should occur. We agree that timber harvest can have impacts on many other resources, and these potential impacts are disclosed in Chapter 3 of the EIS. The Revised Forest Plan focuses on linking timber management to desired forest and habitat conditions, and reducing the associated effects of timber harvest activities to other forest resources. |
| **PC 130** | **The Forest should increase logging:**<br>• **To help sustain large-scale age class diversity**<br>• **To stimulate the economy of West Virginia**<br>• **To aid in fire management**<br>• **To aid in the management of insects, disease, and invasive plants**<br>• **To address water quality concerns**<br>• **Because the 25 percent fund payments are needed by the poorer areas of the State**<br>• **Because access to the more than ample supply of timber is being overly restricted**<br>• **Because the wilderness resource would not be significantly impacted**<br>• **Because Threatened and Endangered species restrictions should not significantly affect timber production**<br>• **Including logging in the Spruce Knob and Seneca Rocks National Recreation Area**<br>• **To increase forest health**<br>• **To provide more tax revenue to local counties**<br>• **To help control the deer population.** |
| Response: | We acknowledge your preference. We agree that timber harvesting can benefit many resources when implemented correctly. The allowable sale quantity under both the 1986 Plan and the Revised Plan would allow substantially more timber harvest than has actually occurred in recent years (see page 3-337 to 3-342 in the DEIS). About two thirds of the stands on the Forest are fully stocked or overstocked, which means trees in these stands are fully utilizing the capability of the land to produce trees. Growth exceeds removal and mortality by a ratio of 3.6:1, meaning the Forest is growing nearly 4 times as much wood as is being harvested and dying from natural causes (USDA Forest Service Northeastern Research Bulletin NE-161). See also responses to PCs 359, 606, and 686.<br><br>We agree that the revised plan's protections for threatened and endangered species allow for timber production where it does not jeopardize these species.<br><br>Timber harvest is more likely to increase the habitat capacity for deer than decrease it. See discussion on deer habitat in the Terrestrial Management Indicator Species and Other Species of Interest section of EIS Chapter 3. See also response to PC 285. |
| **PC 136** | **The Forest should provide information on supply/demand ratios for timber in the Monongahela compared with other National Forests to determine whether the Monongahela is looking to be a bigger player in the overall timber supply to the United States** |
| Response: | The Forest does not manage for timber on a supply/demand basis or compete with other national forests to supply more timber. National forest land management is based on numerous laws enacted by Congress over the past 100+ years. The Multiple Use Sustained Yield Act of 1960 requires national forests to manage the timber resource on a sustainable basis. See page 3-300 in the DEIS. |
| **PC 140** | **The Forest should conduct timber harvest activities in a way that protects the Forest's resources.** |
| Response: | Timber harvest activities on the Forest are conducted within existing laws, regulations, policies, and Forest Plan direction. Implementation of timber management activities to meet the desired conditions, goals, and objectives of the Revised Forest Plan will be determined through site-specific project-level |

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| | analysis, and will be guided by Forest Plan direction that is designed to protect the Forest's resources. These project-level plans are utilized to make the tactical and strategic decisions consistent with the NFMA to "…provide for multiple use and sustained yield of goods and services from the National Forest System…in an environmentally sound manner." (36 CFR 219.1(a)). |
| PC 140a | INCLUDING:<br>• THE USE OF CABLES TO HAUL TREES TO THE SKIDDER<br>• USING AIRLIFT METHODS INSTEAD OF BULLDOZERS TO LIMIT EROSION<br>• THE USE OF EXISTING ROADS<br>• CUTTING MAPLES WITH NON-POLLUTING BIG LOPPERS<br>• USING RAMIAL CHIPPING<br>• USING HORSE LOGGING<br>• USING BIRD EXCLUDERS ON SHELTER TUBES FOR SEEDLINGS<br>• INCREASING THE PRACTICE OF SEEDING |
| Response: | Harvest and regeneration methods are chosen through the NEPA process in site-specific project level planning by professionally trained and experienced natural resource specialists based on information from vegetation inventory data combined with field reconnaissance and public input. |
| PC 140b | INCLUDING:<br>• AVOIDING CLEARCUTS OR LIMITING THEIR SIZE AND LOCATION<br>• PRACTICING SHORT OR LONG ROTATION LOGGING ONLY ON AREAS THAT HAVE A HISTORY OF RECENT LOGGING AND THAT ARE LOCATED IN TERRAIN THAT IS CAPABLE OF HANDLING LOGGING ACTIVITY WITHOUT DAMAGE<br>• RESTRICTING HARVESTING TO UNEVEN-AGED SYSTEMS WHERE WELL DESIGNED ROADS CURRENTLY EXIST<br>• APPLYING GROUP SELECTION WHERE CURRENT, WELL-DESIGNED ROADS EXIST<br>• INCREASING THE ROTATION AGE AT WHICH TIMBER IS HARVESTED<br>• SELECTIVELY CUTTING HARDWOODS TO LEAVE THE BEST AND BIGGEST, AND TAKING UNHEALTHY TREES |
| Response: | Silvicultural methods and prescriptions are chosen through the NEPA process in site-specific project level planning by professionally trained and experienced natural resource specialists based on information from vegetation inventory data combined with field reconnaissance and public input. |
| PC 140c | INCLUDING LEAVING TREETOPS AFTER LOGGING TO HELP RECYCLE SOIL NUTRIENTS |
| Response: | See Standard TR05 in the Proposed Revised Forest Plan, which would restrict whole tree yarding where soil nutrient loss is a concern. |
| PC 140d | INCLUDING NO LOGGING WITHIN 150 FEET OF ANY WATERWAY |
| Response: | See Standards SW34 and SW37 in the Proposed Revised Forest Plan, which would limit programmed timber harvesting within stream channel buffers. |
| PC 140e | INCLUDING PROHIBITING TIMBER CUTTING OF SLOPES GREATER THAN 30 PERCENT GRADE |
| Response: | Although we have limitations on using heavy harvest equipment on steep slopes, we have no rationale or research to show that harvesting timber on slopes over 30 percent creates environmental degradation. |
| PC 140f | INCLUDING ONLY ALLOWING FORESTRY COMPANIES THAT DO NOT EMPLOY HIGH-GRADING TECHNIQUES TO BID ON TIMBER CONTRACTS |
| Response: | Companies under contract to the Forest Service only cut trees as specified in the contract and timber sale area maps, unless otherwise authorized. |
| PC 140g | INCLUDING REQUIRING TIMBER COMPANIES TO CUT CULL TREES AND PAST-MATURITY TREES FIRST, LEAVING HEALTHY TREES |
| Response: | See responses to PC 140b and 140f, above. |
| PC 140h | INCLUDING ALLOWING LOGGING IN AREAS WHERE LOGGING OR DEVELOPMENT HAS BEEN DONE IN THE PAST |
| Response: | Where timber harvest occurs depends on many factors, including Management Prescription, purpose and need of the project, silvicultural prescription, access, and various management constraints. |
| PC 140i | INCLUDING PROTECTION OF WATER RESOURCES, WILDLIFE AND TROUT STREAMS, BIODIVERSITY, SCENIC RESOURCES, AND SOIL RESOURCES |

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| Response: | Protection for these resources is provided in the Revised Forest Plan, particularly in the Soil and Water Resources, Wildlife and Fish, Vegetation, and Scenic Environment sections. |
| PC 140j | TO PROTECT TOURISM |
| Response: | We cannot protect tourism, but we can continue to provide a scenic backdrop and recreation destinations for tourists to enjoy, and we intend to do so. |
| PC 140k | INCLUDING NO LOGGING IN BACKCOUNTRY AREAS |
| Response: | Backcountry recreation prescriptions (MP 5.1, 6.2, 8.1 SPNM) generally prohibit commercial timber harvest, although some tree cutting for specific reasons may occur. |
| PC 140l | INCLUDING AIR LIFTING TREES FROM ROADLESS AREAS |
| Response: | If trees were to be cut in roadless areas, helicopter yarding would be preferred over constructing roads. |
| PC 140m | TO PREVENT THE ENCROACHMENT OF EXOTIC PLANTS |
| Response: | There is little we can do to "prevent" the encroachment of all exotic plants, but we have included direction in the Revised Forest Plan to help control the establishment and spread of non-native invasive species. See the Vegetation section in Chapter II. |
| PC 140n | INCLUDING PROHIBITING THE USE OF CHAINSAWS |
| Response: | This is beyond the scope of plan revision. |
| PC 140o | TO REGENERATE DESIRABLE SPECIES FOR TIMBER AND WILDLIFE AND TO MAINTAIN OR ENHANCE HARD MAST |
| Response: | These goals are included in our management emphasis for MPs 3.0 and 6.1, where most of the timber management will be done on the Forest. |
| PC 140p | TO INCREASE THE SAW TIMBER VALUE PRODUCTIVITY OF THE FOREST |
| Response: | Increased value and productivity would be a by-product of achieving other vegetation management goals and desired conditions, and may not occur in every project or harvest unit. |
| **PC 141** | **The Forest should hire timber management specialists trained in meeting multiple-use objectives to implement a viable timber management program.** |
| Response: | Although hiring practices are beyond the scope of plan revision, we believe the Forest does hire specialists who can meet multiple-use objectives and implement a viable timber management program. |
| **PC 146** | **The Forest should acknowledge that its hardwoods are being marketed as cheap paper products.** |
| Response: | A relatively small amount of the hardwoods and softwoods harvested on the Forest are sold as pulpwood, which can be used for paper products. However, the hardwoods sold as pulpwood for paper products are typically lower value species or smaller diameter trees (usually 5 to 10 inches dbh). Other more valuable hardwood species and larger diameter trees are typically marketed for veneer or other high quality wood products. |
| **PC 126** | **The Forest should explain whether there will be logging in MP 8.0 areas.** |
| Response: | Timber harvest opportunities or restrictions vary by 8.0 area. They are described in the management direction for the various MP 8.0 areas in Chapter III of the Revised Forest Plan. Essentially, timber harvest is allowed and expected in the 8.5 Fernow Experimental Forest and the 8.6 Grouse Management Areas, but harvest would be limited or non-existent in other 8.0 areas. |
| **PC 791** | **The Forest should not allow timber contracts below market prices because it harms the market for private landowners.** |
| Response: | Timber sales on the Forest are appraised based on market conditions and past timber sales and then sold through the sealed bid process. |
| **PC 11** | **The Forest should consider the negative effects of logging, including:** |
| Response: | Potential effects from timber harvest and related activities are described throughout Chapter 3 of the EIS. See the General Effects, Direct and Indirect Effects, and Cumulative Effects for the various resources noted in Chapter 3 and the sub-concerns below. |
| PC 11a | IMPACTS TO SCENERY |
| Response: | See the Scenic Environment section in Chapter 3 of the EIS. |
| PC 11b | DAMAGE TO ROADS |
| Response: | We agree that heavy equipment such as logging trucks can cause damage to roads. However, potential and actual damage is typically compensated for through various means by timber operators, including additional road taxes, road reconstruction, and road maintenance along specified haul roads. |
| PC 11c | DANGEROUS LOGGING TRUCK DRIVERS |

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| Response: | We do not have any statistics to show that logging truck operators are any more dangerous that other drivers. However, they do operate on mountain roads that can be inherently dangerous due to their narrow widths, many curves, dirt or gravel surfaces, lack of sight distances, and often poor weather conditions. All drivers need to exercise more caution under such circumstances. |
| PC 11d | AN INCREASE IN FLOOD RISK |
| Response: | See responses to PC 52, PC 106, PC 23, and PC 833. |
| PC 11e | NEGATIVE EFFECTS ON TOURISM |
| Response: | See responses to PC 74 and PC 827. |
| PC 11f | THE LONG TIME IT TAKES FOR THE FOREST TO RECOVER FROM CLEARCUTTING |
| Response: | In some ways, the forest is still recovering from the extensive clearcutting that was done 70-120 years ago. However, that was timber mining rather than forestry. Today, clearcuts with reserve trees are only applied where they are the optimal method of achieving silvicultural objectives, which means that they are applied on a fairly limited basis, with mandatory leave trees and restrictions on size, amount within a watershed, harvesting in riparian areas, etc. The regeneration success is high in these areas, and new stands grow quickly, limiting visual and hydrologic effects to a relatively short period. |
| PC 11g | INVESTIGATING THE ADVERSE IMPACTS OF THE PAST AND CURRENT LOGGING OPERATIONS IN THE FOREST |
| Response: | Potential effects from timber harvest and related activities are described throughout Chapter 3 of the EIS for various resources, including those captured in these comments. |
| PC 11h | IMPACTS ON BIOLOGICAL DIVERSITY AND THE VIABILITY OF SPECIES |
| Response: | See the Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Management Indicator Species and Other Species of Interest, and Threatened and Endangered Species sections in Chapter 3 of the EIS. |
| PC 11i | IMPACTS ON SOIL |
| Response: | See the Soil Resource section in Chapter 3 of the EIS. |
| PC 11j | IMPACTS ON WATER RESOURCES |
| Response: | See the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS. |
| PC 11k | IMPACTS ON WILDLIFE |
| Response: | See the Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Management Indicator Species and Other Species of Interest, and Threatened and Endangered Species sections in Chapter 3 of the EIS. |
| PC 11l | IMPACTS ON NATIVE PLANTS |
| Response: | See the Vegetation Management, Terrestrial Species Viability, and Threatened and Endangered Species sections in Chapter 3 of the EIS. |
| PC 11m | IMPACTS ON RECREATION |
| Response: | See the Recreation and Wilderness section in Chapter 3 of the EIS. |
| PC 11n | IMPACTS FROM CHIP MILLS |
| Response: | We do not believe that timber harvest on the Forest is receiving negative effects from chip mills. |
| PC 110 | IMPACTS ON AIR QUALITY |
| Response: | See the Air Quality section in Chapter 3 of the EIS. |
| PC 11p | IMPACTS ON FOREST FRAGMENTATION |
| Response: | See the Terrestrial Ecosystem Diversity section in Chapter 3 of the EIS. |
| PC 11q | THE LOSS OF TAXPAYER DOLLARS |
| Response: | All timber sales on the Forest produce revenue for the U.S. Treasury. See also response to PC 144. |
| PC 11r | EFFECTS ON GLOBAL WARMING |
| Response: | See response to PC 110c. |
| PC 11s | THE INTRODUCTION AND SPREAD OF NON-NATIVE INVASIVE SPECIES |
| Response: | See the Non-native Invasive Species section in Chapter 3 of the EIS. |
| PC 11t | EFFECTS ON MATURE AND OLD GROWTH FORESTS |
| Response: | See the Terrestrial Ecosystem Diversity and Vegetation Management sections in Chapter 3 of the EIS. |
| PC 11u | EFFECTS ON ENVIRONMENTALLY SENSITIVE HABITAT |
| Response: | We are not sure what the commenter meant by “environmentally sensitive habitat”. However, we look at the environmental sensitivity of the forest when we do environmental assessments, environmental impact statements, biological assessments, and related documents. For plan revision, these assessments |

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| | appear throughout Chapter 3 of the EIS, and additional assessments can be found in the project record. |
| PC 11v | EFFECTS ON FOREST ECOLOGY |
| Response: | See the Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Management Indicator Species and Other Species of Interest, and Threatened and Endangered Species sections in Chapter 3 of the EIS. |
| **PC 12** | **The Forest should eliminate the two-age system of timber management because it fails to meet landscape appearance goals while unnecessarily increasing the cost and difficulty of harvest.** |
| Response: | The two-aged harvest method (also known as the deferred rotation harvest method) is a valuable silvicultural tool when implemented appropriately. Many of the previous two-aged harvest cuts on the Forest left too many trees that shaded the regeneration causing slower growth (Miller et al. 1997, Pelkki 1996). The effects from timber harvesting on the scenic environment vary depending on the quantity and type of timber removed, logging methods, and the area's setting. Two-aged timber harvesting can have a short-term negative impact on individuals who expect to view an unaltered landscape. Relatively speaking, a clearcut with reserve trees of the same area may have even more negative impacts to those same individuals. However, in either case these areas will re-vegetate over time and can provide for a diversity of openings and age classes that others may enjoy. |
| **PC 556** | **The Forest should not use two-aged harvest methods because it leads to more shade-tolerant species, slower growth, and less diversity.** |
| Response: | See response to PC 12. We agree that two-aged harvest can lead to slower growth and more shade-tolerant species if the overstory is not removed in a timely manner. Post-harvest thinning treatments can also help increase growth rates and select for desired species. |
| **PC 16** | **The Forest should limit the amount of logging, including commercial logging, allowed in the Forest.** |
| Response: | We feel that the amount of logging on the Forest is limited by the Revised Forest Plan. Only about 36% of the Forest is available for regulated or programmed timber management. Within those areas that are suitable for timber harvest, a large portion will not be harvested in the coming decade. For example, the Revised Forest Plan has timber harvest objectives in the range of 2,400 to 4,800 acres a year. The maximum amount in this range amounts to less than half of one percent of the Forest land base, which means that on an average annual basis, at least 99.6% Forest would not have any timber harvest activity.<br><br>Numerous restrictions and mitigation measures are utilized in timber sales to protect other resources. Timber harvesting is a tool used to manage the Forest for multiple uses and a sustained yield of goods and services. Designated Management Prescription areas list desired conditions, goals, objectives, standards, and guidelines in the Revised Forest Plans to: restrict logging to certain areas; protect other resources; and maintain, restore, or enhance habitats. See also responses to PC 11 and PC 140. |
| PC 16a | TO BENEFIT FUTURE GENERATIONS |
| Response: | See responses to PC 62h and PC 37a. |
| PC 16b | TO PROTECT QUALITY OF LIFE |
| Response: | Although the quality of life is beyond our authority or control to manage, we hope we can contribute to various aspects through our management. |
| PC 16c | BECAUSE LOGGING IS COUNTER TO PUBLIC OPINION |
| Response: | We heard from many people who wanted to see more timber harvest on the Forest, as well as those who would like to see less harvest or none whatsoever. |
| PC 16d | TO PROTECT WATER RESOURCES, AND FISH AND BENTHIC ORGANISMS |
| Response: | Effects to water resources and fish habitat from timber harvest are discussed in the Water, Riparian and Aquatic Resources section of Chapter 3 in the EIS. |
| PC 16e | TO PREVENT THE SPREAD OF INVASIVE SPECIES |
| Response: | Effects related to non-native invasive plants and timber harvest are discussed in the Non-native Invasive Plants section of Chapter 3 in the EIS. |
| PC 16f | TO PROTECT SCENIC RESOURCES |
| Response: | Effects to scenic resources are discussed in the Scenic Environment section of Chapter 3 in the EIS. |
| PC 16g | TO PREVENT GLOBAL WARMING |
| Response: | See response to PC 110c. |
| PC 16h | BECAUSE LOGGING NEGATIVELY AFFECTS TOURISM |

