United States
Department
of Agriculture

Forest Service
Southern Region

January 1993

COMMENTS AND RESPONSES

Appendix I to the Final Environmental Impact Statement for the Revised Land and Resource Management Plan

GEORGE WASHINGTON NATIONAL FOREST

Virginia West Virginia

Appendix I - Environmental Impact Statement
COMMENTS AND RESPONSES

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How to Use Appendix I

To determine who made a specific comment -- for instance, the comment from Letter 3728 on page I-469 of this appendix. Use the first list, LIST OF COMMENTERS BY LETTER NUMBER.

To locate comments by the writer's name/affiliation:
-DETERMINE which affiliation code applies -- BUS (business), FED (federal organization or elected federal official), IND (individual), LOC (local government), ORG (organization, primarily special interest and industry groups), ST (state organizations and elected state officials).

-SCAN that code group -- in the LIST OF COMMENTERS BY AFFILIATION CODE -- for the writer's name. The number assigned to the letter is there also.

-CHOOSE from the Table of Contents the topic that best represents the writer's comment. Then scan that topic group for the appropriate sub-heading. Scan that sub-heading group for the letter number.

INTRODUCTION

This appendix presents comments -- from the public, private industry, and governments -- that are related to the Forest's draft versions of the *Revised Plan and Environmental Impact Statement.*

The *Draft Environmental Impact Statement for the Revised Land and Resource Management Plan* (DEIS) and the draft *Revised Land and Resource Management Plan* (Draft Revised Plan) were filed with the Environmental Protection Agency during the week of January 6 - 10, 1992. A "Notice of Availability" was published in the *Federal Register*, Volume 57, Number 12, Page 2093, on January 17, 1992 Based on this notice, the public was invited to comment on these documents until April 17, 1992.

In addition to the "Notice of Availability," we used a variety of methods in bringing these documents to the attention of interested persons The methods include distribution of published documents, news releases, public meetings, open houses, and contacts with organizations, cooperators, local government bodies, and Forest Service employees. Table A-1 in Appendix A contains a list of the public meetings and open houses held during the revision effort

Copies of the DEIS and Draft Revised Plan -- 656 copies of each -- were mailed to key organizations, agencies and individuals Copies of the six-page *Highlights of the Draft Revised Land and Resource Management Plan* were also included in the mailing. Additional copies of the documents were available at the Forest Supervisor's Office, ranger district offices and the Southern Region Office and were provided to persons who visited these offices and requested copies Copies of these documents were also mailed to the libraries listed on page 5-3 of the DEIS

By the end of April, 4,268 letters of comment were received in the Forest Supervisor's Office. The letters were reviewed, analyzed, and considered in preparing the FEIS and Revised Plan The 115 letters we received after April 30 were reviewed but not formally acknowledged or included in the FEIS All letters of comment to the DEIS and Draft Revised Plan are available for review at the Supervisor's Office, Harrisonburg, Virginia.

HOW APPENDIX I IS ORGANIZED

The following pages list the 4,268 letters of comment:

On pages I-2 to I-36, the list is in order by letter number and includes the name of the person who signed the letter

On pages I-37 to I-72, the second list is in order by affiliation code with letter number and name included The affiliation codes are. BUS = business; FED = federal organization or elected federal official, IND = individual (or at least no obvious affiliation with any agency or organization); LOC = local government; ORG = organization, primarily special interest and industry groups; ST = state organizations or elected state officials.

On pages I-72 to I-736, the comments themselves are reproduced and grouped by topic, then by sub-topic. The topics are.

BIODIVERSITY	RESOURCE SUSTAINABILITY
BELOW-COST TIMBER SALES	MINERALS
FOREST ACCESS	GYPSY MOTH AND OTHER PESTS
ALL-TERRAIN VEHICLE (ATV) USE	ADEQUACY OF THE REVISION
ROADLESS AREA MANAGEMENT	THE MIX OF GOODS AND SERVICES
SPECIAL MANAGEMENT AREAS	CULTURAL RESOURCES
AESTHETICS	LANDS
VEGETATION MANAGEMENT	OTHER COMMENTS

During the assignment a number to each letter of comment, numbers 876, 1301, 1344, 1483, 1796, 1801, 4222, 4261, and 4172 were inadvertently skipped and not assigned. Letters 9, 62, 79, 169, 172, 174, 868, 1137, 1171, 1172, 1328, 1438, 1553, 1560, 1908, 1912, 2168, 2630, 2631, 2702, 2747, 2857, 3810, 3888, 3936, 3937, 4014, 4056, 5187, 4215, 4216, 4218, and 4221 are on file with all other letters received, but contain no substantive comments

On pages I-737 to I-756 of this appendix, letters signed by representatives of state/federal agencies or elected officials are reproduced. The reproduction of these letters is in compliance with requirements of the National Environmental Policy Act. The Act requires publication of letters received from agencies/officials with environmental jurisdiction in the Forest's area of influence. Substantive comments from these letters are included with all other substantive comments on pages I-72 to I-736.

LIST OF COMMENTERS BY LETTER NUMBER

1	Peter Frustaci	60	Preston Stevens
2	Greg Demieville	61	Richard Spotts
3	McKelden Smith, M D	62	Richard Grabowski
4	Andrew MacSkimming	63	Clarence J Bennett
5	Walter and Dorothy Peleck	64	Mark Wallner
6	Jeff Taylor	65	Mark Wallner
7	Barbara Teach	66	William H Craig
8	Peter Preston	67	Robin Leonard
9	W. R Vaiden	68	Terry E Van Natter
10	Diane Eubanks	69	Dwaine Boone
11	Richard P Grist	70	J W Puckett
12	John Mash	71	David M Lupsha
13	Pat Drouillard	72	James E Loesel
14	Gregory J Balcerek	73	Ted Harriman
15	Bob Mueller	74	Gary Crawford
16	James E Loesel	75	Chris Burdette
17	James E Loesel	76	Eston Norton, Jr.
18	Frank Overbey	77	Jenny Mcbride
19	Thomas G Traver, Jr	78	James E Loesel
20	Jesse P. Moore	79	Frank A Devinney, Jr.
21	Vern Henderson	80	Julie A Kutruff
22	Skip and Pam Goodrich	81	W E Swygert, Jr
23	Morgan Saxby	82	James E Loesel
24	John S Barr	83	Keith M. Light
25	Debra C. Welch	84	Vernon Garber
26	Myranne O. Wylie	85	Vernon Garber
27	Michael Welch	86	Keith Light
28	Dennis T Conroy	87	James E. Loesel
29	Kris Jones	88	Richard P. Grist
30	Donald & Claudia Tyler	89	Chas. A. Tanner, Jr
31	Sandra Thompson	90	C E. McCallister
32	Elise Galloway	91	Gary Everhardt
33	Emmett Allen	92	Robert E. Lockhart
34	Connie Fisher	93	William A. Regan
35	David J Michel	94	Frederick Maisel, III
36	Steven Wylie	95	Larry Kemper
37	Michael Jones	96	David Rose
38	William A. Hook, Jr	97	Mark Millenbaugh
39	Brain and Jean McCarthy	98	Howard C Bailey
40	Bob Mueller	99	Ted Kyer
41	Janice and Jimmy Salmon	100	David Naylor
42	David Dagenhart, Jr	101	Steve Reinhold
43	Gary Ullrsi	102	Rodney Knight
44	Steve Winder	103	Reed Taylor
45	Dolores C. Acebo	104	James R Road
46	Carl Parsons	105	Terry R Gives
47	John L. Nachman	106	Kevin Bennett
48	Barry F Clutter	107	Daniel H Bragg, Jr
49	Michael J Papay	108	Philip Green
50	Stanley B Griffin	109	William D Martin
51	Elizabeth Murray	110	Randall Mullins
52	Bob Mueller	111	Sherry L Keiffer
53	Charles J Sabottes,	112	Charles R Stavers
54	Jim Coffin	113	Roger Legg
55	Lewis M Prichard	114	Robert Moss
56	Edward Dauchess	115	Robert Van Der Ham
57	Leon S Minckler, Ph D	116	Gary L Owens
58	Kenneth Friend	117	Jimmy D Lawson
59	John A Carter	118	D McMillin

119	Betty Stacey
120	James Bouyer
121	Michael E. Hinely
122	Ernest L. Lake
123	Vernon Young
124	Eugene K. Ward
125	Harold W Hilton
126	Bill Miller
127	Johnni Madison
128	Roy Hilton
129	Carl E. Gower
130	George David Green
131	J G Hurt
132	Joseph M Giuliani
133	James Rowan
134	Robert F Mueller
135	Elton A Ellison
136	David E Marsh
137	Sue J. Wright
138	Donald G Kirkpatrick
139	Appalachian Forest Management Group
140	Vernon Garber
141	Richard A. Jordan
142	Ernie Dickerman
143	John P. Fitzgerald
144	Petition
145	W. R Small
146	James E. Loesel
147	Doug Herbert
148	Melinda N Ross
149	Timothy J Cox
150	Alan Rice
151	John R Erskine
152	John Edwards
153	Mike Juban
154	Illegible Signature
155	Thomas D. Meisel
156	Russell L. Self
157	John Hannan
158	D E. Cox
159	Michael R. Gay
160	Chris Scott
161	Andre Johnson
162	Illegible Signature
163	Andrew Mchellon
164	Kallene R. Purl
165	Ross Weaver
166	R Scott Wallinger
167	Macon C Sammons, Jr
168	Catherine E Dick
169	Tom Eick
170	Greg Lemieux
171	M. A Jones
172	Ione Dusinberre
173	Marione Cobb
174	Stephen A Bennett
175	Kermit D. Reel
176	Mark Gardner
177	R J Beahm
178	Robert Hunsvcker
179	Larry W George
180	Alexis Zeigler
181	R E Hammond
182	Charles W. Houghton, D.D.S , M.S.
183	Harry L. Sargent
184	John E Montague
185	Robert F. Mueller
186	G B Foltz
187	Ralph E. Main, Jr.
188	James E. Loesel
189	Steve Henson
190	Don McElwee
191	Robert F. Nay
192	Franklin D Groves
193	John R Branch
194	Mr and Mrs. Charles Curtin
195	Christopher A. Spraker
196	M. L. Jennings, Jr.
197	Roger Thompson
198	Ann G Williams
199	Peter K Zimmerman
200	William J. Thurston
201	Robert E Williams
202	Charles E. Smith
203	M Scott Vail
204	Gary M. Wilcher
205	Ralph E. Helper
206	Otenia V Wallace
207	Donald L. Simpson
208	Danny Ross
209	Richard L Terrell
210	John Jackson
211	Mary T Ellis
212	Randy L. Lawson
213	Jerry R. Taylor, Sr
214	William T Hevener
215	Richard A Barber
216	James B Kelley, Jr
217	Gail P. Good
218	Vanessa Robinson
219	Ruth P. Altizer
220	John C. Bazzren
221	R Berkley Mays
222	Lonnie A Hayslett
223	Jerry E Ginger
224	Bobby C Augell
225	Donald D Scruggs
226	Darrel W Tucker
227	William H Tucker
228	Stuart C. Johnson
229	Richard K. Keith
230	Edward F Lesher
231	Herbert C Fruland
232	James W Railey, Jr.
233	Lawrence L Carpenter
234	Stephen R Burgess
235	James E. Salyen
236	Patsy G. Snead
237	William M. Conner
238	Thomas F Bowman
239	Jim Given
240	Russell W Lerno

241	William E Hinkle
242	William P Barber
243	Greg Lee
244	Robert S. Liggins
245	Arnold R. Persinger
246	John R Ruble
247	Ezra G. Halterman
248	T. L Neal
249	Charles W. Myers
250	Lindy Bazzria
251	Beverly R. Ervin
252	S Edward Woodcock
253	Ellen J. Candler
254	Freddie Z. Feazell
255	E G Huntington, Jr.
256	Dow E Mongold
257	Mike Grist
258	Jenny C Fenderson
259	R. Wayne Ogden
260	G Pettit
261	Dennis L. Hall
262	June Klement
263	Wesley L. McClung
264	Timothy H. Altizer
265	Henry C Jackson, Jr.
266	Diane C. Hicks
267	Ronald D. Bakes
268	Michael P Wade
269	James E. Burnette
270	Kevin Miller
271	Charles Demoss
272	Brett A. Laudermill
273	Jeffrey Bulischeck
274	W. A. Nikkel
275	C S Gailland
276	Charles L Horn
277	Glenn L. Whitehead
278	James E Loesel
279	Dan Phillipon
280	Bill Small
281	Raymond C Thomas, Jr.
282	Wayne A. Dixon
283	Gloria A Brooks
284	Collette Anderson
285	Lynn Cameron
286	Edward L Mccoy
287	Jody A Willoughby-Pesch
288	E. D Woodson
289	Rodney G. Strong
290	Don P Ruedi
291	Fred Austin
292	Charles S Yates
293	Stephen D. Delappe
294	Leff Moore
295	Robert Mueller
296	Curtis Seltzer
297	Anita J Haymaker
298	Kenneth R Haymaker
299	Ronald L Childs
300	Charles E Givens
301	James R Gibson, Jr
302	Gary E Thacker
303	Harvey L. Mustoe
304	Ernest Jones
305	William F Staton
306	Jennings L Morton
307	Robert W. Honts
308	Robert L Cook
309	George M Talley
310	Anthony E. Campbell
311	Steve M. Crawford
312	James M. Simmons
313	C. N Robertson
314	Darrell Z. Paxton
315	James V. Hefner
316	Richard Paul Lilly
317	Patricia K. Hartman
318	Calvin R. Worley, Sr.
319	Jerry Vess, Sr.
320	Patricia McPeek
321	David R White
322	Bertrand R Sway
323	Amanda, Angelina, Mimi Woo
324	Steve Kelliher
325	William H. Gillespie
326	John D. Farmer, Jr
327	Frederic Bocock
328	James Watson
329	Kenyon Kramer
330	David A Moyer
331	John H Burns, Jr
332	Richard E Lee
333	B N Stallard
334	Homer A Simmons
335	Floyd P Flanagan
336	Ralph D Hamilton
337	Billy Bostic
338	Jennie Hatcher
339	David K. Blankenship
340	Raymond C. Hunter
341	Stanley E. Wright, Sr
342	Michael A. Smith
343	Robert W Honts, II
344	Marlin G Rexrode
345	Charles H Zimmerman, Jr
346	Carl W Dressler
347	Garland H Altizer
348	Wilbur J Carpenter, Jr.
349	Kenneth Hacker
350	Anest Lake
351	Robert Moss
352	Michael Lee Barnhouse
353	Vernon H Young
354	Larry Knighton
355	James S Birchfield
356	Ray A Lockhart
357	Carl E Linkenhocker, Sr
358	Mont Andrew
359	Daniel Tyson
360	Alfred W Paxton
361	Estel B Clark
362	Sylvia R Ehlsinger

