



United States  
Department of  
Agriculture

Forest  
Service



## **Summary of Public Comments**

April 2003

**Notice of Intent  
Revision of the Forest Land and Resource Management Plan**

**Monongahela National Forest**

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# Chapter 1 - Introduction

## ***Background***

The Monongahela National Forest Land and Resource Management Plan (Forest Plan) was approved in 1986 with publication and approval of the final Environmental Impact Statement. There have been six amendments to the Forest Plan since 1986.

### Forest Plan amendments

- Amendment #1 – Hawthorn Standards and Guidelines, June 1988
- Amendment #2 – Long Term Budget Estimates, April 1990
- Amendment #3 – Fisheries Management, June 1991
- Amendment #4 – Oil and Gas Leasing and Development, October 1992
- Amendment #5 – Long Term Budget estimates, August 1992
- Amendment #6 – Threatened and Endangered Species, pending

The Monongahela National Forest (MNF) is the only National Forest in West Virginia and has four ranger districts. The Cheat/Potomac Ranger District has offices in Parsons and Petersburg. The Gauley Ranger District is headquartered in Richwood, the Greenbrier Ranger District in Bartow. The Marlinton/White Sulphur Ranger District has offices in Marlinton and White Sulphur Springs.

Since 1986, the MNF has acquired approximately 51,334 additional acres. The MNF currently consists of about 910,155 acres of land and water in the following 10 eastern West Virginia (WV) counties: Barbour, Grant, Greenbrier, Nicholas, Pendleton, Pocahontas, Preston, Randolph, Tucker, and Webster Counties. The Forest comprises less than 6% of the land in the State. The counties within the MNF are mostly rural, but large metropolitan areas (such as Washington, D.C.; Pittsburgh, PA; Richmond, VA; and Charleston, WV) are within half-a-day's drive.

## ***Identification of potential need for change topics***

In developing the Notice of Intent (NOI), Forest specialists and other resource managers identified preliminary topics to help focus the need for change. These became the five broad revision topics listed in the NOI as a starting point for gathering public comments.

Identifying the need for changing the Forest Plan must consider required revision decisions. The Forest Plan revision process requires that six decisions be addressed:

- Forest-wide multiple use goals and objectives. Goals describe a desired condition to be achieved sometime in the future. Objectives are concise, time-specific statements of measurable planned results responding to the goals.
- Forest-wide management requirements (standards and guidelines).
- Management area direction applying to future activities in each management area.
- Lands suited and not suited for resource use and production timber management, grazing, etc.

- Monitoring and evaluation requirements needed to gauge how well the plan is being implemented.
- Recommendations to Congress, if any, for designations of wilderness or wild and scenic river corridors for example.

When developing need for change topics or issues that will help define the scope of the Forest Plan revision, there are criteria that potential topics should meet. Need for change topics, also called revision topics, must be:

- Consistent with federal laws, policies, and relate to the mission of the agency
- Within the Responsible Official's decision making authority
- Inadequately addressed in the current Forest plan
- Proposed because new information warrants a re-evaluation of one of the six decisions cited above made in the current Forest Plan

These criteria will be used to evaluate the comments and issues brought out during public involvement and during development of issues to focus the Forest Plan revision.

Some of the suggestions, issues, or comments made concerning needed changes and need for change in the Forest Plan will not be addressed during Forest Plan revision. In most cases, the reason those suggestions, issues, or comments are not addressed is because they do not meet the evaluation criteria listed above. Some other common reasons are:

- Issue is already addressed in Forest Plan or recent decision
- Issue/suggestion would require a change to law, regulation, or rule outside the scope of the Forest Plan
- Sufficient information or rationale is not provided or does not exist to support a change to the Forest Plan
- Issue/suggestion is outside the mission or authority of the Forest Service
- Research or data are needed to evaluate if a change is needed and cannot be obtained within the time frame
- Issue/suggestion is more appropriately addressed during implementation at the project level

## ***Scoping Process***

An NOI, published in the Federal register on May 3, 2002, began the formal public comment period of 90 days. The NOI included dates, locations, and times of scheduled initial public meetings. The comments in this document reflect those received during the 90-day comment period from letters, electronic mail, visits, and faxes; 705 responses were logged.

This document displays the summarization of comments received during the 90-day comment period. The revision team will use these comments to help define issues and develop alternatives.

## **Content analysis process**

This analysis is intended to provide an unbiased and impartial summary of comments received. The broad revision topics listed in the NOI were used to group issues where possible. Examples of comments will be used in Chapter 2 of this document to better describe the issues. An attempt has been made to represent the full range of comments on each revision topic.

Although the summary of comments attempts to capture the full range of public issues, respondents elect on their own to respond and their comments do not necessarily represent the sentiments of the public as a whole. It is important for the public and decision makers to understand that this process does not treat public input as if it were a vote. Instead, the purpose of this summary is to ensure every comment is considered at some point in the decision process. Content analysis is meant to reproduce ideas, not evaluate them. Also, this 90-day comment period in response to the NOI is not the only opportunity for comment on the Forest Plan revision.

### **Content analysis steps**

**Receive and identify responses:** All responses received (email, fax, letters, or verbal comments) were dated, given a unique number, and photocopied. The original documents will be retained in the project file. Responses refer to the whole submission from respondents, while comments or issues refer to identifiable expressions of concern made within responses.

**Develop coding structure:** A coding structure was developed to facilitate logical grouping of submitted comments. Coding categories include the five revision topics listed in the NOI. Other topics were added to the list as letters were read and issues identified.

**Assign codes to comments:** Three readers/coders read and coded issues or comments in all responses submitted. Documents were compared and discussed to resolve discrepancies between the coders. The coding team attempted to identify all relevant issues, not just those represented by the majority of respondents.

**Prepare database:** All comments were coded and issues were entered into an electronic database.

**Develop digest of responses:** In the database, responses were assigned codes corresponding to issues identified in each individual response. With this database, the source of issues can be tracked to individual responses.

**Develop summary:** Using the revision topics given in the NOI, an outline was developed to display comments. Under these broad headings the summary describes the range of comments under each revision topic with representative comments from responses. Excerpts from responses are displayed in *italics* in Chapter 2 of this document. The revision team added no additional information and no efforts were made to correct or clarify the content of any response.

### **Demographics**

The demographic analysis is based on 705 total responses. Responses came in the form of letters, form letters, electronic mail, faxes, and personal visits.

Table 1 displays the number of responses by state. Responses were received from 30 states, the District of Columbia, and from members of the military in the Americas. Over half (61%) of responses were from people or agencies residing in West Virginia.

**Table 1 – Number of responses by state**

<i>State</i>	<i>Number of Responses</i>	<i>Percent Total</i>	<i>State</i>	<i>Number of Responses</i>	<i>Percent Total</i>
Armed Forces in America	2	0%	Missouri	6	1%
Arizona	1	0%	Montana	1	0%
California	3	0%	North Carolina	5	1%
Colorado	1	0%	New Jersey	1	0%
District of Columbia	9	1%	New Mexico	1	0%
Delaware	1	0%	New York	10	1%
Florida	1	0%	Ohio	24	3%
Georgia	1	0%	Oregon	1	0%
Hawaii	1	0%	Pennsylvania	26	4%
Illinois	2	0%	Tennessee	1	0%
Indiana	1	0%	Virginia	56	8%
Kentucky	3	0%	Vermont	1	0%
Louisiana	1	0%	Washington	4	1%
Massachusetts	2	0%	Wisconsin	1	0%
Maryland	57	8%	West Virginia	434	61%
Maine	1	0%	None Identified	47	7%
Michigan	3	0%			

Both individuals and organizations or agencies responded. Agencies and organizations listed in Table 2 represent official responses. Table 2 displays the number of responses by organization. For 92% of the respondents, no affiliation was noted.

**Table 2 – Number of responses by organization**

<i>Organization Name</i>	<i>Number of Responses</i>	<i>Percentage of total</i>
American Hiking Society	1	0%
American Whitewater	1	0%
City of Richwood	1	0%
Eastern Cougar Foundation	1	0%
Friends of Blackwater Inc.	1	0%
Friends of the Cheat	1	0%
Granny Gear Productions	1	0%
Greenbrier River Watershed Association	1	0%
Habitat for Humanity	1	0%
Heartwood	2	0%
House of Delegates, WV Legislature	1	0%
Huntington Museum of Art	1	0%
Jim C. Hamer Companies	1	0%
Marshall University	1	0%
Maryland Alliance for Greenway Improvement and Conservation	1	0%
Merrimack Valley Paddlers	1	0%
Mountaineer Audubon	1	0%
Mountaineer Chapter Trout Unlimited	1	0%
Potomac Valley Audubon Society	1	0%
Religious Campaign for Forest Conservation	1	0%
Richwood Area Chamber of Commerce	1	0%
Sassafras Ridge Farm	1	0%
Shavers Fork Coalition	1	0%
Snowshoe Mountain Resort	1	0%
The Access Fund	1	0%
The Rock House	1	0%
The Wilderness Society	2	0%
Tucker County Planning Commission	1	0%
University of Wisconsin-Madison	1	0%
USDA Natural Resource Conservation Service	1	0%
USDI Fish & Wildlife Service	1	0%
Virginians for Wilderness	1	0%
West Virginia University	1	0%
WV Chapter of Sierra Club	1	0%
WV Division of Natural Resources	1	0%
WV Highlands Conservancy	2	0%
WV National Wild Turkey Federation	1	0%
WV Rivers Coalition	3	0%
No affiliation noted	654	92%

Ten or more responses received separately but containing identical text are considered an organized response campaign. Once an organized response campaign is identified, a master list

of issues is entered into the database. All responses with matching text are then linked to this master list within the database. If a response does not contain all of the text of a given organized response, or if it includes additional text, it is entered as an individual letter. Organized campaigns represent 412 responses of the total 705 responses (about 58%).

Some form letters included additional comments from individuals. These were tracked separately for both form letters. Table 3 displays the number of responses by form letter, with and without additional comments.

**Table 3 – Number of responses by form letter**

<i>Type of Letter</i>	<i>Number of Responses</i>	<i>Percent of Total</i>
Form letter – no additional comments (900 and 902)	412	58%
Form letter – additional comments (901 and 903)	87	12%
Total responses	705	

## **Chapter 2 – Summary of Comments**

In this chapter, representative comments or issues are reproduced from individual responses and grouped under the headings created by the coding system. Statements in boxes are from the NOI. The *italicized* text is the individual comment or issue. The number(s) in parentheses after the comments are the individual response numbers. The order the issues are presented here does not represent any importance to one issue. The five general topics are in the order given in the NOI.

### ***Watershed Health***

Many responses addressed the need to protect water quality, aquatic life, and riparian areas. The need to control erosion and sedimentation and prevent flooding also was identified from responses. In plan revision, watershed health will likely be addressed through establishment of management area goals and standards and guidelines. The effects analysis will disclose impacts of Forest Plan alternatives on watershed health.