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| Response: | See response to PC 74. |
| PC 16i | INCLUDING LIMITING OR PROHIBITING CLEARCUTTING |
| Response: | See responses to PC 181, PC 169, PC 43, PC 637, PC 163, and PC 466. |
| PC 16j | BECAUSE THERE MAY BE A LACK OF MANPOWER TO OVERSEE AND POLICE EXPANDED LOGGING |
| Response: | We can likely hire or borrow as many people as we need to administer timber sales. |
| PC 16k | TO PROTECT WILDERNESS QUALITIES, INCLUDING PROHIBITING LOGGING IN ROADLESS AREAS, WILDERNESS AREAS, 6.2 AREAS, AND OTHER PROTECTED AREAS |
| Response: | The specific areas you have listed all have restrictions on regulated commercial timber harvest. |
| PC 16l | TO PROVIDE AND PROTECT RECREATIONAL OPPORTUNITIES |
| Response: | We believe that the entire Forest provides recreational opportunities, although the types may shift from area to area. Harvested areas, for example, may provide opportunities for firewood collecting, berry picking, wildlife watching, or driving for pleasure on Forest roads. |
| PC 16m | TO PROTECT WILDLIFE AND HABITAT, ENDANGERED SPECIES, INDICATOR SPECIES, AND SPECIES DIVERSITY |
| Response: | See responses to PC 22d and PC 37c. |
| PC 16n | TO PROTECT PUBLIC HEALTH |
| Response: | See response to PC 181. |
| PC 16o | TO PREVENT EROSION AND FLOODING |
| Response: | See responses to PC 52, PC 106, PC 23, PC 18, and PC 833. |
| PC 16p | TO PROTECT SOIL NUTRIENT LEVELS |
| Response: | See the Soil Resource section in Chapter 3 of the EIS. See also responses to PC 470 and PC 832. |
| PC 16q | BECAUSE THE FOREST'S RESOURCES BELONG TO THE PUBLIC |
| Response: | We agree, but the public does usually agree as to how those resources should be managed. As land managers with a multiple-use mandate, we try to provide a wide range of opportunities, settings, products, and services on federal lands for all the public to enjoy. For example, people who do not like timber harvest can at any given time visit the vast majority of the Forest where timber harvest is not taking place. |
| PC 16r | TO PREVENT LOGGING ROADS |
| Response: | Effects from roads are found throughout Chapter 3 of the EIS. Existing roads and projected road needs are discussed in the Road Transportation System section of Chapter 3. Management requirements and other suggested mitigation for potential road impacts are found in Chapters II and III of the Revised Forest Plan. |
| PC 16s | BECAUSE FIRE SUPPRESSION IS NOT A LARGE PROBLEM IN THE FOREST LIKE IT IS IN THE WEST |
| Response: | We agree. We have not proposing timber harvest due to immediate fire suppression needs. Any fuel reduction we create through harvest, however, would be an added benefit in wildland urban interface. |
| PC 16t | TO PROTECT SPECIES DIVERSITY |
| Response: | Regenerating forest stands through timber harvest can help enhance plant and animal species diversity across the landscape. See the Vegetation Management analysis in Chapter 3 of the EIS. |
| PC 16u | TO PROTECT WILDFLOWER HABITAT |
| Response: | Timber harvesting can have impacts on wildflowers, but it can also create habitat conditions conducive to many wildflowers. |
| PC 16v | INCLUDING PROHIBITING LOGGING OF OLD GROWTH |
| Response: | There is currently very little "old growth" on the Forest, and most of the known stands are protected from commercial timber harvest. The Forest's strategy for managing potential and existing old growth is described in Appendix B to the Revised Forest Plan. |
| PC 16w | TO PROTECT LARGE FOREST ECOSYSTEMS AND FOREST INTERIOR SPECIES |
| Response: | See responses to PC 530 and PC 690. |
| PC 16x | BECAUSE LOGGING IS COSTING TAXPAYERS TOO MUCH |
| Response: | Timber sales on the Forest typically produce positive returns to the U.S. Treasury. |
| PC 16y | BECAUSE THE FOREST SHOULD NOT BE COMPETING WITH PRIVATE WOODLAND |

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| | OWNERS AND DRIVING DOWN THE PRICE OF TIMBER |
| Response: | We do not believe that we are necessarily in direct competition with private woodland owners, as Forest timber sales tend to be on a larger scale and have more required mitigation that can increase operating costs. Therefore they often have different purchasers. In this respect, Forest timber sales may actually make many private timber sales look more attractive by comparison. |
| PC 16z | BECAUSE TIMBER HARVEST SHOULD NOT OCCUR IN LARGE UNROADED TRACTS, ON STEEP SLOPES, OR NEAR STREAMS OF ANY SIZE |
| Response: | The Revised Forest Plan has restrictions on timber harvesting in roadless areas, on steep slopes, and within stream channel buffer zones. |
| PC 16aa | BECAUSE IT IS NOT GOOD FOR MOUNTAIN BIKING |
| Response: | Mountain bikers who do not like or want to be near timber harvesting have many other places on the Forest to recreate. Many of the roads or trails they bicycle on were originally built for timber harvest. |
| PC 16ab | TO PREVENT DEER OVERPOPULATION |
| Response: | See response to PC 285. |
| PC 16ac | BECAUSE REPLANTED TREES TAKE TOO LONG TO GROW |
| Response: | The vast majority of tree regeneration that occurs on the Forest is from natural sprouting or seeding; very few trees are planted. Trees take as long as they need to grow, and they provide different types of habitat and other values as they cycle through natural succession. |
| PC 16ad | BECAUSE TREES PROVIDE OXYGEN |
| Response: | We agree that trees provide us with life-giving oxygen. We are not proposing a net loss of trees on the Forest. We are proposing to replace some older trees with younger trees, which will also produce oxygen for a very long time, likely much longer than the older trees they are replacing. |
| PC 16ae | INCLUDING PROHIBITING LOGGING IN STEEP AND DIFFICULT TERRAIN |
| Response: | The Revised Forest Plan has restrictions on operating logging equipment on steep slopes, wet areas, etc. |
| PC 16af | BECAUSE THE DEMAND FOR NON-TIMBER FOREST PRODUCTS WILL SOON OUTWEIGH THE DEMAND FOR TIMBER PRODUCTS |
| Response: | Although specific non-timber forest products were not identified, we do not believe that timber harvest and non-timber forest products are mutually exclusive. Also, only 36% of the Forest is considered suitable for regulated timber harvest. That leaves the majority of the Forest for pursuits and products unaffected by timber harvest activities. |
| PC 16ag | TO PROTECT THE FOREST'S CARBON SEQUESTRATION USE |
| Response: | See response to PC 110c. |
| PC 16ah | TO PROVIDE FIRE PROTECTION |
| Response: | See response to PC 16s, above. |
| PC 16ai | INCLUDING PREVENTING LOGGING IN THE SENECA CREEK BACKCOUNTRY, CANAAN MOUNTAIN, AND NORTH FORK MOUNTAIN |
| Response: | Commercial timber harvest is generally prohibited in all of these areas that are in MP 6.2 or 8.1 SPNM. |
| PC 16aj | INCLUDING LIMITING TIMBER SALES IN BIG RUN BOG |
| Response: | Vegetation manipulation of any kind is not allowed in the bog, which is a National Natural Landmark. |
| PC 16ak | INCLUDING PREVENTING LOGGING IN THE LITTLE ALLEGHENY MOUNTAIN AND LAUREL RUN AREA |
| Response: | The Little Allegheny Mountain and Laurel Run area would generally be prohibited from commercial timber harvest under Alternative 3, but would be available for vegetation management under the other alternatives considered in the EIS. |
| PC 16al | INCLUDING LIMITING LOGGING IN 6.1 AREAS |
| Response: | Age class diversity and regeneration of mast-producing species are major management emphases in MP 6.1. Meeting these management emphases requires harvesting timber. |
| PC 16am | INCLUDING LOCATING LOGGING SITES IN AREAS THAT DO NOT HAVE IMPORTANT VALUES |
| Response: | We believe that all areas on the Forest have value, the importance of which can vary widely by resource area or an individual's value system. Any commercial timber harvest proposed by the Forest would undergo a comprehensive analysis of the project area values, and the potential effects the project would have on those values. This analysis would be made available to the public and the Forest would seek |

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| | public input on the project before making a decision on implementation. |
| **PC 17** | **The Forest should acknowledge that statements regarding timber management and mature forests in the Plan are not supported by science.** |
| Response: | We believe that most of the statements attributed to the DEIS concerning mature forests were actually statements related to overmature or older forests. We have tried to clarify this confusion where possible in the FEIS. |
| PC 17a | INCLUDING THE STATEMENT THAT A MATURE FOREST IS MORE SUSCEPTIBLE TO DISEASE AND INSECTS |
| Response: | We agree that mature forests are not necessarily more susceptible to disease and insects. However, they do become more susceptible as they age into overmature or old forests, as seen in the increased mortality of these older forests. |
| PC 17b | INCLUDING THE STATEMENT THAT A MATURE FOREST HAS DECREASED MAST PRODUCTION AND HABITAT DIVERSITY |
| Response: | The analyses of mast production as it relates to wildlife habitat used 50 to 150 years old as the typical age range for optimum mast production. This age range is based on scientific information, as cited in the DEIS (see page 3-198). The DEIS indicates that mature forests are generally at the peak of their mast production, but that production tends to decrease as mature forests become older or overmature. |
| PC 17c | INCLUDING THE STATEMENT THAT A MATURE FOREST HAS INCREASED FUEL LOADS AND MORE SEVERE FIRES |
| Response: | As mature forests grow and age into overmature or old forests, the overall woody material present increases, which increases fuel loading. This progression is not only supported by science but also by simple observation. Although large fires are not characteristic in eastern mesic forests, they can occur, particularly under drought conditions, and the intensity and severity of those fires is at least partially dependent on the amount of fuel present. |
| PC 17d | INCLUDING THE STATEMENT THAT TIMBER HARVEST MIMICS HISTORIC FIRE REGIMES |
| Response: | Uncontrolled wildfires and prescribed fires leave gaps in the canopies. The number and size of these gaps vary depending on the intensity of the fire due to drought, high winds, and other environmental and climatic factors (Hutchinson et al, 2005, Turner et al. 1997). Although timber harvesting cannot duplicate the randomness and chaotic nature of historic fires, it can mimic the effects by creating canopy gaps in the forest spatially and in periodicity. |
| PC 17e | BECAUSE OLD GROWTH FORESTS PROVIDE MORE DIVERSE HABITAT FOR A VARIETY OF SPECIES THAN EARLY SUCCESSIONAL FORESTS |
| Response: | We agree that old growth forests are important components of habitat diversity. These components will be provided by the nearly two-thirds of the Forest that is not in the suitable timber base. We believe that young or early successional forests will also provide diversity, particularly across the future Forest landscape that will primarily be old stands of trees. |
| PC 17f | BECAUSE THESE STATEMENTS TEND TO SADDLE PRIVATE FORESTRY WITH UNNECESSARY AND UNREALISTIC BURDENS AND RENDER SUSPECT PRIVATE PRACTICES THAT DO NOT MIRROR AGENCY ASSUMPTIONS |
| Response: | Private landowners practicing forest management do not have to meet the same laws, regulations, and policies as national forests do. Each landowner has the right to determine how their land should be managed. Forestry consultants working with private landowners are responsible for ensuring that land management practices desired by the landowner are acceptable forest treatments. |
| **PC 20** | **The Forest Service should not allow logging in any National Forest in order to protect recreational opportunities and wildlife.** |
| Response: | We acknowledge your preference. A national forest prohibition on logging is beyond the scope and authority of this plan revision. However, timber harvest projects that are conducted on the Forest incorporate management requirements and mitigation measures to reduce impacts to recreational opportunities and wildlife. See also page 2-2 of the DEIS, and the No Logging/Commercial Harvest alternative that was considered but eliminated from detail study. See also response to PC 72. |
| **PC 28** | **The Forest should set the allowable sale quantity no higher than 30 million board feet, and allow minimal-to-no even-aged management.** |
| Response: | We acknowledge your preference. We did not develop the EIS alternatives around a specific ASQ or harvest method, but rather developed desired conditions around the major need for change issues, and |

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| | then modeled how the alternatives would best achieve those desired conditions to determine specific components of the alternatives like harvest methods and outputs. It is not clear what the desired conditions associated with a 30 million board foot cap and limited even-aged harvest are, though we might assume that the overall intent is to limit disturbance and impacts to other resources. However, to achieve 30 million board feet through uneven-aged management would likely result in a need to harvest more acres over more area on an annual basis than any of the alternatives analyzed in the DEIS. Uneven-aged management typically requires more harvest entries over a rotation period than even-aged management as well. Thus, even though impacts to certain resources, like aesthetics or water quantity, might be reduced under such an alternative, other impacts associated with road construction, soil and water disturbance, or wildlife disturbance could increase over the short and long term. |
| **PC 792** | **The Forest should discontinue the logging practice that leaves trees visible from the road, but clear cuts the trees not visible from the road.** |
| Response: | The Scenery Management System establishes aesthetic standards based on Scenic Integrity Objectives, Landscape Character, Concern Levels, Visibility and Scenic Classes. A variety of landscapes are emphasized based on the areas Recreational Opportunity Spectrum Setting and Management Prescription. Road corridors are typically considered more visually sensitive than areas away from roads in prescriptions that allow commercial harvest. However, under no scenario in the Forest Plan would all trees ever be cut away from the road. See Proposed Revised Plan, Chapter II, pages 31-32. |
| **PC 732** | **The Forest should recognize that science does not substantiate the claim that timber harvest benefits stream flows.** |
| Response: | While increased water yield due to timber harvesting is substantiated by science, and the increase is normally greatest during the growing season, the comment relating to the effects as a potential benefit is a value judgment. The DEIS has been edited to drop the reference to potential benefits.<br><br>In addition to the public concern identified, the commenter also questioned the applicability of the literature that was cited in the DEIS (pg 3-73 to 3-74) because much of it was greater than 10 years old. The commenter suggested "Thinning for Increased Water Yield in the Sierra Nevada: Free Lunch or Pie in the Sky?" by Rhodes and Purser, 1998, as a more current piece of work. Although in many cases the literature cited is dated, we feel their findings are still relevant and applicable to our discussion. It is difficult to find literature that is site-specific and timely to a study area, so the best available information is utilized. Even in the case of the recommended literature, its applicability is questionable because it a) it focuses on thinning effects, b) the forests in the Sierra Nevada mountains are predominantly coniferous, not deciduous as we have here, and c) the hydrologic regimes in the Sierras are primarily snowmelt-dominated and not rain-dominated as they are on the Monongahela. Given these differences, the general conclusion of the paper is similar to many of the studies conducted in the deciduous forests of the Eastern U.S. That is, in order for timber harvest to have an appreciable effect on water yield, including base flows and peak flows, the de-vegetation would have to be at a scale and duration that is unlikely to occur on the National Forest due to effects to other resources and public concerns. |
| **PC 59** | **The Forest should use selective cutting in its timber management to prevent environmental degradation.** |
| Response: | Uneven-aged management (selective cutting) is allowed where appropriate. Minimal impact yarding methods such as helicopter and skyline cable are utilized in site-specific projects to minimize impacts to other resources. These decisions are made at the project level. The location of each project is analyzed by a team of interdisciplinary resource specialists. |
| **PC 771** | **The Forest should clarify the need to revise the suitable lands determination by explaining what the problem was with the previous suitable lands determination or the supply and demand estimations that they needed to be revisited and revised.** |
| Response: | The NFMA 36 CFR 219.14(d) regulation requires lands determined not suitable for timber production to be reviewed every 10 years. Suitability involves not only the capability of the land to grow timber, but other factors, including land allocation. Land allocation and suitability assignments have changed since 1986 (see page 3-325, second paragraph, in the DEIS), and plan revision proposed four management alternatives that would also change Management Prescription distribution and suitability allocations. |
| **PC 770** | **The Forest should develop an alternative and prescriptions that allow only modest cutting over long rotations (200-300 years), using only individual tree selection.** |

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| Response: | We have addressed this potential alternative in Chapter 2 of the FEIS, under Alternatives Considered but Eliminated from Detailed Study. |
| **PC 769** | **The Forest should conduct a thorough and detailed investigation of all timber theft allegations as a routine component of its timber sale program and report these findings to the public.** |
| Response: | Timber theft investigations are beyond the scope of this plan revision. |
| **PC 767** | **The Forest should not allow lands currently in timbering categories to be placed in non-timbering categories:**<br>• **Because timbering should be increased**<br>• **Because mature timber should not be wasted**<br>• **To provide tax revenue for local counties**<br>• **To offset the lack of property tax paid by the Forest Service**<br>• **To stimulate the local economy**<br>• **To maintain forest health and provide food sources for wildlife.** |
| Response: | We agree that timber management can have beneficial effects, including those you have noted. We do not necessarily agree that mature trees are wasted if they are not cut. They have many other values in the forest that are described in the DEIS.<br><br>The preferred alternative (2) in the DEIS has a similar amount of land considered suitable for timber production as Alternative 1, which represents the 1986 Forest Plan as amended. The alternatives are somewhat different in the location of suited timberlands, though. Reasons for the discrepancies are indicated in the alternative descriptions in Chapter 2 of the EIS. |
| **PC 588** | **The Forest should encourage private investment through reliable actual timber sale offerings to help develop a vibrant wood-based economy in the communities dominated by federally owned land.** |
| Response: | We feel that the Revised Forest Plan has sufficient vegetation management objectives to provide for sustainable timber production over time, and we are committed to implementing vegetation management in a sustainable manner throughout the planning period and beyond. |
| **PC 39** | **The Forest should acknowledge that recent surveys indicate that the public is in favor of protecting the Forest rather than logging it.** |
| Response: | The results of the one Maryland environmental survey cited in the comments are not a surprise. Anytime the public is given the theoretical choice between protecting a Forest and logging it, they are likely going to choose protection, because the inferences are that logging provides no protection and the entire Forest is going to be logged. Our proposed action would only allow commercial timber harvest in certain portions of the Forest, and the management direction in the Forest Plan would provide adequate protection to Forest resources under any timber harvest proposal. |
| **PC 190** | **The Forest should harvest smaller areas of timber with more distance between them and with longer harvest rotations.** |
| Response: | Such decisions are more appropriately made at the project level with silvicultural prescriptions that consider existing and desired conditions and site-specific concerns. See also response to PC 57b and PC 57d. |
| **PC 461** | **The Forest should continue to emphasize long timber rotations to protect old growth.** |
| Response: | See the discussion in Chapter 3 of the DEIS on Minimum Dynamic Areas. See also responses to PC 661 and PC 190. |
| **PC 151** | **The Forest should acknowledge that there are more problems with continuing forestry on low percentage slopes rather than high percentage slopes.** |
| Response: | Proper forest management based on sound scientific principles provides a variety of methods to implement projects on steep as well as gentle slopes. Designated skid trails with proper drainage on gentle slopes, along with the timing of operations, can alleviate many problems such as excessive soil compaction, reduced soil productivity, and rutting. Although it is technically possible for conventional equipment such as bulldozers to be utilized on steep slopes, it is not a recommended practice due to both resource damage and safety concerns. |
| **PC 460** | **The Forest should change the viability analysis of the DEIS to adequately reflect the potential impacts of changes to the forest interior species caused by logging.** |
| Response: | Forest interior species with potential viability concerns were fully considered in the species viability |

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| | analysis. Analyses for individual species are contained in the project record and are available upon request. |
| **PC 462** | **The Forest should give first preference to timber companies who are local, small-scale, and guarantee that trees will not leave West Virginia until they have been turned into a value-added product.** |
| Response: | Timber company preferences are beyond the scope of plan revision. See also response to PC 378. |
| **PC 457** | **The Forest should hold logging companies to a worst, then first standard, whereby they only cut trees past maturity and leave healthy trees.** |
| Response: | The Forest Service generally marks the trees that timber contractors are supposed to cut or leave. Cut or leave trees are chosen as to how they will help achieve the desired vegetation conditions in the area. |
| **PC 509** | **The Forest should improve its system for providing timber harvest information and location maps to the public so the Forest can be better utilized.** |
| Response: | Timber harvest mapping is beyond the scope of this forest plan revision. |
| **PC 532** | **The Forest should amend the FEIS to implement a precautionary approach that declares lands unsuitable for timbering unless it can ensure that damage to the lands will not occur.** |
| Response: | We acknowledge your preference, but we already have the capability of declaring lands not suited for timber management at the project level if a site-specific analysis identifies the need. |
| PC 532a | BECAUSE TIMBER HARVEST SHOULD BE RESTRICTED ON SENSITIVE SOILS TO PREVENT NUTRIENT DEPLETION |
| Response: | See response to PC 99. |
| PC 532b | BECAUSE IT IS UNLIKELY THAT ADEQUATE MITIGATION EFFORTS WILL BE CARRIED OUT UNDER ALTERNATIVE 2 |
| Response: | We disagree with your opinion. Management requirements and mitigation measures must be adhered to in project implementation regardless of what plan alternative is chosen to be implemented. |
| **PC 536** | **The Forest should make an effort to achieve allowable sale quantities:**<br>• **Because recent trends indicate that timber harvests are falling well short of allowable sale quantities**<br>• **Because the reluctance to harvest timber creates problems for achieving wildlife objectives**<br>• **Because timber harvesting is an important part of the local economy**<br>• **To provide tax revenue for local counties**<br>• **To improve forest health.** |
| Response: | We agree that recent annual timber production has fallen well short of the Forest's Annual Sale Quantity (ASQ), and that this shortfall affects wildlife habitat objectives and county revenues as well. It is important to remember, though, that ASQ is a maximum amount of timber volume that we do not intend to exceed, as opposed to a target level of production. Theoretically, the closer we move toward the ASQ, the faster we would be able to achieve our vegetation and habitat diversity desired conditions. However, the actual rate of production we achieve will be dependent on many factors that are disclosed in the Timber Supply and Social and Economic Environment sections in Chapter 3 of the EIS. |
| **PC 377** | **The Forest should explain how it intends to achieve the allowable number of timber sales it proposes in Alternative 2, because the projected harvest can only be achieved if the appropriate amount of resources is provided.** |
| Response: | We have an allowable sale quantity, but that figure refers to timber volume rather than the number of sales we implement. We agree that the ASQ would only be achieved if the appropriate amount of resources (funding, staff, equipment, etc.) is provided. With present funding, staffing, restrictions, etc. we feel that an annual objective of 15 to 25 MMBF is likely attainable. See also responses to PC 379 and PC 536. |
| **PC 166** | **The Forest should reevaluate its timber harvest purposes to include public input and discussion.** |
| Response: | We have had similar vegetation management purposes and rationale since the beginning of Forest Plan revision, nearly four years ago. During the interim, we have given the public multiple opportunities to comment on these purposes and their associated timber harvest levels, and they have responded impressively, as evidenced by the comments seen in this Public Involvement Appendix. |
| **PC 162** | **The Forest should acknowledge that private logging lands can meet most of our timber needs because:** |