363	Gerall M. Pullin
364	James A Stinnett
365	Henry F. Turner
366	Owen R. Beale
367	James T. Phipps
368	Frank Sauber
369	Harry McIlvaine
370	Christopher S. Smith
371	J J. Murray
372	Ione Dusinberre
373	James R. Burruss
374	Barry F. Clutter
375	Shireen I. Parsons
376	Gene Smithson
377	Thomas M. Stanley
378	Michelle R. Fletcher
379	B Jack Warren
380	John H. Wick, III
381	Duke Keeter
382	Jay Farrell
383	Ronald Elliott
384	Calhoun W. Umphlett
385	Rick Holtz
386	Larry D. Look
387	Stephen P. Troxell
388	George Oxner
389	Stanford Green
390	H Neil Smith
391	W. Sloan Gavin
392	Mae Bolt
393	Hazel Green Meeke
394	Illegible Signature
395	Charles M Gavin, III
396	William Shelhorse
397	Robert Fickling
398	Steve Brown
399	W. C Blalcevey, Jr.
400	St Clair Walters
401	D Topper
402	Thomas Brinson
403	Kenneth & Carol Rexrode
404	J R. Swanbeck
405	W Haoris, Jr
406	Illegible Signature
407	Ralph White
408	Angelyn Ladue
409	Albert Shaleal
410	Daniel Sturkie
411	Larry Horne
412	A. C Thomas
413	A. B Jones
414	A W. Minchew
415	Clarence & Helen Harrison
416	Mary Kayaselcuk
417	Vince D. Elliott
418	Stephen T.
419	Robert Rose
420	A. Mason Gibbes
421	Illegible Signature
422	Shelby Green
423	Lagarr Burton
424	Mrs. K. C. Nash
425	L. Burton
426	Jesse Shirer
427	Robert P. Taylor
428	David Naylor
429	Eugene K. Ward
430	Grady A Isenhart
431	William C. Thomas
432	Carles Ellinkle
433	Gary E. Isenhart
434	W. C. Williams
435	Charles R. Clewery
436	Davis E Stull
437	Ruhl A Givens
438	William D Martin
439	Michael E. Hively
440	James Dempsy
441	Greg Hively
442	Johnnie Madison
443	Jeff Perkins
444	Jim C Homer
445	Danny Hopkins
446	Orval J. Russell
447	Wayne Smith
448	Robert Malasheirch
449	Timothy A Dick
450	Michael Ferrell
451	Michael W. Mytich
452	Michael Curtis
453	David W. Clarke
454	Patricia C. Watts
455	Wayland A Laudermilk
456	Mary Jane Mitchell
457	John C Harris
458	Mary Ann Tucker
459	Ronnal D. Bostic
460	Robinson Claytor
461	Alec White
462	Scott A Lacks
463	Donald W Wolfe
464	Charles R Campbell
465	Shelby Goode
466	Hunter A Smith
467	L. Doug Smith
468	L. E Smith
469	Kenny Goode
470	Kathy H. Campbell
471	Diana J. Twitty
472	Mrs A. W Harding
473	Ear. D. Hanna
474	Alston McClung
475	Ronnie Eaves
476	Douglas Creasey
477	Stephen Bradebaur
478	Jimmie Shelton
479	W. Lane McComas
480	Sarah Neal
481	Russell Mooney, Jr.
482	Charles Miller
483	Mrs Roni Wilkins
484	James Wilkins

485	Norman L Persinger
486	Dick Mortimer
487	Joseph W. Lancaster
488	Vickie A Boone
489	Roger F Freedman
490	John F. Rasor
491	Corrinne Le Bovit
492	Joseph McNamara
493	Ned Poyser
494	Harold E. Spode
495	Paul B. Lacy, Jr.
496	Beverly Worsley
497	David M. Newkirk
498	Ernest O Pugh
499	Donnie E. Wheatley
500	James E Loesel
501	Rachel Bardwell-Jones
502	Donald R. Ober
503	Jennifer Gaden
504	Anne W Kavanaugh
505	Stephen Nicholson, Ph D.
506	Jesse E Pullin, Jr.
507	A W. Harding
508	Richard M. Downer
509	Ricky W. Daily
510	Judy D King
511	Otis D. Boone
512	E L. Norton, Jr
513	Leonard R Waid
514	Greg Sparks
515	Jeff Morrison
516	Curtis McClung
517	Randy Berry
518	Danny R Brown
519	Samuel M Goodson
520	Steve Lamontagne
521	Jerry A. Mullins
522	Gary A. Roach
523	Steven A Brooks
524	Kenneth Posten
525	William D. Hicks
526	Kevin D Walters
527	Kelly D. Vandall
528	Steve Gill
529	Ken Gunter
530	Raymond L. Taylor
531	Charles W Walters
532	Tawny L Boggs
533	Benjamin E Campbell
534	Chris Burdette
535	Terry E VanNatter
536	Jacob Brown
537	Aruel Walters
538	Bumell Hamrick
539	Gary Crawford
540	Harry Carter
541	Robert W Mayer
542	Eugene Brugg
543	John Ferrell
544	Samuel K Shaffer
545	Marshall D Woods
546	Tim Goodson
547	David Simms
548	Garth D. Gunter
549	Charles M Hite
550	Michael Hardy
551	Ernest C Holliday
552	Macil Sandy
553	Richard D Redden
554	Brian Herndon
555	Ted Harriman
556	Billy Joe Harris
557	Jerry Martin
558	Dwight R Roach
559	Matthew S Tasker
560	Clyde S. Swartz
561	Jerry W Forbes
562	T. B Perry
563	Susie M. Plasters
564	D. F Miller
565	Jesse L. Drennen
566	Dreama R. Hostetler
567	Robert E Loving
568	Richard C Fridley
569	Michael S Bartley
570	R K. Thacker
571	Norman J Garvis
572	Kathryn H Craft
573	Ron Jeffries
574	Gary A Porterfield
575	Robert L. Deitz
576	Randall Caterbury
577	Alvin L Fox
578	Dwight S Hicks
579	Harold N Lacks
580	Charles And Debbie Jamison
581	Robert B Hale
582	W M. Hayslett
583	John J. Gillian
584	Richard E. Cooke, Jr
585	Jarret Perry, Jr
586	Jackie A. Keyser
587	Gary M Bowers
588	Charles Jones
589	Eugene E Young
590	David W McCormack
591	George Clark
592	Rodney Brown
593	Marvin E Faudice
594	Marcus G Smith
595	John And Aleata Gregory
596	Maynard A. Clark, Jr.
597	Cynthia D Lucas
598	Carrie E Gaines
599	Carolyn L Phillips
600	Charles W Pettigren
601	Jerry A Pugh
602	Joseph A Wimer
603	Mary E Azes
604	Ray Quarles
605	Gene N Snyder
606	Robert M Carter

607	Chester N Smith
608	Vernon Blankenship
609	Jimmie F Skelton
610	Roger D Smith
611	Nicholas T Kern
612	Dana R. Humphreys
613	Ellis W. Sellers
614	Jennifer J. Spraker
615	John Bennett
616	Barry G Calvert
617	Roger E. Smith
618	Kenneth W. Downes
619	Mr & Mrs. Thomas E. Ayers
620	William L. Sortain
621	Bruce A Chapman
622	Frederick J. Giles
623	Peggy Cash
624	Art & Jaunice Brumit
625	Larry W. Ruble
626	Gene B Breeden
627	Glenden L. Comer
628	Marcus C Weikle
629	Nancy H Pearmall
630	Hugh Robinson
631	Richard Ford
632	L Bryall
633	Charles Stuart
634	John Boothe
635	John Pitt
636	Harold Swuher
637	Eldon Hart
638	Steve Conrad
639	Claude Reams
640	William Rogers
641	James Woolford
642	Bob Dunn
643	William Carr
644	Homer Rewer
645	Mary Hall
646	Sara Richey
647	John Wilson
648	C M. Powell
649	Illegible Signature
650	Randolph Guthrie
651	Raymond Beers
652	Illegible Signature
653	John Todd
654	Sarah Eggleston
655	Albert J. Meyer, Jr
656	Veronica Horton
657	Illegible Signature
658	Julian Sider, Jr
659	Arthur Johnston
660	Emanuel Strauss
661	E. M. Strauss
662	Chalen Gordon
663	Betty Myurek
664	Ray P. Quarles
665	I B Loueton, Jr
666	Gerald Jetton
667	Jean Gower
668	T Charles Gower
669	F. J Bowman
670	John Mentzer
671	Dr Andrew Arnold
672	J T. McCoulb
673	Richard F
674	Irvine Kectledge
675	Charles Blanton Blackburn
676	Glenn Whitlow
677	Roy Byers
678	Ralph Dolan
679	Vivian Daniels
680	Ronald & Jean Hawk
681	W. W Baber
682	Leroy Parker
683	Illegible Signature
684	B. Norford
685	Richard Ferguson
686	Dewey Camp
687	Carolyn McDonald
688	Francis Shield
689	David Rost
690	Daniel Mann
691	John Gardner
692	John Heilmann
693	Edwin, Roy, Lorrain & Donald Reaves
694	Harry Chiles
695	Rachel Hourn
696	Lisa Eled
697	C. Benton Burns, M D.
698	Lewis Cootes
699	Claude & Lucille Webster
700	Lizzy Burge
701	John Parker, Jr
702	R. N. Parker
703	John Dennison
704	W. L. Bailey, III
705	Rodney E Wolfe, Sr.
706	Leonard W. Val
707	Don Hershey
708	Rebecca R Strong
709	Mike Bucher
710	Latane D. Brugh, Jr.
711	James R. Light
712	Charles S Wingfield
713	R Scott Peterson
714	Ray F Cheatham
715	Robert L Smith
716	Randy Morgan
717	Katherine Woodson
718	Andy Davis
719	Hal H Sharp
720	Richard Preston Lilly
721	Lana Oyler
722	Lonny A Zilkofoose
723	Homer Boggess
724	J. W. Puckett
725	Michael Rybarczyk
726	Harold Steele
727	W J Peters
728	Robert H. Thompson

729	John V. Glover
730	Dan Dessecker
731	Frank Cauraugh
732	Wm. Lee Hildebrandt
733	Raymond W Mullins
734	Hugh T. Henderson
735	Dan Miles
736	Harold M. Wilson
737	E. W Mays, Jr
738	Lin C. Hartung
739	Ben V. Peaman, Jr
740	Neal R. Fisher
741	James K. Saunders
742	Thomas Eiff
743	Mark Buzzard
744	Gary R. Wilson
745	G W Colbert
746	Jaycee Persinger, Jr
747	Gene Marples
748	Donald Seifert
749	Joseph R Newlon
750	Danny R. Arnold
751	William L Paxton, Jr.
752	Gloria Dressler
753	Charles W Whitmore
754	Alice Persinger
755	David E. Rideout
756	Harold B. Risher
757	Richard C. Rakes
758	Wendell M Cramer
759	Anne F. Hunter
760	Debra L. Weaver
761	Thomas B. Norman
762	David W. Yates
763	Edgar Pessemier
764	Donald A. Williamson, Jr
765	Mitchell O. Carr
766	Mark Trainer
767	Jennifer Howard
768	R. W. Denman
769	C Bruce Powell
770	C Bruce Powell
771	William T Shuler
772	Lenzy A Zickofoose
773	H Lang Gilbert
774	John F L. Bell
775	Keith E. Simmons
776	Dewey M Eary
777	Sterling R Snedegor
778	T H Leighton
779	Gary E Neyer
780	James A Terry
781	Louise K. Dooley
782	Oakey L Pruett, Jr
783	Robert R Terry
784	Matthew G Young
785	Carolyn D Young
786	Mary E Young
787	Michael D Henderson
788	Bobbie J Tucker
789	Oakland L Eggleston
790	Patricia F. Amos
791	Wanda K. Hepler
792	James J Foster, Ph.D
793	Richard W Shiflett
794	Gerald D. Burks
795	Charles Bodie
796	Adrienne Hall-Bodie
797	Eric Sheffield
798	Norman C. King
799	Wendy E Richards
800	Steve Richards
801	Albert Simoirds
802	Stuart Dencor
803	William Brewer
804	Harold Douglas
805	Mr. & Mrs. Ward McDavidson, III & Family
806	E. R Moss
807	Steve Allen
808	Jessie McCollough
809	No Signature
810	R E. Dostf
811	James Toflinger
812	Illegible Signature
813	Illegible Signature
814	Edwin Abbott
815	Mary Jane Hamilton
816	J Boyd
817	Greg Chapman
818	George Shriles
819	E A. Tuckevilles
820	William Maxey
821	Gene Glatfelty
822	Mr. & Mrs Robert Darden
823	Richard Starky
824	Francis Lewis
825	Mary Rose Martin
826	Clyde Pope
827	Vinson Bragg
828	Walter Jenkins
829	Gloria Shreue
830	Mark Hargin
831	Caroline Butts
832	A. Mcmelkin
833	Boyd Riddle
834	Maurice Eckman
835	Daniel Baxley
836	Jerry Dean
837	Walter Coles
838	Richard Carter
839	John Homer
840	Illegible Signature
841	Greg Burupas
842	Dick Grist
843	J. Calame, Sr
844	Linda C Criser
845	Glen H Criser
846	James R McAllister
847	Michael Drusinsky
848	A J "Chip" Corley
849	Thomas Beard
850	James Powell

851	Marlin Lawson
852	David A Dandridge
853	Charles W Poland
854	Charles W Newhall, Jr.
855	Mark E. Wallner
856	Franklin Early
857	Bev Anderson
858	Peter Beasley
859	Clarence Bennett
860	Harry S. McIlvaine
861	David G Lilly
862	James R Hays
863	Robert B. Seiple
864	Howard E. Cobb
865	Robert E Shively, Jr.
866	Dwain A. Tyree
867	William Edwin Winn
868	Chearyl Rogers
869	Steven Heintz
870	Randall Eller
871	Alden Holeywell Dreyer
872	Gerald J. Black
873	Thomas G Merring
874	David Guggenheim
875	Jerry C. McMaster
877	Margaret Sacuto
878	Marguerite Dickerson
879	Chris Lyddan
880	George C Patrick
881	Oliver Richards
882	Sherry J Pierson
883	William R Small
884	Mike Bodkin
885	E. Gray Baird
886	Jerry R. Taylor, Jr
887	O'Neill S. Umberger
888	Diana Oddenino
889	Wayne A. Rhodes
890	Wayne Davis
891	Elizabeth B Carson
892	Lee Mercer
893	William V. Parker
894	Lloyd Green
895	Jennings G McAbee
896	Ralph Adams
897	Sidney Woodson
898	Fred Whipple, Jr.
899	William Thompson
900	Melvin Stroud
901	J. Thompson
902	Patricia Estes
903	Robert Nort
904	Peter Beasley, II
905	Billy Margan
906	Howard Vincent
907	Philip Edwards
908	D. W. Northern
909	Bobby Taylor
910	J. Rhett Frazier, Jr
911	Harper Galford
912	Bill Walker
913	Willard Finney
914	Leroy Hinson, Jr
915	Nancy F. Qubain
916	Fahim I. Qubain
917	James S. Hill
918	Jean S. Porterfiled
919	Ronald Porterfield
920	James A Tyree, Jr.
921	John Jordan, Jr.
922	Norman E Murray
923	Edna Claire Thomas
924	Kathi J. Baker
925	Wendy L. Reardon
926	Melissa J. Keppel
927	L. C. Burks, Jr.
928	Richard And Meredith Childress
929	Tim And Donna Stalnaker
930	Connie S. Johnson
931	Clinton G. Sizemore, Sr.
932	Christopher Barlow
933	Pauline And Fred Dickens
934	Ken Novak
935	William G. O'Brien
936	D. G Austin
937	Richard P Grist
938	Frances Lee-Vandell
939	Marino D Medici
940	William H. Tanger
941	Cleve Benedict
942	William D Crull
943	William K Murray
944	Thomas M Debutts
945	Aubrey A. Smith
946	E. B. Gorham
947	Mr. And Mrs Gene Whorley
948	Richard Bell, Jr.
949	(Mrs) M. Moser
950	Trish Dinsmore
951	Steven L. Wylie
952	Steve E. Day
953	Frank Overbay
954	David Thompson
955	Carolyn Green
956	Johnathan Green
957	David Meise
958	Osborne L. Wade, Jr
959	Chris Boucher
960	Jason M Huss
961	Clayton W. Rhodes
962	Kathleen M. Rhodes
963	Dana Craster
964	Jonathan Roth
965	Andrew V. Goodell
966	C. T. Young
967	Mary & William Thompson
968	Henry Kopple
969	James E. Mcclary, Jr
970	Susan Crawford
971	Steve M Lawrence
972	Wallace D. Bowman
973	Peter Hartzler