*Riparian area protection on all rivers and streams from logging, road building, recreation and other impacts must be increased. The clean water and healthy riparian and aquatic resources found on the Monongahela are among its more important and valuable resources. New riparian protection goals and standards must be written to reflect the best scientific understanding concerning riparian and aquatic resource protection. We have attached to our comments a copy of a very thorough scientific review on riparian buffers published by the Institute of Ecology, University of Georgia in 1999. The Forest Service should incorporate the strongest riparian and aquatic resource protection approach indicated by this report. This report should be incorporated into the planning record as part of our comments. (624)*

*When the Forest Plan was written the idea that someday people would pay for a drink of water was considered ridiculous. The idea that people would pay more*

*for 12 ounces of water than they would for a gallon of gasoline was absurd. Now we have 5-6 “brands” of water to choose from alongside the soda and beer in any store cooler. People carry bottles of water with them on a daily basis, not just when they’re out hiking in the woods. In many areas, people check their calendars to see if it is an “odd” or “even” day and whether their use of water will be restricted. Bottled water companies provide home delivery as the effects of chemicals and toxins in the environment have eliminated the possibility of clean well water. Water has become a precious commodity. (624)*

*In particular I want to stress the need for greater emphasis on watershed planning and protection. One of the primary goals for which the National Forests were established was watershed protection. It is time that that neglected goal be fully incorporated into the Monongahela Forest Plan. (682)*

*As a fisherman, I realize the wealth of resources we have with the National Forest. Many of these rivers are home to wild and native species of fish. My primary interest is to protect these rivers and creeks so that these great cold water species may continue to reproduce on their own, so that my son may some day stand with me in a pristine river in WV and fish for WILD trout. The state has set aside some small areas of catch and release to help protect these trout, but I believe this isn’t enough. I would like to see the National Forest designate larger stretches of c&r sections so that these fish can really have a chance! The poaching is really a problem and I really don’t see too many people being scared away from it. I think if we make the sections bigger, it will help buffer the impact of the poachers. (144)*

*I also urge you to pay special attention to those areas of planning that impact water quality. Do all possible to protect watersheds, rivers, and both constant and seasonal streams. I know how fragile water systems can be from watching drastic changes occur in my own community after even very limited development. The Monongahela does not need new roads, logging operations, drilling, or mines. These disturbances damage water quality not only in the forest itself, but also in outlying areas where water moving through the forest ends up. (051)*

*Enact recovery and greater protection for all riparian areas and streams throughout the Mon. The issues of increased stream sedimentation, stream infertility, acid rain deposits, and native trout habitat loss must be addressed in a pro-active manner. (014)*

*We are concerned that the Monongahela National Forest be managed carefully according to a well thought out plan that protects all its rivers and streams from the erosion that mining and logging have caused in the past. (017)*

Establish management area goals, and standards and guidelines, to improve watershed health in terms of ecological sustainability, including: ecological functions, riparian area management, erosion and sedimentation control, flood and flood damage control, and restoration of aquatic ecosystems.

### Riparian areas

Riparian areas include the transition area between the terrestrial and aquatic ecosystems. Responses stressed the need to protect and enhance the recovery of these areas on the Forest.

*Enact recovery and greater protection for all riparian areas and streams throughout the Mon. The issues of increased sedimentation, stream infertility, acid rain deposits, and native trout habitat loss must be addressed in a pro-active manner. Water has such strong symbolic value for peoples of faith that we take very seriously the way our public streams and waterways are care for. To degrade the very symbol of baptism for the Christian faith is truly an offense to those who practice Christianity. (014)*

*Increased protection for riparian areas along the creeks, streams, and rivers of the MNF. (034)*

*Riparian area protection should be increased. (068)*

### Erosion/sediment control

While erosion and sediment movement are natural processes, management actions can cause increases to background levels. Comments identified the need to protect fragile soils and other resources from impacts of soil movement.

*The issues of increase stream sedimentation, stream infertility, acid rain deposits, and native trout habitat loss must be addressed in a pro-active manner. (014)*

*Fragile MNF soils should be provided maximum protection from erosion and nutrient depletion. (070)*

### Flooding Concerns

Many responses express concern for possible increases in flooding due to management actions and request these activities be eliminated or impacts addressed.

*Any project requiring ground or canopy disturbance should evaluate the possible effects on flooding. The Monongahela National Forest was established with this as a primary purpose but it has not lived up to its mandate. This is not unique to the Monongahela; it has seen in other National Forests and Parks. Serious floods in 1985 and 1996, and more recent flash flooding, involved streams originating in*

*the National Forest where intensive logging had taken place. Any activities that increase the probability or intensity of flooding should be eliminated. (558)*

*A thorough assessment of the ecological conditions and management actions that cause or exacerbate the effect of flooding must be completed. The Monongahela National Forest was established with flood control as a primary purpose but has not lived up to its mandate. Serious floods in 1985 and 1996, and more recent flash flooding, involved streams of originating in the National Forest where intensive logging had taken place. Forest Plan standards and management area direction that will decrease the probability or intensity of flooding should be included in the revised Plan after this assessment is conducted. (624)*

*Devastating floods have occurred in recent years in and around the Forest. The origins of some of these floods have been traced back to areas where extensive logging has taken place. As development around the Forest increases (see below), flood prevention will play an even bigger role on the Monongahela. The Forest Service must assess and address the impacts of its management planning and activities on flooding in West Virginia watersheds. The agency should consider the recently released findings of the Flood Advisory Technical Taskforce appointed by Governor Bob Wise in response to the flooding which occurred in July of 2001. (624)*

*We would like to see steps taken to minimize floods and to prevent the deforestation that harms wildlife habitat. (017)*

*Any activities that may increase the intensity or probability of flooding w/in or outside forest boundaries should be eliminated. (021)*

*The effects of ground disturbance to flooding should be studied carefully to determine the connection and strategies implemented to avoid increased flooding. (076)*

*In addition, if logging of any sort is permitted, care should be taken that it does not increase the probability of flooding. (083)*

<p>Establish standards and guidelines to mitigate any adverse impacts on watersheds from acid deposition.</p>
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*Restore natural pH levels to acidic streams by use of lime (limestone) dispensing devices as necessary to promote the return of once native trout and other aquatic life. (621)*

*Treating streams with limestone fines has been highly successful in trout stream management. Recognizing that there remains to be a number of waters too acid (sic) to produce trout and other aquatic organisms, the revised forest plan should*

*provide for the treatment of these streams, including partnerships with other agencies/organizations. (676)*

## **Ecosystem Health**

An ecosystem has integrity, or is healthy, if it retains complexity and capacity for self-organization and sufficient diversity, within its structures and functions, to maintain the self-organizing complexity through time (Iverson and Cornett 1994). This definition considers forest health in a broad sense that encompasses multiple resource productivity and ecological values over the long-term. In plan revision, ecosystem health will likely be addressed through establishment of management area goals and standards and guidelines. The effects analysis will disclose impacts of Forest Plan alternatives on components of ecosystem health.

*I am not asking the Forest Service to abolish resource extraction or motorized vehicles within the Monongahela National Forest. I am merely pleading to revise the Forest Plan so that more acres are allocated for the preservation of natural ecosystems and wilderness habitats, areas to conduct ecological research, and the provision of a wilderness experience and the protection of wilderness attributes for future generations. (119)*

*Please visit the area. Get to know it intimately like an old friend. Let reverence and respect be your guides as you make decisions that affect the lives of native animals and plants. The Monongahela National Forest is a treasure. I urge you to consider its health and well-being by thinking larger than the next 50 years or even 100. Let's move to a model that mandates this land is protected and loved so that 7 generations from now our descendants can wander the top and pick those miraculous blueberries for their pancakes. (179)*

*The Monongahela National Forest is a precious gem that needs our help to keep it this way for future generation to come. Please do not allow the sprawl on human greed to damage this very special place. So few places like it are left near the East coast, that this really should be left as it is, to allow everyone now and for years to come to enjoy this place for what it is. NATURE and Natural. This doesn't mean mankind has no place there. But we should limit our impact while we visit this National Forest. (571)*

*Ecosystem Health and Integrity depend on the maintenance of ecological processes – and recovery depends on understanding and developing robustness of these processes. (648)*

## Native species

Comments received included suggestions to use no pesticides, herbicides, or genetically altered species on the Forest. The current Forest Plan emphasizes using native species if replanting or re-seeding is required.

*There should be no use of chemical pesticides or herbicides or genetically altered species within the Forest. (083)*

*Stop use of non-native species. (015)*

*Forest Plan standards should be written which clearly prohibit the use of non-native species in Forest management activities. Activities that lead to the spread of invasive species, such as road building and ground disturbance, need to be curtailed. This can be accomplished via general standards and guidelines or through specific management area direction (e.g. the prohibition on activities that encourage or allow the spread of non-native or invasive species in and around Research Natural Areas or other sensitive ecological areas). Forest Plan direction to monitor and eliminate these species needs to be developed and included in the revised Plan. (624)*

*As a native West Virginian, I am familiar with the forest and have concerns about the future direction of its management, in particular the management of rare and sensitive species. According to Forest Service Manual Chapter 2672.1, "Sensitive species of native plant and animal species must receive special management emphasis to ensure their viability and to preclude trends toward endangerment that would result in the need for Federal listing." Further: "There must be no impacts to sensitive species without an analysis of the significance of adverse effects on the populations, its habitat, and on the viability of the species as a whole. It is essential to establish population viability objectives when making decisions that would significantly reduce sensitive species numbers." I am particularly concerned for species like *Clintonia alleghaniensis* and *Viola appalachiensis*, which are low in number and occur in or adjacent to areas likely to be managed for other uses. If the current populations are not sustainable, suitable habitat not currently occupied by these species must also be protected to allow these species to reach stability. (552)*

*To manage these sensitive species according to the guidelines laid out in the Forest Service Manual, you must quantify the current distribution, status, and population trends for these species and then propose a management plan that will ensure their continued viability. (552)*

## Old growth

The Forest Plan defines old growth as a stand of trees older than normal rotation age for that forest type. Public comment generally focused on protecting existing old growth and protecting areas to become old growth.

*Protect all Old growth forest and historical resources from impacts/destruction. America is counting on you to protect these valuable national resources from overuse, greed, commercial theft, and unwise management. (057)*

*All old-growth in the MNF should be protected. Old growth should be defined as any tree eighty years old or older. This is the definition Senator Wyden used in his Northwest old-growth protection bill. (070)*

*Protect all old growth in the Mon Forest. (007)*

*I especially want to see special areas such as large tracts of undisturbed forest and wilderness and old growth stands protected from logging. (012)*

*I am especially concerned about preservation of natural habitat and old growth stands. I would like to see commercial logging curtailed if not completely ended. (019)*

*Protection of what we have: The older the growth, the more precious; The larger the area, the more valuable. Areas of any aged-growth are the future and need protection from more disturbance than I (a non-professional) know of: (036)*

## Forest/habitat fragmentation

An unfragmented forest was identified by public comments as a service the Monongahela should provide.