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| | • **This will benefit wildlife**<br>• **This will protect recreational opportunities**<br>• **This will benefit downstream communities.** |
| Response: | Much of the harvesting on private land in West Virginia is completed using the diameter limit method. This harvest method leaves smaller diameter stems of the older age class on site in trees that are of similar age to the ones removed, but usually in the intermediate or suppressed crown classes. The diameter limit harvest method is not considered to be an even-aged regeneration harvest method. In addition, private land ownership is becoming more fragmented (USDA Forest Service General Technical Report SRS-53, 2002; Clutter et al. 2005). Larger parcels of land are divided into smaller parcels, often for housing or other development. Although most of these smaller parcels remain forested, many small land owners are not willing to manage their land for timber. Parcels smaller than 15 acres are not economical to manage for timber. The result of ownership fragmentation is less private land available to meet timber needs. See also response to PC 112. |
| **PC 135** | **The Forest should educate owners of private timberlands how to harvest their lands effectively to alleviate the economic pressures driving the harvesting our national forests.** |
| Response: | See responses to PC 162 and PC 329. |
| **PC 194** | **The Forest should conduct timber harvesting primarily to provide a successional forest for wildlife food and habitat, because there is plenty of timber to harvest on private land.** |
| Response: | As noted in the many places in the DEIS and the Proposed Revised Plan, early successional habitat is closely tied to timber harvesting. See also responses to PC 162 and PC 376b. |
| **PC 196** | **The Forest should enforce a sustained program for commercial timber harvest to protect timber harvesting jobs and revenue in Pendleton County, including sustaining its commercial timber sales at the rate of at least 20 million board feet per year.** |
| Response: | It is a goal and desired condition of the Forest Plan to harvest a sustainable supply of timber. Although we have not harvested 20 million board feet for many years, we hope to return to that level in the near future. |
| **PC 779** | **The Forest should let the sale area determine the type of logging allowed because:**<br>• **There may be instances where logging in stream buffers is appropriate**<br>• **Requiring a certain percentage of logging be down by helicopter puts the plan in a box that requires the sale areas to fit a certain logging method.** |
| Response: | Site-specific project planning and analysis determines where and how logging occurs on the Forest. The stream channel management corridor direction allows for tree cutting if it is needed to benefit riparian resources. The plan does not require a certain percentage of logging to use helicopter yarding. However, for our analysis we assumed that helicopter yarding would be used for a certain percentage of harvesting based on recent experience and future resource protection needs. |
| **PC 157** | **The Forest should implement timber harvesting in a way that retains as much protection for the vegetation on the Forest's steep slopes as possible and gives first consideration to human lives and private property, because clear cutting on steep slopes can reduce vegetation needed for ground absorption.** |
| Response: | Slope limitations are set for operator safety and resource protection concerns, mechanized equipment limitations, and due to the higher soil risks associated with steep slopes, like erosion potential. Although landslides are not a common occurrence on the Forest, they do occur. When a large landslide occurs in an area of management, or in an area where a risk to human safety or facilities exists, the cost of repair and maintenance can be very large. Therefore, avoiding potential landslides is often the best course of action. Providing standards and guidelines that require site-specific review of these areas prior to management is a valuable tool the Forest can use to reduce the risks to Forest resources and operator safety. Considering alternative methods of harvesting can also have a beneficial effect to further protecting the soil resource. Helicopter and skyline cable logging, for example, disturb very little of the forest floor. Vegetative growth responses to harvesting occur rapidly especially in even-aged openings due to the readily available amount of light on the forest floor. This new vegetation acts to take up moisture rapidly as competition amongst the new growth thrives. We also consider the soil type and geology of the unit selected for harvest at the project scale. At this scale, recommendations for harvest methods, silviculture prescriptions, and mitigations are discussed before the project is implemented. See also response to PC 637. |

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| **PC 421** | **The Forest should acknowledge that over half of the Forest is not suitable for timber management by conventional means because much of the lands are highly vulnerable to erosion, resulting in water degradation.** |
| Response: | We have identified and examined areas within the Forest that have soils, slopes, and watershed conditions that are susceptible to serious or irreversible damage. We have utilized many tools including a soil sensitivity map that looks at soil interpretations for such concerns as hydric soils, flood plains, karst topography, mass wasting, prime farmland, steep slopes, erosion hazards and soils with seasonal water tables. This information is and will be used at the project level to determine risk and potential effects, and to help prioritize locations within a project area that need to be ground-truthed or surveyed to greater detail. |
| **PC 553** | **The Forest should clarify whether or not it will be harvesting timber within the Indiana bat's primary range.** |
| Response: | Timber harvesting to improve or maintain Indiana bat habitat is allowed in primary range (see Forest-wide direction TE27 and TE29 in the Proposed Revised Plan). Because the primary reason for such harvesting is management of bat habitat rather than meeting timber harvest objectives, and harvest levels are projected to be low, primary range is not included in the suitable timber base. |
| **PC 550** | **The Forest should acknowledge that there is no evidence that cutting trees within ephemeral and intermediate drains has adverse effects.** |
| Response: | Ephemeral and intermittent streams play an important role in drainage networks and provide habitat for a range of aquatic and terrestrial organisms. They also play an important role in storing sediment, organic matter and moisture that influence the quality of perennial habitat downstream. The role and function of ephemeral and intermittent channels can be affected by land management activities that remove trees along the channel (reducing the amount of organic inputs and structure along the channel), or physically disturbing the channel morphology. The number of studies that address ephemeral and intermittent streams is increasing and improving our understanding of the characteristics and importance these small, headwater areas. |
| **PC 504** | **The Forest should provide information on what the planned or existing markets are for the timber harvested on the Forest and where the finished products will go at the end of the marketing process.** |
| Response: | Timber markets were assessed for the 1986 Plan, and this assessment was revisited and updated in the Analysis of the Management Situation for plan revision. Ultimately, because timber is bought on the open market, it is difficult to predict who will buy it, how they will use it, and where it will end up. However, Table TR-6 on page 3-327 of the DEIS provides a recent snapshot of wood products that are being manufactured in the 10-county area around the Forest. |
| **Harvest Methods** | |
| **PC 364** | **The Forest should abandon helicopter logging unless it can be shown to lower costs.** |
| Response: | Helicopter logging is a valuable tool to manage land that is inaccessible by road, is too steep for ground equipment, has soils that should not be exposed or disturbed, etc. We are well aware of the higher operating costs associated with helicopters, and therefore we intend to use them judiciously. |
| **PC 368** | **The Forest should use horses instead of bulldozers for logging operations.** |
| Response: | The Revised Forest Plan would allow the use of horses to yard timber. However, horse logging, if not planned properly, can cause more damage than conventional logging equipment. A well-designed and administered timber sale can avoid or limit most negative impacts, regardless of yarding methods. |
| **PC 62** | **The Forest should require the Allegheny Wood Products Company to use helicopter removal rather than using the Blackwater Trail for timber removal.** |
| Response: | The Allegheny Wood Products Easement in Blackwater Canyon is beyond the scope of Forest Plan revision. There is a separate and current Environmental Impact Statement that is addressing this site-specific easement request on the Forest. |
| **PC 57** | **The Forest should not enlarge the allowable size of clearcuts from 25 to 40 acres:**<br>• **To protect the water resources**<br>• **To protect habitat**<br>• **To prevent flooding**<br>• **To protect the forest experience of both humans and animals.** |
| Response: | Although the 1986 MNF Forest Plan allowed for a maximum 25 acre regeneration harvests, the average |

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| | size over the past 20 years has been less than 15 acres. Increasing the maximum size to 40 acres does not mean that all or any regeneration harvest units will be the maximum size. Site-specific project analysis by an interdisciplinary team of specialists will determine the type and size of harvest units. The 40-acre maximum size limit does, however, make Forest management direction more consistent with national direction and give us more flexibility to address ecological concerns. Increasing the allowable size of even-aged harvest units does not increase the total amount of harvesting in a given project area; it merely concentrates the harvesting in fewer, larger units. This concentration reduces fragmentation of the remaining forest habitat, compared to more numerous smaller units, and would not result in fewer acres of forest for the enjoyment of recreationists. See also responses to PC 76, PC 106, and PC 637. |
| **PC 362** | **The Forest should enlarge the size of allowable clearcuts because clearcutting sites of up to 40 acres is considered sound practice for the region.** |
| Response: | We are returning to the regional and national standard for regeneration harvest unit size for consistency and flexibility in management. |
| **PC 380** | **The Forest should provide enough resources to actively and responsibly oversee timber sales to:**<br>• **Prepare and offer quality hardwoods to the economy of the area**<br>• **Promote age-class diversity** |
| Response: | Trained and experienced Certified Timber Sale Administrators supervise all timber sale harvesting activities on the Forest. |
| **PC 278** | **The Forest should adequately supervise clearcutting activities.** |
| Response: | See response to PC 380. |
| **PC 811** | **The Forest should manage the entire forest for uneven-age harvest because age diversity is important to the Forest's health.** |
| Response: | We believe that a diverse forest like the Monongahela should be managed with a diverse set of tools. Utilizing only the uneven-aged silvicultural system, irrespective of site-specific conditions, would decrease our ability to meet diverse goals and objectives. Also, on the large portions of the Forest where little to no active management will occur, natural processes will likely create uneven-aged forests over time (see Vegetation Management section in Chapter 3 of the EIS. |
| **PC 169** | **The Forest should limit the amount of clearcutting.** |
| Response: | Although clearcutting is regarded as a legitimate silvicultural tool, the Forest does not really use this harvest method in the way that many commenters evidently believe or have been told. First, clearcutting is the removal of all tree vegetation from a specified site, which we rarely if ever do anymore. The Forest does use clearcuts with reserve trees, where some trees are left on the site for wildlife habitat or other ecological purposes. Second, we do not use clearcuts with reserve trees very often, as most of the even-aged management on the Forest is some combination of two-aged, shelterwood, or commercial thinning harvests. Third, when we do use clearcuts with reserve trees, they must be identified as the optimal harvest method for achieving silvicultural objectives. Thus, the use of clearcutting on the Forest has been limited. Although we plan to do more regeneration harvest in the future, it remains to be analyzed and determined at the project level how much of that harvesting will be clearcuts with reserve trees. See also responses to PC 43, 637, 163, and 466. |
| PC 169a | INCLUDING AVOIDING AN INCREASE IN THE MAXIMUM SIZE OF CLEARCUTS |
| Response: | See response to PC 57. |
| PC 169b | TO PROTECT HABITAT |
| Response: | See response to PC 37c. |
| PC 169c | INCLUDING PROHIBITING IT ON LAND NEXT TO STREAMS |
| Response: | The Revised Forest Plan has restrictions on programmed timber harvest within stream channel buffer areas. See Standards SW34 and SW37 on page II-ll of the Proposed Revised Forest Plan. |
| PC 169d | TO PROTECT MACRO-INVERTEBRATES |
| Response: | Although some effects to macro-invertebrates may occur when stands and their soils are opened up to full sunlight conditions, we expect those effects to be mitigated to some extent, even in clearcuts, by shade from reserve trees, slash piles, and understory vegetation. Effects would be relatively short term, as regenerated trees typically establish a greater than 50% canopy by 5 years after harvest, and full canopy within 10 to 12 years. |
| PC 169e | TO PROTECT FISH AND WILDLIFE |

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| Response: | See response to PC 37c. |
| PC 169f | TO PROTECT SCENIC RESOURCES |
| Response: | See the Scenic Environment section in Chapter 3 of the EIS. See also response to PC 11f. |
| PC 169g | TO PROTECT WATER RESOURCES |
| Response: | See the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS. |
| PC 169h | TO PREVENT FLOODING |
| Response: | See the discussion of flooding effects in the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS. See also responses to PC 52, PC 106, PC 23, and PC 833. |
| PC 169i | TO PREVENT NON-NATIVE INVASIVE SPECIES |
| Response: | The Revised Forest Plan contains direction to address the establishment and spread on non-native invasive species, something that the 1986 Plan generally lacked. Potential effects from these species are disclosed in Chapter 3 of the EIS. See also response to PC 280. |
| PC 169j | TO PROTECT SOIL NUTRIENTS |
| Response: | See the Soil Resource section in Chapter 3 of the EIS. See also responses to PC 470 and PC 832. |
| PC 169k | TO PREVENT DISRUPTION OF THE HYDROLOGIC CYCLE |
| Response: | See the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS. See also responses to PC 52, PC 106, PC 23, and PC 833. Timber harvest does not actually disrupt the hydrologic cycle, but it can change the amount of water that is absorbed and released within a given watershed. This amount is not likely to be measurable, given the relatively low amount of even-aged harvest we are proposing in any given year. |
| PC 169l | BECAUSE SELECTIVE CUTTING PROVIDES MORE VALUE |
| Response: | Selective cutting has often led to the high-grading of timber in the past, with loss of future value. This practice has changed on NFS lands, although high-value trees are still included to help fund operations and achieve overall management objectives. Also, a number of high-value species, such as black cherry and red oak, need more open conditions to successfully germinate and grow. |
| PC 169m | BECAUSE IT WOULD MAKE IT DIFFICULT FOR OAK TO GROW BACK |
| Response: | Most oak species favor the open sunlit conditions provided by even-aged harvests to germinate and grow competitively into the canopy. |
| **PC 56** | **The Forest should discontinue the use of clearcutting.** |
| Response: | We utilize a number of regeneration harvest methods other than clearcutting, which may only be used when it is the optimum silvicultural method (see Appendix A to the Revised Forest Plan). See also responses to PC 43, PC 132, PC 163, PC 169, PC 466, PC 637, and PC 811. |
| PC 56a | BECAUSE IT IS NO LONGER HYDROLOGICALLY OR VISUALLY ACCEPTABLE |
| Response: | See the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS for potential hydrologic effects. See also responses to PC 52, PC 106, PC 23, and PC 833. See the Scenic Environment section in Chapter 3 of the EIS for potential effects on Forest scenery. See also response to PC 11f. |
| PC 56b | BECAUSE IT TENDS TO ISOLATE AND CREATE BARRIERS |
| Response: | See responses to PC 637a, PC 57, and PC 530. |
| PC 56c | TO PROTECT THE WATERSHEDS, SOIL, STREAMS, FISH, WILDLIFE, AND HABITAT |
| Response: | See various analyses in Chapter 3 of the EIS, including sections for Soil Resource, Water, Riparian, and Aquatic Resources, Terrestrial Ecosystem Diversity, Terrestrial Species Viability, Management Indicator Species and Other Species of Interest, and Threatened and Endangered Species. See also management direction for these resources in Chapters II and III of the Revised Forest Plan. |
| PC 56d | TO PROTECT RECREATIONAL OPPORTUNITIES AND TOURISM REVENUES |
| Response: | See responses to PC 18s, PC 50, PC 827, PC 994b, and PC 66f. |
| PC 56e | TO PREVENT EROSION AND FLOODING |
| Response: | See the analysis of erosion effects in the Soil Resource section, and the discussion of flooding effects in the Water, Riparian, and Aquatic Resources section in Chapter 3 of the EIS. See also responses to PC 52, PC 106, PC 23, and PC 833. |
| PC 56f | TO PROTECT HARD MAST |
| Response: | Although hard mast trees may be removed during harvest, most hard mast-producing tree species do not tolerate shade and cannot be regenerated effectively without removal of the tree canopy. |

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| PC 56g | TO PROTECT THE FOREST FROM BRUSH FIRES |
| Response: | Although clearcutting with reserve trees can create extensive brush from the limbs and tops that are left behind in harvest units, those units can be treated if fuel loading and ignition are concerns. They have not typically been major concerns in the past due to the abundant moisture this Forest receives and the wet fuel conditions that moisture creates. Analysis and decisions to treat activity-created fuels would occur at the project level based on site-specific conditions and management objectives. |
| PC 56h | TO MAXIMIZE FOREST CANOPY |
| Response: | We believe that much of the Forest will have a closed canopy over the long term, but that we can provide more diversity in vegetative and habitat conditions by opening up the canopy in selected areas over time. See the Vegetation Management section in Chapter 3 of the EIS. |
| PC 56i | BECAUSE SELECTIVE CUTTING IS ECONOMICALLY AND ENVIRONMENTALLY SUPERIOR |
| Response: | We believe that selective cutting can help meet environmental and social needs in selected areas of the Forest; however, we doubt that selective cutting would be the economically superior system to use in most management scenarios. |
| PC 56j | BECAUSE IT LEAVES SURROUNDING TREES OPEN TO PESTS AND DISEASES |
| Response: | We have not seen any convincing literature that shows that one type of harvest method predisposes adjacent stands to insects and disease infestation more than others. However, because certain insects or diseases target trees of a certain age or size, we have seen even-aged harvest used to reduce the risk of insect or disease transmission by creating a mosaic of tree stand ages and sizes throughout an area. |
| PC 56k | BECAUSE IT DAMAGES SCENIC RESOURCES |
| Response: | See the Scenic Environment section in Chapter 3 of the EIS. See also response to PC 11f. |
| PC 56l | BECAUSE TREES SHOULD NOT BE CLEAR CUT JUST BECAUSE DEER ARE BROWSING ON THEM |
| Response: | We typically do not harvest trees that are being damaged by deer browsing because of their small size. |
| PC 56m | TO PREVENT INVASIVE SPECIES |
| Response: | The Revised Forest Plan contains direction to address the establishment and spread on non-native invasive species, something that the 1986 Plan generally lacked. Potential effects from these species are disclosed in Chapter 3 of the EIS. See also response to PC 280. |
| **PC 58** | **The Forest should enforce a minimum distance between areas of clearcutting.** |
| Response: | Standard TR19 on page II-37 of the Proposed Revised Plan requires a distance of at least 1/8 mile between regeneration harvest units. We have dropped the 1/8 mile requirement in the Final Revised Plan but have left the stipulation that units must be separated by a manageable stand. A manageable stand is typically considered to be at least 10 acres, which means that the width of the stand could be somewhat less or quite a bit more than 1/8 mile. However, we felt that not all manageable stands would need to be at least 1/8 mile in width, depending on variables such as the configuration of the harvest units and terrain features. Enforcement is applied through project design and administration. |
| **PC 43** | **The Forest should allow clearcutting only in poor soil and low timber quality.** |
| Response: | The clearcut with reserve tree harvest method can be a valuable resource management tool. However, this method is only used by the Forest when an interdisciplinary team of specialists have determined, through site-specific analysis, that this is the optimum method for achieving silvicultural objectives. Silvicultural objectives may consider soil and timber quality, but are not usually driven by them. |
| **PC 637** | **The Forest should consider the adverse effects of clearcuts and roads.** |
| Response: | We considered the effects of roads and timber harvest, including clearcutting with reserve trees, in various resource sections in Chapter 3 of the EIS. Clearcutting with reserve trees is used only when it is determined to be the optimum harvest method to achieve the desired conditions. |
| PC 637a | INCLUDING FRAGMENTATION OF WILDLIFE HABITAT |
| Response: | Contemporary research indicates that normal forest management, including clearcutting, does not cause serious fragmentation problems in landscapes that are at least 70-80 percent forested. The Monongahela currently is over 90 percent forested, and is expected to remain overwhelmingly dominated by forest cover under any plan alternative. Still, all alternatives would guard against any unexpected fragmentation effects by allocating a substantial portion of the Forest to large core reserves that would be dominated by natural processes (see also responses to PC 530 and PC 690). |