974	Dwayne L. Pretzer
975	John J Clarke
976	Frank & Katja Richards
977	Ralph Perry
978	Frits & Jacqueline Van Der Leeden
979	E Cameron Pond
980	Boby Pittman
981	Charles A. Bodie
982	Adrienne Hall Bodie
983	H Earl Longest
984	Al R Pugh
985	R Creigh Deeds
986	Valerie Cook
987	Ralph W. Bolgiano
988	Pete Davis
989	David L. Hook
990	James E. Loesel
991	John Crites
992	William H Fiest, Jr.
993	R Carroll Conley, R Gibson, D Conley
994	Rodney D Chestnut
995	Harold Perry
996	Charles D. Cauley
997	Jerry Taylor
998	Jake Fauste
999	William C Miller
1000	James W Sullivan
1001	Lisa And Steve Shaughnessy
1002	Paula Childress Sullivan
1003	Larry Bolt
1004	Peggy Leasure
1005	Nancy Anderson Letcher
1006	Robert R. Clemons
1007	B C. Tucker
1008	Fred M Humphreys
1009	Glen R. Hugus
1010	Dorothy Schoenberg
1011	Ray Crush
1012	Richard Schoenberg
1013	W A Strang, Jr
1014	Thurmon Noel, Jr
1015	Kevin Donovan
1016	Thomas E Staudt
1017	Nancy Strang
1018	Mollie J Messimer
1019	Jesse Taylor
1020	Herbert & Mary Stotter
1021	Leslie L Youngblood, Jr
1022	Elizabeth J. Watson
1023	H S Crouch, Sr
1024	Mary R. White
1025	Donald G Drake
1026	Eunice L Austin
1027	Bailey Dixon
1028	Roma Nell Rowland
1029	Don Taylor
1030	John E Johnson
1031	Kay D Wyatt
1032	William L Gable, Jr
1033	Noble & Elizabeth Laesh
1034	Leslie W Ponton
1035	Carolyn S. Baber
1036	Leonard B Compton
1037	A Whitfield
1038	Florine Sweeney
1039	James W Owens
1040	Raymond S. Uromer
1041	William S Tuey
1042	Gene Berry
1043	Illegible Signature
1044	Edward Struck
1045	Larry Hower
1046	Jeff Clark
1047	Troy Williams
1048	Barbara Rain
1049	Timothy J Wedding
1050	Christopher Breault
1051	Betty M Rosson
1052	Michael T. Goinger
1053	Greg Gingerich
1054	Linda Frye
1055	Margaret Shady
1056	James W. McFarland
1057	Melanie W. Rickett
1058	Gary D Rickett
1059	Gary Taylor, M D
1060	Deborah B. Baker
1061	Jack Rogers
1062	Mr & Mrs Edward Ward
1063	Lowell Henry Johnson
1064	H J. Michaels, Jr
1065	Ross M Brown
1066	Bob Kerns
1067	Charles D Pierce
1068	Lillian E Rodgers
1069	Nancy Bower
1070	John L Vicoli
1071	Joan S Lindsey
1072	Ian J Torrence
1073	Gregory J Vassilakos
1074	Ron Griswold
1075	Jane Heyward
1076	R E. Kidder, M d
1077	E Palmer Taylor
1078	Lorri Gruner
1079	Jeffrey M Jensen
1080	Sally M Staudt
1081	Christina Bolgiano
1082	Sue Gier
1083	Thomas Y Savage
1084	David L Pack
1085	Traci Hickson
1086	Betty G Ware
1087	Allen L Hammer
1088	Barry L Crutchfield
1089	Brian K Peckins
1090	Larry Uman
1091	William C Sugg, Jr
1092	Dean S Owens
1093	Joyce Rowan
1094	Malcolm A Crosbie
1095	Michael R Skrovanek

1096	Gary H Swope
1097	Scott Craig
1098	Renee Hernandez
1099	E Judge Cohen
1100	Robert E Thomas
1101	Richard Weidner, Jr
1102	Henry W Lancaster
1103	Tim Sprouse
1104	Laura Brown
1105	Sara Maze
1106	Russell W. Watkins
1107	Gene Mcelwel
1108	Ronnie L. Keyser
1109	Rodney D Chestnut
1110	Janet N Batten
1111	Helen P Burnette
1112	John W. Smith
1113	C. J Entsminger, Jr
1114	Charlotte W Smith
1115	T. A Brown
1116	J Richards
1117	Glenn Dixon
1118	A Hydrick, Jr
1119	Robert Little
1120	Illegible Signature
1121	Betty Butler
1122	T R. Kiser
1123	Nora Wagoner
1124	William Dukes, Jr.
1125	Garland Humphries
1126	Linda P Williams
1127	Gary L Williams
1128	Margaret M Hottel
1129	Susan A Hess
1130	Margarel Foth
1131	Robert M. Bontrager
1132	Jo Ellen Emswiler
1133	Patti Warner
1134	Betty And William Springston
1135	Sharon Lucille Morris
1136	Nicole M. Freson
1137	James D. Williams
1138	Fred Thies
1139	Beth Swanson Kuhn
1140	B. R Mccartney
1141	F. A Lugar
1142	James T. Martin
1143	Ginger L Bucher
1144	Mike Stone
1145	William J Kautter
1146	Hamlet Tenel
1147	Bruce B Brenneman
1148	Will Kidd
1149	Gary C Murray, M.D
1150	James Faulconer
1151	Jeffery A Messenger
1152	Caroline E McCullough
1153	Charles E Sullivan
1154	Edwin C Bumbaugh
1155	Lynn & Malcolm Cameron
1156	Betsy Washington
1157	W A Chapin
1158	Lloyd and June Smith
1159	David W Hardy
1160	John K Byron
1161	L. Philip Bailey
1162	William F Piccolo, Jr
1163	Kevin McCormack
1164	Eric J Lundquist, Esq.
1165	Kathie S Ritchey
1166	James R Hileman
1167	Dorothy W. Painter
1168	Julie Davis
1169	Marlin P Krouse
1170	M E Plett
1171	Ron Swoope
1172	John P Cone
1173	Jack Fuson
1174	Madelyn Miller
1175	Rupert Palmer
1176	Roy Hanna
1177	John Jalmatr
1178	Jerry Mckee
1179	Bobby Hipp
1180	Russell Fritz, Jr
1181	Johnny Lambert
1182	Henry Thorton, Jr.
1183	Harper K Loury
1184	Don M Ailstock
1185	Harry W Simmons
1186	William C. Robertson
1187	Raymond Reibach
1188	John S
1189	Jeanne Causin
1190	Tim Medley
1191	Philip Hyre
1192	Kenneth Novak
1193	Marion Brown
1194	Scott Williams
1195	Robert French
1196	Robert Garst
1197	Sara Lagerholm
1198	Joanna Martin
1199	Coleman Easterly
1200	Frank Mackey
1201	John D Vice, Sr.
1202	David Jarrett
1203	Catherine B Martin
1204	John H Reeves, Jr.
1205	Ms Carter Stubbs Drake
1206	Cheryl A. Beswick
1207	Mildred M Cox
1208	Carol Felton
1209	Ed Houff
1210	Terry Houff
1211	Mel Maher
1212	John Burcham
1213	Heather Juls
1214	Charles J Churchman
1215	Jane E Cox
1216	Thomas Vison, III
1217	Sandra Stuart

1218	Pete Mohoney
1219	William B Grant
1220	Bruce A Wiggins, Ph D
1221	James R Smuler
1222	Warren Crowder
1223	Cary Ashly
1224	Polly H Taylor
1225	Charles A Nalley
1226	Nathaniel H Axtell
1228	Richard McClung
1229	James McCoy
1230	Robert Merrill
1231	O'Neal
1232	James Rice, Jr
1233	Ardelle Cole
1234	Gene Oliner
1235	Robert Speten
1236	James Wilson
1237	George Garman
1238	Winston Sibley
1239	Stanley Higdon
1240	J Yowell
1241	Howard Hevener
1242	Ethelind McIntosh
1243	Otto Warner
1244	Frances Judy
1245	Carl Lipton
1246	Dr. & Mrs William Courtney
1247	Ethelind McIntosh
1248	C. Wigenton
1249	Adele Wood
1250	Charles D Pitts
1251	Woodrow W Wallis
1252	Thomas G. Eick
1253	Harry S McIlvaine
1254	Bonnie R Walker
1255	Wm Phillip Gibbs
1256	M M Homan, Jr.
1257	Edwin L. Mccoy
1258	Lawrence Straus
1259	Lisa G Schoener
1260	Jill & Rich Hoehlein
1261	J D. Martin
1262	Henry J Eick
1263	Jennifer L Hupp
1264	Calvert S Fitzgerald
1265	Donald E. Buckland
1266	Tony And Wanda Hubbard
1267	Michael Field
1268	Joseph E Conley
1269	Steve Collins
1270	Philip J. Statton
1271	Douglas E. Fletcher
1272	Mr & Mrs C A Hazen, Jr
1273	Ed Walters
1274	Betty L Sullivan
1275	Alice J Towne
1276	Paul J Belczyk
1277	Crystal Theodore
1278	E Anne Susen
1279	A B Sayers Jr
1280	Clinton W Mills
1281	James W. Youngblood
1282	Charles W Green
1283	David R. Forrer
1284	Kenneth F. Powell
1285	E. F. Oliver
1286	William A Cobb
1287	Clifton Ellis
1288	Linda A Barton
1289	Daniel W Dougherty
1290	Wallace E McIntyre
1291	Charles W. Hamric
1292	Judy L. Barr
1293	James C. Phillips
1294	Marin E Glaze
1295	Charles E Lugar
1296	Pam Malley
1297	Suzanne R Schaeffer
1298	Bernard C Zlomek
1299	Virgina B Jordan
1300	David E Ayers
1302	Michael J Sullivan
1303	Paul D Zimmerman
1304	Charles F. Finley, Jr.
1305	Timothy Woody
1306	Kenny A Grandstaff
1307	Larry E. Orr
1308	Reid Harris, Ph D.
1309	John M Gregory
1310	James W. Clarke
1311	Doug Davis
1312	Paul H. Delong
1313	Betty Golloway
1314	Joe D Perdue
1315	John F Vallelonga
1316	Warren R Dickens
1317	Margaret R White
1318	R E Fawley
1319	Jimmie F. Shelton
1320	Sarah Drain
1321	Conrad B Burriss
1322	Willard R. Owens
1323	Hazel Heddings
1324	Harold D Hunt
1325	Orest Pizzoferrato
1326	Roger Lyon
1327	Simon D Fenney
1328	Melvin G Truman
1329	David Luthin
1330	M Kirsten Luescher
1331	Ken Archer
1332	James C Ayres
1333	Donald D Reed
1334	Curtis F Ball
1335	Earl G Reedy
1336	Claudie R Koon
1337	Cyril I Kendrick
1338	Carey M Copeland
1339	Garry T Griffith
1340	Danny Moore
1341	J Bradley Rhodenizer

1342	Herbert W. Taylor
1343	Michael Gray
1345	Thurman Mace
1346	Earl T. Chandler
1347	John L. Burkett
1348	H. D. Pole
1349	Janet Eddy
1350	Opal Ruth Baker
1351	William W. Gainer
1352	David E. Denham
1353	Tom Catlett
1354	Kevin J. Smead
1355	M L. McClung
1356	Mr. & Mrs Lewis L. Mays
1357	Anne Y Stagdale
1358	R E. Owens
1359	Hal A Fuller
1360	Edgar Spencer
1361	Tunis J. Lyon
1362	Menil F. Powell
1363	Larry Martin
1364	Tom Balas
1365	Thomas E. Street
1366	Jack C. Sturgill
1367	Leonard A Smith, Jr
1368	Faye C Cooper
1369	Joe T. Evans
1370	John A. Cruickshank
1371	James Elwood Perry
1372	John H. Spencer
1373	David P. Bookman
1374	Herbert L. Freeman, Jr
1375	Stan Parham
1376	Paul D Powell
1377	Michael Lee Mccoy
1378	Kenneth L Heitner
1379	Joe Young
1380	Ann Stuart
1381	Dennis Harbour
1382	Robert Harbour
1383	Ricky Harbour
1384	Joe Young
1385	John Franklin
1386	Thomas Childress
1387	Gail Pigeon
1388	Joe Nasr
1389	T. Novry
1390	James A. Arritt
1391	Freddy E. Holley, Jr.
1392	Thomas L. Long
1393	Garland Ebert
1394	Willie Craig
1395	Charles Logsden
1396	Gary Strawderman
1397	Howard Dempsey
1398	Hatler Morgan
1399	Michael Moghtader
1400	Guy M Henderson
1401	Mike Roebuck
1402	Cary Roebuck
1403	Snoda Hendricks
1404	Don Megert
1405	Charles Lloyd, II
1406	William Garrett
1407	Philip Green
1408	Betty Stacy
1409	Alan Rice
1410	Marshall Clendenin
1411	Gus Grisson
1412	Robert F. Woods
1413	Daniel Ash
1414	Donald Waugh
1415	David Mason
1416	Cindy Ash
1417	Tommy L. Stanley
1418	John H. Tyler
1419	Raymond Jackson
1420	Joseph Rogers
1421	Carl E. Clark
1422	April E Staudt
1423	Samuel T. Staudt
1424	Carl E Gainer
1425	Bruce A. Schick
1426	Dave Lupsha
1427	Charles Matlock
1428	B. A Mullican, Sr
1429	James A. Parker
1430	Wayne K. Newcomb
1431	Bob Radspinner
1432	Robert R. Feagans
1433	Forest R Wiest
1434	Nancy M Wilson
1435	John E Estep
1436	Mark W. Younkins
1437	Lynn Cameron
1438	Michael Dagerhart
1439	Kenneth Watson-Jones
1440	Stephanie Billon
1441	Robert C Deacon
1442	Thomas D Scanlan
1443	Mary M. Haney
1444	Robert E. Hepfner
1445	J. B. Murray
1446	Kenney P. Funderburke, Jr.
1447	Nancy K. Harding
1448	Luca Di Cecco
1449	Roy S Sites, Ph D
1450	L. Ryan Hodges, III
1451	Allen W Stultz
1452	Randall L. Mullins
1453	William F. Cox
1454	Alan Kincheloe
1455	David E. Gouthers
1456	H Thomas Fretwell
1457	Samuel B Mozza
1458	Ellen Chan
1459	Jimmy D. Lawson
1460	William W. Hacker
1461	Donald L. Beale
1462	Samuel Kesterson
1463	Carl E Gowen
1464	James R Roach

1465	David Rose
1466	James E Bowyer
1467	Tony Gwinn
1468	Harold W. Hilton
1469	Roger D Legg
1470	Robert Van Der Horn
1471	Gary L Owens
1472	Stephen Nicholas
1473	Drexel McMillion
1474	Roger Lyon
1475	Todd Martin
1476	Barbara S Miller
1477	Ronald G Rain
1478	Darlene L Newman
1479	Dale Diaz
1480	Donna Brooks
1481	Dennis Referir
1482	Fred And Cheryl Lavy
1484	Ann E Miller
1485	Ernie Dickerman
1486	Nee-Yin Chou
1487	Marian G Taliaferro
1488	Amy V Derezinski
1489	Lynn Smith
1490	Elaine S Smith
1491	Mearl Witcher
1492	John Hickman
1493	Andy Gall
1494	D. W Kirby
1495	Dan Lynch
1496	Harry Hale
1497	Dale Simmons
1498	Lester Hodges
1499	Jonathan Long
1500	Joe Lewis
1501	J. R Summerlin
1502	Ernest Stebbins
1503	Marlene Clendenin
1504	J Little
1505	B Stewart
1506	Wallace Buchanan
1507	John Reed
1508	Roy Shryoc
1509	Harold Lott
1510	H Mccoy
1511	Mrs C Osborn
1512	Louis B
1513	W Cellie
1514	Beth Plummer
1515	Charles Feagans, Jr
1516	Robert Neary
1517	Larry Loden
1518	Roy Helmick
1519	Michael L Massey
1520	Tijana Radoaevic'
1521	April L Bush
1522	Jody Venn
1523	James Snyder
1524	June Arnold
1525	Earl Henderson
1526	Rena Henderson
1527	Sandra Andrick
1528	Ben Ritter
1529	Charles D. Pierce
1530	Lois Pieper
1531	Roger Andrick
1532	Harvey Ferris
1533	Lanan Staunton
1534	Alan Moore
1535	Greg Cantley
1536	Ty Cantley
1537	W Steve Thompson
1538	Robert L Thompson
1539	Robert J. Wood
1540	Dale Early
1541	Harold Templeton
1542	Thomas R.
1543	Wayne A. Barfield
1544	Walter F Perkins
1545	Edward O Stinson
1546	Katherine S Firsching
1547	Clarence Chapman
1548	Robert D Wells
1549	Jeff Byrd
1550	Leslie Ray Brown
1551	Ivan H Shefrin
1552	Karl P. Ritchey
1553	Richard L. Crodelock
1554	Rachel Easterly
1555	Watkins M Abbitt, Jr
1556	John G Leigh
1557	Benjamin Axleroad (The Rev.)
1558	Gail Taber Steele
1559	Charles W Thompson
1560	James Carter
1561	Louis Bernstein
1562	John B. Veach, Jr
1563	Ronald O Sheets
1564	James E. Waller
1565	Curtis Zopp
1566	Donald McCaig
1567	Lossie F. Walker
1568	Tom Marchensky
1569	Dale A Mcmillen
1570	B L Tackett
1571	Frank W Saunders
1572	Kenny Rhoades
1573	Mark Williams
1574	Gene Pullri
1575	Misty Williams
1576	Brad Hickman
1577	Lorie Keyser
1578	Karen Kling
1579	Wendy King
1580	Greg Woodzell
1581	No Signature
1582	Timothy Morton
1583	Becky Hanson
1584	Andrea Gram
1585	Lee Roy Glimer
1586	Melissa Ryder
1587	Melinda Cauley