*Concentrate on provision of unfragmented forests, old-growth forest, Wilderness, remote wildlife habitat, dispersed recreational opportunities, and watershed protection. (131-137, 139-144, 147-149, 151-153, 155-160, 162-164, 166-172, 174-176, 178-179, 539-541, 572, 586-593, 595, 610, 613, 619, 621, 622, 635, 647, 661, 667, 675)*

*Unfragmented forests, old-growth forests, Wilderness, remote wildlife habitat, dispersed recreational opportunities, and watershed protection are examples of services that the Monongahela should be concentrating on. The private sector provides plenty of timber, early successional habitat, fragmented forests, and highly developed recreational opportunities. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127, 129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

Maintain red spruce, northern hardwood, and oak-hickory ecosystems at sustainable levels.

No public comments were identified that further define this issue as given in the NOI.

Identify appropriate conditions for use of prescribed fire to restore ecosystems, reduce hazardous fuels, maintain healthy forests and provide wildlife habitat.

### Prescribed fire

The use of controlled burning, or prescribed fire, is supported with limitations, by public comments.

*Prescribed burning for natural areas and forest management should only be used for small projects, infrequently, and only after per-burn flora and fauna surveys have been conducted and data analyzed for potential impacts. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 558-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

*The plan should provide for the use of prescribed fire, under appropriate conditions, for the maintenance and restoration of certain ecosystems. There are excellent opportunities, on the Monongahela, to manage for openings, blueberries, possibly scrub oak (*Quercus ilicifolia*), and early successional wildlife species through the use of fire. Vegetation mosaics, as a result of prescribed fire, can be a direct benefit to plants and animals alike. (676)*

*To address these concerns, the Forest Plan should encourage the expansion of prescribed burning research already initiated. In particular, research into the non-commercial application of fire to maintain native ecosystems should be specifically encouraged. Fire control policy for Wilderness and 6.1-6.2 areas should be revisited, and specific limits placed upon fire control methods in remote areas. (608)*

Update the current list of management indicator species. Replace some of the game species on the current list with non-game species that better represent habitats and species.

### Wildlife, management indicator species, Regional Forester's sensitive species

Many comments were received regarding management of wildlife in general on the Forest and the suggestion of changes needed to management indicator species and sensitive species lists. Management indicator species are used to track impacts of management on groups of wildlife species with similar habitat needs.

*While the list (sic) for forest interior species should be retained, the following species need to be added/updated/assessed: salamanders, tree frogs, bats, flying squirrels, snakes, lizards, etc. Four-legged mammalian (sic) species, including deer, that are classified as GAME species should be removed. (021)*

*Also you need to let up on the white tailed deer, I feel they are being hunted much to hard. (027)*

*Ceasing the enhancement and creation of deer habitat within the MNF. There are too many of these animals already and they are causing serious environmental damage to the forest. (034)*

*All enhancement projects for deer should stop. Deer populations are causing a lot of environmental damage to the forest that unless curtailed will lead to a forest without any diversity. (043)*

*Wildlife plans need to be updated. White-tail deer are abundant to the point of becoming a hazard. Other rare species such as bats, tree frogs, snakes and salamanders should be added to the list. Although some of these are less "cuddly" there (sic) are important for maintaining a healthy ecosystem. (072)*

*The so called "protection of endangered and threatened species" should be minimised (sic) I realize you are subject to certain federal laws but I question how important this concept is over time. (545)*

*I value the MNF for the habitat it provides for wildlife, habitat that continues to disappear on private land because of excessive human population and development. (553)*

*The list of Management Indicator Species (MIS) should be updated. Interior species presently on the list should stay. Bats, salamanders, tree frogs, and snakes are classes that should be added. White tailed deer, as a MIS, should be removed. I do not believe that the Forest Service should be enhancing deer habitat; but should strive for creating forest with biodiversity.*

*In the field population counts of Management Indicator Species should be the basis of all planning for ecological matters. Computer models that have not been tested and verified for precision and accuracy with multiple years of actual field data collected by qualified individuals have very limited application. Limitations need to be fully addressed and reconciled in the context of the upcoming EIS and subsequent Land and Resource Management Plan. (558)*

*We believe the protection of Threatened and Endangered species should be the first priority of the US Forest Service management plan. Formal consultation with the US Fish & Wildlife Service should be part of this plan, and inventories of the species should be made. (564)*

*The Monongahela National Forest supports a sparse population of cougars. To aid in the recovery of the eastern cougar, a federal endangered species, we recommend the following:*

*To minimize the contact between humans and cougars, which could result in the death of a cougar, existing roads that are closed to public vehicles should remain closed.*

*The ban on off road vehicles on the national forest should continue.*

*The Black Bear Sanctuary in the Cranberry Backcountry should continue. (623)*

*A study of the size and impact of deer populations on the biodiversity of the forest, as their current population densities seem to be creating a significant hazard, nuisance, and detrimental effect on forest health and biodiversity. We believe this information is critical to determining future management direction. We anticipate that a thorough analysis of deer populations and their impact on the forest may support a reduction or outright elimination of Forest Service goals and activities to increase deer habitat, browse and populations on the Monongahela. (624)*

*More emphasis on early successional wildlife species and their habitats. Many of these species (both game and non-game) are exhibiting population declines and with a large part of the forest now being 90 years old, habitat considerations for these species should be of primary importance. A strong timber management program could be used to alleviate some species concerns. I would hope that the size of tree regeneration areas would be sufficient to satisfy the life requirements of at least some of the early successional species. In the selection of management indicator species, some considerations should be given to declining non-game species or an early successional game species in order to appropriately monitor these habitats.*

*Gated and seeded roads, forming linear openings, are a direct benefit to many wildlife species and assist the public in walking travelways. (676)*

Establish guidelines to reduce negative impacts to forest health from plant and animal pests, including insect infestations and non-native invasive plant species.

### Invasive species

Invasive species are usually non-native species with few natural controls outside their home ranges. The issue of protection from invasive species was a concern for some responders.

*The Forest Service should take measures to curtail the spread of non-native species. Programs should be implemented to eliminate these species. (029)*

*Deer populations should be limited to protect the total biodiversity in the Forest. Deer overpopulation has been documented to have severe effects on understory vegetation and the wildlife that depend on it. Deer overpopulation also enhances the invasion of non-native species. (564)*

*Curtail activities that lead to the spread of invasive species, including road building and ground disturbance, and planting. Non-native species should cease to be used in Forest management activities. (131-137, 139-144, 147-149, 151-153, 155-160, 162-164, 166-172, 174-176, 178-179, 539-541, 572, 586-593, 595, 610, 613, 619, 621, 622, 635, 647, 661, 667, 675)*

### Pesticides/herbicides use

The range of comments on pesticides and herbicides was limited to a desire to eliminate use on National Forest lands.

*Do not use chemical pesticides and herbicides. (131-137, 139-144, 147-149, 151-153, 155-160, 162-164, 166-172, 174-176, 178-179, 539-541, 572, 586-593, 595, 610, 613, 619, 621, 622, 635, 647, 661, 667, 675)*

*Chemical pesticides and herbicides or genetically altered species should not be used on forest. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127, 129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

## **Vegetation Management**

Vegetation management includes commercial and non-commercial manipulation of plants on the Forest. Comments ranged from eliminate commercial harvest of timber to continue commercial logging. Some comments included issues dealing with specific silvicultural practices.

In plan revision, vegetation management will likely be addressed through establishment of management area goals and standards and guidelines. The effects analysis will disclose impacts of Forest Plan alternatives on forest vegetation.

*I worked for the Forest Service in the State of Washington in the summer of 1952 while enrolled at West Virginia University. I spent the first several weeks in training. Part of the training was spent in working along with a permanent crew whose main task was clearing trails of windfalls so that horses and men could have rapid access to a forest fire with tools, cutting (sic) and stacking windfalls and other debris so that it could be burned during the winter, when the danger of fire getting out of control was low, and in suppressing small fires before they become big. When fire season started, I was assigned to a forest lookout tower on top of an 8,000 foot mountain, where I stayed throughout the fire season (about 8 weeks) 24 hours a day. My tower was one of about 6 towers from which at least one human could see practically (sic) every square inch of the forest, and lighting strikes, continuously, and report any fire within minutes after it started. It is inconceivable to me (sic) that a (sic) fire could have gotten out of control with the preventative efforts the Forest Service invested in in (sic) 1952. (151)*

*I went back to the Salmo-Priest River (SP) ranger station at Sullivan Lake Washington last summer. There was no permanent crew performing preventative fire suppression work. I hiked 13 miles to the top of the mountain, climbing over deadfalls that no horse loader with tools could have managed. There (sic) lookout on top of the mountain, or in the entire forest. No debris piles were in evidence, and debris was scattered throughout the forest. I believe the Forest Service has forgotten that it is far better to prevent small fires from becoming large than it is to suppress large fires. (151)*

*The reasons for this story: (1) practice the fire prevention and detection that the Forest Service was good at in 1952. (2) Allowing logging companies to cut live trees is not the answer. Clean debris off the ground. (151)*

*As stated earlier, the primary role of the Monongahela National Forest should be to provide what private land does not, maintaining options and opportunities for the future, within the context of protection, restoration and enhancement of long-term forest ecological health and watershed integrity. We believe that all management activities and decisions, including the determination of the Allowable Sale Quantity (ASQ), actual harvest levels and vegetation management practices must contribute to the fulfillment of this role. (624)*

*I would like to see grazing permitted more under special use particularly in the Spruce Knob area, this was always a unique experience. These old usages are a part of the cultural and historical aspects of much of the area. Even the GSMNP is having second thoughts about this part of their management. (545)*

*I DON'T value the MNF as a pasture to graze livestock. Cattle feeding on public lands make an insignificant contribution to the food supply, take resources away from wild species, and further degrade the natural landscape. (553)*

Set the Forest Allowable Sale Quantity (ASQ).
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### Commercial logging

Comments ranged from eliminate commercial logging on the National Forest to continue commercial logging.