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| PC 637b | INCLUDING DECREASING THE ABILITY OF THE LAND TO RECHARGE GROUNDWATER |
| Response: | Even-aged harvests, including clearcuts with reserve trees, can actually increase the ability of the land to recharge groundwater because less precipitation is intercepted by the forest canopy, less soil water is lost through transpiration, and more precipitation is allowed to soak into the forest floor organic material and soil. |
| PC 637c | INCLUDING FLOODING |
| Response: | Recent research indicates that clearcutting does not elicit measurable watershed hydrologic changes unless over 25% of the basal area in a watershed is removed in a short period of time (Hornbeck and Kochenderfer 2000). These changes may or may not lead to an increase in the risk of flooding. We are also required to analyze and disclose the potential effects of all major timber harvest projects to the public under the NEPA process, so we will be well aware if we are approaching a level of concern for hydrologic change on a project-by-project basis. |
| **PC 163** | **The Forest should complete an analysis of clearcutting that considers all anticipated effects and use the best information available.** |
| Response: | The clearcut harvest method has been studied for over 40 years. We have used professional experience in our analysis, and we have considered numerous research articles, including Dale et al. 1994, Boughton 1990, LaFarge 1990, Shearer 1990, Loftis 1988, Wang et al. 1993, Beck 1988 and others cited in the Reference section of the EIS. Also see response to PC 637. |
| PC 163a | INCLUDING ANALYSIS OF THE EFFECTS ON SUBTERRANEAN DYNAMICS |
| Response: | The EIS analysis of various vegetation management activities and methods focuses on specific issues and concerns identified during public and internal scoping, such as effects to scenery, water quality and quantity, fish and wildlife habitat, recreation opportunities, and species viability. Subterranean dynamics was not determined to be an issue or a concern, the commenter did not cite any research or analysis on subterranean dynamics that we should have considered, and the NFMA and NEPA do not require an EIS to be encyclopedic research document. |
| PC 163b | INCLUDING TO WHAT DEGREE CLEARCUTTING AND ITS VARIANTS PRODUCE FORESTS THAT ARE OVERCROWDED AND VULNERABLE TO FOREST FIRES |
| Response: | Generally, the clearcut harvest method does not increase the vulnerability of the eastern hardwood forest to forest fires. Overcrowded forests, regardless of how they came to that condition, may be thinned precommercially and commercially, to reduce fuel loading. |
| PC 163c | INCLUDING TO WHAT DEGREE CLEARCUTTING AND ITS VARIANTS PRODUCE MAPLE, TREE OF HEAVEN, AND OTHER LESS DESIRABLE TREES |
| Response: | Maple trees can be found on the majority of forested acres, and the tree of heaven has been found sporadically but is not inhibiting the regeneration of other tree species on the Forest at this time. Native maple tree species growing on the Forest are considered to be tolerant of shade but will also grow in even-aged regeneration harvest units. |
| PC 163d | INCLUDING TO WHAT DEGREE CLEARCUTTING AND ITS VARIANTS PRODUCE ILL-FORMED OR UNMERCHANTABLE TREES |
| Response: | The trees growing on the Forest today are mostly the result of clearcutting that occurred from 1880 through 1930, and timber stand improvement practices implemented by the Forest in more recent years. The quality of trees growing on Monongahela Forest lands is higher than those growing on private land – 34% of sawlog volume on the Forest is Grade 1 compared to 21% on other forested lands in WV (USDA Forest Service Resource Bulletin NE-161). |
| **PC 465** | **The Forest should recognize that clearcuts, when performed responsibly, are a valuable management tool.** |
| Response: | We agree. However, this method is only used by the Forest when an interdisciplinary team of specialists have determined, through site-specific analysis, that this is the optimum method for achieving silvicultural objectives. |
| **PC 607** | **The Forest should consider the problems with helicopter logging, including:**<br>• **Its inconsistency with the goal of promoting sustainable timber management**<br>• **Its high cost, which limits silviculture options**<br>• **The inability to gain access to the harvest area, which greatly limits the ability to do wildlife, recreation, or timber management activities.** |
| Response: | Helicopter logging is a valuable tool for Forest managers and is typically used when we need to access |

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| | areas that are otherwise inaccessible or to protect other resources that would suffer significant adverse impacts if another logging method was used. Generally, helicopter logging costs about twice as much as conventional logging. Where access is difficult and road construction is expensive, the costs may not be much higher than conventional logging. Helicopter logging is utilized by several forest industry companies in the eastern United States but usually only when other less costly options are not possible or resource damage would be unacceptable with conventional methods. We agree that post-harvest silvicultural treatments are more expensive in areas logged by helicopter due to lack of road access. We must consider these additional costs and/or loss of opportunities to provide recreation or wildlife habitat improvements when planning and analyzing the use of the helicopter logging. |
| **PC 351** | **The Forest should reduce the potential helicopter harvest areas by at least 50 percent because it is too expensive and resources could be better used elsewhere.** |
| Response: | See response to PC 607. |
| **PC 466** | **The Forest should only allow clearcutting to be permitted where appropriate.** |
| Response: | National forests may only use clearcutting where it is the optimum method to achieve the desired results. |

| **MINERAL AND ENERGY RESOURCES** | |
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| **PC 381** | **The Forest should make natural gas reserves available where it is environmentally suitable to do so.** |
| Response: | Under the Proposed Revised Forest Plan, 439,000 acres or 77%, of the federally owned natural gas is considered available for exploration, development and production. Although gas operations may be prohibited or timing restrictions may dictate when certain operation may occur in small areas within these 439,000 acres, exploration and development is not expected to be precluded (DEIS, pages 3-356 through 3-357).<br><br>The Proposed Revised Plan updates and incorporates direction from the 1992 Forest Plan Amendment 4 on Oil and Gas Leasing and Development. Amendment 4 identified federally owned oil and gas available for lease, the lease conditions needed to protect resources, and standards and guidelines for the development of federally owned natural gas. This direction was based on an environmental analysis of the effects of reasonably foreseeable natural gas development. |
| **PC 199** | **The Forest should allow mineral exploration and development in areas such as campgrounds, administrative sites, and other areas dedicated to some recreational activities, because these areas are already greatly disturbed and they could be returned to administrative sites and campgrounds after exploration and development are completed.** |
| Response: | The Revised Forest Plan does allow for some forms of mineral exploration and development in campgrounds, administrative sites, or other areas dedicated to recreational activities (Proposed Revised Plan, page II-41 through II-42, Standards MG07, MG09, MG19). For example, seismic prospecting may be allowed within these areas if a project-specific environmental analysis found that the type and/or timing of the seismic operation would not adversely affect recreation use. Also, in cases where private mineral rights exist beneath campgrounds, administrative sites or other recreation areas, mineral exploration and development may occur.<br><br>The Proposed Revised Plan updates and incorporates direction from the 1992 Forest Plan Amendment 4 on Oil and Gas Leasing and Development. Amendment 4 identified federally owned oil and gas available for lease, the lease conditions needed to protect forest resources, and standards and guidelines for the development of federally owned natural gas. This direction was based on an environmental analysis (EA) of the effects of reasonably foreseeable natural gas development on forest resources, including recreation resource values. Standards that were developed to protect recreation resource values and administrative sites from effects of federal gas leasing and development are found in the Proposed Revised Plan, page II-43 (MG29-MG33, MG37, MG38, MG39). A description of the effects controlled by the standards is disclosed in the EA, pages 3-18 through 3-23. |
| **PC 777** | **The Forest should examine the effects of mineral and oil and gas development, including impacts on surface and water resources, and the cumulative effects of mountaintop removal and other** |

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| | **surface mining near the Forest.** |
| Response: | The DEIS analyzes and discloses the effects of mineral and natural gas development (there is only a low probability for oil as stated on page 3-348) on Forest resources that such development may affect, including Soils (pages 3-36, 3-50), Watershed, Riparian and Aquatic Resources (pages 3-75, 3-80, 3-89 through 3-92), Terrestrial Ecosystem Diversity (pages 3-117, 3-118, 3-156, 3-158, 3-160), Terrestrial Species Viability (pages 3-190, 3-191), Terrestrial MIS and Other Species of Interest (pages 3-203, 3-204, 3-220 through 3-222), Threatened and Endangered Species (pages 3-238, 3-240, 3-242, 3-245, 3-249, 3-259 through 3-266), Non-Native, Invasive Plant Species (pages 3-271, 3-277, 3-278), Recreation and Wilderness (pages 3-377, 3-387 through 3-390), Scenic Environment (pages 3-400, 3-401, 3-408, 3-409), Road Transportation System (pages 3-419, 3-420, 3-423 through 3-426), and Social and Economic Environment (pages 3-457 through 3-462).<br><br>In addition, the Forest Service analyzed the effects of natural gas leasing and development in the Environmental Assessment of Oil and Gas Leasing and Development, Monongahela National Forest (USDA Forest Service 1991). The Proposed Forest Plan updates and incorporates direction from the 1992 Forest Plan Amendment 4 on Oil and Gas Leasing and Development. Amendment 4 identified federally owned oil and gas available for lease, the lease conditions needed to protect forest resources, and standards and guidelines for the development of federally owned natural gas. This direction was based on an environmental analysis of the effects of reasonably foreseeable natural gas development on Forest resources. The effects of gas development are also disclosed in the Environmental Assessment of Oil and Gas leasing and Development (USDA Forest Service 1991, (EA, pages 3-1 through 3-74).<br><br>We are unaware of any mountain top removal that is occurring or proposed near the Forest or within the proclamation boundary. Forest Plan revision would have no influence or cumulative effects on this type of activity if it were to occur on private lands, and it is highly unlikely to occur on federal lands. Private mountain top removal near the Forest could have cumulative impacts on scenery, water quality, and other resources, but we have no indication that is a reasonably foreseeable activity at this time. |
| **PC 778** | **The Forest should not lease forest land to mining or wind turbines because they are noisy and they would affect wilderness experiences.** |
| Response: | Federal leasing of minerals has been withdrawn in the Forest Wilderness areas. See also responses to PC 790, PC 97, and PC 179. |
| **PC 254** | **The Forest should prohibit mineral extraction, oil and gas exploration and drilling, off-road vehicles, and all logging not required for public safety.** |
| Response: | Mineral extraction, oil and gas operations, and timber harvest are all legally sanctioned and Congressionally funded uses of NFS lands. Off-road vehicle use is allowed only on designated routes in the 1986 and Revised Forest Plans. However, there currently are no designated routes, so the Forest is effectively closed to off-road vehicles at present. |
| **PC 179** | **The Forest should not allow oil and gas production on the Forest**.<br>A) To prevent road building<br>B) To prevent openings<br>C) To prevent air and water pollution<br>D) Because the amount of oil obtained would be inconsequential<br>E) Because the Forest is more valuable for its natural habitat |
| Response: | Oil and gas production is a legally sanctioned use of NFS lands. We have no authority to prohibit this activity for privately owned mineral rights. We do have the authority to limit federal mineral leasing in certain specified areas, and the capability to use management requirements and mitigation measures to reduce the impacts of these activities on other Forest resources. See Forest-wide and Management Prescription direction for Minerals in Chapters II and III of the Revised Forest Plan. |
| **PC 426** | **The Forest should not sell Forest land to mining companies because it may compromise the integrity of the forest.** |
| Response: | We have not sold National Forest System lands to mining companies in the past, nor do we have any plans to do so in the future. We do have federal leases for gas exploration and development on the Forest, though very few are currently active. More information on leasing can be found in the Mineral Resources section in Chapter 3 of the EIS. |
| **PC 783** | **The Forest should improve the minerals analysis in its Wilderness Evaluation.** |

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| PC 783a | BECAUSE IT IS NOT COMPLETE ENOUGH TO MAKE DECISIONS AS TO WHETHER MINERAL-RELATED ISSUES ARE SIGNIFICANT IN DETERMINING WILDERNESS POTENTIAL |
| Response: | The minerals assessment completed for the wilderness evaluations is based on the most current information available to the Forest. The minerals assessment recognized and incorporated current knowledge and the many uncertainties surrounding the presence of and potential for development of mineral resources within the Forest. These uncertainties, mineral ownership, and the existing federal lease situation framed the minerals assessment for evaluated areas. These uncertainties also complicate the prediction of whether federal leases or private mineral rights might be explored or developed. |
| PC 783b | TO DESCRIBE THE MINERAL RESOURCES AND CURRENT STATE OF DEVELOPMENT WITHIN THE LARGER REGION TO PROVIDE A CONTEXT FOR FOREST MINERAL RESOURCES |
| Response: | The regional and Forest context for mineral resource potential is disclosed in the DEIS, Pages 3-347 through 3-352. We did not see the need to repeat this information for every evaluated area in Appendix C to the DEIS. |
| PC 783c | TO DISCLOSE WHAT THE LEASE LENGTH AND EXPIRATION DATE FOR EACH FEDERAL LEASE IS ON LANDS WHERE BOTH THE SURFACE AND SUBSURFACE ARE FEDERALLY OWNED |
| Response: | An existing federal lease with no active operations will expire at the end of the lease term. However, at any time during the lease term, the lessee could exercise their rights to develop the lease. For as long as production is possible from the lease, the lease does not expire. Therefore, it is not possible to give a definite length and expiration date to each of the federal leases. |
| PC 783d | TO DISCLOSE THE STIPULATIONS, IF ANY, RELATED TO SURFACE OCCUPANCY OF THESE LANDS |
| Response: | Where federal leases exist and a no surface occupancy stipulation applies, the information was disclosed (DEIS, Appendix C, C-67, C-95). Also, all Inventoried Roadless Areas evaluated in Appendix C have either a 6.2 or 5.1 Management Prescription under the preferred alternative. These prescriptions have a no surface occupancy stipulation for any new federally leased minerals (see Proposed Revised Plan, page III-29, Standard 5133, and page III-44, Standard 6228). |
| PC 783e | TO DISCLOSE WHETHER THERE ARE ANY CONGRESSIONALLY DESIGNATED WILDERNESS AREAS ON THE FOREST THAT HAVE CURRENT FEDERAL LEASES ON ANY OR ALL ACRES, AND IF SO, WHEN THOSE LEASES EXPIRE |
| Response: | The presence of mineral resources and status of mineral rights in the existing Congressionally designated Wilderness have no bearing on the mineral assessment for current wilderness evaluations. |
| PC 783f | TO DISCLOSE WHAT HAS HAPPENED WHEN A FEDERAL LEASE HAS EXPIRED IN A WILDERNESS OR POTENTIAL WILDERNESS AREA |
| Response: | We have not had any federal leases expire in designated wilderness or areas recommended for wilderness study. |
| PC 783g | TO DISCLOSE WHAT PERCENTAGE OF EACH OF THE AREAS IS UNDER FEDERAL LEASE |
| Response: | The information needed to calculate the percentage of the area under federal lease is shown in the evaluation for each of the areas. |
| PC 783h | TO DISCLOSE WHETHER THERE ARE CURRENTLY ANY WILDERNESS AREAS WITH PRIVATE SUBSURFACE MINERAL OWNERSHIP ON THE FOREST |
| Response: | The presence of mineral resources and status of mineral rights in the Forest's existing Congressionally designated Wilderness has no bearing on the mineral assessment for present wilderness evaluations. |
| PC 783i | TO DISCLOSE HOW OFTEN SURFACE OCCUPANCY HAS BEEN REQUESTED AND HOW THE FOREST SERVICE DEALT WITH THESE REQUESTS |
| Response: | The uncertainties associated with federal mineral leasing make looking at historical requests for or incidences of surface occupancy in areas evaluated for wilderness an unreliable way of predicting where surface occupancy in these areas may be requested in the future. |
| PC 783j | TO DISCLOSE WHETHER THE FOREST SERVICE HAS BEEN OFFERED THE PURCHASE OF PRIVATELY OWNED SUBSURFACE RIGHTS |
| Response: | An offer to sell mineral rights to the United States is not relevant to whether a private mineral right may be developed in an evaluated area because Congress would have to authorize and fund the mineral |

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| | acquisition before one could conclude that the private mineral rights would not be developed. |
| PC 783k | TO DISCLOSE WHAT PERCENTAGE OF EACH AREA HAS BOTH PRIVATE SUBSURFACE OWNERSHIP AND IS CURRENTLY UNDER LEASE |
| Response: | Potential mineral activity in each area falls into one of three categories that do not overlap: lands with private mineral ownership, lands that have federally leased minerals, and lands that are not leased that have no private mineral ownership. The information needed to calculate the percentage of the area under federal lease and the amount of private mineral ownership is shown in the evaluation for each of the areas. Private mineral owners may lease their rights to other private entities, but we do not normally track that information, nor is it always available to us. |
| PC 783l | BECAUSE IT IS NOT CLEAR IF PRIVATE SUBSURFACE MINERAL OWNERSHIP IS A FORGONE VALUE IF AN AREA IS DESIGNATED AS WILDERNESS |
| Response: | Private mineral value in the evaluated areas would not likely be foregone because a private mineral owner could exercise their rights to develop the minerals in the future. The exception to this would be if the federal government was to purchase those federal rights, but we cannot predict whether the owner would be interested or willing to sell them. Appendix C to the DEIS has the following statement for each evaluated area with privately owned mineral rights: "However, there could be value received from future development of the private mineral estate because X% of the area has privately owned mineral rights. These rights remain valid and could be exercised regardless of wilderness designation." |
| PC 783m | TO EXPLAIN THE EXTENT TO WHICH NOT OFFERING FUTURE LEASES ON LAND WHERE THE MINERAL ESTATE WAS NEVER DEVELOPED CONSTITUTES A FOREGONE VALUE |
| Response: | Values foregone should the area be designated wilderness were based on federal minerals that would be unavailable for exploration and development. We do not know for sure whether that federal mineral estate would not be developed until the estate is withdrawn from consideration under a wilderness designation. |
| **PC 219** | **The Forest should address natural gas storage needs, including any strategy for renegotiating the Glady Gas Storage Agreement, or a possible proposal to use larger depleted gas reservoirs for gas storage.** |
| Response: | A decision to authorize use of National Forest System (NFS) land or not for natural gas storage operation and facilities would be best made at the project-specific level, rather than the Forest Plan level. This is because the need or desire for new, subsurface natural gas storage fields is so speculative that it is not a major issue ripe for Forest Plan level analysis. For example, the natural gas industry would determine whether or not and where technically and economically feasible natural gas storage facilities may be needed to meet customer demands. If federally owned mineral estates and NFS land were desired for gas storage facilities, a proposal would be made for consideration by the authorizing federal agencies. We have no information suggesting such a proposal is forthcoming.<br><br>Any new proposal for use of NFS land for gas storage operations, as well as renegotiation of the NFS land use and conditions under the Glady Gas Storage Field Agreement, up for reauthorization in 2013, would be analyzed in a project-specific environmental analysis. Forest Plan limitations on what actions may be authorized and what conditions must be met would be applied during the project-specific analysis of a new gas storage proposal, and any proposal related to continued and future operation of the Glady Gas Storage Field. |
| **PC 243** | **The Forest should have a plan developed to anticipate future mineral and energy exploration, development, and reclamation, because political pressure can make such activity happen quickly.** |
| Response: | The Revised Forest Plan includes direction developed to address anticipated mineral and energy exploration, development and reclamation. The DEIS discloses current and reasonably foreseeable mineral and energy exploration and development (pages 3-347 through 3-350). Forest Plan direction for mineral and geology resources, as well as for protection of other Forest resources (Proposed Revised Forest Plan, pages II-41 through II-44) represents the Forest's guidance for managing anticipated mineral resource exploration and development, and its reclamation. |