1588	Tracey Kay
1589	Jennifer Roberts
1590	Carol Hicks
1591	Brandy Tidd
1592	Nathan (illegible last name)
1593	Corey McElwee
1594	Antonio Presey
1595	Kevin Campbell
1596	Heather Morgan
1597	Josh Smith
1598	Amanda M Gibson
1599	Eric Essex
1600	Heather Bryan
1601	Y Intercept
1602	Maury Young
1603	Victoria E. Walton
1604	Alexander Gattinger
1605	Amanda Ray
1606	Warren Woodzell
1607	Terry A. King
1608	Joe David, Md
1609	Glenn M Birch
1610	E W Lautenschlager
1611	Dawn M Leland
1612	Mack C Weaver
1613	Helen Timbrook
1614	David W Moles
1615	Paul M Hendricks, M d.
1616	Malcolm Henry
1617	Fred Lockard
1618	Denver Sheets
1619	Alonzo Sirianni
1620	S E Breeden
1621	J Eddy G Craig Jr
1622	William Foot
1623	Laurel Foot
1624	Thomas W Current
1625	Richard Dye
1626	Marina Gopadze
1627	R Scott Criss
1628	Peter D. Gayer
1629	Franklin D. Chestnut
1630	Luca Di Ceco
1631	Johnny L Hill
1632	B P. Schwanda
1633	O J. Rozell
1634	Bernice C Renn
1635	R H Beauchamp
1636	Dan E. French
1637	Herbert B Murphy
1638	Richard K. Hamilton
1639	Les Strawderman
1640	Philip D. Pannill
1641	Gary Totten
1642	William S. Kerr
1643	David Husaw
1644	James E. Loesel
1645	James E. Loesel
1646	Karl R Abner
1647	David Conrad
1648	Charles G Backus
1649	Dave Crites
1650	Stacey D Clevenger
1651	Julianne Craig
1652	Wingate H. Lucas
1653	Tony Wilt
1654	Ted Bowen
1655	Gregory A Shilling
1656	Kay Peaslee
1657	John A Heard
1658	Robert D. Whipkey
1659	Terry Short
1660	Ronald Seiss
1661	Jerry Thompson
1662	David Horton
1663	Loretta D Reeves
1664	Robert G Schoonover
1665	Tony Rosi
1666	Gary L. Wooldridge
1667	Alfred W Cumby
1668	John H Gilbert
1669	Philip C Johnson
1670	Gary G Youngblood
1671	Linda S. Murr
1672	Rufus H Parker, Jr
1673	Eric Sheffield
1674	William D Scherer
1675	Donald L. Dorrier
1676	Jane Melbourne
1677	Harold Everson
1678	Kirby P Funderburke
1679	Robin F. Leonard
1680	R Cassidy
1681	James E Crosier
1682	Robert L Miller
1683	Kathie Jensen
1684	Angelica Heath
1685	John Mcpheter
1686	William M Meredith
1687	Andy Foster
1688	Gary Godfrey
1689	Bobby D Gibson
1690	Karen Green
1691	Anna Alford
1692	Randy Coots
1693	Richard Ray
1694	Raymond Goad
1695	Harold Adkins
1696	Fred Muir
1697	Anthony Quinn
1698	Ricky Diller
1699	Tanya L K. Denckla
1700	Richard P Wettstone
1701	Susan B Lynch
1702	Robert J Derenge
1703	Shireen I Parsons
1704	Janene E Osborn
1705	Kathi Baker
1706	Elizabeth K. Hetz
1707	Andy Hetz
1708	Gary Dubler
1709	Jane Mechem

1710	Gerard Fitzpatrick
1711	John Wooley
1712	Hollis Large
1713	Chandler Warner
1714	Gary Robinson
1715	Scott Hatfield
1716	Stan Retzaldr
1717	Joyce Gross
1718	Illegible Signature
1719	Stanley Gazelle
1720	J. E. Harris
1721	James Hill, Jr
1722	Gary Swain
1723	Arleno Serafini
1724	J. Powell, Jr.
1725	Bill Hoffman
1726	Kenton & Robin Bower
1727	Donald Studer
1728	Robert Baker
1729	Garland W. Kessinger
1730	Kristen Umstat
1731	Jean Patten
1732	Elizabeth Cottrell
1733	Jay Roberts
1734	Cindy Spencer
1735	Dicker Peverall
1736	Chris Peverall
1737	Steven And Jamie Greenway
1738	Emily Coleman-Wolf
1739	Billy Mitchell
1740	Crystal Coleman-Wolf
1741	Laurence Loesel
1742	William Edward Loesel
1743	Howdy Henritz
1744	Jim Huthrip
1745	Frankie Greenway
1746	Brandi Spence
1747	Elizabeth Mccory-Irons
1748	Ed Lyons
1749	Virginia L. Decher
1750	Illegible Signature
1751	Pete D Corbett, III
1752	Grover C Mitchell
1753	Calie Mitchell, Jr.
1754	Natalie Tritt
1755	W R Tritt
1756	Susan H Peverall
1757	Eugene T Nervo
1758	Robert Stahl
1759	Betty Vermillion
1760	Karen S Stahl
1761	Laura J Spitzer
1762	David L Weiss
1763	Illegible Signature
1764	Anne Cutler
1765	Ellen Coleman
1766	Chris Rich
1767	Lois M Welele
1768	Ed Tucker
1769	Garnett Mohler
1770	Beth Stahl
1771	Tom Brobson
1772	Elizabeth Rich
1773	Harriet Hodges
1774	Fred C Jones, III
1775	Paul Herling
1776	William W. Richardson
1777	Mark Willis
1778	Donna Willis
1779	Emily Peverall
1780	John Pollock
1781	Laura Williams
1782	Gaea Ric
1783	Mitchell Davis
1784	Kelly Pollock
1785	John Flynn
1786	Joyce Morgan
1787	David J. Hirschman
1788	Mary Pearl Compton
1789	Jane E Johnston
1790	A. W. Webb, Jr.
1791	Robert H. Hunt
1792	Olivia Bilenky
1793	Matthew S Thomas
1794	Carrie Crawford
1795	Bill Wolf
1797	William L. Mays
1798	Barry C. Jeffries
1799	Richard Addison Siler
1800	Richard C. Siler
1802	Mike McCormack
1803	Randy Spear
1804	W C Mead
1805	Mr. & Mrs Ted Berg
1806	Hugo Kostelni
1807	Fred Lockard
1808	Randal Flanagan
1809	Eve D. Fout
1810	John Watson-Jones
1811	Mr Stanley B. Griffin
1812	Mary F Wirth
1813	Walter Barker
1814	R. L Saunders
1815	Robert M Inghram
1816	Bill Rosolowsky
1817	Richard J. Byrd
1818	Charles P Allen
1819	William E Matics
1820	Robert A Bare
1821	Anthony P Mollish
1822	Kay Peaslee
1823	Dr Donna R Kuroda
1824	James G Tennant
1825	Franklin D Lambert
1826	Stephen Patterson
1827	Donald L Evans
1828	Charlie Patterson
1829	F L Greer
1830	Clayton L Cowan
1831	Richard W Martin
1832	A G Burris, Jr
1833	Ross Whitacre

1834	Sherman G White
1835	Suzanne S. Warden
1836	H. Bryan Mitchell
1837	Michael Mccarley
1838	John L Eye
1839	Larry G Farley
1840	Joseph Mollish
1841	Jane Bay
1842	Raymond L Hawkins
1843	William J. Woods
1844	Steven S McCauley
1845	Stephen Troxill
1846	James C. Breeden
1847	Rick Wellbeloved-Stone
1848	Richard A. Currence
1849	Sarah Faulconer
1850	John R Martin
1851	William A. Scofield
1852	Raymond W. and Esther P. Locke
1853	Daniel J. Holt
1854	Dr David Dwight Mulligan
1855	Charles R. Lloyd
1856	Ray Binaco
1857	Patrick J. Murray
1858	Eric S. Smith
1859	Autumn Bell
1860	Charles T Philpott, Jr
1861	Kathleen Wissinger
1862	Louise N. Medman
1863	Ken C Kowalski
1864	Christobel B. Keathley
1865	Lawrence R. Burton, Jr.
1866	Craig Alan Atkins
1867	Marvin B. Rexrode
1868	Mardell K. George
1869	Ted Brenig
1870	Mike Nelson
1871	Richard Woody
1872	Freddie L Moore
1873	James J Geary
1874	Charles Montague
1875	Betty Rosson
1876	Patrick T. Sullivan
1877	Herbert Murray
1878	Samuel J. Gamble
1879	Donald A. Barrow
1880	Jeffrey L. Lowman
1881	Leroy Cochran
1882	Hobart O. Butler, Jr.
1883	Craig Melby
1884	Pete Given
1885	R. M. Loeser
1886	Henry Lea Mason
1887	Mary W. Smith
1888	Frank J. Shole
1889	Robert L. Boroughman
1890	William B Fenderson
1891	Wanda L. Fenderson
1892	Randall B. Fenderson
1893	Russell F Deems
1894	Dayton Workman
1895	Edgar E Taylor
1896	Steve Noll
1897	Robert Elkins
1898	David Sheppard
1899	Mike Sheppard
1900	George Sheppard
1901	Charles May
1902	Virginia Fauntleroy Carter
1903	James D. Starr
1904	Ron Mulinex
1905	Bernard Calvert, III
1906	Steve Bridge
1907	Gerald Luck
1908	David W. Suttner
1909	Illegible Signature
1910	W. E & Millie Woodroff
1911	Brooks Tuttle & Heather D Williams
1912	James E Loesel
1913	Scott McElwee
1914	Loring B. Timbrook, Sr
1915	Joseph McNamara
1916	Hal And Helen Davis
1917	Nancy Watkins
1918	Susan T. Manpin
1919	Susan Eckenrode
1920	Lois M Pieper
1921	Dave Hall
1922	Mildred H. Misour
1923	Mary Louise Fisher
1924	N Gerald and Sara Shenk
1925	Debra and Randy Mitchell
1926	Henry Heller
1927	Rodney W. Burnette
1928	Elwood Persinger
1929	Marvin Mitchell
1930	James Clayborne
1931	Bobby Nichols, Jr.
1932	Cathy Harrison
1933	R S Rodgers
1934	Peter Fremgen
1935	Maria Berger
1936	Mathias Kayhoe
1937	John Kaye
1938	Kathryn Plumb
1939	Leonard Tosto
1940	Mark Robb
1941	Jean Tignor
1942	Selden Menefee
1943	Juliana Simpson
1944	Elizabeth Herbert
1945	William Wotmas
1946	Benjamin Hicks
1947	Stephen Reckner
1948	Mary Clark Wilkes
1949	J. Snyder
1950	Mr & Mrs. Robert Nolan
1951	Rachel & James Schlesinger
1952	Harry and Maxine Scruggs
1953	William Maiden
1954	No Signature
1955	Thomas Farley, Jr.

1956	Samuel L Campbell
1957	Trevor Corbin
1958	Deborah Shifflett
1959	Paul Almorde, IV
1960	Fred A. Kurt
1961	Richard T Moore
1962	Elizabeth J Moore
1963	Harvey G Wilson
1964	Lloyd S. Younker
1965	Robert E Griffin
1966	Ed Gilliam
1967	Ralph E Ramsey
1968	Pete Mohoney
1969	H. A Siler
1970	R S. Rosser
1971	Nicole Lassiter
1972	Bob Mahanes
1973	Jeffrey A Taylor
1974	Kathryn and John Fairfield
1975	Daniel D. Hamrick
1976	Danny Lubovich
1977	Jake Henry, Jr
1978	Julie Vehie
1979	Sidney O Feaster, III
1980	W T Colvin
1981	Patricia K Maier
1982	Lois B Austin
1983	Gregory W. Cook
1984	Alva E. Sizemore
1985	Johne F Albanese
1986	Ronald F Clark
1987	Stephen Bliley
1988	C David Pruitt
1989	Robert D Bedingfield
1990	Clarence Farmer and Macon Sammons, Jr
1991	Richard Fletcher
1992	Teresa Friedlander
1993	John E. Lambert
1994	Suzanne Noonan
1995	Perry T Hunt
1996	Louise T Williams
1997	Robert B. Davis, III
1998	Donna Whitmarsh
1999	Joy Satterwhite
2000	R Ronald Sutton
2001	Billy A Joy
2002	Ruth H Ball
2003	Les Mahoney
2004	Jeanne Kibbee
2005	Jean L Suter
2006	Chandler Stewart
2007	Catherine Jost
2008	B J Sunderland
2009	Judy Gattis Smith
2010	Noelle Borders
2011	David M Dolly
2012	Kathi Baker
2013	Melinda J Lukei
2014	Reese F Lukei, Jr
2015	Evelyn Tatman
2016	Lorvell Dillon
2017	James L Venture
2018	Joseph C Kelley
2019	Merle Beatty
2020	Kate Lambdin
2021	Heidi Targee
2022	Rosalie Talbert
2023	Jan H Smith
2024	J. M Davidson, Jr.
2025	David Baisden, Sr & David Baisden, Jr.
2026	John Held
2027	Janine L. Winegard
2028	Allen Lowry
2029	John F Pagels, Ph D
2030	Mr & Mrs. S Todd Lowry
2031	Richard G Ephgrave
2032	Jeff Powelson
2033	Mary C Orr
2034	Robert A. Huddleston
2035	F P. Aldhizer
2036	Charlotte and Henry Schreiber
2037	F. G Dean, Jr
2038	R Mark Jones
2039	Tamara Smith
2040	Andrew, Mack & Ben Trank
2041	Andrew E Freszen
2042	Kenneth Clements
2043	Allen B Farmer
2044	John Lesher
2045	Whitney Lonsdale
2046	Susan Wiedman
2047	James L. Minter
2048	Lucius H Bracey, Jr
2049	Rachel B Pattison
2050	Doris K. Baker
2051	R L. Mason
2052	E Palmer Taylor
2053	Cyane Lowden
2054	Jennifer Soles
2055	Patricia Sexton
2056	Walter Mehring, II
2057	Dave Peters
2058	Franklin L. Griffith
2059	Joseph V King
2060	Paul F Torrence
2061	Ms Terry Gabrielson
2062	James Hancock
2063	Roger N Canfield
2064	Petition
2065	Thomas W Schneider
2066	Jim Olin, Member Of Congress
2067	Luke Campbell
2068	Lewis Crummett
2069	John Robert Jackson
2070	D Kiser
2071	Lyle Marshall
2072	Thomas Nichel, Jr
2073	Elizabeth Fuller
2074	Ellis Klahre
2075	Kenneth Klahre
2076	Donald Klahre
2077	George Lees