*Commercial logging in the Forest should be limited. (042)*

*Reduce or eliminate commercial logging, and require funds from any existing timber sales to go exclusively to habitat protection, restoration, and recreation efforts. (057)*

*I would take issue with the statement that the private sector provides plenty of timber – most of the unmanged (sic) forest have not provided a sustainable supply of quality logs, and the high grading harvest in private lands does not leave a thrifty stock of growing timber for the next generation. (061)*

*Commercial logging on Monongahela Forest lands should be reduced, limited, or terminated. I am not opposed to all logging on forest lands, but I do feel that should be a low priority in the plan. (081)*

*I'm a woodworker and housebuilder...I would prefer my wood to come from private land..not our forest. (182)*

*More emphasis on early successional wildlife species and their habitats. Many of these species (both game and non-game) are exhibiting population declines and with a large part of the forest now being 90 years old, habitat considerations for these species should be of primary importance. A strong timber management program could be used to alleviate some species concerns. I would hope that the size of tree regeneration areas would be sufficient to satisfy the life requirements of at least some of the early successional species. In the selection of management indicator species, some consideration should be given to declining non-game species or an early successional game species in order to appropriately monitor these habitats.*

*I recommend the continuation of the Spruce Knob Lake Grouse Management Area with the added emphasis of more frequent timber sale applications. A continued partnership with the both the Division of Natural Resources and The Ruffed Grouse Society would be of benefit to all concerned, including the hunting public. (676)*

*I think the current plan attempts to address all aspects of sustainable multiple use, ranging from various types of outdoor recreation to timber harvesting. This has been the traditional role for national forest lands. (099)*

*In conjunction with the ASQ, there needs to be a minimum harvest level set. This would provide a range to work within and ensure that timber is harvested – to start the balance age class distributions, improve forest health, and improve wildlife habitat.*

*I am opposed to commercial logging there for two reasons. 1. Lumbermen see the forest as cropland and a source of money that demeans the value of the forest for me. 2. I do not want my tax dollars spent supporting their private commercial use of the forest. I especially want to see special areas such as large tracts of undisturbed forest and wilderness and old growth stands. (012)*

*The commercial harvesting of timber on the Mon. should be stopped, and all timber subsidy monies re-directed toward local communities, for the hiring of timber workers and other local people to begin recovery of the Forest, through road closures, reforestation, alien-species removal, stream recovery work, and other projects. (014)*

*I now expect you to harvest more timber to make up for this oversight. One, to provide raw materials for the additional paper and envelopes used; and two, to generate revenue to offset the additional cost to the U.S. tax payers. (102)*

**Update standards and guidelines to accommodate appropriate silvicultural methodologies.**

### Silvicultural methods

Some comments address specific silvicultural actions while many other are more general in nature. Rotation ages and age class distributions were also addressed in comments.

*Logging should be continued on a sustainable basis using the very best techniques on road location and silvicultural systems especially on Red spruce. (545)*

*The Chamber also supports the selective cutting of timber in the forest (as **it matures**) and clear-cutting as a management tool for a functional and healthy forest. The recent wildfires out west have shown what can happen when National Forest are left to grow at their own pace, and selective cutting has been curtailed (due to the vocal objections by environmentalists, who wish to keep **all** trees, regardless of their condition). (607)*

*The current Forest Plan also responded to public concerns about rotation ages for timber and the impact these rotations have on habitat for black bear and other species requiring remote habitat. (LRPM -20). The final plan increased rotation ages. We encourage the Forest Service to further promote such remote habitats*

*and by extension the unique character of the Monongahela National Forest by further extending rotation ages on the Forest. (624)*

*Forest Plan has guidelines to maintain age class diversity with commercial timber harvesting. Many wildlife species need that diversity to provide the cover, food, and habitat necessary for healthy viable populations. (112)*

#### Pesticides/herbicides use

See comments under Ecosystem health revision topic.

Establish vegetation management goals to better represent ecosystems at appropriate scales.

No public comments were identified that further define this issue as given in the NOI.

Establish appropriate harvest levels to maintain the ecological function and supply of special forest products (i.e., mosses, medicinal herbs, mushrooms, firewood).

No public comments were identified that further define this issue as given in the NOI.

### **Visitor Opportunities and Access**

This revision topic generally refers to recreational uses of the Forest and levels of access to the forest. All types of trails, from foot traffic to all terrain vehicles, are addressed in many responses.

In plan revision, recreational uses and components such as roads and trails, will likely be addressed through establishment of management area goals and standards and guidelines. The effects analysis will disclose impacts of Forest Plan alternatives on recreational uses of the Forest.

*As this particular forest is so close to large population areas, the increasing public use needs to be kept in mind. It's wonderful to have such a site available for many people to use and enjoy. (063)*

*I strenuously oppose a blanket user fee for the use of the forest. I support campground fees provided the money is used to maintain and improve the campground where the fee is paid. (123)*

*The revision of the management plan for the Monongahela National Forest should reflect the extensive interest by whitewater boaters from all over the eastern seaboard. Some of the best whitewater paddling in the east is located in this Forest.*

*We would appreciate being able to continue to paddle these rivers and enjoy the aesthetics of the river/forest/camping experience. Any commercial uses of the Forest should not impact whitewater boating. Access points for boating should be maintained. And low impact use should be encouraged. (154)*

*The USFS should not fall into the trap of promoting the use of the forest. People will come! Usage and people are the root evil of many of it's problems and will continue as long as we maintain our lifestyle. (545)*

*I have hiked to Spruce, biked on the Greenbrier River trail, and visited a few caves. What attracts us to the area are its natural beauty, its unspoiled forests and streams, and its non-commercial ambiance. (551)*

*I believe it is crucial to provide a balanced plan of improved and nonimproved access to some of the most beautiful spots of the forest. Improved access should only be done in a way that compliments the natural surroundings. This will, with hopefully minimal impact, allow more people to experience the wonders of our forest and undoubtedly bring some economic benefit to many of the communities sprinkled throughout the Mon. (632)*

*The Monongahela National Forest has done a poor job of managing recreation resources. Staffing is simply insufficient; support for recreation is insufficient; creative ideas are lacking. There are so many opportunities to manage high-quality recreational experiences that are going unrecognized and unfulfilled. The previous Forest Plan promised much and delivered little; this needs change in the Plan Revision though (sic) acknowledging past mistakes, and by addressing current recreation issues clearly and honestly.*

*The Monongahela National Forest should develop and sustain quality recreation staff trained and experienced in semi-primitive/wildlands/backcountry recreation, wilderness management, developed recreation, interpretation, and knowledgeable in other natural resources including timber management and wildlife management. These individuals should be placed on the ranger districts and be supported by staff specialists in Elkins. (646)*

*I am an avid horseback rider who enjoys riding in our beautiful woodlands. I have just returned from a riding trip up at five lick and laurel fork. I have been going up there for 5yrs and now I see there is nowhere setup for people camping with horses. I was told that there were some ideas floating around about some horse accesible (sic) campgrounds. I was just wanting to say on behalf of our riding group it would be greatly appreciated. It does seem like it has a lot of potential to be a great place to continue going if we can have some place to camp with our horses. (702)*

## All terrain vehicles/off-road vehicles

Comments both in support of off-road vehicles and against allowing their use on the Forest were received. Comments included suggestions for a dedicated trail system for off-road vehicles.

*No access for off the road motor vehicles of any kind. (028)*

*The Forest Service should continue to prohibit all motorized vehicle usage not on maintained roads in the MNF. Off-road motorized vehicle usage is destructive to soil, vegetation and water quality. It cannot be adequately controlled.*

*Ban use of snowmobiles on the Highlands Scenic Highway. Trespass on to wilderness areas has not been monitored or adequately enforced. (035)*

*Future management should focus primarily on preserving these unique natural areas intact for future and current generations –not for commercial benefit from logging or often destructive commercial practices. Specifically—*

*--Continue to prohibit all motorized vehicle use off roads.*

*--End use of snowmobiles on roads unless their use can be shown to not have negative impacts. (057)*

*The ban on all motorized vehicles not on maintained roads needs to be enforced -- 4-wheelers, jeeps, ATVs and motorcycles are causing extensive, long-lasting damage to soils, vegetation, water quality and the recreational experiences of others. Ban snowmobiles on the Highlands Scenic Highway and enforce their prohibition from the neighboring Cranberry Wilderness. (058)*

*Have something like Hatfield & McCoy trails for A.T.V.'s & trail bikes. People would pay to ride on it. Make an A.T.V. trail out of the old railroad bed that goes through the Nat. Forest. (115)*

*I believe you should open up a part of the forest, for use by off road vehicles. There are many atv riders and we as tax payers should be given access to our national forest. (118)*

*I am very concerned that you are considering allowing the use of ATV's in the Mon. National Forest. My friends, family and I love to use the Cranberry area as a quiet get-away from the pressures of everyday living even though it is a 2-3 hour drive for us. Its unspoiled beauty can't be beaten for quiet hikes. I hope you will not let that be ruined. Please let the ATV owners seek private land to tear up with their noisy machines. (181)*

*Board members were later contacted and a majority of them agreed that the Chamber should ask representatives of the Monongahela National Forest to support the development of an Off-Road Vehicle (ORV) Trail in this area. (607)*

*I'm writing to express my opinion on four wheeler trails in the Monongahela National Forest. Personaly (sic) I think it would be wonderful. And it would also be great for the State of West Virginia. I live in Webster County, which takes in a lot of the National forest. I would like to see Cowen, Webster Springs, and Richwood linked up with trails. Since most of the States that surround West Virginia have trails through their National Forests, I think People would travel here to ride. It would be good for business not only for the people here but, for the State also. (120)*

Establish direction for the Forest trail systems.
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### Recreational trails

In this section are comments on the range of trails on the Forest and desired on the Forest. Trails for hiking, biking, and horseback use are desired by some commenters and not by others.

*I feel you need to do more work on the trails in the forest, some are in bad condition, we do not need to find ways to attract tourist to the forest, they have enough special places to see in our State the way it is. (027)*

*Even reasonable trails can cause damage in rains-so they need to be planned specifically for large crowds, for specific use and with weather in mind. (063)*

*A high quality trail system needs to be put in place emphasizing loop and connectors trails as described, but not implemented, in the current Forest Plan. This system should be capable of handling high capacity horse and mountain biking use, including commercial uses under administration of approved, managed or monitored special use permits. This system needs to include trails designed, constructed and maintained for such high impact trail users. A second system of non-descript, non-disturbing, non-commercial, hiking-only trails also needs to be established. Trail density standards should be enforced, as well as road and trail classes, and associated use standards. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

**NO MORE TRAILS** *should be constructed and roads needed for logging and mining should be “put to bed” as soon as no longer needed. Horses, ATVs and mountain bikes should be eliminated as much as feasible. I have seen and had bad experiences with all of these in the Cherokee NF and with horses in the GSNP. (545)*

*The current plan established trail construction and maintenance priorities emphasizing loop and connector trails. We support the construction of the trail system described in the current plan. (624)*

*Safety: Trails should be designed to allow for safe passage of one traveler by another by another, and provide for adequate visibility to avoid collisions. Design should account for varying speeds of travel.*

*Environmental protection: Trail surfaces should be designed to sustain all allowed uses under all conditions, or be managed with provisions that protect against environmental damage and erosion under certain conditions.*

*The experience of hiking: Trails developed for multiple uses should be designed with consideration given to the needs and concerns of people traveling on foot. (636)*

Update road and trail density guidance to maintain a variety of visitor experiences.
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## Roads

Both existing and future roads were the subjects of many comments. Protection of unroaded areas is addressed in comments under this issue sub-heading and under Land Allocation.