| RANGE MANAGEMENT | |
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| **PC 772** | **The Forest should reconsider the use of fences and pastures on public land, because fences can inhibit wildlife and recreational movement, and they detract from aesthetic beauty and naturalness** |
| Response: | The use of fencing on the Forest is typically a site-specific decision based on resource protection needs, rather than aesthetics. There are relatively few fences on the Forest, and they are usually used to keep large livestock within allotments or away from streams. The fences do not inhibit the movement of most wildlife species, and gates, stiles, or other passage can be provided where fences and recreation trails intersect. |
| **PC 773** | **The Forest should examine and provide measures that mitigate the effects of grazing, including:**<br>• **Protection of high-elevation forests, balds, and riparian areas**<br>• **Prevention of forest fragmentation**<br>• **Protection of water resources, including wetlands**<br>• **Protection of native plant, animal species, and ecological communities**<br>• **Protection of recreational uses**<br>• **Prevention of the spread of exotic plants**<br>• **Examining what rare plants and animals are negatively impacted by grazing**<br>• **Examining the time for forest ecosystems to be substantially restored at various grazing levels**<br>• **Examining effects to soil**<br>• **Examining the carrying capacities for grazed areas, including wildlife**<br>• **Examining how grazing affects remote habitat, wilderness/non-wilderness interface, forest interior habitat and edge effect along wilderness boundaries, roadless areas, semi-primitive areas, and special areas**<br>• **Examining the effects on vegetation**<br>• **Examining the effects on lichens, fungi, and other small organisms**<br>• **Examining the effects on old growth and mature forest ecosystems**<br>• **Disclosing whether current and past grazing permittees have complied with the Forest Plan, permits, and applicable laws and regulations.** |
| Response: | As stated in Chapter 1 of the DEIS, page 1-21, Range Resources are not addressed in detail because grazing allotments cover less than one percent of the Forest, and they are not expected to change by alternative under plan revision. At the current levels of use, effects from livestock grazing to the resources noted in the concern statement are relatively minor. Effects from livestock grazing are addressed under General Effects in the appropriate resource sections in Chapter 3 of the EIS. Mitigation measures for grazing are found in the standards and guidelines of the Range Resources section in Chapter II of the Revised Forest Plan, where they are also linked to additional Forest-wide direction that is applicable to grazing effects. Additional mitigation measures may be developed during the allotment planning process or project-level planning. Carrying capacity changes and permittee compliance are beyond the scope of this plan revision. |
| **PC 774** | **The Forest should consider alternative open field management methods and varying degrees and methods of native forest restoration and balds restoration.** |
| Response: | For plan revision, we have considered various types of managed or unmanaged areas as openings in our vegetation desired conditions and analysis. However, to consider site-specific changes to range allotment management and the permits that cover them is beyond the scope of this revision. These types of decisions must be made at the project or allotment assessment level. |
| **PC 775** | **The Forest should consider grazing permits that do not allow road use.** |
| Response: | Grazing permit changes are beyond the scope of this plan revision. It is doubtful, though, that the Forest Service would issue a grazing permit that did not allow motorized access on roads to transport livestock, permittees, and range improvement materials, especially when that access already exists. |
| **PC 776** | **The Forest should examine whether or not permittees are paying market rates.** |
| Response: | The Forest does not set grazing fees or market rates, and the analysis of whether fees or rates are appropriate is beyond the scope of this plan revision. |
| **PC 486** | **The Forest should consider rotational grazing because it can greatly reduce the number of cowbirds and starlings, which can damage the nests of songbirds.** |

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| Response: | Guideline RA11 in Chapter II of the Proposed Revised Plan encourages rotational grazing. However, the specifics of a rotational grazing scheme are best addressed during the preparation of allotment management plans using site-specific information. |
| **PC 798** | **The Forest should allow intensive rotational grazing of pastures to benefit bobwhite quail.** |
| Response: | See response to PC 486. |
| **PC 537** | **The Forest should not allow intensively managed cattle pastures to prevent erosion, compaction, and pollution from chemicals caused by cattle production.** |
| Response: | Range allotments comprise less than 7,000 acres, or 0.7 percent of the Forest. Not all of these allotments are actively grazed by livestock in any given year. Potential impacts are addressed by Forest-wide direction (see Range Resources section in Chapter II of the Revised Forest Plan), and additional mitigation measures can be applied at the allotment level. |
| PC 537a | BECAUSE THERE IS PLENTY OF NEARBY PRIVATE LAND FOR THIS KIND OF ACTIVITY |
| Response: | Livestock grazing is a legitimate multiple use of federal lands. Permittees continue to sell their cattle and sheep, so there evidently is still a market for livestock grazed on both federal and private lands. |
| **PC 83** | **The Forest should not allow grazing:**<br>• **To prevent erosion**<br>• **To prevent compaction**<br>• **To prevent pollution**<br>• **Because grazing land should be reforested**<br>• **Because grazing can be done on private land.** |
| Response: | See response to PC 537. |

# Section 4: Transportation System Management

| ROAD MANAGEMENT | |
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| **PC 572** | **The Forest should consider the conflicts that existing and planned roads create, including conflicts with hunting, recreation, fishing, and wildlife.** |
| Response: | The EIS focuses mainly on the general impacts that roads have on other resources, including wildlife. Roads provide access for recreationists, including hunters and anglers, and roads are generally not viewed as a conflict with recreation unless the recreation is occurring in a roadless area. We did consider the effects from existing roads in the roadless area inventory process and wilderness evaluations that we completed for Appendix C to the EIS. |
| PC 572a | INCLUDING WHETHER ROAD DENSITIES ARE CURRENTLY EXCEEDED IN MANAGEMENT PRESCRIPTION OR OPPORTUNITY AREAS |
| Response: | The Revised Forest Plan no longer has opportunity areas. Road density in Management Prescription areas is one of the criteria to be considered for identifying and prioritizing road decommissioning. See Guideline RF09, part C, in the Proposed Revised Plan. We have also added goals in certain Management Prescriptions in the Revised Plan to address road reduction where we feel there may be a need. However, we are not making any road-specific decommissioning decisions in plan revision. |
| **PC 568** | **The Forest should provide an adequate assessment of the cumulative impacts of the forest road system.** |
| Response: | The Road Transportation System section in Chapter 3 of the EIS presents cumulative effects to the road system, focusing primarily on Forest roads, but discussing other public or private roads as well. Other sections of Chapter 3 describe the general effects that roads have on their specific resources. Effects are not limited to Maintenance Level 3-5 roads, but typically include all roads affecting the resources within a given area, often the area within the Forest's proclamation boundary for cumulative effects. |
| **PC 109** | **The Forest should revise its road management plan.** |
| PC 109a | BECAUSE THE AVERAGE CITIZEN HAD NO INPUT INTO THE CURRENT PLAN |
| Response: | The Roads Analysis Report (2003) was not a NEPA document, requiring public involvement and road-specific decisions. It was an internal exercise designed to provide the current status of the Level 3, 4, and 5 roads on the Forest, including known hazards or concerns that should be addressed in watershed and project-level planning. |
| PC 109b | BECAUSE MORE ROADS NEED TO BE CLOSED SINCE MANY ROAD MILES ON THE FOREST CANNOT BE MAINTAINED TO STANDARD |
| Response: | We agree, which is why the Roads and Facilities section in the Draft Forest Plan has management direction devoted fully or partially to road decommissioning or closures. See, for example, Goal RF02, and Guidelines RF08, RF09, RF11, and RF20. |
| PC 109c | BECAUSE THE CURRENT PLAN LACKS ADEQUATE GUIDANCE |
| Response: | The Roads Analysis Report (2003) was not intended to provide guidance, but rather comprehensive information about roads that can be used to help formulate road management guidance and inform project-level decisions. The Revised Forest Plan provides guidance on road management through Forest-wide and Management Prescription direction for roads in Chapters II and III. |
| PC 109d | BECAUSE A ROAD SYSTEM SHOULD BE WORKED OUT BEFORE THE PLAN IS COMPLETED TO IDENTIFY THE MINIMUM ROAD SYSTEM NEEDED ON THE FOREST |
| Response: | The road transportation system on the Forest is an ongoing and evolving process. Any road-specific decisions made at the forest planning level would have to be revisited, re-analyzed, and redistributed for public comment at the project level, so we have chosen to make those decisions at the project level where site-specific information can be more appropriately applied. |
| PC 109e | TO REDUCE ILLEGAL ALL-TERRAIN VEHICLE USE |
| Response: | Illegal ATV use is a law enforcement problem that the Forest is addressing on an on-going basis. No report or plan can by itself reduce illegal use. The Forest Plan does include direction that describes that ATV use may only occur on designated routes. |
| **PC 565** | **The Forest should provide an explanation of how they intend to manage roads and trails.** |
| PC 565a | INCLUDING THE STATED “ADMINISTRATIVE USE” OF CLOSED ROADS AND TRAILS |
| Response: | Administrative use is primarily use by Forest personnel for such activities as fire suppression, |

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| | inventories, monitoring, and project implementation. It may also include use by permittees, contractors, or cooperators, if not explicitly stated. Administrative use is typically very low in areas where projects are not being planned or implemented, or special uses are not in effect, but may be considerably higher in areas where they are. |
| PC 565b | INCLUDING THE 60 PERCENT OF ROADS THAT ARE NOT MAINTAINED TO THE SAFETY AND ENVIRONMENTAL STANDARDS FOR WHICH THEY WERE DESIGNED |
| Response: | The DEIS, page 3-417, specified that an estimated 48 percent of Level 3, 4, and 5 roads are currently not being maintained to standard. The EIS Road Transportation System analysis also describes a variety of factors that affect our ability to maintain roads, not all of which are under our control. As a result, roads are typically maintained on a priority basis, depending on safety, resource protection, and user comfort needs. |
| PC 565c | INCLUDING HOW IMPACTS FROM USER-CREATED AND UNAUTHORIZED ROADS WILL BE REDUCED |
| Response: | Unauthorized user-created roads can be physically closed to motorized access and rehabilitated as appropriate and needed. However, closing existing roads is not necessarily going to stop the creation of new unauthorized roads. Law enforcement and rehabilitation efforts will continue, but specific impacts and how they will be reduced cannot be accurately predicted at this time or at the forest planning scale. |
| PC 565d | TO COMPLY WITH THE FOREST SERVICE'S ROADS POLICY |
| Response: | We believe we are in compliance with Forest Service Roads Policy. |
| PC 565e | INCLUDING DETERMINING THE MINIMUM ROAD SYSTEM NECESSARY FOR SAFE AND EFFICIENT TRAVEL, ADMINISTRATION, UTILIZATION, AND PROTECTION OF FOREST SERVICE LANDS |
| Response: | See response to PC 109d. |
| PC 565f | INCLUDING PROVIDING A GENERAL MILEAGE TARGET FOR DECOMMISSIONING ROADS IN THE ABSENCE OF MORE DETAILED PLAN FOR ROAD MILES TO BE DECOMMISSIONED |
| Response: | We have added a general objective for road decommissioning mileage in the Revised Forest Plan. |
| PC 565g | INCLUDING PROVIDING A PLAN FOR ROAD REMOVAL AND UNROADED FOREST BLOCK CONSERVATION AT THE FOREST LEVEL |
| Response: | The revised Forest Plan has direction for road decommissioning. Appendix C to the EIS describes the roadless areas that would provide relatively unroaded blocks on the Forest, along with existing Wilderness and some of the Forest special areas (MP 8.0). |
| PC 565h | INCLUDING CLARIFYING WHETHER YOU WILL PRIORITIZE THE DECOMMISSIONING OF ROADS IN THE UPPER END OF WATERSHEDS THAT CURRENTLY HAVE LOW ROAD DENSITIES |
| Response: | Guideline FR09 in the Proposed Revised Plan describes priorities for road decommissioning. The situation you describe would fall under part D of FR09. |
| PC 565i | INCLUDING CLARIFYING WHETHER YOU WILL ACCURATELY ASSESS THE COST OF ROAD MANAGEMENT AND REDUCE THE OVERALL ROAD NETWORK TO ONE THAT CAN BE MAINTAINED WITHIN BUDGETARY LIMITS AND WHICH IS MORE ECOLOGICALLY FUNCTIONAL |
| Response: | The Forest assesses the costs of road management on an annual basis. As described in the Road Transportation System analysis in Chapter 3 of the DEIS, we cannot accurately predict what the overall road network will be in the future due to the many variables and unknowns involved. We have added a Forest-wide objective and management prescription goals for road decommissioning in the Final Revised Plan. |
| PC 565j | INCLUDING CLARIFYING WHETHER YOU WILL ENSURE THAT THERE IS NO NET INCREASE IN ROADS IN UNROADED AREAS OVER 1,000 ACRES |
| Response: | The revised Forest Plan has general prohibitions on new road construction in Management Prescriptions 5.1 and 6.2, which comprise all of the roadless areas on the updated Roadless Area Inventory. However, even these "roadless areas" have existing roads within them. There are no other unroaded areas over 1,000 acres in size. |
| PC 565k | INCLUDING ASSESSING THE IMPACTS THAT ROADS HAVE ON FOREST RESOURCES AND PROVIDING ADEQUATE MONITORING AND MITIGATION MEASURES |
| Response: | The EIS assesses general impacts from roads on forest resources, and the Revised Forest Plan has both |

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| | monitoring and mitigation measures (in the form of standards and guidelines) for road impacts. |
| **PC 236** | **The Forest should include "woods roads" in the road densities because they have the same environmental effects as properly recognized roads.** |
| Response: | Woods roads are unauthorized roads that present a challenge to Forest planning and management efforts. These are roads that are usually user-created and have not been properly designed, constructed, or maintained for vehicle use. Where the roads still have vehicle traffic, there can be effects similar to those seen on Forest system or authorized roads. In other cases, these roads are becoming woods again, and we would create more disturbances by obliterating them than by just allowing natural reclamation to occur. There may be roads that we have yet to discover, and there are likely roads depicted on old maps that have long since disappeared. In either case, it would be impossible or inappropriate to map and include them in road density estimations. We did not include woods roads our EIS analysis or in road density calculations for reasons given on page 3-412 of the DEIS. However, as described on page 3-413, we do have a strategy for addressing woods roads during project planning, and we have management direction in the Revised Forest Plan that reflects this strategy. |
| **PC 570** | **The Forest should provide direction given in all management prescriptions for maximum road density as standards, not as guidelines, and areas should be prioritized for decommissioning of unneeded roads where road density exceeds the maximum.** |
| Response: | We believe that guidelines will provide more flexibility at the project level to adjust over time to access needs (private mineral rights, special uses, etc.) that are unknown at this time. However, we have added direction to the Revised Forest Plan that will help us prioritize areas where decommissioning may be needed. For example, see the new Transportation System Planning objective in MP 4.1. |
| **PC 566** | **The Forest should include existing roads and trails in assessing compliance for detrimentally disturbed conditions.** |
| Response: | Direction for the assessment of Forest Service roads and disturbance with regard to soil productivity comes from the Forest Service Handbook 2509.18, p. 6.<br><br>“Temporary roads used for vegetation management are included as areas evaluated for soil quality. System road and trails, on the other hand, and other administrative facilities within or adjacent to the activity area, are dedicated land uses and not considered detrimental soil conditions.”<br><br>In other words, system roads are not considered a detrimental disturbance to soil productivity because the land they occupy has been dedicated to a use that assumes the soil is no longer productive for growing trees. However, the effects of system roads, including effects on soil productivity, are still analyzed under the NEPA process for appropriate projects. In addition, all roads (open, closed, authorized, and unauthorized) are considered at the watershed and project levels when we look for opportunities to provide the minimum transportation system needed to meet resource and use objectives. See Goal RF02 and Guideline FR09 in the Roads and Facilities section of Chapter II in the Proposed Revised Forest Plan. |
| **PC 365** | **The Forest should provide adequate roads for fire and other protection.** |
| Response: | We agree, and as stated in the DEIS, page 3-419, most of Forest’s road needs for the current level of use are already in place. Road management over the coming planning period will likely be a matter of fine-tuning; upgrading the system we have, providing for identified needs, and removing unauthorized or unwanted roads from the system or landscape. |

| **ROAD CONSTRUCTION AND MAINTENANCE** | |
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| **PC 567** | **The Forest should consider maintaining roads if closing existing corridors would negatively impact watersheds** |
| Response: | All authorized roads on the Forest are maintained to an assigned level. However, maintenance on Level 1 and 2 roads may be very infrequent, and some impacts to watershed resources may occur between or even during maintenance operations. |
| **PC 361** | **The Forest should consider building new roads if needed for public access.** |
| Response: | As stated in the Road Transportation System in Chapter 3 of the EIS, we feel that most of our access roads are already in place. However, this does not mean that we would not consider additions or |

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| | replacements to the system if there is an identified need. |
| **PC 24** | **The Forest should build no new roads in the Forest:**<br>• **To protect wildlife habitat**<br>• **To protect wilderness qualities**<br>• **To save taxpayer dollars**<br>• **To reduce road maintenance needs**<br>• **To protect water resources**<br>• **To prevent excessive commercial uses of the Forest**<br>• **To reduce littering**<br>• **To reduce noise pollution**<br>• **To reduce air pollution**<br>• **To reduce poaching of wildlife**<br>• **To prevent deterioration of Forest land**<br>• **To prevent invasive plant species**<br>• **To prevent increased logging**<br>• **To prevent forest fragmentation**<br>• **To prevent erosion and sedimentation.** |
| Response: | Road management is a delicate balance between providing for management and enjoyment and legal access of public lands, and keeping the impacts from road construction and use at acceptable levels. Chapters II and III of the Revised Forest Plan describe many areas where new road construction is prohibited or limited, and provide a lengthy list of management requirements to control the potential impacts of new and existing roads. See also responses to PC 198. |
| **PC 198** | **The Forest should limit road building in the Forest.** |
| Response: | We recognize that, even though roads are needed on the Forest for recreation, management, and to access private property or rights, they do have impacts. Therefore, we try to limit the amount of road building on the Forest, and we apply mitigation to reduce impacts where roads are built. For example, many of the roads on the Forest have been built in the past for timber harvest purposes. We expect to continue to harvest timber, but we will look for ways to reduce the amount of roads needed for this activity through the use of existing roads, the use of helicopter logging, and the use of temporary roads that can be closed and restored after harvest. We also will look for opportunities to decommission or obliterate existing roads. See the Road Transportation Section in Chapter 3 of the EIS for a more detailed discussion of road management. |
| PC 198a | TO PROTECT WATER RESOURCES, TROUT, WETLANDS, AND SOIL |
| Response: | The Proposed Revised Plan includes direction to protect water, soil, wetlands, and aquatic habitat from the impacts of road building. Many are noted below, but others may be found in Chapter II of the Revised Plan, primarily in the sections for Soil and Water, Wildlife and Fish, and Roads and Facilities. |
| PC 198b | TO PREVENT FLOODING |
| Response: | We agree that excessive road building, particularly adjacent to streams, can exacerbate the effects of flooding. However, flooding occurs when precipitation greatly exceeds the land's capacity to absorb it, and there is little we can do to prevent those types of events. We do have management direction in the Plan that limits road building and associated activities within riparian areas. See Standards SW40, SW44, SW45, SW46, and Guideline SW62 in the Proposed Revised Plan. |
| PC 198c | TO PREVENT EROSION |
| Response: | Similar to flooding, erosion is a natural process that we cannot prevent. However, we do have management direction in the Proposed Revised Plan that is designed to reduce erosion from road building and associated activities, including Standards SW03, SW04, SW05, SW35, SW36, RF06, and Guidelines SW11, SW14, SW16, and SW19. |
| PC 198d | INCLUDING NO ROAD BUILDING IN ROADLESS AREAS, MP 6.2 AREAS, MP 5.1 AREAS, AND EXISTING WILDERNESS |
| Response: | Management Prescriptions 5.0, 5.1, and 6.2 have general restrictions on new road construction, and 5.1 and 6.2 contain all of the roadless areas on the revised Roadless Area Inventory. See Chapter III of the Revised Forest Plan for road-related direction for these prescription areas. |
| PC 198e | TO PROTECT WILDLIFE |