2078	David Smith
2079	Thomas Thrash
2080	Troy Reinhart
2081	Richard Conner, Jr.
2082	J. Nevin White
2083	J Powell, Jr
2084	Fred Williams
2085	Norman Apter
2086	Barbara D. Kaufman
2087	Gina E. Bondurant
2088	Ed Pearson
2089	Linda Bancropt
2090	Matthew L. Shields
2091	D. A Pabst
2092	Emily Baxtar
2093	Jessica D Conaway
2094	Jacob H. Kahn
2095	L Wettstone
2096	Stephen M Fredrick
2097	Katharine Whitfield
2098	Glen Mitchell
2099	Leonard J. Uttal
2100	Sara Srome-Shomsen
2101	Debra R Neves
2102	Frank Karichoff
2103	Mark E Karichoff
2104	David L. Weutz
2105	Evelyn Karichoff
2106	Kelly Coiner
2107	Jodie Ann Coiner
2108	Elmer L Fix
2109	D Jim Terrell
2110	Michael D. Lowery
2111	Barbara A Hunter
2112	Lyle W Hunter
2113	Michael W Jarvis
2114	William Wilson
2115	Edgar W Patterson
2116	William G Truslow
2117	William D Fields
2118	Eric T. Coiner
2119	Paul E Balsley
2120	Jesse W. Bridge
2121	Donald F. Wright, Jr
2122	David Truslow
2123	Thomas L. Fix
2124	John B Brooks
2125	Roger L Welcher
2126	Stacy Bridge
2127	Harvey Belew
2128	Beatrice T Coiner
2129	Angela Rasmusser
2130	Anneliese Scouten
2131	Sara Board
2132	Jennifer Conway
2133	Daisy Stevens
2134	Sara Chilstrom
2135	Amy Moler
2136	Emily Kaiser
2137	Tracy Urech
2138	Jennifer Hepler
2139	Peggy S Kirby
2140	William H Sizemore, Jr
2141	W. W Rinker
2142	Robert L. Ewing
2143	Coleman Grandstaff
2144	Amanda Marsh
2145	Eugenia Grandstaff
2146	Lawrence I Field
2147	Harley Kierstead
2148	Eleanore Towe
2149	Gregory Peterson
2150	Kenneth Lang
2151	James Herbert, Sr
2152	Thomas Eyring
2153	S. Abeel
2154	John Rappole
2155	Allen Barker
2156	Raymond Burns
2157	William P Gadd, II
2158	Sandra Thompson
2159	Sheri R Cox
2160	Daniel B Deeds
2161	David L. Deeds
2162	Barry Jeffries
2163	Norman R Deacon
2164	Barry C. Dutter
2165	Steve Miller
2166	Greg Nicely
2167	Wesley Keith
2168	Bobby D Rogers
2169	Randall Pursley
2170	Lyle Alphin
2171	George Alphin
2172	Julie Alphin
2173	Glenn Alphin
2174	Vernon Alphin
2175	Paul R. Kennedy
2176	James L Will
2177	Algen P. Eckard
2178	Joyce Persinger
2179	Berkly Persinger
2180	Harvey Ferris
2181	Wilson R Shank
2182	Edwin P Darty
2183	Edwin Parkey
2184	David H Leach
2185	Gerald Cox
2186	Charles H Hartman
2187	C W Hepler, Jr.
2188	Charles Benny Reid
2189	Elizabeth Maxfield
2190	Michelle L. Boyer
2191	Thomas L Austin
2192	James R Flint
2193	James H Gum
2194	David Charles
2195	Rodney Vess
2196	Douglas S. Deacon
2197	Douglas W Conner
2198	Ricky S Deacon
2199	Donald E Burtt

2200	Clemmer Byer
2201	Raymond A Majesty
2202	Tim Wales
2203	Brian D Gingerich
2204	Bobby Hubbard
2205	Edward S Burk
2206	S F Simons
2207	Richard L. Smith
2208	Calvin G Gum
2209	Gary Flint
2210	Tim and Kristi Pleasants
2211	Wesley B Johnson
2212	Steve Thomas
2213	Gary Lynn Reery
2214	Robert M Flint
2215	Bill Ragette
2216	Ronald Flint
2217	Maynard Kessler
2218	Amanda D. Hubbard
2219	Robert C. Langkamer
2220	David Mollish
2221	John E Masaschi
2222	Thomas J Wasmer
2223	David Wilcher
2224	Russel E. Carter
2225	Mack Jay Howard, Sr.
2226	Ivan M. Gum
2227	Anna Ayer
2228	Randy Lee & Family
2229	Norman J. Sykora
2230	William A Mugg
2231	Jeff Flint
2232	Jim Loesel
2233	Frank Persinger
2234	William Hughes
2235	Ernest E Treadway
2236	Harry Walton
2237	Steven A Jost
2238	Kenneth E Stevens
2239	Carolyn C Bates
2240	Marianne J. Skeen
2241	James E. Vadas
2242	Richard Barnes
2243	David P Hancock
2244	Donald O Furler
2245	Calvin T. Bane
2246	Charles E Richardson
2247	Kermit E. Evan
2248	William C Young
2249	Thomas Webley
2250	Jim Hersey
2251	Ken & Georgie Shufran
2252	Alton H Davis
2253	Bonnie N Hoover
2254	H E Matics
2255	Sara H Davis
2256	Alan E Carlson
2257	Dan Abston
2258	Edmund T Bridge
2259	James R Godsey
2260	Mrs Carol Godsey
2261	Mark C Jewell
2262	E F. Knipling
2263	Philip E Booker
2264	W. L. Goard
2265	Bradley E Clarke
2266	Mark A. Brown
2267	John Middleton
2268	French W. Armstrong
2269	Sara Clark Mehring
2270	Ernest P. Ogden, Jr
2271	John Hesse
2272	Kristine E. Jost
2273	William D Fawcett
2274	Stan Adams
2275	Roy Mims
2276	Scott Wiggins
2277	Edith A. Duguay
2278	Curtis Miller
2279	Donald R Harless
2280	David F. Lange
2281	Theodore M Wright
2282	Frank Defonsera
2283	Bonnie Johnson
2284	Jerry Holloway
2285	Conrad J. Marshall
2286	Janet H. Lowe
2287	Fred Hardin
2288	James L Duncan
2289	R E Fawley
2290	Richard A. Miale
2291	Sandra Elder
2292	Virginia J Grossman
2293	Donna Barbour
2294	Galen E. Shingleton
2295	Buddy R Gragg
2296	Delbert Thorne
2297	Milton Tolley
2298	Brown Sensebaugh
2299	Joel M Weber, M.D
2300	James Martin
2301	Randy Terry
2302	Mark E. Wilkins
2303	Bunny Clifton
2304	David Clark
2305	R Lynwood Scott
2306	Joseph L. Garrett
2307	Randolph J Maupin
2308	Ernie Dickerman
2309	Aubrey Pritchett
2310	Joe Lenviel
2311	Mrs. Samuel Stevens
2312	Paul E Miller
2313	R. L Carpenter
2314	James H Swanson
2315	Paul Ingram
2316	Dorna Howard
2317	Susan Jones
2318	John Hicks
2319	Charles M Moss
2320	John Franklin Higgins
2321	Ted Ade

2322	Hal Bush
2323	Mike Paynter
2324	Roger Thigpen
2325	Steve Pullinger
2326	Colleen Williams
2327	Roger Williams
2328	Harriet Shaffer
2329	Stewart E Shaner
2330	Paula A Linder
2331	E. V Werner
2332	Lisa Dabek
2333	Dale Lunsford
2334	Richard P. Coon
2335	Garvis M. Reynolds, Jr
2336	Steven K. Ashcraft
2337	Gene K. McGuire
2338	John D Hurd
2339	Mark Peneonil
2340	Mark Jacobson
2341	John R. Lynch
2342	W E. Ragland
2343	Patrick D Sarsfield
2344	Lesley Davis Arnold
2345	Lynn Cameron
2346	Robert O. Richardson
2347	Lafayette Bluford Adams, III
2348	Roger F. Timbrook
2349	Stanley W Thomas
2350	Kim Repp
2351	William Staton
2352	Ed Foley
2353	James D Beck
2354	Eric C Bocci
2355	Robin Cage
2356	Dean Ottby
2357	Charles W. Green
2358	Jeffrey J. Bracken
2359	Dennis Harbin
2360	Michael J. Papay
2361	William D. Jones, Jr
2362	G T. Tibbs
2363	Leah B. Johnson
2364	Mike Hill
2365	Jim Patterson
2366	James P. Davis, III
2367	I.A Signorelli
2368	F Dallas Parsons
2369	Lynn Dickerson
2370	Janice & Jimmy Salmon
2371	Lynn E. Griffin, Jr.
2372	Lynn Cameron
2373	John R Northrop
2374	Lynn E. Griffin, Sr.
2375	Ania Pospiczalska
2376	Jennifer Brammer
2377	Jean L. McCarthy
2378	G Nelson Wilson IV
2379	Yukon Lumber Co.
2380	Kenny Carroll
2381	Daniel E. Hammer
2382	John L Nachman
2383	Pauline Tibbs
2384	Petition
2385	Fred W. Shields, Jr
2386	Scott Roberts
2387	H D Carter, Jr , Mayor
2388	Michael D Erickson
2389	Joyce C. Faw
2390	Pieter Van Beek
2391	Darrell B. Cogar
2392	Clyde & Imogene Littlejohn
2393	John Jordan
2394	Ernie Metz
2395	G. O Farrow
2396	Edwin Brown
2397	David Hopkins
2398	James Alvis, Jr
2399	Dane Ohler
2400	Sally Anderson
2401	Anderson Flues
2402	Mark Huffman
2403	Kevin Steinbo
2404	Ray M Brown
2405	John H Halterman, Jr
2406	Gary L Brubaker
2407	E. R Lunsford
2408	William L Sensabaugh
2409	Catherine H Pugh
2410	Melvin Lee Baber
2411	Andy Baber
2412	Michael Bartley
2413	Barbara Campbell
2414	Jesse J. Campbell
2415	Carolyn B Campbell
2416	Edgar E. Taylor
2417	R L. Staton
2418	Michael J Colland
2419	Bob Hess
2420	Karen B. Debord
2421	Ted Debord
2422	Edith G. Bradbury
2423	Mark E. Thomas
2424	Avalene C Jones
2425	Doug and Tina Grandle
2426	Christi Carver
2427	Steve Tabscott
2428	Laurine White
2429	Beverly P Silver
2430	Jeanette Hess
2431	Linda J. Hopkins
2432	Harold Grossman
2433	Peggy H Harper
2434	Jacqueline A Sobirshi
2435	Tracy L. Petersen
2436	Laura A. Kiefer
2437	Jack Erons
2438	Howard A Acheson
2439	Michael Lieb
2440	Henry H. Wise
2441	Helen Ware and Collen Smith
2442	Janet and Leonard Jarrard
2443	B Webster

2444	Jennifer Brammer
2445	Ania Pospiesialska
2446	Lynn Mouvery
2447	Adam & Elizabeth Hupert
2448	Bonita C. White
2449	Jacquelyn E. Mosby
2450	Celia L. Sweeney
2451	Kevin Arey
2452	Ed Arey
2453	Carol Lee Short
2454	Patricia Attkisson
2455	Susan Barry
2456	Deanna Andrews
2457	Betty Schewel
2458	Chauney F. Kutz
2459	William H Bowers
2460	R S. Fortune
2461	William E. Clarkson
2462	Charles H Wiesneth
2463	Richard Flinchbaugh
2464	M M Sanford
2465	Ernie Thomas
2466	John W Stewart
2467	Clint Thomas
2468	Lisa G. Ottley
2469	Betty Peters
2470	Steven P Jordan
2471	Barbara Lambert
2472	Robert P Kyle
2473	J. Norvill Jones
2474	Mary Barnes
2475	George L. Ziegenfuss
2476	Doug Nelson
2477	Dave Bryant
2478	David R Fix
2479	Thornton W. Burnet
2480	Barbara P. Kenyon
2481	Lenn Lennard
2482	Lawrence B Griffin
2483	Randy Garrison
2484	Christopher D Boch
2485	Victoria Parriex
2486	R Ross Roby, M D
2487	William F. Bennett
2488	Marvin L Dowdy
2489	No Signature
2490	Steven M Scott
2491	V Ray Phillips, Jr
2492	Cleora J Scott
2493	Paul A Von Hoene
2494	Richard Dowdy
2495	J L Chafin
2496	Michael G. Shanks
2497	Ray F Tesh
2498	Ann Burchard
2499	Randall E Dolly
2500	Thomas S Williams, III
2501	Kris Christensen
2502	Blenda Duckworth
2503	David R Richmond
2504	Terry L Deiss
2505	Rachel Johnson
2506	Jeff A Webb
2507	Dillard Hylton
2508	Jean C Bratton
2509	Kenneth R. Landon
2510	Thomas Neely
2511	Richard P. Wahl, Jr
2512	Carla H. Perrenot
2513	Richard I Crouthamel
2514	Edward R Johnson
2515	Craig E Peterson
2516	James L. Franklin, Jr
2517	Cliff W. Clark
2518	Willard L Ball
2519	Brian Krate
2520	Kaye Chandler
2521	Susan Demoss
2522	Butch and Dale West
2523	Marcus K. Lundmark
2524	David Flint
2525	Glen Adkins
2526	Ronald Bowman
2527	James R. Bezanson
2528	George Beon
2529	Roger Diedrich
2530	Miriam L Weaver
2531	G. Wayne Martin
2532	Charles W Rhodes
2533	Fred L Bagley
2534	A. Joanne Bates
2535	Easton Loving
2536	Rebecca Smith
2537	Leon Ellis
2538	J Terrill McCall
2539	O O Neely, Jr
2540	Barbara S Smith
2541	Charles Demoss
2542	S L Spradlin, Jr
2543	Jeff Devol
2544	Harold O'Dell
2545	William B Stuart
2546	James O Logan
2547	Georgia Persinger
2548	W Allan Sharrett
2549	Mike Norris
2550	Earl Z Damewood, Ph D
2551	Jane S. Jessee
2552	Elmer Grimm, Jr
2553	Wayne Atkins
2554	William G. Susling, Jr.
2555	Rick Thomas
2556	Terrance Allan Sidley
2557	Dean F. Amel
2558	Robert L. Henke
2559	Robert R Putman
2560	Linda G Akers
2561	Don Barrier
2562	Carolyn S Forbes
2563	Jeff Hicks
2564	Connie Mercie
2565	Allen J Cline

2566	Andrew D. Claxton
2567	Joel M Sowers
2568	Michael Welch
2569	John D Hurd
2570	Sharon M Ripley
2571	Delmer D. Aylor
2572	John F. Marshall, Ph.D
2573	Susan Makurat
2574	Johnathan Wright
2575	Terry M. Brooks
2576	Steve Dixon
2577	Joseph A Duda
2578	Kent Fleming
2579	Emmett S. Grogan
2580	Randy Hoover
2581	Warren D Pinnick
2582	Paul G. Barringer
2583	Douglas N. Toothman
2584	Charles W. Sloan
2585	Skip Goodrich
2586	David Jones
2587	Larry N. Fuller
2588	Alan Darke
2589	Michael D. Buckland
2590	R E. Russell
2591	Margaret L Gibson
2592	Scott W. Shallenberger
2593	Mark F Caron
2594	C. Richard Devore
2595	David Thomas
2596	W F Lee
2597	Elton Riffee
2598	Dr and Mrs David K. Dirlam
2599	Robert Baird
2600	Robert Trelawny
2601	John A Lackman
2602	Bob Adkisson
2603	Charles T. Lane
2604	Sandy Hart
2605	Tom R Davenport
2606	Jenny L. White
2607	William S. Jones
2608	Sneed T. Adams
2609	Neil D Emerald
2610	Gary Miller
2611	John Garner
2612	William L Yochum
2613	David Simon
2614	Dorothy C Bliss
2615	Kurt N. Detweiler
2616	J. Francis Palmer
2617	George M Jacks
2618	David G Brewer
2619	Paul A Carpenter
2620	A. W. Shelhorse, Jr
2621	Emil Friberg
2622	Sam Ripley
2623	Rodney L Willis
2624	James B Loan Jr
2625	Gary R Greenstein
2626	J C Watts, Jr
2627	M Ann Phillippi, Ph.D.
2628	James E. Loesel
2629	Preston Stevens
2630	John W. Warner
2631	Bob Dixon
2632	Greg Mick
2633	S. Vance Wilkins, Jr
2634	Lacey E. Putney
2635	Joe Martin
2636	James E Loesel
2637	James W Deeds
2638	Rosemary Richards
2639	Ruth A Lillard
2640	Nancy J. Martin-Perdue
2641	Ellen V. Aylor
2642	Maynard Feury
2643	David Dunsmore
2644	Charles Kessinger
2645	Charles Redman
2646	Lloyd Flury
2647	James G Dunsmore
2648	Craig J. Bradley
2649	John M. Roberts
2650	Charlie E Givens
2651	Helen Hamilton
2652	Roger R Forrest
2653	William B Stewart
2654	Robert Hueston
2655	Jeffrey K. Riggs, Pa
2656	G. Esler Inskeep
2657	Janet M Malcolm
2658	Phillip W Deacon
2659	B. Clayton Goodman, III
2660	Bernard Chestnut
2661	Russell Broyles, Jr.
2662	James Blake
2663	Brenda S Goff
2664	Bert Caul
2665	Ernie Reed
2666	Sarah P. Faulconer
2667	W. Gentz
2668	Bobby D Roges
2669	Lloyd A Deeds
2670	Robert M Carey
2671	Charles D. Pierce
2672	Stuart L. Deacon
2673	Donald P. Mimmo
2674	Laura A Harders
2675	Susan G Bender
2676	J D. Thomas, Jr.
2677	Morris Daniel
2678	Andrew J. McCoy
2679	Joseph G Savery
2680	M James Menk
2681	Betty J Owens
2682	Brian W Edson
2683	Randall A Lillard
2684	Alice Menks
2685	Albert L Huber, M D
2686	Tony Tomlinson
2687	Janet P Drumheller