*Continuation and expansion of re-vegetation and stabilization of inherited industrial roads. Unnecessary roads should be obliterated in an environmentally sound way. Identification of “unnecessary” roads should a very balanced decision-making system which weighs all elements. We feel that the Shavers Fork from Bemis upstream needs to be carefully re-evaluated for roads, many of which might be significant sources of sedimentation. Access has been increased by the West Virginia Central Railroad, thus eliminating a need for so many roads. We would suggest that four access roads down to the river from the ridgetop FS 92 is excessive. A study of sediment sources from roads should be done for the area below Cheat Bridge similar to the study done above Cheat Bridge. We recommend this study be extended to the whole Forest. (573)*

*The current Forest Plan responded, at least in part, to a “large body of comment urging that those areas of the Forest now unroaded be left in that condition.” (LRMP – 18). New roads should be prohibited in all 6.1 areas and eliminated or sharply curtailed in all other management areas. Roads and road construction negatively affect wildlife habitat, water resources, opportunities for solitude and other primitive recreation opportunities on the forest. The ecological, economic, and social costs and damages from erosion, habitat disturbance, stream sedimentation, degraded water quality and other road impacts outweigh their benefits. Forest Service policy directs the construction of a revised Forest Plan within reasonable future funding parameters. The elimination of new road*

*building (and later maintenance and reconstruction) will help control future road system costs...*

*An analysis of the existing road system should be conducted in light of Forest Service budgetary requirements for maintenance and the system's impact on forest resources including fish and wildlife habitats, solitude, water quality and primitive recreational opportunities. This should lead to a list of existing roads that could be obliterated in an environmentally sound way without significantly reducing the efficiency of the current road system in implementing desired management objectives. The Wilderness Society's Ecology and Economics Research Department (EERD) has developed a software program called ROADNET, which makes this type of analysis easier. We would be happy to make the program available to the Monongahela Planning Team. (624)*

Establish guidance to maintain dispersed and developed recreation settings that provide customer satisfaction.
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No public comments were identified that further define this issue as given in the NOI.

## **Land Allocations**

This issue directly relates to the six decisions required during Forest Plan revision. In general, land allocation is the assignment of management areas and the goals and objectives of management of those areas. Comments received deal mainly with specific areas such as roadless, wild and scenic river designations, and wilderness.

The allocation of National Forest Land to various management areas will be a major part of the revision of the Forest Plan.

## **Research Natural Areas**

Research natural areas are defined in the current Forest Plan and are managed to protect unique botanical areas or National Natural Landmarks. Many responses included the comment to protect existing research natural areas

*Protect and enforce enclosures for all Research Natural Areas in the Monongahela National Forest from incompatible uses (horse and bike riding, motorized vehicles, plant collecting, etc.). (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127, 129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

*Protect from incompatible uses and enforce closures for all Research Natural Areas in the Monongahela National Forest. (131-137, 139-144, 147-149, 151-153, 155-160, 162-164, 166-172, 174-176, 178-179, 539-541, 572, 586-593, 595, 610, 613, 619, 621, 622, 635, 647, 661, 667, 675)*

Adjust Management Area boundaries where needed to incorporate ecological land types, current social demands, and management practicalities.

No public comments were identified that further define this issue as given in the NOI.

Establish Management Area(s) and appropriate standards and guidelines to protect rivers eligible for inclusion in the National Wild and Scenic River system.

### Wild and Scenic rivers

One of the decisions to be made during Plan revision is the recommendation to Congress on wild and scenic river corridor designation under the Wild and Scenic river act. Comments generally supported the designation of all rivers and river segments under study.

*All of the 12 rivers under consideration for Wild and Scenic status should indeed be designated as Wild and Scenic. (043)*

*Designate all 12 rivers as wild or scenic. (025)*

*I'm in favor of designating all 12 rivers in the forest under study for Wild and Scenic as such. (081)*

*We would suggest the use of a management area prescription strategy, which has been used successfully on the Green Mountain National Forest (GMFL) in Vermont. This strategy would be useful in managing riparian zones and rivers suitable for Wild and Scenic Rivers protection. The GMFL has a management area designation known as 9.4 for Wild and Scenic Rivers. The management area lies on top of the existing management areas on either side of the river and has special standards and guides to protect and enhance the unique characteristics of the river. Where standards and guides conflict between the under and overlying management areas, the more restrictive standards win out. This management strategy would be appropriate for both general riparian area management and protection of Wild and Scenic eligible or suitable rivers. (624)*

Determine whether any areas are appropriate for recommendation to Congress for Wilderness designation.

## Wilderness

One of the decisions to be made during Plan revision is the recommendation to Congress on any wilderness designations. Comments ranged from increasing the area currently designated as wilderness, to expressions that the current amount is sufficient.

*The expansion area north of the wilderness should be recommended for wilderness status and appended to the Dolly Sods Wilderness Area.*

*Roadless areas adjacent to any existing Wilderness should be appended to that Wilderness. (080)*

*The natural forests in West Virginia are a treasure. Please preserve them so my children & my children's children can experience undeveloped wilderness – expand these treasures – be courageous – the right choice is sometimes hard – be strong. (053)*

*I love to be able to go to the Cranberry Wilderness and Dolly sods, take family and friends there; for many of us, it is a spiritual experience unmatched by anything under a roof. Let's expand our natural world, not log and mine it to death. (056)*

*Designate areas of contiguous forest 500 acres or larger as special protected areas free from impacts. (057)*

*Although it cannot be contested that there is much demand for the valuable mineral and timber resources within the Mon National Forest, there is an equal if not greater demand for the spiritual resources such as the solitude and natural beauty that the forest has to offer. As a citizen of West Virginia, I myself find true peace of mind within the boundaries of the wild Mon National Forest. For me, this value of the land must be weighed above all others. When backpacking within the Mon, logging roads, clearcuts, and mine slurry detract immensely from my experience of wilderness.*

*We come to wilderness to escape the hard and unforgiving lines laid down by mankind. We come to appreciate the infinitely complex geometries of nature, the lush interconnectedness of natural ecosystems, and the silence that lies within them. (119)*

*Finally, I fully support the protection of unique natural areas of the forest. In addition to wilderness areas already declared, Dolly Sods North would seem to lend itself to some level of protection – backcountry status or something similar if it is not proposed for wilderness. I think the MNF has done more than a credible*

*job in protecting unique areas – Seneca Creek comes readily to mind in addition to the wilderness and backcountry areas. As additional areas are identified, I hope the effort continues. (123)*

*I am a regular visitor of the Monongahela National Forest and would like to take this opportunity to comment on its management. I believe strongly that the Monongahela's greatest value is in wilderness. The MNF is some wild and biologically rich country that is much needed in the eastern US. The value is both large areas of contiguous forest that are important to so many species, as well as large wild areas for recreation. Therefore I would like to see the entire Monongahela National Forest managed as though it were federally designated wilderness areas. (548)*

*I feel that the mix of Congressionally designated wilderness and wild areas is presently sufficient. I do not favor any additional wilderness or quasi-wilderness. (676)*

*I have a deep personal interest regarding the issue of use of the Monongahela National Forest. We are fortunate to have property that borders the forest in the magnificent Canaan Valley and we hike there extensively as often as we can. It is spectacular in its wildness and we are especially blessed to be so close to the Dolly Sods Wilderness Preserve (and hope for its planned expansion to the north sooner rather than later). We have also witnessed the horror of logging on the Allegheny Power land that the Canaan Valley Refuge just purchased. I understand the necessity for logging; that it is a renewable resource, that it is also an opportunity for employment.....but I urge you to wander the area that has just been logged to see the carnage that has been left in the wake of “progress and industry”. There has to be a better way and there has to be more intentional management of this wondrous resource. (179)*

*The Chamber also supports the **selective** cutting of timber in the forest (as it **matures**) and clear-cutting as a management tool for a functional and healthy forest. The recent wildfires out west have shown what can happen when National Forests are left to grow at their own pace, and selective cutting has been curtailed (due to the vocal objections by environmentalists, who wish to keep **all** trees, regardless of their condition). However, **we do not approve of increasing the size of Wilderness Areas** in the Monongahela. (607)*

*I am in favor of increasing the scope and size of the wilderness areas in the forest. This includes expanding the Cranberry Wilderness to include the Little Fork and Rough Run Opportunity Areas and expanding the Dolly Sods Wilderness to include recently acquired Forest Service lands to the north. (081)*

*No net loss of MP 6.2 & designation of wilderness study areas; more land should be managed w/no extraction; hire professional recreation person for the revision team. (113)*

Determine the most appropriate use for inventoried roadless areas.

## Roadless Areas

Areas of National Forest previously identified as roadless (RAREII areas) and the identification of new areas without roads currently came up in many responses. Comments ranged from support of adding adjacent roadless areas to wilderness to “release” of previously identified roadless areas.

*The Roadless Area Conservation Final Rule, 66 FR 3244, was put into effect on 12 January 2001, and then, for purely political reasons of dubious legality, its implementation was suspended. Although the rule is suspended for the National Forest System as a whole, there is nothing to say that the content of this rule cannot be implemented through individual Forest Plans. I believe that this course of action would be beneficial for the Monongahela National Forest. (125)*

*RARE II areas: Retain as such or study for Wilderness designation. (573)*

*I have the following comments & recommendations concerning the MNF plan Revision.*

*-Implementation of the complete Roadless Plan proposed by Pres. Clinton. (064)*

*Apparently inventoried roadless areas are an issue again. The Forest Service should comply with Congressional wishes when they released them for other purposes other than Wilderness. They are in fact set aside as long as we keep studying them and not doing anything with them. Lets abide by the wishes of Congress and do not set them aside for Wilderness or similar designation. (074)*

*All roadless areas and RARE II lands should be evaluated and recommended for Wilderness. (014)*

*All RARE II and roadless areas should be evaluated and recommended for Wilderness designation. Additionally, any roadless areas adjacent to existing Wilderness Areas should be appended to that Wilderness Area. Specifically, this would include expanding the Cranberry Wilderness to include the Little Fork and Rough Run Opportunity Areas, and expanding the Dolly Sods Wilderness to include the recently acquired Forest Service lands to it's (sic) north.*

*Furthermore the “Cheat Mountain Backcountry” should be evaluated for any potential Wilderness, and these lands should be designated as such. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

## **Potential revision topics not covered by the Notice of Intent**

Many responses included comments not covered by the broad revision topics listed in the NOI.

### **Threatened and Endangered Species**

Protection of threatened and endangered species and their habitats is required by federal law on federal land. In 2003 the Forest amended the Forest Plan for management of certain threatened and endangered species.

*Put high priority on protection of Threatened and Endangered Species. (007)*

*Protection of Threatened and Endangered Species should be the first priority of the USDA Forest Service. This should include protection and maintenance of biodiversity, including formal consultation with the US Fish and Wildlife Service. Thorough inventories of endangered species should be conducted. (070)*

*The so called “protection of endangered and threatened species” should be minimized (sic). (545)*

### **Gas and Mineral Exploration/Extraction**

Comments ranged from support of continued leasing of mineral rights on the Forest, to opposition to most mining on the National Forest. In Plan revision, gas and mineral extraction and exploration, will likely be addressed through establishment of management area goals and standards and guidelines. The effects analysis will disclose impacts of gas and mineral exploration and extraction on other resources and the impacts to the mineral program from other resources.