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| Response: | While remote and roadless habitats are important for a number of species, many other species do not require remote habitats, and many species benefit from the young forest and herbaceous habitats created by active management outside of backcountry and wilderness areas. The Revised Plan provides for a mix of remote, unmanaged and non-remote, managed habitats to meet the needs of a wide variety of species. Forest-wide direction provides extensive protection for threatened, endangered, sensitive, and other wildlife and plant species. This direction applies wherever these species occur, regardless of whether the land is allocated to management prescriptions emphasizing backcountry preservation or active vegetation management. |
| PC 198f | INCLUDING ROAD CLOSINGS WHERE POSSIBLE |
| Response: | The Proposed Revised Plan includes direction to close or decommission roads that are not needed for long-term management, including Goal RF02 and Guidelines RF08, RF09, RF11, and RF12. We have also added an objective for road decommissioning in the Final Revised Plan. |
| PC 198g | INCLUDING ROADS BUILT FOR TIMBER HARVEST PURPOSES |
| Response: | See general response to PC 198 above. |
| **PC 170** | **The Forest should not allow logging roads to be built unless their entire costs, including long-term maintenance, are paid for.** |
| Response: | We address road maintenance concerns in the Road Transportation section of Chapter 3 in the EIS. We are looking at alternatives to permanent road construction in many of our timber sale projects now, including using existing roads, helicopter yarding, extended skid trails, and temporary roads that can be returned to productivity after harvest. |
| PC 170a | INCLUDING LOGGING ROADS IN WILDERNESS AREAS |
| Response: | Management Prescription 5.0 (Designated Wilderness) has a general prohibition on new road construction. |
| **PC 186** | **The Forest should not pave existing gravel roads because it detracts from the remote nature of the Forest, and many Forest roads are not designed for the higher speeds that paving would encourage** |
| Response: | We are not proposing to pave any Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level with site-specific information and public involvement. |
| **PC 165** | **The Forest should close some existing roads:**<br>• **Including seeding the closed roads for wildlife**<br>• **Including removing roads from riparian areas**<br>• **Including the upper basin road in East Fork of Greenbrier River Basin**<br>• **Including collector roads that have been used to remove timber after all possible timber resources have been removed from that area**<br>• **To reduce traffic**<br>• **To protect the soil**<br>• **To prevent illegal all-terrain vehicle use**<br>• **To better focus on existing, unused roads that need to be maintained**<br>• **To comply with the Forest Service's Roads Policy**<br>• **To reduce siltation**<br>• **To protect water resources**<br>• **To prevent non-native invasive species.** |
| Response: | We are not proposing to close any specific Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level. However, the Revised Plan has direction for closing and decommissioning roads where and when appropriate in the Roads and Facilities section of Chapter II. The Final Revised Plan also includes a specific objective for road decommissioning. |
| **PC 603** | **The Forest should only construct low maintenance roads using broad based dips instead of high crowned roads with ditches and culverts that never get cleaned.** |
| Response: | We are not proposing to construct any Forest roads in plan revision. These types of road-specific decisions are more appropriately made at the project level, based on site-specific information such as terrain, road design, maintenance level, and projected use |
| **PC 239** | **The Forest should provide information regarding road maintenance, including traffic volume data.** |

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| Response: | We do not have past traffic volume data for our roads, although we have now started to collect this information. The EIS statement cited in the comments was an observation based on the general consensus of people who have worked on the Forest for many years that there has been a gradual increasing trend in visitation. |
| PC 239a | INCLUDING WHAT PRIORITY MAINTENANCE IS BASED ON |
| Response: | Maintenance priorities are typically based on the Maintenance Level assigned, which takes into account user comfort. However, roads with immediate user safety or resource impact concerns often leap to the top of the priority list. Maintenance levels are described on page 3-416 of the DEIS. |
| **PC 207** | **The Forest should consider the impacts that road maintenance has on habitat changes, including silting issues in the watershed, and fragmentation and disturbance caused by new and existing roadways.** |
| Response: | The DEIS addresses these potential impacts on pages 3-79 and 3-124 through 3-125. |
| **PC 139** | **The Forest should provide adequate drainage to roads to limit disruption to the Forest.** |
| Response: | We agree. We apply road drainage structures to all improved roads on the Forest. |
| **PC 241** | **The Forest should forego improving the maintenance conditions of roads unless it is proven that the watershed would be more impacted or mitigation would be cheaper because restoration of riparian areas should be favored.** |
| Response: | This type of decision is more appropriately made at the site or project level, based on site-specific conditions and information, rather than in forest planning. |
| **PC 378** | **The Forest should assist local companies in managing road construction to make it easier for companies to bid on timber.** |
| Response: | Timber contract provisions and agency reimbursement policies are beyond the scope of plan revision. |
| **PC 571** | **The Forest should apply the same standards for open roads to temporary and gated roads, because road density standards only apply to open roads.** |
| Response: | Road density direction was originally designed to reduce disturbance to wildlife, and density direction was focused on collector and local roads that could be open or closed. For plan revision, we shifted the focus to open roads where public motorized use would create more disturbance. Road-related standards and guidelines for soil, water, and other resources apply to all roads, including temporary and gated roads. We do not agree that temporary roads—when designed, implemented, and rehabilitated correctly—have a permanent footprint on the landscape. However, we have added direction for temporary roads to clarify our management intentions in the Final Plan. |
| **PC 343** | **The Forest should examine the feasibility of designating and creating new primitive areas by obliterating roads around the largest roadless areas, including protection of roadless and Semi-Primitive Non-Motorized areas.** |
| Response: | The identification of roadless or Semi-Primitive Non-Motorized areas has to be based on current conditions rather than the possibility of obliterating roads in the future. Road decommissioning is part of the road management strategy in the Proposed and Final Revised Plans (see Chapter II, Roads and Facilities section). Therefore, it is feasible that the Forest may create additional roadless areas over time through road decommissioning. As explained in the Road Transportation System section of the EIS, however, individual road decommissioning decisions are inappropriate at the Forest planning scale because of the site-specific information, needs, and trade-offs that need to be considered. |
| **PC 144** | **The Forest should acknowledge that taxpayers pay for roads in the Forest, not logging companies.** |
| Response: | Although this subject is beyond the scope of plan revision, we acknowledge that road costs for timber sales factor into the overall returns to the U.S. Treasury, and indirectly the taxpayer. There is an overall benefit to the Treasury/taxpayer when timber harvested on federal lands results in a positive return. The degree of that benefit varies depending on, among other things, the cost of access to the timber, including road construction, and that cost will depend on the value of other resources that require protection. However, there is no return to the Treasury/taxpayer if there is no timber sale. |
| **PC 242** | **The Forest should acknowledge that there are more important things to spend funding on than road improvement projects.** |
| Response: | We acknowledge your preference. Roads are needed to access public and private lands within the Forest proclamation boundary, and improvements are needed to keep the roads safe and to reduce impacts to the environment. |
| **PC 238** | **The Forest should acknowledge that unplanned travel ways and two tracks have the highest** |

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| | **impacts on destroying resources, including silting streams, exposing soils to invasive species, and littering.** |
| Response: | Effects from roads are disclosed throughout various resource sections in Chapter 3 of the EIS. Whereas unplanned travel ways and two tracks can have impacts on other resources, in some cases these roads have revegetated to an extent where they are having relatively little or any impacts, especially if they do not have culverts or other drainage structures associated with them that could fail over time. |

| **TRAIL MANAGEMENT** | |
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| **PC 576** | **The Forest should include a Comprehensive Trail Plan in the Forest Plan.**<br>• **Including specific sections of the Forest for all-terrain vehicle usage**<br>• **Including accommodations for bicyclists**<br>• **Including a list of trails that are safe for horse traffic**<br>• **Including creating a public service team of naturalists, sportspersons, photographers, journalists, editors, and authors who are familiar with all or a large listing of Forest trails**<br>• **To address funding problems**<br>• **To deal with environmental damage on some trails**<br>• **To deal with confusion over usage on some trails**<br>• **To remove the uncertainty trail users have regarding the term "non recommended".** |
| Response: | The Revised Forest Plan has an objective to develop a Forest–wide trail management plan to establish trail classes, permitted uses, and construction, reconstruction, and maintenance priorities (see Objective RC26 on page II-30 of the Proposed Revised Plan). We will see that your comments are passed on to those who develop this plan. The reasons this plan was not developed during Forest Plan revision are explained on page II-4 of the DEIS. |
| **PC 578** | **The Forest should provide clear trail markings at major intersections.** |
| Response: | Trail marking is beyond the scope of Plan revision. Trail marking at the site-specific scale depends on trail classes. In some areas, like Wilderness, trail markings are mainly for resource protection rather than visitor convenience. |
| **PC 575** | **The Forest should close trails that run adjacent to streams occupied by wood turtles and reroute them to the roads and other trails that exist at a greater distance from the stream.** |
| Response: | The only currently known wood turtle location within the Forest proclamation boundary is not on National Forest System land. If occurrences are discovered on NFS land, protections can be designed and evaluated on a case-by-case basis. |
| **PC 491** | **The Forest should protect trails from damage caused by logging activities.** |
| Response: | Trail protection from harvest activities has improved in the Proposed Revised Plan compared to the 1986 Plan. See Forest Wide Standards RC28, RC29, and Guideline RC31 (Proposed Revised Plan, page II-30). However, some damage may still occur during operations. Additional mitigation measures to protect trails may be developed during site-specific project planning. |

# Section 5: Recreation Management

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

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

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

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

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

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

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

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

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

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

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

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

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

# Section 6: Lands and Special Designations

| LAND ACQUISITION, BOUNDARIES, AND SPECIAL USES | |
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| **PC 277** | **The Forest should acquire land:**<br>• **Including private property within the proclamation boundaries**<br>• **Including all lands in the Spruce Knob Unit of the National Recreation Area**<br>• **To make the Forest a contiguous whole**<br>• **To allow more access for hunting and fishing**<br>• **To lease to coal or wind.** |
| Response: | The Forest has acquired about 60,000 acres of land since the 1986 Plan was released. We hope to acquire more land as opportunities and funding arise. Direction for land acquisition is provided by Goal LS01 and Guideline LS05 in the Proposed Revised Forest Plan. |
| **PC 726** | **The Forest should not restrict prior existing rights on the Forest unless adequate compensation is granted.** |
| Response: | We agree. Chapter II of the Proposed Revised Plan has a statement to this effect on page II-1, under Outstanding and Reserved Rights. We have changed this statement in the Final Plan somewhat to better address your comment. |
| **PC 817** | **The Forest should not renew the existing special use permit for the transmitter tower on the Flatrock Plains.** |
| Response: | Special use permit renewal is beyond the scope of this plan revision. The Forest has a separate process for permit renewals. |
| **PC 97** | **The Forest should acknowledge the threats from wind turbines, including:**<br>• **Threats to aesthetics**<br>• **Threats to wildlife**<br>• **Using caution when locating turbines.** |
| Response: | Any proposal for wind energy development would be subject to Forest-wide direction for special uses, as well as Forest Plan direction that protects the various resources on the Forest. Wind turbines present a challenging mix of potential impacts to scenic, recreational, and biological resources that must be factored into any application for such a use on public lands. |
| **PC 790** | **The Forest should place a high priority on the responsible development of wind power within the Forest to provide for a more sustainable future in energy resources.** |
| Response: | See response to PC 97. |

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

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| **PC 820** | **The Forest should conduct a site-specific inventory of all roadless areas to determine their wilderness eligibility and make recommendations, including Upper Shavers Fork East and West, North Fork Mountain, Roaring Plains North, McGowen Mountain, Meadow Creek North, Kennison Mountain, Lockridge Mountain North and South, Little Allegheny/Laurel Run, Little Mountain, Greathouse Hollow, and Beaver Lick Mountain.** |
| Response: | We took a hard look at each of the areas listed above as to their eligibility for the roadless area inventory. The results of the inventory process are found in Appendix C to the EIS. The process we used does not require field inventories. Although we were not able to visit some of these areas in person, we used a number of sources to gather the appropriate information for our inventory assessment. These sources included District personnel who were acquainted with the areas, Roth-photo maps, aerial photos, stand exam data, GIS data for roads and other features, West Virginia DNR information, and comments from the West Virginia Wilderness Coalition. In some cases, Forest personnel did visit specific sites to verify or supplement information. |
| **PC 826** | **The Forest should consider the impacts of roadless areas, including economic impacts, wildlife impacts, native plants impacts, fisheries impacts, and watershed impacts.** |
| Response: | The Wilderness evaluations that we completed for the Inventoried Roadless Areas have descriptions of resources, including wildlife, fisheries, water, and vegetation. The evaluations also include potential economic values in each area, and how they might be affected by Wilderness designation. These evaluations, however, do not feature the same sort of effects analyses as Chapter 3 of the EIS. The Chapter 3 analyses look at effects to multiple resources on and from all areas of the Forest, including roadless areas (MPs 5.1 and 6.2 in the preferred alternative). The economic impacts of roadless areas on tourism would be virtually impossible to isolate and identify, given the complexity of factors that influence tourism in general. However, recreation visits are incorporated into the economic impact analysis conducted in the Social and Economic Environment section of Chapter 3. |
| **PC 830** | **The Forest should apply a strengthened version of the Roadless Area Conservation Rule, including:**<br>• **Immediately protecting all uninventoried roadless areas that meet all technical criteria for roadless areas, provided those areas are 1,000 acres or larger**<br>• **Banning off-road vehicles, off-road vehicle trails, and surface mineral extraction in roadless areas**<br>• **Taking proactive steps to restore heavily roaded areas of the Forest.** |
| Response: | The original Roadless Area Conservation Rule no longer exists. To apply a strengthened version of this rule would be both beyond our authority as an agency and beyond the scope of this plan revision. |
| **PC 171** | **The Forest should return to the Roadless Area Conservation Rule policy of 2001.** |
| Response: | The 2001 Roadless Area Conservation Rule no longer exists. To return to this rule would be beyond our authority as an agency and beyond the scope of this plan revision. |
| **PC 32** | **The Forest should protect roadless areas, including Gauley Mountain East and West:**<br>• **To benefit future generations**<br>• **To provide recreational opportunities**<br>• **To protect wildlife**<br>• **To prevent flooding**<br>• **To provide tourism revenue**<br>• **To protect water resources**<br>• **To provide educational opportunities**<br>• **To protect against invasive species**<br>• **To protect plant communities**<br>• **To protect endangered species**<br>• **For research purposes**<br>• **To protect from motorized use**<br>• **To protect from extractive development.** |
| Response: | Under the preferred alternative in the DEIS, the areas identified as Inventoried Roadless Areas in plan revision (including Gauley Mountain East and West) would receive resource protection through Forest-wide management direction (Chapter II, Revised Plan) and through additional direction for Management Prescriptions 5.1, 6.2, or 8.1 SPNM (Chapter III, Revised Plan). These areas would all be |

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| | managed to provide backcountry recreation opportunities. |
| **PC 501** | **The Forest should not add roadless areas to the Forest—including the Gaudineer area and the East Fork of the Greenbrier area—because it would restrict timbering.** |
| Response: | One of the six key decisions made in forest planning is a "Recommendation to Congress of areas for wilderness classification where 36 CFR 219.17(a) applies" (DEIS, page 1-1 and 1-2). To this end, the Forest completed a Roadless Area Inventory and Wilderness Evaluation. Both the Gaudineer and East Fork Greenbrier areas met the eight inventory criteria and therefore were included in the Roadless Area Inventory and evaluated for wilderness potential. The potential timber values foregone if the areas were to be designated as Wilderness are given in the evaluations (see Appendix C to the EIS). |
| **PC 543** | **The Forest should give assurances that certain activities will be allowed within the roadless areas proposed in Alternative 2, including:**<br>• **Management of existing insect and disease problems**<br>• **Management of public health or safety situations**<br>• **Management of wildfire risks**<br>• **Management of critical wildlife habitat needs**<br>• **Maintenance and/or establishment of critical infrastructure needs**<br>• **Recognizing the right of private property owners to access their surface or subsurface properties, and**<br>• **Addressing emerging critical opportunities to address our country's energy or security needs.** |
| Response: | Management direction for roadless areas in Alternative 2 includes provisions for the concerns listed in the concern statement, although there are also limitations on the amount of development that can occur related to these and other activities. To understand the full scope of these provisions and limitations, one must read both Chapters II and III of the Revised Plan, particularly Management Prescriptions 5.1, 6.2, and 8.1 (SPNM). |
| **PC 172** | **The Forest should not alter the current Forest Plan's semi-primitive policy because changes may not protect roadless areas.** |
| Response: | The 2006 Inventoried Roadless Areas will have their undeveloped character and semi-primitive non-motorized qualities protected by management direction for MPs 5.1 and 6.2. |

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

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

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

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

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| Response: | Most activities allowed by the Forest Plan create noise, including recreation. The Revised Forest Plan also allocates large areas to places where people can generally escape from noises that people associate with large-scale development. See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. |
| PC 3j | TO AVOID THE CURRENT SCHEME'S PERIODIC AND COSTLY REVIEWS |
| Response: | The only Management Prescriptions that would absolutely not be up for review in the future would be those areas that are designated by Congress or the Department of Interior. |
| PC 3k | BECAUSE THERE ARE PLENTY OF OTHER SOURCES FOR WOOD AS WELL AS ALTERNATIVES TO WOOD |
| Response: | The Forest Service is a multiple use agency, and one of those uses is and always has been wood production. There are plenty of other sources for recreation, and alternatives to backcountry recreation, but we will continue to provide a variety of quality opportunities in that program area as well. |
| PC 3l | INCLUDING ADOPTING BUILDING REGULATIONS THAT REQUIRE LESS WILDERNESS LAND USE |
| Response: | We do not set building regulations, and we are not clear as to how they might affect wilderness land use, as facility construction is generally not allowed in Wilderness. |
| PC 3m | BECAUSE THERE ARE PLENTY OF ACTIVELY MANAGED LANDSCAPES ON PRIVATE AND STATE-OWNED LANDS OUTSIDE THE FOREST THAT WILL PROVIDE THE YOUNG SUCCESSIONAL FORESTS FOR CERTAIN SPECIES |
| Response: | See responses to PC 269, PC 112, PC 522, and PC 17e. |
| PC 3n | BECAUSE WE HAVE TO MAINTAIN SUFFICIENTLY LARGE AREAS WHERE NATURE CAN TAKE ITS COURSE AND REVERT BACK TO THE WAY THINGS OPERATED BEFORE WE INTERVENED |
| Response: | See the Minimum Dynamic Area analysis in the Terrestrial Ecosystem Diversity section of Chapter 3 in the EIS. |
| **PC 694** | **The Forest should examine the carrying capacity of wilderness areas.** |
| Response: | Based on the results of National Visitor Use Monitoring conducted on the Forest in Fiscal Year 2003, visual observations by employees, and comments from Wilderness visitors, we did not perceive a need to have carrying capacities at this time. The results of the NVUM indicate that only about 3% of Forest Visitors visited the Wilderness areas on the Forest, and comments did not indicate that visitors felt overcrowded (DEIS, Chapter 3, pages 385-386). In addition, we could find no clear record of how the carrying capacities were established in the 1986 Plan. We now have Wilderness monitoring in place, including NVUM, and better methodologies (such as Limits of Acceptable Change) to reassess and determine new carrying capacities if there is an identified need to do so in the future. |
| **PC 276** | **The Forest should continue to separate designated wilderness and proposed wilderness into two different management areas to avoid confusion.** |
| Response: | We agree. These management prescriptions remain separate in the FEIS and Final Revised Plan. |
| **PC 345** | **The Forest should make wilderness protection its highest priority, and therefore you should choose Alternative 3 for implementation.** |
| Response: | We acknowledge your preference. Wilderness protection is a high priority for us, but not necessarily any higher than protection of all resources across the Forest. Although Alternative 3 has more area recommended for Wilderness study than any other alternative, all alternatives have the same amount of designated Wilderness. |
| **PC 167** | **The Forest should protect lands with wilderness and backcountry designations:**<br>• **Including wilderness recommendation for Laurel Run**<br>• **Including wilderness recommendation for Little Allegheny Mountain**<br>• **Including wilderness recommendation for the East Fork of the Greenbrier**<br>• **Including wilderness recommendation for Middle Mountain**<br>• **Including wilderness recommendation for Spice Run**<br>• **Including wilderness recommendation for Big Draft**<br>• **Including additional wilderness designation for Dolly Sods**<br>• **Including the Management Prescription 6.2 areas listed in Alternative 3**<br>• **To protect water resources** |