2688	Gary Mahly
2689	Grover M. Nicely
2690	Bonnie J Smith
2691	David Lynn Dumonsau
2692	Grant P. Thompson
2693	Brian Woods
2694	Douglas C Ramsey
2695	Dick Shutt
2696	Jerry L. Jacobsen
2697	Kennie G. Underwood
2698	Gregory Orndorff
2699	Austin Mantz
2700	Richard Broyles
2701	Bernice Eubank
2702	Rosalind Wilson
2703	H C Edwards
2704	George M. Deeds
2705	Ann W Boldin
2706	Darrin Marbley
2707	Wanda C Warlitner
2708	Richard W Ayers
2709	David J Heiser
2710	Chris J. Hyland
2711	Chris Almond
2712	Art Fovogue
2713	Beverley Carver
2714	Peter Adams
2715	Jeri Thomas
2716	Randall Williams
2717	Luigi Morelli
2718	Helen M McCoy
2719	Cecil Holler, Sr
2720	Ronald G Wasem
2721	Elmer L Shifflett
2722	James W Jarrell
2723	Georgia Thomas
2724	John W Ballard, III
2725	Ronnie J Simmons
2726	Thomas W. Deeds
2727	Marcus N O'Conner
2728	Jack W. Smith
2729	Samuel L. Rogen
2730	Jackie L. Smith
2731	Gerald W Huffman
2732	Mike Iwanik
2733	Ruth D. Nicely
2734	Harold R Woodward, Jr
2735	Rev Heather A. Warren
2736	George G. Givens
2737	Charles R Douglass
2738	Mrs Julie C Blunt
2739	Jesse L. Daries
2740	Leona M Sonne
2741	Charles Perdue, Sr , Ph D
2742	Joseph A. Schifrin
2743	Terry L. Meade
2744	John M Hancock
2745	William R Moodispaw
2746	R L Owens, Jr.
2747	Jack J Schilthuis
2748	Michael Allen
2749	Ellen Halbert
2750	Lawrence P O'Donnell
2751	Richard Lambert
2752	Shyla Vesitis
2753	T H Lillard, Jr.
2754	Mary M. Harshfield
2755	Sarah Faulconer and Lynn Cameron
2756	Stanley Spitler
2757	John W Rogers
2758	William Gimbel
2759	Larry L. Baker
2760	Helen G -A
2761	Heidi Haverson
2762	Jehu Austrir
2763	Manton Frierson, Jr
2764	Heather Taylor
2765	Jane Gaidos
2766	William Gaidos
2767	Linda Thomas
2768	Patricia Brubaker
2769	Bonnie Jones
2770	Steven M Fox
2771	Kristine J Olka
2772	John Dean
2773	Lynn Allen
2774	Gail Dussere
2775	Wes Allen
2776	Tracey Homen
2777	William G Maddox
2778	Paul Rosen
2779	Ralph T Dameron
2780	Conley E. Daughtry
2781	Kenneth B. Lunsford
2782	Raymond E Lunsford
2783	Romonda Barkley
2784	Roger E Bartley, II
2785	Dennis M Campbell
2786	Lyman D. Allen, Jr
2787	Betty J Baber
2788	J. W Baber, III
2789	Henry W Barber
2790	Jean and Dillard Morris
2791	Keith A Mays
2792	Robert Patterson
2793	John W Baber
2794	Junior C Fox
2795	Pamela Pride Eaton
2796	Sergeo Levy
2797	Cheryl Chapman
2798	Gregory H Aplet
2799	M L Sheffer
2800	Tricia Grant
2801	Gayle Petersen
2802	Ann E Werner
2803	Lucinda Bishop
2804	Mary Henley
2805	Barbara Dowell
2806	Neil Andreal
2807	Patrick Knighton
2808	Neil O Rider
2809	Ginny Sonne-Peteson

2810	Liz Wilsdorf
2811	Tal Munassfi
2812	Samuel Fisher
2813	Robert V Clagett
2814	Greg Benson
2815	Rodney G Duley
2816	Doc Blanchard
2817	George Burgess, Esq
2818	Charles Dillon
2819	Dr Dennis Carlini
2820	Edward Farmer
2821	Rosene Tippett
2822	James D Bailey
2823	Pat Loving, Jr
2824	James E. Loesel
2825	Mac McDaniel
2826	L B. Hills
2827	Art Ostdiek
2828	David H Morris
2829	R. H. McFaddin
2830	Anthony P. Mollish
2831	Donald L Pritt
2832	Kenneth A. Pritt
2833	Jo Anne Scott Webb
2834	Douglas G. Barbour
2835	Roland and Itsuko Walters
2836	Eva M Lively
2837	Ronald J. Falyar
2838	Jesse C. Thompson, Jr
2839	N. Wayne Yoder
2840	James R. Barrett
2841	Cleveland H. Porter, Jr , D D S
2842	Joe Cheney
2843	Floyd C Ryman
2844	Todd Shauger
2845	Patricia J Fraser
2846	S. Ed Kuhn
2847	Sue Carolyn Smith
2848	Fred M Dean
2849	Billy Perry
2850	Donald E Shires
2851	Clyde H Shipp
2852	Donald L. Ryman
2853	Mr Blaine E. Peet
2854	Marie Dills
2855	Diane C. Bowman
2856	Henry and Jill Bruhl
2857	Daisy Oblinger
2858	Armpie Tauman
2859	Owen R. Beale
2860	Ann Marks
2861	William E Gayle
2862	Lee Kelleher
2863	T Ritchie Peery, D D S
2864	Victor Dunsmore, Sr
2865	Roger D Groot
2866	Donald H Lentz
2867	George Fralin
2868	David W Carr, Jr.
2869	John R Fowler
2870	David Bhlob
2871	David R Olund
2872	Jack Williams
2873	James A. Ruckman
2874	Steve M Hundley
2875	James A Mccann
2876	Victor Dunsmore, Jr.
2877	Jeanette B. Robinson
2878	Daniel M. Bayer
2879	George & Mary Bobenia
2880	Ollie W. Kitchen, Jr
2881	Clifford Miller
2882	Kenneth B Kirkham
2883	T. J Daly
2884	Rose A Magnarella
2885	Tonya Grinde
2886	Marvin Q Tinsley
2887	Rick Bonifant
2888	Paul F. Torrence
2889	H. A Turner
2890	James Farmer
2891	Mark D. Sims
2892	Jacob A. Kamerow
2893	Robert T. Forney
2894	Adeline B. Lyle
2895	Richard G Dowlavage
2896	Charlotte L Umholtz
2897	Stephen R Haines
2898	Craig R. Kaderavek
2899	Reese Bull
2900	Constance A Morella
2901	Sue M. Haley
2902	Keely Mackey
2903	David E Nees
2904	Thomas E Carroll
2905	Herbert Hardbarger, Jr.
2906	Fred Burke
2907	Linda Wade
2908	Timothy Wade
2909	Petition
2910	Gary Dellinger
2911	Richard L. Hundley
2912	David A. Snebold
2913	I. Fredrick Trew
2914	Frank Baber, III
2915	N.E. Houser
2916	Brooks Irwin, Jr.
2917	Arnold L. Warlitner
2918	John M Yeago
2919	J. Carlton Courter, III
2920	Charles T Campbell
2921	Bruce & Bonnie Benedict
2922	Clyde T. Smith
2923	Terry S Templeton
2924	David G Wilcher
2925	Sue Carlyle
2926	Trenor L. Hypes
2927	Ken Isaac
2928	Stephan T. Clark
2929	Charles T. Boggs
2930	R Lee Kernell
2931	Gary J. Close

2932	Larry Gochenour
2933	Nora M Taylor
2934	Rob and Sandy Fountain
2935	Carvel Blair
2936	Bryan Barb
2937	Mark Burton
2938	Danny B Goodbar
2939	Ike Knox
2940	Alan E Bellinoff
2941	Waitman Wade
2942	Steve Parks
2943	Layne W Beverly
2944	Betty Cochran
2945	Mary Ruley
2946	Robert Spight
2947	Daryl E Reed
2948	Robert Bowyor, Jr.
2949	Glen W. Snider
2950	Wayne Huffman
2951	Troy Beverley
2952	David Eggleston
2953	Lowell A Davis
2954	Donnie Wines
2955	Tammy Johnson
2956	Larry A Clark
2957	Donnie Huffman
2958	A K. Miller
2959	William M. Hall
2960	Mike Bare
2961	Martha Garrett
2962	Frank Dawdra
2963	J David Hall
2964	Randy Camden
2965	Gary Spence
2966	Ronald N Gilman
2967	Randy Humphries
2968	Warre Maddox
2969	Mike ^unter
2970	Michael D Cheatham
2971	H. P Brown, III
2972	Wayne D Peterson
2973	H P Brown, IV
2974	Gregory Syle
2975	Eric Snyder
2976	Thomas J Lloyd
2977	E A. Villafranca
2978	Arthur W Hurt
2979	Jason Amos
2980	C Thilsims
2981	V Owen Warr
2982	Timothy M White
2983	Steve Slagle
2984	Robert R Floyd, Sr
2985	Tollie D Moore
2986	E R Glass
2987	Joe Glass
2988	Ronald E White
2989	Eddie Foster
2990	Barry W Tyree
2991	John Merrison
2992	Hershell Burr
2993	Lloyd Pennington
2994	Jerylene Mason
2995	Nancy R Hartless
2996	Henry L Henson
2997	Wendell Lee Fitz, Sr
2998	David Coleman
2999	E. R. Montgomery, Jr.
3000	Lee Wright
3001	Delores Humphries
3002	William A Rudford
3003	May Lowe
3004	Edmond Floyd
3005	W. C. Biller, Jr
3006	Bill Floyd
3007	C. S. Hesk
3008	Delmas Clark
3009	Newassa Huffman
3010	Carrie Mason
3011	Frances Fields
3012	Audrey Staton
3013	Gary Knick
3014	Pam Shiley
3015	V Eugene Wood
3016	H P Brown, IV
3017	Frank Davidson
3018	Randy Humphries
3019	Gary Spence
3020	Randy Camden
3021	Fred Catlett
3022	William M Hall
3023	Donnie Huffman
3024	A K Miller
3025	Russel Glen
3026	David L. Eggleston
3027	Lee Wright
3028	Wayne Huffman
3029	Daryl E Reed
3030	Robert C Spylt
3031	Troy Beverly
3032	Glen W. Snider
3033	Robert L Bowyer Jr
3034	Layne W Beverly
3035	V Eugene Wood
3036	Edward M Hamilton
3037	Mike Bare
3038	Warren Muddox
3039	Michael D, Cheathen
3040	H P Brown, IV
3041	G Sythe
3042	Jason S Amos
3043	Eric Snyder
3044	C Russell Williams
3045	V Owen Ware
3046	Timothy M White
3047	Steve Slagle
3048	Tollie D Moore
3049	C R Glass
3050	Joe Glass
3051	Ronald E White
3052	Eddie Foster
3053	Barry W Tyree

3054	John Morrison
3055	Herbert H Brown
3056	Mike Gunter
3057	Martha J Garrett
3058	Robert Miller, III
3059	Paul Wisman
3060	Betty Troumadd
3061	James Parsons
3062	John Kemp
3063	Illegible Signature
3064	Joe Archambeault, P.E.
3065	Yolanda Spencer
3066	David H. Kinney
3067	Stella M Koch
3068	John S. Gottschalk
3069	Patricia A Jackson
3070	Heloise D H Dornin
3071	Robert T. Dornin
3072	Megan Gallagher
3073	Katheryne L Goodman
3074	Kate Goodman
3075	Joseph P Weeks
3076	Susan C. Weeks
3077	David Chuse
3078	Lind Kolodziej
3079	Neal D Emerald
3080	Loudell R Staunton
3081	Brian W Moores
3082	Georgia H. Herbert
3083	Josephine De Give
3084	Timothy Cook
3085	Shelley G Bourdon
3086	James F. Brown
3087	Laura Thicker
3088	Rebecca Conway
3089	Stephen Parks
3090	Marilyn & Pat Lockhart
3091	Jennifer Hiebert
3092	Debra Livramento
3093	Helen Oldenberg
3094	Kurt J Erchinson
3095	*John M Parfell & Dorothy Day*
3096	Michael Farabaugh
3097	Rev Rick Hill
3098	Mary P Sease
3099	Chas. Grady
3100	Samuel and Margaret Johnson
3101	Theron Smalbidre
3102	Kenny Wagoner
3103	Robert Rogers
3104	Jack Barker
3105	Thomas Mcclain
3106	Ronald Shingleton
3107	Lonnie Lackey
3108	John Taylor
3109	Douglas Perry
3110	Jeff Swiger
3111	Steve Lawson
3112	Franklin Taylor
3113	Tip Starkey
3114	Roger L Robertson, Jr
3115	Donald S Sims, Jr
3116	Gordon L Souz
3117	Roger Ellewod King
3118	Margaret J. Simms
3119	Roger L Robertson
3120	Reed Probst
3121	Claude Gittinger
3122	Claude L Gittinger
3123	Thomas Symmes Jr
3124	George Dephe
3125	M Hartman
3126	Sandra Hauser
3127	Dwight Bolyard
3128	Bill & Helen Braunworth
3129	Calvin Prfer
3130	John Lipscomb
3131	Max White
3132	Joseph Hauser
3133	William Hauser
3134	Pete Evans
3135	Wade Hanser
3136	Robert Harsh
3137	Jackie Snyde
3138	David Wiles
3139	Kevin Wiles
3140	John C Hall
3141	H Hartruss
3142	Ralph Buckley
3143	Herbert Richey
3144	Warren Groves
3145	W Myer, II
3146	Mark Crummett
3147	Oliver Bauer
3148	Jane Harrison
3149	Barbara Phillipson
3150	Larry Collins
3151	Chad Mays
3152	Kenny Mays
3153	Edward B. Decker
3154	W B Waggy
3155	Anne B. Dale
3156	*Edward M. Dale*
3157	Willie L Mccune
3158	Sharon Griffin
3159	Eddie T Allen
3160	Roger C Allen
3161	Manley T Allen
3162	Stephen P. Troxell
3163	Terry L Shifflett
3164	Dennis M Campbell
3165	Tim Chandler
3166	*Chris Fretwell*
3167	Danny Clinedinst
3168	Chris Marshall
3169	Ronnie Henderson
3170	James C Ratcliffe, III
3171	David L Campbell
3172	W H Reid
3173	J L Aikens
3174	R C Roger
3175	Frank Pyanue