*The current forest plan placed little emphasis on the production of coal on the Monongahela National Forest. Coal mining is not consistent with the unique ecological, scenic, and social values of the Monongahela National Forest. The fragmented nature of the coal reserves under the Monongahela and the availability of coal outside the Forest support the preclusion of any new coal development on the Monongahela.*

*The 1985 plan resulted in a decision not to proceed with limestone quarrying on the National Forest because “limestone is available for private lands in the area.” Limestone quarrying does not promote the unique character of the Monongahela and should not be allowed on the Forest. (624)*

*It is crystal clear fact that the last quarter of the 20<sup>th</sup> century witnessed a trend toward decline and obsolescence of extractive industries, and rise of conservation dependent industries. This trend is ongoing, and becoming stronger with each passing year. It is critical to the lives of our people, for government to cease its*

*obsolete support system of subsidizing destruction of Appalachia's natural resources by extraction, and to encourage preservation of same. (046)*

*Clear cutting and strip-mining have taken a terrible toll on the land in and around Cold Knob. Enough has been taken. Its time to give back. (052)*

*I am opposed to mining & most logging (any other extractive industry use) in the Mon. (004)*

*We are concerned that the Monongahela National Forest be managed carefully according to a well thought out plan that protects all its rivers and streams from the erosion that mining and logging have caused in the past. (017)*

*Do not curtail exploration or leasing of mineral rights for oil and gas drilling, or mining. I recognize it is critical to have energy exploration from a national security perspective and I am willing to hike admidst (sic) pipelines knowing it will lessen our dependence on foreign sources of energy. (138)*

## Special uses

Special uses of the National Forest are those private uses of the Forest either by individuals or groups. These include such things as outfitter/guide permits to guide groups on the Forest as a business, placing a spring box on National Forest for household waters source, and conducting research on the Forest. Many responses include the suggestion to increase environmental protections when allowing such uses.

*Special use permits for the privilege of making money from using MNF lands and resources should include important environmental protection standards such as seasonal and weather-related restrictions, load restrictions, and trail restrictions. These permits should be issued for activities only in areas and on trails that are designed, constructed and maintained to withstand such intensive use without resource deterioration or impacts to other resources. The strict terms and conditions of these permits must be consistently enforced, and an effective monitoring program must be developed and implemented to ensure permitted uses are not negatively impacting resource or social conditions. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

*Standards and guidelines for special use permits for using National Forest System lands and resources should include important environmental protection standards such as seasonal and weather-related restrictions, load restrictions, and trail restrictions. These permits should be allowed for activities only in areas and on trails that are designed, constructed and maintained to withstand such intensive*

*use without resource deterioration or impacts to other resources. The Forest Plan should clearly state, either in Management Area prescriptions or general resource prescriptions the kinds and volume of special uses allowed and the locations where they are on and off limits. The strict terms and conditions of these permits must be consistently enforced and an effective monitoring program must be developed and implemented to ensure permitted uses are not negatively impacting resource or social conditions. As with other requirements for monitoring and evaluation we have proposed, monitoring during the use and post-permit must appear in the Forest Plan as a written standard. (624)*

## Law enforcement

Most comments on law enforcement dealt with the need to enforce present laws and regulations and to consider increases in law enforcement needs when revising the Forest Plan. Law enforcement needs will likely be considered a constant through all alternatives in the revision process.

*The second constricting factor is the ability to enforce legal uses of the National Forest. Staffing levels are tight, especially in law enforcement. We would like to see desired future conditions, management area prescriptions and standards and guidelines that describe a present and future for the forest that can (within reasonable limits) be enforced. Proposing more roads and trails or allowing certain uses without any hope of being able to monitor and enforce legal use would seem as out of step as proposing a Forest Plan for which there was no hope that Congress would increase the funding to achieve. (624)*

*The proliferation of off-road vehicle (ORV) use, including snowmobiles, since the last Plan's promulgation, warrants strong guidelines. ORVs represent one of the fastest growing threats to the integrity of our national forests, placing soil, vegetation and wildlife at risk, and they diminish the recreational experiences of other forest visitors. Despite to seriousness of these threats, ORV management by the Forest Service is currently inconsistent. Inadequate and unenforced laws and regulations result in illegal trespass, unauthorized trail creation, safety concerns and undue damage to sensitive habitat and resources. We urge the Forest Service to improve monitoring and enforcement of ORV use in the Monongahela and suspend any new ORV route development until appropriate monitoring and enforcement mechanisms are in place. (636)*

*Improve law enforcement activities in the Mon. Part of Godly stewardship on public lands is aggressively enforcing all regulations and laws, especially concerning illegal ATV's, off-road driving, illegal timbering, over-harvesting of native plants, and illegal resource utilization. (014)*

*Ban use of snowmobiles on the Highlands Scenic Highway. Trespass on to wilderness areas has not been monitored or adequately enforced. (035)*

*Increase law enforcement of all Forest Service's regulations. (064)*

*With the levying of campground fees, a dedicated source of funding for more enforcement is an absolute necessity. The resource is spread entirely too thin. Some of the issues I see are illegal ATV activity, lack of presence in campgrounds (people playing radios too loud, setting up camp late at night/early in the morning and disturbing other campers), and reports of vandalism to vehicles or theft from vehicles. While I realize it may not be practical (or even desirable) to have enforcement rangers standing around like cops in the city, the scarcity of enforcement patrols invites criminals and abuse of the resources. (123)*

## Land Acquisition

Generally, responses included comments favorable to the acquisition of more land to be added to the National Forest.

*I strongly support increasing the amount of money to buy more public land within the national forest boundaries. (043)*

*The Forest Service should undertake a renewed commitment to land acquisition with goals of:*

- *increasing the total acreage held within the proclamation boundary by 20% in the next ten years.*
- *making the Mon Forest a contiguous whole by purchasing connecting corridors and inholdings within and between the present patchwork of separated tracts.*
- *supplementing these acquisitions with leases/easements/rights-of-way where public ownership is not possible. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

*We urge the Forest Service to undertake more land acquisition, with a goal of making the Mon Forest a contiguous whole. We also urge you to promote conservations easements by private landowners within the Proclamation Boundary. (551)*

*Acquisition of additional land is a major issue in Tucker County especially since PILT payments are so low and the 25% fund is down from where it used to be.*

*Beyond payments to the local governments, however there are other issues the Forest Service should consider before simply buying more and more land. The Forest Service budget is down and will remain so for the foreseeable future. As a*

*consequence you probably don't have enough funding to adequately take care of the land you now have. (074)*

*Parcels of land adjacent to Wilderness lands (such as Dolly Sods, Roaring Plains, or Cranberry) should be considered for addition to the existing Wilderness areas to help maintain them as bulwark against encroaching development. (003)*

*If land acquisition is not possible, then the forest needs to try to purchase connecting corridors and/or rights of way and/or conservation easements on lands contiguous to some of the forest's fragmented tracts. (024)*

*The Forest Plan should include guidance on land acquisition and exchanges. Standards and guidelines describing criteria that set priority conditions for acquisition and exchange are appropriate in the resource sections. These standards and guidelines would focus on achieving desired future conditions across the forest and/or in particular management areas. The Wilderness Society recommends standards and guides which focus acquisition on unique and special habitats, connecting corridors, and eliminating inholdings. (624)*

### **Potential revision topics outside the revision process**

These issues or suggestions from public comments are considered outside the revision process because they do not fit the criteria listed in Chapter 1.

#### **Education**

Educational aspects of the mission of the National Forest are best addressed at the project level. Usually, educational programs do not require analysis under NEPA or NFMA.

*Education programs should be developed about the importance of endangered species and maintaining biodiversity. (558)*

*We have enjoyed Raptor programs, shows on wild life, treasure and "snipe" hunts. What a tremendous way for families to interact (sic) & tell stories and sing around the campfire. (671)*

#### **Partnerships and Collaborative Efforts**

Many responses included suggestions for partnerships between the Forest service and private or public entities. This issue will not likely be directly addressed in the Forest Plan revision as these opportunities are more suited to the project or program level of decision making.

*The Forest Service should also cooperate with Land Trusts and facilitate the protection of lands through conservation easements within the Proclamation Boundary. (082)*

*I recently attended a conference regarding USFS partnering with communities and I know our district has entered into several MOUs in the past with tourism and other groups. We would like to see more of these types of community efforts on the Mon in the future. (177)*

*Partnering for help in education, historic education, heritage tourism, preservation, and ecosystems education should be encouraged. Becoming involved with the Forest Heritage Area initiative could be valuable in furthering forest/Mon Forest education and appropriate use, as well as relationships with chambers of commerce, convention and visitors' bureaus, tourism businesses, and local historic groups. (573)*

*A continued partnership with both the Division of Natural Resources and The Ruffed Grouse Society would be of benefit to all concerned, including the hunting public. (676)*

## Public involvement

Responses included suggestions and reminders to keep the public informed throughout the Plan revision process and beyond. This issue will not be addressed directly in the Forest Plan itself as public involvement requirements are included in federal regulations, and Forest Service manual direction.

*As you embark on the process of planning for the management of National Forest Lands for the next decade, it is my hope that you will allow citizen comments to influence the decisions. The Monongahela National Forest is deemed "public" land. (083)*

*I understand that the National Forest Service seems to think that plans for National Forest are simply to be in the best interest of the Forest Service itself. This is far from the truth. As public property-it should be managed with the public in mind and for the benefit of the public. (063)*

*Public participation in Forest and Project Planning should be an important part of all decision making. The Monongahela National Forest is, after all, public land. (080)*

*Public participation in Forest and Project Planning should be an important and crucial part of all decision making. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

## Planning process

There were many comments on the planning process itself and how the Forest should work within the process. This issue will not be addressed directly in the Forest Plan itself, as the planning process is guided by federal regulations, and Forest Service manual direction.