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| | • **To reduce flooding of the Greenbrier River**<br>• **To provide recreational opportunities**<br>• **To provide tourism revenue**<br>• **To protect wildlife and habitat**<br>• **To protect trout**<br>• **To achieve ecological balance**<br>• **To prevent the timber supply acreage from exceeding 29.5 percent of the forest acreage.** |
| Response: | The Forest does not have the authority to designate Wilderness. We identified areas for backcountry recreation prescriptions based on their current conditions or wilderness potential, not the watershed where they are located. We feel that the management direction we have provided in the Revised Plan will provide adequate protection for all resources, and the mix of management prescriptions across the Forest will provide more backcountry recreation opportunities than the 1986 Plan. See the Recreation and Wilderness section of Chapter 3 in the EIS for more information. See also responses to PCs 66 and 103. |
| **PC 258** | **The Forest should fully evaluate areas for their wilderness potential, including Upper Shavers Fork.** |
| Response: | One of the six key decisions made in Forest Planning for long term management of the Forest is a "Recommendation to Congress of areas for wilderness classification where 36 CFR 219.17(a) applies" (DEIS, pages 1-1 and 1-2). The Forest completed a Roadless Area Inventory and Wilderness Evaluation; however the Upper Shavers Fork area did not meet the eight roadless inventory criteria and therefore was not evaluated for its wilderness potential (see page C-20 in Appendix C to the DEIS). |
| **PC 425** | **The Forest should improve its description of the Seneca Creek Basin and its wilderness qualities.** |
| Response: | We agree that Seneca Creek is a special area. However, we believe that the current description adequately displays the area's qualities, without going to the level of specificity that you suggest. The Seneca Creek Backcountry would continue to be managed for backcountry recreation in all of the EIS alternatives. Alternative 1 is no change, Alternative 2 and 4 continue to manage a somewhat larger area for SPNM recreation, including portions that are now in MP 8.0, 3.0, and 6.1. Alternative 3 recommends the area for Wilderness. Public motorized use would continue to be prohibited under any alternative. |
| **PC 355** | **The Forest should acknowledge problems with its wilderness evaluation of the Big Draft area.** |
| PC 355a | INCLUDING NO LOSS OF MINING OPPORTUNITIES IF BIG DRAFT IS RECOMMENDED AS WILDERNESS |
| Response: | The wilderness evaluation in Appendix C to the EIS indicates that mineable coal is not present in the Big Draft area. Based on our information the area has a 12.5% chance of natural gas production at 1.56 million cubic feet/ acre. The moderate potential for conflict is based on the potential for natural gas discovery coincident with private ownership (40% of the area). See PC 783 for additional information. |
| PC 355b | INCLUDING NO LOSS OF WILDLIFE CLEARINGS IF BIG DRAFT IS RECOMMENDED AS WILDERNESS |
| Response: | Although WVDNR indicated that there were 18 acres of wildlife openings and one waterhole in this area, a subsequent check based on your comment determined that these features are in the 1986 Plan Big Draft 6.2 area, as opposed to the somewhat smaller area that qualified for the updated Roadless Area Inventory in 2005. We have reworded the Appendix C description to reflect this change. |
| PC 355c | INCLUDING NO LOSS OF THE ABILITY TO APPLY FIRE SUPPRESSION TECHNIQUES SUCH AS PRESCRIBED FIRE IF BIG DRAFT IS RECOMMENDED AS WILDERNESS |
| Response: | The values foregone described in the Appendix C description only apply if the area were to be designated as Wilderness, not recommended. Mechanical equipment can only be used for fire suppression in Wilderness with appropriate approvals. Similarly, prescribed fire would have specific restrictions. |
| PC 355d | INCLUDING THE ABILITY TO LIME BIG DRAFT STREAM IF BIG DRAFT IS RECOMMENDED AS WILDERNESS |
| Response: | Again, the values foregone described in the Appendix C description only apply if the area were to be designated as Wilderness, not recommended. However, we agree with your concern about the statement regarding stream liming for the reasons you gave, and we have removed the statement. |
| **PC 33** | **The Forest should re-evaluate roadless areas for potential wilderness recommendation to include** |

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

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

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| | timing of the activity relative to the RACR is immaterial to the process we used to evaluate potential roadless areas. |
| **PC 432** | **The Forest should expand the Dolly Sods/Roaring Plains wilderness area:**<br>• **To accommodate the large number of visitors**<br>• **To prevent fragmentation caused by timbering**<br>• **Because forests in the highlands recover slowly as a result of slow tree growth**<br>• **Because spruce restoration is naturally occurring without timber operations**<br>• **To protect the Red Creek watershed**<br>• **Because Red Creek has the potential to become an attractive brook trout fishery.** |
| Response: | The Forest cannot designate Wilderness; only Congress has that authority. For plan revision, we followed FSH 1909.12 and the R9 Regional Foresters August 1997 letter to establish boundaries for Inventoried Roadless areas (Appendix C, pages 3-8). All of the Dolly Sods/Roaring Plains areas are either Wilderness or on the Roadless Area Inventory. In the FEIS preferred alternative, Dolly Sods North, Roaring Plains East, and Roaring Plains North are in MP 6.2, Roaring Plains West is MP 5.1 and Dolly Sods is MP 5.0. Under all of these MPs we would continue to manage this general area of around 27,000 acres to provide for backcountry recreation, emphasizing a SPNM setting. |
| **PC 354** | **The Forest should not over-emphasize the importance of "solitude" when evaluating potential wilderness areas, because Congress has rejected the "sight and sound doctrine", and several potential wilderness areas provide considerable solitude, despite minor intrusions.** |
| Response: | See response to PC 33. In plan revision, we are required to re-inventory the roadless areas on the Forest in order to evaluate their potential for Wilderness. The inventory and evaluation are connected actions. One does not occur without the other. Well-defined wilderness attributes include the opportunities for solitude and primitive recreation. Therefore, we feel that it is appropriate, as part of a revision roadless inventory process, to look at how the size and shape of prospective inventory areas would potentially affect an area's capacity to provide for solitude and primitive recreation. |
| **PC 454** | **The Forest should review the boundaries of the proposed wilderness areas based on comments from concerned private citizens and professionals.** |
| Response: | We did review the boundaries for other proposed wilderness areas. In some cases, the proposed areas did not make our roadless inventory, regardless of the boundaries. In other cases where the proposed areas were on our inventory, we were obligated to use the boundaries established through the inventory process in the Forest Handbook. All of the inventoried areas were evaluated for wilderness potential, and we do not feel that the differences in other boundaries versus ours had any measurable effect on our wilderness recommendations. |
| **PC 191** | **The Forest should create continuous strips of wilderness areas connecting larger wilderness areas together to allow animals to move easily from one mature habitat to another.** |
| Response: | The Forest followed FSH 1909.12 and the R9 Regional Forester's August 1997 letter to establish the Roadless Area Inventory and complete wilderness evaluations. The criteria used and rationale is in Appendix C to the EIS, pages 4-9. See also response to PC 9u. |
| **PC 760** | **The Forest should not impose stricter standards for wilderness than Congress does.** |
| Response: | Congress does not recommend areas for Wilderness study, and the Forest Service does not designate Wilderness. This comment appears to be comparing two separate processes, with the expectation that they should be using the same process and criteria. |
| PC 761a | BECAUSE AN ARBITRARY ACREAGE THRESHOLD OR BOUNDARY SETBACKS BASED ON SOLITUDE SHOULD NOT PRECLUDE LANDS FROM CONSIDERATION AS A POTENTIAL WILDERNESS AREA |
| Response: | We followed FSH 1909.12 and the R9 Regional Forester's August 1997 letter to establish the Roadless Area Inventory and complete wilderness evaluations. The criteria used and rationale is in Appendix C to the EIS, pages 4-9. We do not believe that the process was arbitrary or arbitrarily applied. |
| PC 761b | BECAUSE SIGHTS AND SOUNDS OF HUMAN ACTIVITY FROM OUTSIDE ANY PARTICULAR ACRE OF LAND SHOULD NOT DISQUALIFY THAT AREA FROM BEING RECOMMENDED OR DESIGNATED AS WILDERNESS |
| Response: | See responses to PC 33 and 354. |
| PC 761c | BECAUSE CONGRESS DOES NOT USE THE RECREATION OPPORTUNITY SPECTRUM IN ITS WILDERNESS DECISIONS |

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

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

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| | areas in Alternative 3. |
| **PC 453** | **The Forest should eliminate the Dry Fork Wilderness from its wilderness list.** |
| Response: | Dry Fork by itself is too small to be recommended for wilderness, but it is contiguous with Otter Creek and would expand the current Otter Creek Wilderness by an estimated 739 acres. Therefore we are required to consider it in our roadless area inventory process and wilderness evaluations. |
| **PC 173** | **The Forest should not recommend areas for wilderness designation if it would endanger brook trout, because wilderness designation would preclude the use of mechanized equipment that is needed to mitigate acidic conditions in fisheries, affecting brook trout.** |
| Response: | We agree that Wilderness designation would likely prelude the use of motorized and mechanized equipment to transport lime or other chemicals in any area so designated. Materials could be transported into the wilderness by foot or horseback, or lime could be added to Wilderness streams from points outside of the Wilderness; however the use of trucks, helicopters, or liming drums would likely be prohibited unless approved by Congress. |
| **PC 134** | **The Forest should not recommend any new wilderness area designations and should subject existing wilderness areas to re-evaluation with each new Forest Plan.** |
| Response: | If recommended wilderness areas (MP 5.1) are not designated for Wilderness by Congress in the interim, we would likely re-evaluate them for Wilderness potential during the next Forest-wide planning process. The Forest does not have the authority to reconsider Wilderness designations made by Congress. |
| **PC 795** | **The Forest should consider the negative effects of wilderness designation;**<br>• **Including the limits it puts on the management of acid deposition in streams**<br>• **Including the limits it puts on the ability to remediate long-term physical alterations of areas caused by anthropogenic effects or climactic changes and events.** |
| Response: | See response to PC 173. We acknowledge in the wilderness evaluations that designation would likely prohibit the use of motorized and mechanized equipment to access areas for stream treatments. |
| **PC 195** | **The Forest should not recommend any new wilderness areas until the new study of need is completed as part of the new regulations that allow States to participate in directing management of the Forest.** |
| Response: | We believe you are referring to the process related to the State Petitions for Inventoried Roadless Area Management. This process is not so much a study of need as it is an opportunity for state governors to involve themselves in roadless area management on federal lands within their states. The Governor of West Virginia has opted not to pursue the petitioning process at this time (see letter from the Governor's Office in this appendix). |
| **PC 736** | **The Forest should consider, when making wilderness recommendations, that the 917,000 acres of federal land within the MNF proclamation boundary is broken up by over 600,000 acres of private land, unlike the West where most of the land is in huge blocks of solid federal ownership.** |
| Response: | We acknowledge your points; however, we are obliged to follow the standard process for wilderness evaluation. Proximity is one of many factors that is considered in wilderness recommendations. It should be obvious that, if proximity were the only criterion we considered, we would not have recommended any Wilderness. |
| **PC 940** | **The Forest should show more clearly how restrictions on land management are affecting multiple uses of the Forest.** |
| PC 940a | BECAUSE BACKCOUNTRY STATUS SHOULD SERVE TO PROTECT THE SO-CALLED "ROADLESS" VALUES ON THE FOREST WITHOUT BINDING THE HANDS OF MANAGERS FOR THE FORESEEABLE FUTURE |
| Response: | We agree that we should be able to do limited management in backcountry areas without affecting the overall roadless values of the area. |
| PC 940b | BECAUSE IT IS OUR OBSERVATION THAT WITH REGARD TO WILDERNESS RECREATION, PEOPLE ARE NOT USING WHAT HAS ALREADY BEEN SET ASIDE |
| Response: | The visitor use numbers presented in the Recreation and Wilderness section of Chapter 3 in the EIS indicate that people are using wilderness areas, but at relatively low rates compared to other areas. |
| PC 940c | BECAUSE BACKCOUNTRY, WILDERNESS AND PROPOSED WILDERNESS MAKE UP ABOUT 24 PERCENT OF THE FOREST THAT SAYS "CLOSED" TO THE VAST MAJORITY OF POTENTIAL USERS |

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

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

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| **PC 784** | **The Forest should not reduce the size of the potential Cheat Mountain wilderness area and should provide information about mineral and gas lease activities in the area:**<br>**To protect scenic resources**<br>**To provide recreational opportunities**<br>**Because of the solitude it provides**<br>**To protect vegetation**<br>**To protect wildlife and habitat**<br>**Because current wilderness evaluation results are not consistent with existing MPs.** |
| Response: | The Forest does recommend Cheat Mountain for Wilderness in Alternatives 2 and 3, based on the wilderness attributes identified in this area as described in Appendix C to the DEIS, pages 46-50. Although the West Virginia Wilderness Coalition's proposal includes another 4,000 acres of area on Cheat Mountain to the south, this area has several miles of road numerous wildlife openings that may have disqualified it from meeting all 8 Roadless Area Inventory criteria. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Cheat Mountain area was presented on page C-52 and C-53 of Appendix C to the DEIS. |
| **PC 785** | **The Forest should support wilderness designation for the Cranberry Expansion:**<br>• **To provide connectivity to the existing trail system in the current Cranberry Wilderness Area**<br>• **To provide recreational opportunities**<br>• **Because of the solitude it provides**<br>• **Because little timber harvesting has been done in the area during the past decade**<br>• **To protect wildlife and habitat**<br>• **Because there is no established mountain biking use in the area**<br>• **Because current wilderness evaluation results are not consistent with existing MPs.** |
| Response: | The Forest does recommend the Cranberry Expansion for Wilderness in Alternatives 2 and 3. This recommendation is based on the opportunity to increase the size of the Cranberry Wilderness and the wilderness attributes identified in this area as described in Appendix C to the DEIS, pages 51-55. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. |
| **PC 786** | **The Forest should support wilderness designation for the Dolly Sods Expansion:**<br>• **Because you have failed to acknowledge the public support for this area as wilderness**<br>• **To disperse the heavy use of the Dolly Sods Wilderness Area**<br>• **Because of special features such as the high elevation, bog and heath ecosystem, and vast**<br>• **spreads of low bush blueberries**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **To protect unique flora**<br>• **Because mountain bike use in the area is minimal**<br>• **Because current wilderness evaluation results are not consistent with existing MPs**<br>• **To protect the headwaters of Red Creek**<br>• **Because of its unique landscape.** |
| Response: | The wilderness evaluation for the Dolly Sods Expansion states that "There has been public interest in this area becoming wilderness. The West Virginia Wilderness Coalition included this area in its 2004 wilderness proposal", see Appendix C to the DEIS, page 59. Based on visual observations, National Visitor Use Monitoring completed in FY-03, and limited traffic counts, we do not concur that wilderness designation of Dolly Sods Expansion would decrease use in the Dolly Sods Wilderness or that mountain bike use is minimal. Under Alternatives 2, 3, and 4, the Dolly Sods Expansion would be managed as MP 6.2, and in Alternative 1, as MP 8.0. Both of these MPs would protect the areas special features and continue to provide for a variety of SPNM recreation opportunities. See DEIS Appendix C pages 56-60 for additional information on solitude, special features, botanical features, and recreation opportunities. |
| **PC 787** | **The Forest should support wilderness designation for the Dry Fork/Otter Creek expansion and provide information about mineral activities in the area:**<br>• **Because of the solitude it provides** |

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| | • **To provide recreational opportunities**<br>• **To protect scenic resources**<br>• **Because the surrounding private land would make it easy to manage this area**<br>• **Because most of the area is managed as wildlife habitat and not for timber harvest**<br>• **Because current wilderness evaluation results are not consistent with existing MPs.** |
| Response: | The Forest does recommend Dry Fork for Wilderness in Alternatives 2 and 3. This recommendation is based on the opportunity to increase the size of Otter Creek Wilderness and the current wilderness attributes as described in Appendix C to the DEIS, pages 61-64. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Dry Fork area was presented on page C-52 and C-53 of Appendix C to the DEIS. This information has been updated for the FEIS. |
| **PC 788** | **The Forest should support wilderness designation for the East Fork Greenbrier area:**<br>• **To protect scenic resources**<br>• **To protect vegetation**<br>• **To provide recreational opportunities**<br>• **Because of the lack of roads in the area**<br>• **Because mountain biking use is minimal in the area.** |
| Response: | The Forest does recommend the East Fork Greenbrier area for Wilderness in Alternative 3. This recommendation is based on the wilderness attributes identified in this area. Alternative 2 would continue to manage this area as MP 6.2, and this management would continue to provide backcountry recreation opportunities and protect the resource values identified in this comment. We believe that our wilderness evaluation for the East fork of the Greenbrier is accurate and that the boundaries established best meet the mapping criteria described in Appendix C to the DEIS (see pages C-65 though C69). The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. |
| **PC 434** | **The Forest should support wilderness designation for the Lower Laurel Fork area:**<br>• **To protect trout populations**<br>• **To provide a wildlife corridor connecting the northern and central portions of the Forest.** |
| Response: | Lower Laurel Fork did not meet the 8 criteria for roadless areas in the East (DEIS Appendix C, page 5) and therefore was not included in the Inventory or moved forward for wilderness evaluation. The rationale is presented on page 16 in Appendix C to the DEIS. However, due to public comments, we have decided to change the Management Prescription under the preferred alternative from 6.1 to 6.2 in the FEIS and Final Revised Plan for the following reasons:<br>• The area is currently in 6.2 under the 1986 Plan,<br>• A 6.2 would provide additional protection to wetlands and fisheries in the area,<br>• About two thirds of the area is in an eligible WSR corridor with a Wild classification, which gives the area a strong existing backcountry recreation emphasis,<br>• Our options for actively managing the area under a 6.1 are slim at present due to the eligible WSR corridor and the fact that this area is surrounded by private land,<br>• Keeping this area in 6.2 would accommodate a wide variety of supporters who have shown a relatively high interest in protecting this area in a 6.2 prescription.<br><br>We believe that the 6.2 designation will provide essentially the same level of protection for the resources mentioned as would a Wilderness recommendation (MP 5.1). |
| **PC 739** | **The Forest should support wilderness designation for the Middle Mountain area and disclose information about mineral leases in the area:**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **To protect scenic resources**<br>• **To protect wildlife**<br>• **Because timber harvesting is not common in the area.** |
| Response: | The DEIS provided a range of alternatives for managing the Middle Mountain area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends the Middle Mountain area for Wilderness. Appendix C to the |

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| | DEIS includes the roadless Area inventory process, and the Middle Mountain Wilderness Evaluation is on pages C-83 to C-87. We believe that management of the Middle Mountain Area in Alternative 2 as MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Middle Mountain area is presented on page C-85 of Appendix C to the DEIS. |
| **PC 740** | **The Forest should support wilderness designation for the Roaring Plains West area and disclose information about mineral leases in the area:**<br>• **To protect scenic resources**<br>• **To protect geological and cultural features**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **Because mountain biking is almost non-existent in the area**<br>• **Because the area is not conducive to timber harvesting**<br>• **To protect wildlife.** |
| Response: | We have recommended Roaring Plains West for wilderness in Alternatives 2 and 3 in the DEIS. This recommendation is based on the wilderness evaluation in Appendix C to the EIS. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Roaring Plains West area is presented on page C-90 of Appendix C to the DEIS. |
| **PC 741** | **The Forest should support wilderness designation for the Spice Run area and disclose information about mineral leases in the area:**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **To protect geologic features**<br>• **To protect scenic resources**<br>• **Because there are no established mountain bike trails in the area**<br>• **Because current wilderness assessment results are not consistent with existing MPs and restoration efforts.** |
| Response: | The DEIS provides a range of alternatives for managing the Spice Run area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends Spice Run for Wilderness. Appendix C includes the roadless Area inventory process, and the Spice Run Wilderness Evaluation is on pages 98-102. We believe that management of the Spice Run Area under Alternative 2 as MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The final recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Spice Run area is presented on page C-100 of Appendix C to the DEIS. |
| **PC 742** | **The Forest should support wilderness designation for the Turkey Mountain area and disclose information about mineral leases in the area:**<br>• **Because no logging has occurred in the area in the past ten years**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **To protect wildlife**<br>• **To prevent road building**<br>• **To protect water resources.** |
| Response: | The DEIS provided a range of alternatives for managing the Turkey Mountain area (Chapter 3, pages 3-382 to 3-383). Alternative 3 recommends the Turkey Mountain area for Wilderness Appendix C to the DEIS includes the roadless area inventory process, and the Turkey Mountain Wilderness Evaluation is on pages C-108 to C-111. We believe that management of the Turkey Mountain Area in Alternative 2 as a MP 6.2 would adequately protect the resources you have identified and continue to provide backcountry recreation opportunities. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Turkey Mountain area is presented on |