3176	Rebecca L. Thompson
3177	Ralph E Griffin, Jr
3178	O Martin Wheeler
3179	Brenda F Thompson
3180	H Paul Thompson
3181	Steve Sutton
3182	*Whitney P. Terrell*
3183	Gary L Brubaker
3184	John Abshire
3185	Paul Driner
3186	William Warren, Jr.
3187	T Payton Coyner
3188	Rick Hicklin
3189	B Whalen
3190	Steve Coffman
3191	Mark Schleupner
3192	Thomas G. Eick
3193	G Van Pelt
3194	Dr Brosius, Ph D.
3195	Anna Hall
3196	Martha P. Makel
3197	Bruce L Legge
3198	David Rockman
3199	Karen Silver
3200	Jennifer Oman
3201	Dave Corban
3202	*Mark R Woodie*
3203	Greg Sandage
3204	Sarah Swank & Jon Kastendick
3205	Carol Gardner
3206	Thelma G Strehle
3207	Doug Sease
3208	Suzanne Sease
3209	C Pfeifer
3210	Charles B. Fenster
3211	Michele R Rudash
3212	Nan Jack
3213	Dana Kirley
3214	Louise and Milton Perlman
3215	Lacey L. Leffel
3216	Charles And Martha Maddox
3217	Bill and Joyce Fuller
3218	Thomas J. Gillerfrie
3219	E Whelty Hopt
3220	Aubor T. Bloh
3221	Jonathan Stanly
3222	*Illegible Signature*
3223	Brian Pott
3224	Donald J Skelly and Chad Fears
3225	Allison Babs
3226	Christopher F Tricarick
3227	Harvey W Ollinger
3228	Carl Dale
3229	Laura Musser
3230	Kathleen A Griffin
3231	Jo Ellen Capstack
3232	Merriheth Neal
3233	Nancy Steller
3234	Mary Ann Yarsinske & John Cunningham
3235	Ted Urappel
3236	Wendy J Garpow
3237	Marsha Shank
3238	Carl W Fritzinger
3239	Dawn Kern
3240	Gena Tenney Phenix
3241	Elizabeth Chappell
3242	Rose Mcnameric
3243	Susan Aaren
3244	Erin Lise Tabscott
3245	Patricia Rust
3246	Dr. and Mrs. T. Keith Vest
3247	Karen Day
3248	Carolyn Alkire
3249	Nicole Gravatt
3250	Steven L Gray
3251	James Terrill
3252	Luther Brown, Jr.
3253	B Palmer
3254	Rose Koogle
3255	Robert Adams
3256	Jeff Hatfield
3257	Belle Dreyfuss
3258	Charles N. Adams, Jr
3259	William A. Keely
3260	Dr R Michael Erwin
3261	Kate Matthews
3262	Robert Holley
3263	Joan Adams
3264	Arthur Chambers
3265	Sharon Dreyfuss
3266	Wayne Crider, Sr
3267	Regina Shapley
3268	Sandra S. Howard
3269	Allen Alexander
3270	Steven Whitney
3271	James L. Claybrook
3272	Eleanor D Campbell
3273	Chris Leitch
3274	Marion R White
3275	Mark Campbell
3276	David Charles
3277	Steven Byer
3278	Kenneth Callahan
3279	Stacy Depriest
3280	Robert Bradley
3281	Steven Southall
3282	Brian Bland
3283	Dennis Campbell
3284	Ronnie Williamson
3285	Gerald Rogers
3286	Bryan Knids
3287	Randy Shifflett
3288	Kenneth Hill
3289	Curtis Kincaid
3290	Lonnie Pagans
3291	Eli Perrine
3292	Clyde Pagans
3293	Cindy Jackson
3294	Linda David
3295	Gretchen Robb
3296	*Christian Smith*
3297	M McKenna

3298	Patricia Sandage
3299	Cameron Mvir
3300	Bruce Batling-Austin
3301	Leland Keller, Jr.
3302	Mark Schleupner
3303	J Smith
3304	Jeff Herrin
3305	Judy Lachappalli
3306	Jonathan Evans, Ph D & Amy Evans, M.D.
3307	Elizabeth & William Solomon
3308	Elizabeth Bignell
3309	Tami Arbogast
3310	John Jackson
3311	Blair Sharpe
3312	Jackie Cooke
3313	Frankline Brown, Jr.
3314	John Marston
3315	June Yager
3316	David Carter
3317	Katherine Orff
3318	Stephanie Login
3319	Camille Means
3320	Dale Dunsmore
3321	Maynard L. Patterson
3322	Edward, Scotty, Jean Dawson
3323	Dan Brownlee
3324	David Cook
3325	Helen & Bill Braunworth
3326	C. C. Manning, Jr.
3327	Jean K. Loesel
3328	Charlotte Morgan
3329	Cathy Meister
3330	Natalie Hawkins
3331	Malcolm Crosbie
3332	John K Camper
3333	Edward B. Hamer
3334	Herb Goldstein
3335	Jo Ellen Parent
3336	Glen Leasure
3337	Steven R Parent
3338	Wylma Davis
3339	Fred Baker
3340	A. Foster, III
3341	Paul Mallos
3342	Negesh P. Mehta
3343	Raymond Cohen
3344	Wayne Raynal
3345	Ella Baker
3346	Cathy Wells
3347	Rita Jean Leasure
3348	David F Harris
3349	Melvin N Leasure
3350	Mary Barnes
3351	Helen Haniz
3352	Mrs. Farris Hotchkiss
3353	John C Wise
3354	Laura Neale
3355	Lois E Leasure
3356	Virginia McGhee
3357	John E. Friedrichs
3358	John D Morgan
3359	Thomas H. Ahnemann
3360	Karen Ahnemann
3361	Andrew C. Johnson, Jr
3362	Rebecca McGhee
3363	Morgan Harris
3364	Betty Lemon
3365	Richard G Barnes
3366	David Daystar
3367	Yaviah Renner
3368	Margaret Dyson-Cobb
3369	Nancy Spencer
3370	David Purly
3371	Tom Marshall
3372	Ed Moore
3373	Michael R. Sexton, II
3374	Lee Sauder
3375	Ruth P. Mccormick-Goodliat
3376	Zephy Renner
3377	Margaret Sharbel
3378	Betty L Putnay
3379	Stephanie Bond
3380	Gabriel Leasure
3381	Phillip R. Welch
3382	Harvest Leasure
3383	Larry Mcneil
3384	Ann Henderson
3385	Lenna and Terry Ojure
3386	Summer Welch
3387	Katie McNeil
3388	Katherine Smith
3389	David A. Johnston
3390	Pamela E. Breil
3391	Dan Frese
3392	Florence G. Cook
3393	Mark K Cathey
3394	Eliot Balazs
3395	Peter O'Shaughnessy & Frank Hawkins
3396	Joan Robins
3397	Gary Sizer
3398	Billie Jean Sizer
3399	Drew Winterer
3400	Richard H Moore
3401	John Grant
3402	Tom Oxendine
3403	Andrew H. Williams
3404	Sally Hutcheson
3405	Paula Sullivan
3406	Mark Corrales
3407	Diane Melton
3408	Ben Brown
3409	James A Strock
3410	Ellen Jennings
3411	Eric Renner
3412	Josephine R Morrison
3413	Alex H. Morrison
3414	Haines Sprunt
3415	Dr David Sprunt
3416	Elise Sprunt
3417	Eric Sheffield
3418	Elise Sheffield
3419	Reid T. Putney

3420	Darryl Knick
3421	Nancy Bidlack
3422	Patrick Conner
3423	Steven R Brads
3424	Steven Brads
3425	James Benton
3426	Susan Benton
3427	Dianna Williams
3428	Pam Olvers
3429	Barbara Ruddick
3430	Jean Nalley
3431	Linda Jackson
3432	Brian Nalley
3433	Linda & Bill Raines
3434	Betty Gordon
3435	Pearline Nalley
3436	Jeff Allen
3437	Jeff & Tonya Mcdaniel
3438	Anna-Marie York
3439	Rea Klosky
3440	Henry York
3441	Colon R McMath
3442	Alma McMath
3443	Kirk McMath
3444	Darren McMath
3445	Larry Hale
3446	Richard Cartwright Austin
3447	Jeff Hedrick
3448	David Work
3449	D L. Hedrick
3450	Petition
3451	Petition
3452	Petition
3453	Petition
3454	Petition
3455	Petition
3456	Petition
3457	T C Pinckney
3458	Donna Murphy
3459	Stephen Templeton
3460	Jeanne Biggart
3461	Eve D Fout
3462	Kathy M Taylor
3463	Colin Bruce Macleod
3464	S J Kolmstetter
3465	Laura G Dervishian
3466	Sharon E. Mohney
3467	Bonnie Pulliam
3468	Stephen L Stoner
3469	Philip Paschall
3470	Elizabeth & Robert Alcock
3471	Ginger Herring
3472	Benjamin F Livingston, III
3473	Chris Brinton
3474	Ruth Hudson
3475	Emily Johnson
3476	Lynda Cozart
3477	Catherine A Anderson
3478	Madeline Delgado
3479	Eileen G Popp
3480	Mrs W J Nelson
3481	Kirk Lunsford, Jr
3482	Monroe Phillips
3483	Ned Kahns
3484	G W Monk
3485	Cindy Bowen
3486	Donald L. Ash
3487	Carlos Marie Ellis
3488	Vernon L Matpey, Jr
3489	Lawrence W Deitz
3490	Alan S Warden
3491	Temple Kessinger
3492	Sharon H. and G Gray Puryear
3493	Dorothy H Briggs
3494	Susan Fisher
3495	Betty W. Marr
3496	Virginia M. Driver
3497	Michelle & Ruth Poignant
3498	James Kelly
3499	Newell Irwin
3500	Bruce Griffith
3501	Roger J Cufton
3502	Sara Stewart
3503	Sandra Marre
3504	Robert N Porter, Jr.
3505	David & Julie Coffman
3506	Gregory A Stull
3507	Wm J Ellis, M D
3508	Kathy Bilton
3509	Ann M Patterson
3510	Carol C. Gray
3511	Ralph W Hart
3512	Hallie B Albergotti
3513	Victoria Rizzi
3514	Joe R Meadors
3515	Bell Martin
3516	Morton M Smith
3517	Rosemarie Sawdon
3518	Aj John Jordan Ty & Carly Eccles
3519	Larry & Cindy Linville
3520	Christopher M Stinnetts
3521	Aubrey Neas
3522	Laurie and Leonard Adin
3523	Phyllis M Dawson
3524	R Lynn Browder
3525	Rickey Shortt
3526	John D Doyle, Jr
3527	Jill Harper Sease
3528	Karen Waldren
3529	C Kunkel
3530	Sylvia Staukavich
3531	Howard Sturgeon
3532	Joe Malloy
3533	Elizabeth Travis
3534	Thomas Sowers
3535	Homer W Witcher
3536	David Siskind
3537	Michael A Francis
3538	Debby Thoma
3539	Ron Boyd
3540	Ronald T Malcolm
3541	Frederick E Rose

3542	Del McNeely
3543	Robert B. Turk
3544	James Troy
3545	Dan Miles
3546	Elizabeth I Vander Berg
3547	John P Cone, Jr
3548	Mr and Mrs B R Lamb
3549	Ralph Benton
3550	N A. Fitzpatrick
3551	R Holt Hogan
3552	James E. Grobowski
3553	Joan Chapman
3554	Charles H Hartman
3555	Andrew Nimmo
3556	Roger L. Sherman
3557	Mark M Lloyd
3558	J Bryan Wibberley
3559	Thomas E Flora, Sr
3560	Elmer E Hatcher
3561	Tom Evans
3562	Raymond A. Booth
3563	Terri Ikard
3564	K A Toombs
3565	Marjorie Griffith
3566	N Haynie Kabler & Sarah E Kabler
3567	Watt Bradshaw
3568	Crickett Hammond
3569	Marshall Brooks
3570	Michael L Lee
3571	Irv Gupton
3572	Mary Jane & J B Linker
3573	Arnold Scott
3574	James Foley
3575	Gordon Jeffries
3576	Clinton Handey
3577	William Smith
3578	Melvin D Jones
3579	Larry Lawless
3580	J. W Belcher
3581	Albert L. Lance
3582	(Illegible 1st Name) Griffith
3583	Winston Aldermon
3584	M. D Skelton
3585	Garland Cochran
3586	A L. Skelton
3587	James A Gorton
3588	R Clifford Belcher
3589	Clifford A. Bowman
3590	Cas Marszal
3591	Mary Lou Speckheuer
3592	Michele C Wright
3593	Betty Treuey
3594	Michael Jamison
3595	Sammy L Stewart
3596	Sammy L Stewart
3597	Kenneth K. Patrick
3598	E F. Friess
3599	Anthony B Bolen
3600	George Roger Clark, III
3601	Charlie Smithers
3602	John K. Sheldon
3603	Wayne Finch
3604	Elizabeth L Neill
3605	James M Whitney, Jr
3606	Bill and Sally Miller
3607	Laura Bliss
3608	Richard D Jacques
3609	Daniel H Turner, II
3610	John P Newmarker
3611	Thomas E. Carroll
3612	James A Britt, Chairman
3613	Roger Dexter
3614	Larry W George
3615	Nina Pfeiffer
3616	Peter Robinson
3617	Richard G Breeden
3618	Daniel B. Deeds
3619	Kristen A Ciarrocchi
3620	William Kirkpatrick
3621	Robert M Garrison
3622	Mr Louis Makey
3623	David Copley
3624	Emmitt Clark
3625	Ed Page
3626	Roy E St John, Jr
3627	Kenneth A Gibbs
3628	Jim Mcavoy
3629	Kristin B Peckman
3630	Dan E French
3631	Steve Letterman
3632	Dave Patrick
3633	Nat Mawby
3634	Joseph P Briggs
3635	Ronald R Knipling
3636	Max Kendall
3637	Benny Southall
3638	David A Clark
3639	James C Campbell
3640	Eric Seaborg
3641	Sam & Dora Lee Ellington
3642	L Guy
3643	Don Henne
3644	Andrew Woody
3645	Marie B Tyree
3646	P Albright
3647	Jean E Hiatt
3648	Michael C Cundiff
3649	William D Rice
3650	Robert E Wallace
3651	Diane Goodhart
3652	Melinda L McDaniel
3653	Donald R Nulpy
3654	Norman E Beam
3655	Erik W. Robeler
3656	Tom Phillips
3657	David B Spears
3658	Bert Caul
3659	Mary & Harry Bennett
3660	Dennis Austin
3661	Tammy Browning
3662	Arlene B Green
3663	Teresa Taylor