*The first factor is monitoring and evaluation capabilities. We would like to see a plan built around an achievable monitoring and evaluation program. Standards that make project (during the project) and post-project monitoring and evaluation a requirement are a necessity. The public must be assured that the agency is learning from their work and practicing adaptive management as post-project monitoring and evaluation results come in. This must be combined with a more broadly defined monitoring and evaluation program that functions on a longer timeframe and assessed conditions in non-project areas. (624)*

*First, it is unclear why the Forest Service “propose(s) to narrow the scope of revising the Forest Plan by focusing on topics identified as being most critical in need of change.” Who has decided what is most critical, and on what basis? At the outset, the planning process should be completely open to any and all issues. People should be encouraged to voice any and all opinions. This is the very basis of our democracy, and the Forest Service should be enthusiastically encouraging input on as wide a range of Monongahela National Forest issues as possible. Narrowing the focus effectively eliminates issues from consideration simply because people won’t feel free to voice their opinions on what they themselves consider most critical. Narrowing is a restriction; it is trammeling the free exchange of information, and will have dramatic effects on those issues and concerns that are ultimately addressed and reconciled in the planning process. The Forest Service stands to loose much useful input as a result, and has missed a valuable opportunity. Although “additional topics may be identified” later on, forcing of issues at the outset will have repercussions throughout the entire process. (646)*

*The Plan is outdated simply because goals have changed and we have new information. (In a sense new information precedes changed goals). If we have different goals it is not apparent in your excellent paragraph of “setting”. This is a marvelous “common ground” of mutual understanding that could make this difficulty undertaking much less so – even a lot. We should refer to it often, and it would be profitable to expand upon it, as we could. Next you reassure us that additional topics can be added. We note the problems of perspective next in the details. Lastly you note topics not covered. Again, our perspective is that this revision must be so extensive that hardly anything can be excluded. You note that Wild & Scenic Rivers consideration would not be a part of the Plan; we say it must be. We also need your ultimate road plan, and we will attempt soon to get it. “Topics Related to Implementation Projects” you consider beyond the Plan’s scope; we do not know what you mean. Your handling of species recovery plans for Threatened and Endangered Species depends on it contents – not on its timing, so your proposal seems fine. (648)*

*Information about how well you did in the existing plan would help in making the new plan. Almost no information about accomplishments was available at the public meetings. For example, how much land has been purchased since 1986; where was it purchased and in which priority did it fit. How many permanent roads were constructed and what traffic service level were they? How many acres of land were cut over and how much clear cutting was done? What have the annual budgets been and what are the future trends? (074)*

*I would like to see the planning process expedited (EIS) and laws and guidelines changed so the preservationist attack through lawsuits do not have such a large impact on the plan implementation.*

### **Public issues to be addressed through analysis of effects**

The following issues are from public responses to the NOI. These topics, among others, will be addressed in the analysis of effects of alternatives and are not the basis for goals, outputs, or issues used to develop alternatives.

#### Private lands concerns

Concerns pertaining to private land brought up by the public generally focus on the differences between goods and services provided for on public land. Also, concerns were expressed on the effects of development of private lands to National Forest lands and the tie to land acquisition to prevent negative impacts.

In Plan revision, impacts to private land from management of the Monongahela will be addressed, and impacts from private land actions on National Forest resources will be addressed to the extent practical.

*Our hopes are in your ability to protect roadless areas and add to the wilderness acreage, to stop the scourge of 4-wheelers, snowmobiles and the like and the damage they cause, to limit logging and its attendant activities to lands in the private sector, and in sum, to do what is necessary to preserve the Forest. (013)*

*In addition to land acquisition, the Forest Service should also cooperate with Land Trusts and facilitate the protection of lands through conservation easements within the Proclamation Boundary. This is a critical objective because:*

- The goal of public ownership of the lands within the proclamation boundary is fundamental and longstanding*
- Opportunities for acquiring additional land are fast vanishing*
- The pace of development of key inholdings is sure to increase*
- There is a need for very large, wild, contiguous protected areas as habitat for vanishing, and recovering species*
- These same areas will provide quality recreational opportunities that are presently unavailable in the East. (030, 046, 050, 053, 061, 063,*

066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)

*The Monongahela National Forest should be providing for the public those goods and services not provided by the private sector. (078)*

## Historic and cultural resources

Protection of historic and cultural resources was identified as a need from public comments. In Forest Plan revision, this topic is likely to be addressed through standards and guidelines.

*Historical and cultural resources on the Forest need to be vigorously protected. More effort needs to be placed in educating and informing the public about the significance of these resources and the laws relating to their protection. (030, 046, 050, 053, 061, 063, 066-069, 078, 082, 084, 121, 124, 126, 127,129, 130, 146, 184, 185-287, 288-353, 355-538, 541-544, 546-550, 553, 554, 556, 557, 559-563, 566, 567, 569, 570, 574-578, 599, 600, 602, 606, 609, 616, 617, 627, 633, 642, 650, 651, 653-655, 663-664, 670, 674, 677, 678, 683-685, 687, 688, 692, 693, 696-701)*

*Lastly the Mon National Forest needs to give much greater attention to the protection of important natural, historical, and archeological resources. We stand to gain so much by showing off what we have to the outside world, and to educate ourselves more about them. (0580)*

*Historical and cultural resources on the Forest need to be identified and inventoried by the agency. A more comprehensive assessment of the historical and cultural resources known on the Forest to date and the efficiency of past protection standards and protocols will likely lead to better survey strategies, and more effective standards and guidelines for resource protection. (624)*

## Socio-Economic concerns

Social and economic concerns from public comments include the suggestion to partner with local communities, the role the National Forest can play in the local economy, and the suggestion to eliminate timber sales that do not make a profit.

*Above all, please, consider the vital importance of this land, this forest, these rivers. Pressure from population increase private & business interests will only become more intense as the years go by. (031)*

*Finally, the “Mon” needs to be far more active in economic partnering with “Gateway” towns such as Webster Springs, Richwood, and Marlinton. (052)*

*This would help to stimulate the local economy and the timber industries through increase timber sales and create jobs and take some of the pressure off private timber sales and reduce Forest Mgt. decisions made for economics only, so as to further sustain our future forests. (011)*

*Abolition of timber sales which do not leave a clear profit for the U.S. Government. In figuring profits, the impacts of logging on tourist-related industries must be considered. (034)*

*According to Forest Service Studies that I have read, recreation generates up to ten times the revenue for local communities than any of the extractive industries that USFS cater to. (122)*

## Air Quality

Responses noted that impacts from air pollution are occurring on the Forest and in the region. Continued research and cooperation in finding solutions and mitigations is suggested.

*Air pollution impacts due to acid rain and ozone are necessarily occurring across large areas of high-elevation and sensitive-soil habitats on the Monongahela National Forest. Widespread effects in upland and aquatic ecosystems are probably occurring. In addition, impacts linked to global climate change should be expected to occur across forest ecosystems. However, documentation of air pollution’s current and anticipated impacts appears to be limited, as has cooperation with other state and federal agencies to address these impacts. The Forest Plan should identify the variety of air pollution types and related impacts. It should also specify geographic and subject areas for research toward management solutions and mitigation. (608)*

*As people with a background in biology you know better than I the role of trees in filtering and purifying air. (032)*

## Biodiversity

The importance of preserving biodiversity on the Forest was brought out in several public comments. In Plan revision, this topic will be addressed through standards and guidelines that protect elements of diversity on the Forest and through designation of management areas and goals.

*Loggers and road builders will have grandchildren like the rest of us who will benefit from your preservation of land, water and diverse species, grandchildren*

*who would suffer in ways we can barely foresee, from climate changes on, if you succumb to short term but mighty pressures from business. (032)*

*While National Forest land has been designated such for its multi-use potential, certain uses of the land (such as logging, mining, and motorized vehicle use) impact other uses of the land (wildlife habitat, biological and geological research, and recreation) in a deleterious manner. As you are well aware, wilderness is a set of intricately interrelated networks, systems nested within systems, and if one aspect of a wilderness subsystem is affected, the effect will reverberate throughout the entirety of the larger system. The sensitivity of wilderness ecosystems to human actions cannot be denied. Resource extraction industries such as mining and timbering have direct and harmful impact on the health of wilderness ecosystems, and there is a wealth of empirical data (that you no doubt have access to) to support this assertion. (119)*

*Preservation of biodiversity on this planet is the most important challenge of our times. Future generations are dependent on your courage today. (524)*

## Appendix A - List of Preparers

Doug Adamo, Forest Planner (has since moved to another position)

Joshua Bixby, Forest Plan Analyst

Anita Kelley, Editorial Assistant

Bronwen Hamilton, Senior Community Employment Program Enrollee

Betty Roach, Senior Community Employment Program Enrollee

Melissa Thomas-Van Gundy, Natural Resource Specialist

## Appendix B – Notice of Intent

Attached is the text of the Notice of Intent published in the federal register on May 3, 2002.

Notice of Intent

[3410-11]

U.S. DEPARTMENT OF AGRICULTURE  
FOREST SERVICE

Revised Land and Resource Management Plan for the Monongahela National Forest:  
Barbour, Grant, Greenbrier, Nicholas, Pendleton, Pocahontas, Preston, Randolph, Tucker,  
and Webster Counties, West Virginia.

**AGENCY:** Forest Service, USDA

**ACTION:** Notice of Intent to prepare an environmental impact statement (EIS).

**SUMMARY:** The USDA Forest Service intends to prepare an environmental impact statement for revising the Monongahela National Forest Land and Resource Management Plan (*Forest Plan*) pursuant to 16 U.S.C. 1604(f) (5) and USDA Forest Service National Forest System Land and Resource Management Planning regulations. The revised *Forest Plan* will supersede the Forest Plan previously approved by the Regional Forester in January 1986, and *Forest Plan* amendments 1 through 5; dated June 24, 1988, April 20, 1990, June 28, 1991, October 1992, and August 27, 1992, respectively. The 1986 *Forest Plan* will remain in effect until this revision effort is completed. This notice identifies the topics that will help focus our revision effort, lists possible changes to the *Forest Plan*, displays the estimated dates for filing the EIS, provides information concerning public participation, and provides the names and addresses of the responsible agency official and the individuals who can provide additional information.

**DATES:** We need to receive your comments on this Notice of Intent in writing within 90 days after this notice is published in the **Federal Register**. The draft EIS should be available for public review by December 2004. The final EIS and revised *Forest Plan* are expected to be completed by December 2005.

**ADDRESSES:** Send written comments to: NOI – FP Revision, Monongahela National Forest, 200 Sycamore Street, Elkins, West Virginia 26241, or direct electronic mail to: r9\_monong\_website@fs.fed.us and “ATTN: Forest Plan Revision” in the subject line.

**FOR FURTHER INFORMATION CONTACT:** Doug Adamo, Forest Planner; or Kate Goodrich, Forest Public Affairs Officer at the address listed in the previous section, or by calling (304) 636-1800, fax number (304) 636-1875.

**RESPONSIBLE OFFICIAL:** The Responsible Official for this action is Donald L. Meyer, Acting Regional Forester, Eastern Region, 310 W. Wisconsin Avenue, Milwaukee, Wisconsin 53203.

**SUPPLEMENTARY INFORMATION:** The Regional Forester for the Eastern Region gives notice of the agency's intent to prepare an EIS to revise the Land and Resource Management Plan for the Monongahela National Forest (*Forest Plan*) pursuant to 16 U.S.C. 1604(f)(5) and USDA Forest Service National Forest System Land and Resource Management Planning regulations. The Regional Forester approved the original *Forest Plan* in January 1986. This *Forest Plan*, and the aforementioned plan amendments, guide the overall management of the Monongahela National Forest.