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| | page C-100 of Appendix C to the DEIS. |
| **PC 743** | **The Forest should support separate wilderness designations for Upper Shavers Fork East and West to provide remote backcountry recreational opportunities in these areas.** |
| Response: | Upper Shavers Fork East and West did not meet the 8 criteria for roadless areas in the East (Appendix C to the DEIS, page C-20), and therefore they were not included in the Inventory or moved forward for wilderness evaluation. Under the preferred alternative, these areas would be managed as MP 4.1. This MP emphasizes spruce and spruce-hardwood restoration. The high-elevation areas of Upper Shavers Fork provide suitable habitat for the West Virginia northern flying squirrel, and therefore little development activity is expected in this area. MP 4.1 and Forest-wide direction would provide protection for natural resources, as well as backcountry recreation opportunities. |
| **PC 744** | **The Forest should support wilderness designation for the Canaan Loop area**<br>• **To provide recreational opportunities**<br>• **Because no timber harvesting has taken place in the area for 20 years**<br>• **To protect from damage caused by mountain biking**<br>• **Because of the solitude it provides**<br>• **Because there are currently no mineral or gas leases in the area**<br>• **To help meet the growing demand for wilderness tourism**<br>• **To take pressure off the overused Dolly Sods and Otter Creek Wilderness Areas.** |
| Response: | The Canaan Loop area was evaluated and included in the Roadless Area Inventory. This area received a wilderness evaluation (Appendix C to the DEIS, pages C-41 through C-45). Based primarily on the area's popularity for mountain biking and its location between two highly used state parks, it was not recommended for wilderness in any of the EIS alternatives (or in the West Virginia Wilderness Coalition proposal, for that matter). Alternative 2 would manage the Canaan Loop area (the portion inside the FR 13 loop) under MP 6.2. This MP would continue to manage the area for backcountry recreation while protecting or maintaining the resources identified in this concern. Portions of the Canaan Area outside of the FR13 loop would be managed under MP 4.1. This MP emphasizes spruce and spruce-hardwood restoration. Canaan Mountain provides suitable habitat for the West Virginia northern flying squirrel, and therefore little development activity is expected in this area. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Minerals information for the Canaan Loop area is presented on page C-43 of Appendix C to the DEIS. |
| **PC 745** | **The Forest should support wilderness designation for the Tea Creek area and disclose information about mineral leases in the area.**<br>• **Because there has been insignificant logging in the area over the past decade**<br>• **Because of the solitude it provides**<br>• **To provide recreational opportunities**<br>• **To protect geologic features**<br>• **Because current wilderness evaluation results are not consistent with existing MPs** |
| Response: | The Tea Creek area was evaluated and included in the Roadless Area Inventory. This area received a Wilderness Evaluation (Appendix C to the DEIS, pages C-103 through C-107). Based primarily on the area's popularity for mountain biking, it was not recommended for Wilderness in any of the EIS alternatives (or in the West Virginia Wilderness Coalition proposal). Alternative 2 would manage the Tea Creek area under MP 6.2. This MP would continue to manage the area for backcountry recreation while protecting or maintaining the resources identified in this concern. The Responsible Official ultimately decides which areas will or will not be recommended for Wilderness. The recommended areas and accompanying rationale are included in the Record of Decision. Mineral information regarding Inventoried Roadless Areas and Potential Wilderness is responded to in PC 783. The minerals summary for Tea Creek is located in Appendix C to the DEIS, page C-105. |
| **PC 737** | **The Forest should not use the Recreation Opportunity Spectrum semi-primitive non-motorized core criteria to evaluate potential wilderness areas, because:**<br>• **Its interpretation of the word "solitude" is too restrictive**<br>• **A half mile buffer should not be used in wilderness evaluation criteria**<br>• **It undermines many other wilderness values and goes against decades of wilderness legislation and Congressional testimony** |

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| | • **The guidance is not signed by a line officer.** |
| Response: | The Forest followed Forest Service Handbook 1909.12 and the August 1997 Regional Forester's letter to identify Inventoried Roadless Areas (IRAs) and to complete wilderness evaluations. See Appendix C, pages 4-9. We disagree with your opinion that we relied too heavily on the core solitude concept to identify IRAs. IRAs must meet all eight criteria in FSH 1909.2 to be included on the roadless area inventory. The core solitude concept comes into play in only one of these eight criteria, Criterion #4: Is the area conducive to Wilderness values (proximity to pollutions sources or obvious signs of development). We feel this criterion is appropriate given that the sole purpose of conducting the roadless area inventory during plan revision is to eventually identify those areas on the Forest that have potential for wilderness recommendation, which is one of the six planning decisions that are made in the revision process. Thus, we consider the inventory process, wilderness evaluations, and wilderness recommendations to be connected actions in plan revision. Furthermore, we looked at over 40 areas for potential inclusion on the roadless area inventory, and only 2 of those areas were excluded from the inventory based solely on Criterion #4. No area was excluded based on core solitude; in fact, there are three areas on the inventory that have little if any core solitude. |
| **PC 957** | **The Forest should change a number of the areas listed as assigned to MP 6.2 (Draft Plan, page III-39) to MP 5.1, and retain all areas assigned as MP 6.2 in the 1986 Plan as 6.2, along with some new suitable roadless acreage.** |
| Response: | We acknowledge your preference. We generally used this allocation strategy for Alternative 3. |

| **WILD AND SCENIC RIVERS AND SCENIC BYWAYS** | |
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| **PC 562** | **The Forest should include further discussion regarding wild and scenic rivers, including:**<br>• **Clarifying what Federal or State water quality parameters and designated uses must be protected**<br>• **Clarifying what agencies the Forest Service must coordinate with and how they will work together to maintain and/or improve water quality**<br>• **Clarifying what impairments have been defined by the Forest Service or other agencies**<br>• **Clarifying whether the goal is protection or improvement and how Forest Service management will respond to changing conditions over the life of the Forest Plan.** |
| Response: | The "discussion" items referenced appear to have been generated from information found in the federal implementing regulations for designated Wild and Scenic Rivers. We have no designated rivers on the Forest; our rivers are considered eligible. On the other hand, the concerns related to state water quality parameters, 303(d) stream impairment, and coordination with other agencies are ones that we have to address for ALL of our water bodies, not just eligible Wild and Scenic River segments. Because the processes for addressing these concerns are covered in existing law, regulations, and policies, there is no need to repeat them in the Forest Plan. We have, however, provided more discussion related to these concerns in the Watershed, Riparian, and Aquatic Resources section of Chapter 3 in the FEIS. |
| **PC 333** | **The Forest should recommend all potential wild and scenic river segments at the highest levels possible.** |
| Response: | The Wild and Scenic River Act and its implementing regulations say that eligible segments should be classified at their highest potential classification. Potential classification is based on current conditions, rather than desired conditions or highest potential protection. Thus, if an eligible corridor has a number of current development features, like roads or bridges or campgrounds, its highest potential classification may only be "Recreational" rather than "Scenic" or "Wild". |
| **PC334** | **The Forest should place eligible wild and scenic river segments in a separate management prescription to ensure that the correct standards, guidelines, and management practices are applied.** |
| Response: | We considered the option of giving eligible river segments their own management prescription prior to the DEIS and Proposed Revised Plan. This is an approach that some other Forests have taken, typically for designated rivers. We decided against this strategy for the following reasons: 1) our river segments are eligible, not suitable or designated, and therefore their WSR status could change, 2) the guidance for managing Wild and Scenic Rivers and their corridors is included in the WSR Act and Forest Service policy direction, and therefore does not have to be repeated in the Forest Plan, and 3) overlaying |

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| | prescriptions generally makes a Forest Plan more difficult to follow. What we have done in the Final Revised Plan to address this concern is provide a map of the eligible river corridors on the Forest and more information in the MPs about the rivers' potential outstandingly remarkable values that need to be maintained. |
| **PC 911** | **The Forest should explain whether the Plan will protect sensitive species and the free-flowing status of the four eligible Wild and Scenic River corridors that intersect MP 3.0.** |
| Response: | The Proposed Revised Forest Plan provides Forest-wide direction for protecting sensitive species (p. II-26) and the free-flowing status of eligible Wild and Scenic Rivers (p. II-33). This direction would protect these features in any Management Prescription they are located. |
| **PC 944** | **The Forest should explain how the plan will address the importance of free-flowing WSR eligible rivers in Wilderness, MP 5.0, and Recommended Wilderness, MP 5.1.** |
| PC 944a | BECAUSE THESE RIVERS SHOULD REMAIN FREE-FLOWING |
| Response: | All eligible rivers would remain free-flowing, regardless of what Management Prescription that are in, as directed by Forest-wide Goal WS02. Although a suitability study could remove their eligibility status, impoundments are rare in wilderness areas and require Presidential approval. |
| PC 944b | BECAUSE EXISTING STRUCTURES, AT THE TIME OF DESIGNATION, ARE PERMISSIBLE WITHIN A RECREATIONAL LISTED RIVER, BUT IMPROVEMENT IS NOT ENCOURAGED, AND NO NEW STRUCTURES ARE ALLOWED |
| Response: | New structures or improvements are not generally allowed in MPs 5.0 and 5.1, either, and existing structures can be and often are removed when an area is designated as Wilderness. |
| PC 944c | BECAUSE WILD AND SCENIC MANAGEMENT DICTATES THAT MOTORIZED TRAVEL "BE RESTRICTED OR PROHIBITED WHERE NECESSARY TO PROTECT THE VALUE" (FEDERAL REGISTER, 09/07/82) OF THE ELIGIBLE RIVER CORRIDOR |
| Response: | Motorized travel is generally prohibited in Designated Wilderness, and public motorized travel is prohibited in Recommended Wilderness, so we see no conflict in direction for rivers in these areas. |

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

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

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

# Section 7: Social and Economics

| CULTURAL, TRIBAL, AND TOURISM | |
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| **PC 435** | **The Forest should provide discussion of cultural resources in the EIS, including archaeological sites, historic sites, and the federal laws protect these sites.** |
| Response: | Although management direction was updated for Heritage Resources in the Revised Forest Plan, we did not analyze effects to these resources in the EIS because they were not identified as an issue or concern, and potential effects to or from the resources would not vary measurably by alternative (DEIS, page 1-22). The archaeological and historic sites on the Forest are managed according to the various laws, regulations, executive orders, and Forest Service policies that provide protection for these resources, and this protection would not vary by alternative considered or management prescription allocation. |
| **PC 818** | **The Forest should conduct thematic research on Heritage Resources.** |
| Response: | We currently do thematic categorization of historic and prehistoric sites on the Forest, and evaluate site significance within a regional context. The Heritage Resource Goals in Chapter II of the Revised Forest Plan reflect the Forest's commitment to continue these types of activities. The amount of thematic documentation and research we accomplish in the future will be largely dependent on funding and staffing levels. |
| **PC 374** | **The Forest should give consideration to the folk culture of the Forest area to better manage and interpret the Forest through surveys and documenting aspects such as music, vernacular, and traditional activities.** |
| Response: | Although we recognize that the Forest can play a role in preserving "the mountain ecology and culture important to the Appalachian region" (DEIS, p. 3-363), we feel that role is limited to providing scenery and forest products related to that culture, and periodically hosting interpretive displays of local crafts or music. We do not have any Forest program resources devoted specifically to ethnography or ethnomusicology at this time, but we are encouraged that scholars such as yourself are helping to fill that void. |
| **PC 643** | **The Forest should consider how Forest management activities will affect the treaties and reserved rights of Native American tribes.** |
| Response: | There are no tribal trust or ceded lands within the Forest proclamation boundary or West Virginia. Therefore our management activities would not affect any treaties or reserved rights of Native American Indian tribes. |
| **PC 53** | **The Forest should notify the appropriate tribal representatives if any Native American cultural resources or sacred sites are found during any construction activities in the Forest and should halt construction immediately if such items are found.** |
| Response: | There are no tribal trust or ceded lands within the Forest proclamation boundary or West Virginia. Therefore we have no legal obligation to contact tribal representatives related to general cultural resources or sacred sites. However, we would contact appropriate tribal representatives in the event we discovered any American Indian human remains or funerary rights, as required by the Native American Graves Protection and Repatriation Act of 1990. |
| **PC 202** | **The Forest should acknowledge that it is a certainty, not a likelihood, that the Forest region will become more racially diverse in the future.** |
| Response: | We agree that the region is not very racially diverse at present, which makes the likelihood of diversity increasing that much higher as the state and nation continue to become more diverse. |
| **PC 74** | **The Forest should recognize how valuable the Forest is to West Virginia as a source of tourism.** |
| Response: | We do recognize that tourism is valuable to West Virginia (DEIS, page 3-367), and that the Forest is a major recreation attraction in the State (DEIS, page 3-369). However, many of the comments related to this concern seemed to assume that tourism is driven solely or primarily by backcountry recreation opportunities, or that tourism will disappear if we allow timber harvest on the Forest. We do not believe that either of these assumptions is accurate given what we have seen in the past or are predicting for the future. First, people are drawn to this Forest for many other reasons than to hike or camp in the remote backcountry. In fact, not one of the top ten Forest recreation activities in Table RE-5 (DEIS, page 3-370) requires remote backcountry. Second, timber harvest and log hauling have occurred on the Forest |

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| | for many decades and people still come here to recreate. Third, we have management direction in place to help protect scenic and recreation resources from harvest impacts under all alternatives. Fourth, we have management prescription areas in all alternatives where programmed commercial timber harvest would not be scheduled. Finally, no alternative in the DEIS would harvest a maximum of more than one half of one percent of the Forest in any given year, and the preferred alternative would actually increase the amount of backcountry recreation opportunities on the Forest compared to the 1986 Plan. |
| **PC 220** | **The Forest should use the most up-to-date information on tourism and recreational industries, because West Virginia relies heavily upon tourism, and because of the recent growth in recreational industries.** |
| Response: | We have updated the FEIS to include recreation and tourism information from the Economic Impact of Travel on West Virginia 2000-2004 Detailed State and County Estimates (Dean Runyan and Associates, June 2005). See Final EIS, Chapter 3, Recreation and Wilderness section. |
| **PC 25** | **The Forest should consider the negative impact that the Proposed Forest Plan would have on tourism and the local economy.** |
| Response: | See response to PC 74. |
| **PC 994** | **The Forest should revise Tables S-42, S-43, S-44, and S-45 to show the more recent and optimistic economic data on tourism that are now available.** |
| Response: | See responses to PC 993 |

| **SOCIAL AND ECONOMIC IMPACTS** | |
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| **PC 827** | **The Forest should consider the social and economic benefits of keeping the Forest wild and natural, including clean air and water, and tourism for outdoor recreational opportunities.** |
| Response: | We recognize that the Forest has social and economic values related to clear air, clean water, and tourism. However, it is difficult if not impossible to display these values in any meaningful way at the Forest scale by alternative. For instance, we have no information that would validate whether more people would visit an unmanaged "wild" forest than a forest with multiple motorized and non-motorized opportunities. We have accounted for recreation visits in general, though, in our economic analysis in Chapter 3 of the EIS. The EIS also has analyses on the potential effects to air and water, but we have not placed ecological service values on these amenities. |
| **PC 284** | **The Forest should explain the differences in the money created from the Forest Plan revision.** |
| Response: | Forest Plan revision does not create any money. However, the DEIS that accompanied the Proposed Revised Plan analyzed different types of money sources provided by the Forest and how they would contribute to local economies. This analysis is found in the Social and Economic Environment section of Chapter 3. The sources include Forest-linked employment and income (page 3-450), 25% Fund/Stabilized Payments (page 3-454), and Payments in Lieu of Taxes (page 3-455). |

# 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)

| Name | Organization |
|---|---|
| **Federal** | |
| 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 |
| **State** | |
| Senator Jon Blair Hunter | The Senate of West Virginia – 14th 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 |
| **County** | |
| 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 |
| **City/Town** | |
| 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 | City of White Sulphur Springs |
| **Tribal** | |
| 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

MON 2159

November 3, 2005

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

CAG RECEIVED
NOV 09 2005

September 26, 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 we 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.

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MON-2159

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
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INTERIOR, ENVIRONMENT & RELATED AGENCIES

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Congress of the United States
House of Representatives

November 14, 2005

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

Alan B. Mollohan

ABM:ao

# 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


TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

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.

Mon-2319

## 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."

**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

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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

Michael T. Chezik
Regional Environmental Officer

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

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# The Senate of West Virginia

Charleston

**MON 2766**

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HEALTH AND HUMAN RESOURCES
JUDICIARY
LABOR

November 14, 2005

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,

Jon Blair Hunter

Senator Jon Blair Hunter
14th Senatorial District

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NOV 15 2005

MON 2602

Joe Manchin III
Governor

Charles R. Dye
Director/State Forester

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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



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-2602



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

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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

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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

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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.

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*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**

| Stream Classification | Zone Width |
|---|---|
| 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)."

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*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.

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*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."

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*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

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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.

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*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.

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*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.

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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.

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**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

Frank Jezioro, Director
Division of Natural Resources

RLH/pf

cc: Curtis I. Taylor
Richard L. Hall

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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.

CAG RECEIVED
NOV 14 2005

MON-2603



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 favorable 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.

MON-2603



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 proposes 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*

MON 1428

OCT 28 RECEIVED

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.

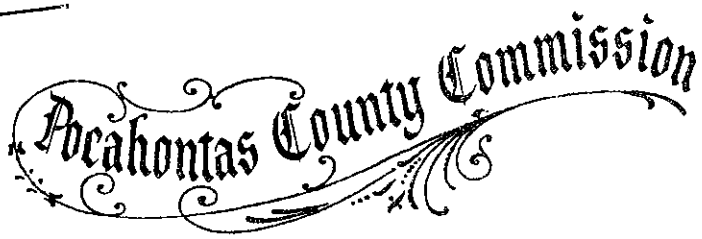
Sincerely,

H. Steve Conrad
Chair

CAG RECEIVED
NOV 02 2005

*Phone (304) 358-2074* *www.pendletoncounty.com* *Facsimile (304) 358-2187*

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

Joel S. Callison, President
Pocahontas County Commission

CAG RECEIVED
OCT 17 2005

900 G Tenth Avenue • Marlinton, WV 24954 • (304) 799-6063 • Fax (304) 799-6047 • pocahontascc@suplitewf.com

# 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

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 · 2006

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,

W L Schmidlen III

Walter L. Schmidlen III
Randolph County Commissioner

MON 2540

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
E-mail: 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 I-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.**

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% or 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 a 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

Charles H. Friddle, III
President

MON 2605

Dear Forest Service Representative,

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

CAG RECEIVED
NOV 14 2005

MON 3434

# 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

F -23+

November 7, 2005

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

MON 810

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

www.info@upshurda.com
www.upshurda.com

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

MON 2160

# 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.

Judy Guye

Judith A. Guye
Mayor

Telephone: (304) 636-1414 - Fax: (304) 636-7866

MON-2604


# 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


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

John Manchester
Mayor
Lewisburg, West Virginia

Attachment

RESOLUTION

mon. 2604

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.

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 Carver, the City of Lewisburg, West Virginia does hereby approve and authorize the adoption of said Resolution to become effective immediately.

Adopted this 18th 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 18th 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 -23

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,

Janice Davis

MON 11675

Council Person of The City of Thomas

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 my 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 12th day of October, 2005

Debra Fogus

Debra Fogus, Mayor

Mon·2607

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 12th 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
09/07/2005 16:01

To: comments-eastern-monongahela@FSNOTES
cc:
Subject: Fw: WV/Monongahela Natl Forest/Forest Mgmt Plan/More Info

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" <kkaniatobe@astribe.com>
09/07/2005 11:07 AM

To: <r9_monong_website@fs.fed.us>
cc:
Subject: WV/Monongahela Natl Forest/Forest Mgmt Plan/More Info

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

MON-43

*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*