**Forest Plan Decisions:** We make six primary decisions in the *Forest Plan*, including:

1. Forest-wide multiple-use goals and objectives. Goals describe a desired condition to be achieved sometime in the future. Objectives are concise, time-specific statements of measurable planned results that respond to goals.
2. Forest-wide management requirements (standards and guidelines). These are limitations on management activities, or advisable courses of action that apply across the entire forest.
3. Management area direction applying to future activities in each management area. This is the desired future condition specified for certain portions of the forest, and the accompanying standards and guidelines to help achieve that condition.
4. Lands suited and not suited for resource use and production (such as timber management and grazing).
5. Monitoring and evaluation requirements needed to gauge how well the plan is being implemented.
6. Recommendations to Congress, if any (such as Wilderness or Wild and Scenic River designation).

The scope of this revision is limited to changing only those portions of the current *Forest Plan* that need revision, update, or correction. We propose to narrow the scope of revising the *Forest Plan* by focusing on topics identified as being most critically in need of change. The six decisions listed above will be revisited only in how they apply to the revision topics that are identified.

**Purpose and Need for Action:** There are three compelling reasons to revise the 1986 *Forest Plan*: (1) 15 years have passed since the Regional Forester approved the original *Forest Plan* for the Monongahela National Forest and national forests must revise the forest plan at least every 15 years according to requirements of the National Forest Management Act [U.S.C. 1604 (f)(5)]; (2) agency goals and objectives, along with other national guidance

for strategic plans and programs, have changed more than can effectively be covered by additional forest plan amendments; and (3) new information and changed conditions need to be taken into consideration.

**Setting:** Throughout the mid-Atlantic region, including the Potomac Highlands of the Appalachian Mountains, people value the opportunities public forests provide. These opportunities include enjoyment of recreation, solitude, nature study and scenic beauty. In addition to such opportunities, the public expects important benefits from managed forests. Benefits provided by the Monongahela National Forest include a natural, forested setting for hunting and fishing; commercial recreation events, relaxation with family and friends, a place to learn about West Virginia history and culture, and wilderness experience, as well as providing wood products, and natural gas and minerals. These benefits and opportunities, coupled with its proximity to population centers, make the Monongahela National Forest integral to the sense of place for communities across West Virginia, as well as for the entire mid-Atlantic region.

**Proposed Action:** The revision of the Monongahela *Forest Plan* will focus on management direction and other areas identified as most critically in need of change. The revision topics will be refined, and additional topics may be identified, through the public comment process, through monitoring and evaluation, and experience with implementation of the *Forest Plan* since 1986. The following preliminary revision topics and associated subtopics have been identified:

#### 1. Watershed Health

- Establish management area goals, and standards and guidelines, to improve watershed health in terms of ecological sustainability, including: ecological functions, riparian area management, erosion and sedimentation control, flood and flood damage control, and restoration of aquatic ecosystems.
- Establish standards and guidelines to mitigate any adverse impacts on watersheds from acid deposition.

#### 2. Ecosystem Health

- Maintain red spruce, northern hardwood, and oak-hickory ecosystems at sustainable levels.
- Identify appropriate conditions for use of prescribed fire to restore ecosystems, reduce hazardous fuels, maintain healthy forests and provide wildlife habitat.
- Update the current list of management indicator species. Replace some of the game species on the current list with non-game species that better represent habitats and species.

- Establish guidelines to reduce negative impacts to forest health from plant and animal pests, including insect infestations and non-native invasive plant species.

### 3. Vegetation Management

- Set the Forest Allowable Sale Quantity (ASQ).
- Update standards and guidelines to accommodate appropriate silvicultural methodologies.
- Establish vegetation management goals to better represent ecosystems at appropriate scales.
- Establish appropriate harvest levels to maintain the ecological function and supply of special forest products (i.e., mosses, medicinal herbs, mushrooms, firewood).

### 4. Visitor Opportunities and Access

- Establish direction for the Forest trail systems.
- Update road and trail density guidance to maintain a variety of visitor experiences.
- Establish guidance to maintain dispersed and developed recreation settings that provide customer satisfaction.

### 5. Land Allocations

- Adjust Management Area boundaries where needed to incorporate ecological land types, current social demands, and management practicalities.
- Establish Management Area(s) and appropriate standards and guidelines to protect rivers eligible for inclusion in the National Wild and Scenic River system.
- Determine whether any areas are appropriate for recommendation to Congress for Wilderness designation.
- Determine the most appropriate use for inventoried roadless areas.

When making decisions to revise the *Forest Plan*, we will examine economic and social impacts, as well as environmental impacts at local and sub-regional levels. Based on the above-mentioned preliminary revision topics and associated sub-topics, the Forest planning team is gathering information for an analysis of current and projected uses, demand, and capabilities of the Forest. Data gathering and analyses that are either underway or planned include a recreation feasibility study, a social assessment, evaluation of potential roadless

areas, special forest products inventories and species viability evaluations. Collectively, this information and analysis will contribute to our Analysis of the Management Situation. The Analysis of the Management Situation, studies, and related references compiled by the planning team, will be made available for public review upon completion.

In addition to the preliminary revision topics, we propose to revise the *Forest Plan* to:

- Make minor changes throughout the *Forest Plan* for new or updated information;
- Update the monitoring and evaluation strategy; and
- Incorporate the Scenery Management System (SMS) in place of the current system to evaluate visual resources.

**Topics Not Addressed in This Revision:** Forest plan decisions do not change laws, regulations or rights. The revised *Forest Plan* will only make decisions that apply to National Forest System lands. The *Forest Plan* will make no decisions regarding management or use of privately owned lands or reserved and outstanding mineral estates. Further suitability studies of Wild and Scenic Rivers will not be completed as a part of this Forest Plan revision. Topics related to implementing projects or enforcing regulations are also beyond the scope of what can be decided in a forest plan.

The management guidelines related to the federally listed (endangered) Indiana Bat and West Virginia Northern Flying Squirrel are not included as a revision topic because the Forest is currently amending the existing *Forest Plan* for these species based on formal consultation with the U.S. Department of Interior's Fish and Wildlife Service. Information about these species will be brought forward into the revised *Forest Plan* and does not need to be duplicated during the revision process. The alternatives in the final EIS will be analyzed for their effects on Threatened and Endangered Species.

Public comments received on topics that will not be addressed in the revised *Forest Plan* will be forwarded to the managers responsible for that topic area. The comments will be considered as managers develop information and proposals related to those topics. Such proposals may result in future plan amendments, changes in implementation, changes in program emphasis, or various other means of addressing concerns related to a particular topic. Implementation of proposals will be addressed as budget priorities allow.

**Possible Alternatives:** We will consider a range of alternatives when revising the *Forest Plan*. Alternatives will be developed to address different options to resolve issues raised about the proposed action, and the revision topics and proposals listed above, and to fulfill the purpose and need described earlier in this document. A "No Action" alternative is required and will be considered. For this analysis, the No Action alternative means that management would continue under the existing *Forest Plan* as amended.

**Decision Framework:** The Responsible Official will decide on the management direction for the Monongahela National Forest. The Responsible Official's choices will include:

1. The No Action Alternative, which would continue management under the current *Forest Plan* as amended; and
2. Alternatives developed during the revision process to address issues raised about the Proposed Action.

**Inviting Public Participation:** Following publication of this Notice of Intent, we will provide opportunities for public involvement including: a 90-day formal comment period, public meetings, written comments, website and e-mail. The Forest Service will host a series of public meetings to: (1) establish multiple opportunities for the public to generate ideas, concerns, and alternatives; (2) present and clarify proposed changes to the *Forest Plan*; (3) describe ways that individuals can respond to this Notice of Intent; and (4) invite comments from the public on this proposal for revising the *Forest Plan*.

The table below presents the schedule of initial meetings that will be held during the 90-day public comment period. If you need special accommodations, please contact Doug Adamo, Forest Planner; or Kate Goodrich, Forest Public Affairs Officer, by calling (304) 636-1800, fax number (304) 636-1875.

<b>Date</b>	<b>Location</b>	<b>Time</b>
June 15, 2002	Seneca Rocks Discovery Center Intersection of State Routes 28 and 33 Seneca Rocks, Pendleton County, West Virginia	Two Meetings: 9:00 a.m. – 12:00 noon 1:00 p.m. – 4:00 p.m.
June 17, 2002	Graceland Inn and Conference Center Davis and Elkins College 100 Campus Drive Elkins, West Virginia 26241	4:00 p.m. – 7:00 p.m.
June 18, 2002	Richwood Public Library White Avenue Richwood, West Virginia 26261	4:00 p.m. – 7:00 p.m.
June 20, 2002	McClintic Public Library 500 Eighth Street Marlinton, West Virginia 24954	4:00 p.m. – 7:00 p.m.
June 24, 2002	Blackwater Falls State Park Harr Conference Center Davis, West Virginia 26260	4:00 p.m. – 7:00 p.m.



**Proposed New Planning Regulations:** The U.S. Department of Agriculture (USDA) published new planning regulations in November of 2000. Concerns regarding the ability to implement these regulations prompted a review with probable revision of these regulations. On May 10, 2001, USDA Secretary Veneman signed an interim final rule allowing *Forest Plan* amendments or revisions initiated before May 9, 2002, to proceed either under the new planning rule or under the 1982 planning regulations. The Monongahela National Forest revision process will be initiated under the 1982 planning regulations, pending future direction in revised regulations.

**Early Notice of Importance of Public Participation in Subsequent Environmental Review:** A draft EIS will be prepared for comment. The comment period for the draft EIS will be 90 days from the date the U.S. Environmental Protection Agency publishes the Notice of Availability in the **Federal Register**.

The Forest Service believes it is important to provide reviewers notice of several court rulings related to public participation in the environmental review process. First, reviewers of draft environmental impact statements must structure their participation in the environmental review of the proposal so that it is meaningful and alerts an agency to the reviewer's position and contentions [*Vermont Yankee Nuclear Power Corp. v. NRDS*, 435 U.S. 519, 553 (1978)]. Also, environmental objections that could be raised at the draft environmental impact stage but that are not raised until after completion of the final environmental impact statement may be waived or dismissed by the courts [*City of Angoon v. Hodel*, 803 F.2d 1016, 1022 (9<sup>th</sup> cir. 1986) and *Wisconsin Heritages, Inc. v. Harris*, 490 F. Supp. 1334, 1338 (E.D. Wis. 1980)]. Because of these court rulings, it is very important that those interested in this proposed action participate by the close of the 90-day comment period so that substantive comments and objections are made available to the Forest Service at a time when it can meaningfully consider them and respond to them in the final environmental impact statement.

To assist the Forest Service in identifying and considering issues and concerns on the proposed action, comments on the draft environmental impact statement should be as specific as possible. It is also helpful if comments refer to specific pages or chapters of the draft environmental impact statement or the merits of the alternatives formulated and discussed in the statement. Reviewers may wish to refer to the Council of Environmental Quality Regulations (<http://ceq.eh.doe.gov/nepa/nepanet.htm>) for implementing the procedural provision of the National Environmental Policy Act at 40 CFR 1503.3 in addressing these points.