3664	Jim Philpott
3665	Nicky Staunton
3666	Thomas G Black
3667	Juanita Roe
3668	Kent Bartley
3669	Scott and Virginia Shackelford
3670	William Baum
3671	George Wetzel
3672	Roy D. Zangari
3673	Jerry Hooke
3674	Mo Duncan
3675	Gary Leggett
3676	Frederick, Margaret, Dr. Carmen Rexrode
3677	Kimberly Richardson
3678	Patricia Mankin
3679	John T Deacon
3680	Mary Le Grand
3681	L Craig Carr
3682	Preston L. Leitch
3683	Kenneth H. Lowery
3684	Charles E Horn
3685	Stephanie A Michaels
3686	E. E. (Gene) Dixon, Jr.
3687	Kathleen Fovargue
3688	W. L. Wilsher
3689	Mark Holiberg
3690	Marilyn Peters
3691	Joseph P Morra
3692	Brian Blankenship
3693	James Johnson
3694	Robert G. Mason
3695	Anthony L Blow
3696	Duncan Fairlie
3697	William Aypen
3698	Charles D Engle
3699	Barbara Rebert
3700	Daniel Lam
3701	Kelly Hutcheson
3702	David Griffiths
3703	Jane Coleman
3704	Harold G Snead
3705	Josephine F De Give
3706	Pennie & Dennis Dunham
3707	Humphrey Moynihan
3708	Charles W Perdue
3709	Gene Gendersen
3710	F Kaid Benfield & Robbin S Marks
3711	Claire A Collins
3712	Neal D Emerald
3713	Michael L McGlothlin
3714	Cliff Gunst
3715	Phillip V Bagdon
3716	Philip Scott Park
3717	Dennis C Vincent
3718	W E Berthrong
3719	Harmonson J Floyd, Jr.
3720	Patrick Vaccarino
3721	William L Johnson, II
3722	John W MacIlroy
3723	Mary M Bechtold
3724	David A West
3725	Robert Richards
3726	Steven & Wendy Richards
3727	Robert K. Egbert
3728	J. Edward Hamrick, III
3729	John C. Barber
3730	James A. Carter
3731	Tad Eareckson
3732	A. Wayne & Teresa Allen
3733	Peter and Leslie Mehring
3734	Miles Hartman
3735	Richard L. Seeman
3736	John H. Woolwine
3737	Stevie Bond
3738	Ann B. Bowles
3739	Kenneth Edlund
3740	William Wenthe
3741	Bill & Helen Braunworth
3742	James E. Loesel
3743	Randy Bush
3744	Martin P. Albert, M D.
3745	Brenda M. Jeffries
3746	Ed Allen
3747	J D. Brackenrich
3748	Mike L. Mays
3749	James Gormy
3750	Michael Roebuck
3751	Virgil R. Groves
3752	Robert J. Gregorio
3753	Frank T Chesson
3754	Duncan C. Augustine
3755	Don L. Long
3756	Vaughan Webb
3757	Steven C. Wilson
3758	Patrick J Coffield
3759	Jo Ann N Milander
3760	Herbert A. Kwasniewski
3761	Jim Hutchings
3762	Robert K. Schlawin
3763	Stefan Bechtel
3764	Dan E French
3765	John E Allen
3766	Katherine Anne Rolph
3767	Brian Bowen
3768	Larry Barb
3769	Michael Benton
3770	Charles T. Cushwa
3771	William J. Floyd
3772	Walter A Berg
3773	John A Carter
3774	Eldon R Plaugher
3775	Dosie Breeden
3776	S L Spradlin, Jr
3777	Fran Genovese
3778	Jay Shutte
3779	Leona M Sonne
3780	Jerry Wilson
3781	Lewis G Nichols
3782	Dana Clark
3783	Petition
3784	Peter M Schumann
3785	Bob Peckman

3786	Charles J. Parry
3787	Kenneth E Graybill
3788	Mr. & Mrs. William A. Blatter
3789	Charles F. Hudson
3790	Jim Martin
3791	Leslie B. Dayton
3792	Donald L. Champion
3793	Frank V Sherwood
3794	Robert B. Szablinski
3795	Dawne R. Trainer
3796	Sharon Whitlock
3797	Nancy & Robert Roig
3798	David M. Andrews
3799	Jefferson M. Bean
3800	Helen Y. Scott
3801	Wanda B. Henwood
3802	Kirk Lunsford
3803	Frank Davidson
3804	William S. Hartless
3805	Karl F. Plitt
3806	Dan Fadely
3807	Harold Silcott
3808	David L Posca
3809	Shelly Zoumbaris
3810	Keith M. Light
3811	Allen Belden, Jr.
3812	Christopher Bailey
3813	W. R Deacon
3814	Heather D. Newmarker
3815	Jerry W Deacon
3816	Margie Jeffries
3817	Bob Rice
3818	Austin Mantz, Jr.
3819	J. E Raynor
3820	David W. Gillespie
3821	John Richard Ale
3822	*Joseph L Lehnen*
3823	John Johnson
3824	Curtis Seltzer
3825	Bennett H. Beach
3826	Glen Flanagan
3827	*Jane Fellows*
3828	David E. Larch
3829	Susan A Henley
3830	Susan "Butch" Henley
3831	Stephen A. Bennett
3832	Lynda V. Houck
3833	Edward B. Wright
3834	Cindy Denchfield
3835	Mark Hervig
3836	Laura Lyons
3837	Thomas Rooney
3838	Sylvia Brugh
3839	William & Elizabeth Lamson
3840	J Dana Mccarron
3841	Walter W Daggett
3842	William L. Harris, III
3843	Zetta M. Campbell
3844	Christy Huddle
3845	Lloyd Sumner
3846	Ethan Shenkman
3847	James & Dianne Rusnak
3848	Daniel M. Downey
3849	Matthew C. Allen
3850	Francis Racette
3851	Marilyn Horvath
3852	Mrs Julie C. Blunt
3853	John M. Yeago
3854	Norris Q. Bruke
3855	Daniel P. Small
3856	J. Michael & Royce Oxley
3857	David Dagenhart, Jr.
3858	Jeanne Darling
3859	Kimberly M. Jones
3860	James D. Terry
3861	Sam Patten
3862	Paul Bourdon
3863	*Eleanor J. Marshall*
3864	Charley W. Banks
3865	David L. Posca
3866	Robert A Coulter
3867	Kenneth A. Scott
3868	*Richard S. Olseth*
3869	Dennis T. Conroy
3870	Robert J. Soltess
3871	Dr. Holden Direskendi
3872	L. Ryan Hodges
3873	*Douglas Avery*
3874	W. C. Bowling
3875	Bennie N. Shaver
3876	Gordon Avery
3877	Basil H. Tenney
3878	*Randy Fasler*
3879	Cecil Holler, Jr.
3880	William J. Brill
3881	Tommy Jamerson
3882	Michael D. Brewer
3883	John B. Smith
3884	Myra G. Karacofe
3885	Howard Cartwright
3886	John M. Sibold
3887	John Fairfield
3888	*Miles Hartman*
3889	Kenneth R Rexrode
3890	J. R Dixon
3891	John A Luke
3892	Marie M Muller
3893	R Timothy R Romett
3894	Jonathan L. Thoma
3895	Myrtle Conner
3896	Dr R Bradley Pierce
3897	W. Alex Sasamoto
3898	Sue F. Lee
3899	William L. Adams
3900	*Ginger Sanderson*
3901	Philip J. Rossano
3902	David L. Bowers
3903	Christopher G Gelliug
3904	Edward G Frazee
3905	*Phyllis Shutte*
3906	Jack Albright
3907	H Marshall Jarrett

3908	Mr John S Meckley
3909	Robert Bardwell, Ph D
3910	Phillip Hanood
3911	Seth Heminway
3912	Edward G Kraynok
3913	G B Ragsdale
3914	Charles C Hooks, Jr
3915	George Smith
3916	Thomas W Woodward
3917	Richard L Youmans
3918	Clyde K. Venable
3919	James M. Hoye
3920	Mr. & Mrs Eugene Meekins
3921	Elizabeth H. Belcher
3922	Dennis Hendricks
3923	Brian D. Shirley
3924	Jordan Luke
3925	Denver Tiller
3926	Brenton H Staples
3927	Henry D. Carr
3928	Doris L Magee
3929	Ross S Shearer, Jr
3930	William S Graybeal
3931	Dona Davis
3932	J E & Darleen S Martin
3933	M A. Jones
3934	Curtis I Taylor
3935	B L Weimer
3936	James E Loesel
3937	James E Loesel
3938	Malcolm Cameron, Jr
3939	Daniel B Deeds
3940	David E. Steffen
3941	David N Startzell
3942	Lynn Cameron
3943	Lou Schmidt
3944	Howard McClanahan & Donald Cook
3945	William L Hardbarger
3946	James E Loesel
3947	Judith B Williams
3948	Sharon L Cooper
3949	Richard A Harris, Jr
3950	Scott H Wingfield
3951	William B Leichter
3952	James W Garner
3953	Cecil L Boggs, Jr
3954	Melvin J Burch, Jr
3955	S L Spradlin, Jr
3956	Gary G Youngblood
3957	John B Bazuin, Jr.
3958	John B Kulstad
3959	William N Gordge, M D
3960	Calvin Harris
3961	Charles E Sullivan
3962	Lee Bowen
3963	James E Loesel
3964	James E Loesel
3965	Steven A Rapp
3966	Hal Cantrill
3967	Edward White
3968	Alan Lane
3969	Robert J Shura
3970	Richard Buzard, Jr.
3971	James C. Clark
3972	Lester L Campbell
3973	Stephen Brown
3974	Richard D Persinger
3975	James M Boone
3976	A R Schroeder
3977	Michael O'Brien
3978	Kenneth J Roberts
3979	James Earl Kennamer
3980	Karen C Wittig
3981	Steven Krichbaum
3982	Adena Cook
3983	Petition
3984	David James
3985	Elizabeth Hutchinson
3986	John D. Hutchinson
3987	Jesse Jones
3988	Wayne D Iverson
3989	Jackie Taylor
3990	Greg Harris
3991	W R Garland
3992	Richard L Clark
3993	Rick Webb
3994	Daniel N Jack
3995	Patrick Donnelly
3996	Julie Engsberg
3997	Michael L. Lipford
3998	Jack Reeder
3999	T. H Watkins
4000	Nicky Staunton
4001	John R Sweet
4002	E W Irving, Jr
4003	Elliot Schewel
4004	Brian Knox
4005	Robert D Forster
4006	Donald E Baird
4007	J D Brackenrich
4008	Jonathan E Parker
4009	Edward T Walters
4010	Nelson Lewis
4011	Thomas M Bennett
4012	Donald H White
4013	Gary Marr
4014	Stuart and Joan White
4015	Dolly Voss
4016	David Skeval
4017	William H Ramsey
4018	Robert J. Lowe
4019	W Raleigh Novak
4020	James G Landis
4021	Frank Watson
4022	W Edward Hopkins, III
4023	Benjamin T King
4024	Thomas M Schofield
4025	Eric D Hoover
4026	Mickey Deike
4027	Theresa A Duffey
4028	Oscar F Baxter, IV
4029	Kurt R Weiss

4030	Michael Ballinger
4031	Dr. Geo Deike
4032	Michael W Slimak
4033	Thomas F. Wieboldt
4034	David Zimmerman
4035	Adena Cook
4036	Ben Turley
4037	Keith Harbour
4038	Elizabeth H Haskell
4039	Cynthia Sutton
4040	Sherman Bamford
4041	George Waxter
4042	S R Gochenour
4043	Patricia O'Connell
4044	M L Howley
4045	Malfourd W Trumbo
4046	James Earl Kennamer, Ph D.
4047	Warren Fitzgerald
4048	Ron Brown
4049	Cecil and Hellen Armstrong
4050	Mark Kelsey
4051	Irene C. Marston
4052	Cynthia L. Rinker
4053	Karl Krueger
4054	William (Butch) Perrine
4055	Arvid Christiansen
4056	John B Tonkins
4057	James E. Loesel
4058	Donna E Berg
4059	Michael S Hoover
4060	F Eugene Wirwahn
4061	Christy Henshaw
4062	James S Armentrout
4063	Christopher W. Hoover
4064	Artist Menks
4065	James D Sutton
4066	Joseph C Mitchell, Ph D
4067	J. Bradley
4068	Betty Anne Hoplie
4069	Sandra Dean
4070	A J Pema
4071	Harry S McIlvaine
4072	Joseph R Martin
4073	Audrey Dannenberg
4074	Anita Thomasson
4075	Eve Haverson
4076	Michael Foxx
4077	Joann G Hewitt
4078	Travis Hewitt
4079	Ernie G Hewitt
4080	Eddie H Hewitt
4081	D N Clark
4082	Terry M. Brooks, II
4083	George Null
4084	Carla Schnerman
4085	Patti Driggers
4086	Nancy Mcdonald
4087	Michelle Moring
4088	Dorothy Siviard
4089	Debbie Sawyer
4090	Jonathan Wirth
4091	Linda Hatch
4092	Richard L. Herz
4093	R Payler
4094	Sandy Greene
4095	Agnes T Rollins
4096	Partricia Wade
4097	Odell S McGuire
4098	Jean S. Sumner
4099	George M Skinnett
4100	Franz-Hakr Smith
4101	Anne Houston
4102	Shirley Atkinson
4103	Pat Pratali
4104	Jessica Bui
4105	Andrew Schwartz
4106	Nancy Walker
4107	James Wilson
4108	Michele L Smith
4109	Rebecca Bier
4110	Jim Bir
4111	Thomas W. Goodin
4112	Maggie Turggle
4113	Peggy Edwards-Frabell
4114	Mary Jane Huber
4115	Leslie Edwards
4116	Sharon Wojno
4117	Dawn J Grener
4118	Louis E. Eukise, Jr
4119	Erick Gregory
4120	Lizz Szafran
4121	L Morgan Forsee
4122	Grace Herzog
4123	Elizeth Labega
4124	Cathy Miller
4125	Eugenia Acree
4126	Donna Lowe
4127	K. J Lowe, Jr.
4128	W Craig Sease, M D
4129	Johnathan Achilles
4130	R Philip Irwin
4131	Kathleen Maier
4132	Mark Malik
4133	Patricia Jepsen Chuse
4134	John L Lanier
4135	Elizeth Labega
4136	Phillip W Hammond
4137	Laurie Awens
4138	Catherine Miller
4139	Greg Morrison
4140	Elizabeth Derringer
4141	Angela Hill
4142	Robert J Derenge
4143	Carla Ponciroli
4144	Grace Herzog
4145	Pat Pratali
4146	Peggy Edwards Frabell
4147	Mary Jane Huber
4148	Shirley Atkinson
4149	Anne Houston
4150	Tom Kihm
4151	Greg Tucker

4152	Ann Monnig
4153	Peter Osenton
4154	Mary Matherne
4155	Jason Kwok
4156	Melanie Parks
4157	Kathy Knight
4158	Sarah Drain
4159	Charlotte Venable
4160	Frank & Shirley Hobbs
4161	Martha Manner
4162	J. M Manner, Jr
4163	Jean Mauner
4164	Perry Johnson
4165	Ingrid Simanis
4166	W T Coleman
4167	Mrs F M Cahoon
4168	Virginia Jones
4169	E. W. Mays, Jr
4170	William & Elizabeth Washburn
4171	Nancy Slusser
4172	H Merrill Pasco
4173	Robert M Bozic
4174	Norman Dean
4175	Paula Nachman
4176	Patty Fox
4177	David F. Robinson
4178	John Nachman
4179	Jane Dean
4180	Kenneth B Alexander
4181	Faye Alexander
4182	Worthy Martin, Ph D
4183	Jennifer Williams
4184	Robert T. Jordan
4185	Harold and Margaret Crate
4186	Francis G Haas
4187	Ginny Shoosuit
4188	Greg Godbey
4189	No Signature
4190	Greg Weaver
4191	Gayle C Carson
4192	Mary F Greenlee
4193	Ginger Hawver
4194	Nicole E Droitsen
4195	Dan Pearson
4196	Christa Hill
4197	Wayne C McLaughlin
4198	Rosemary Boure
4199	Gerald Mckinney
4200	Phil Fonel
4201	Michael Petro
4202	David Griffith
4203	Matthew Greenway
4204	Leigh Majer
4205	Peter D Schaller
4206	Stephanie Wycoff
4207	Patrick Holan
4208	Mark McGinn
4209	Lisa Bagby
4210	M. J. Linn
4211	Carolyn C Cosgrove
4212	Ann McCaffrey
4213	Robert G. Humphrey
4214	Kat Neal
4215	A. Gilliam
4216	Ron Bloom
4217	Ophelia Van Ludwig
4218	Ron Shinner
4219	James E. Loesel
4220	James E Loesel
4221	Steven Sutton
4223	Lynwood H Sours
4224	Jeffrey Kostelni
4225	Gary Williams Riffer
4226	Curtis Seltzer
4227	Daniel A. Grosch
4228	Matthew J Blackwood
4229	O. B. Honell
4230	Edward Mainland
4231	Nancy Gilliam
4232	Doris Deel Hall
4233	James E Bryant, Jr.
4234	Kay Hanes
4235	David B Mathison
4236	Tim Hoffman
4237	Thomas M Ricker
4238	Daniel Hicks
4239	Phillip D Coulombe
4240	Clay Williamson
4241	Mark L. Shaffer
4242	Michael O'Brien
4243	William P Scudder, Jr.
4244	Carol Jensen
4245	Sue McDonald
4246	Charles T. Warren
4247	George N Keefe
4248	Allen Kreger
4249	Sylvia A Brugh
4250	Andy Mahler
4251	Carl R Fischer
4252	Margaret Lindsay
4253	Donald Walden
4254	Bob Liebman
4255	Thomas J. Messenger
4256	Mark A Smith
4257	Barry L Cook
4258	Andrew A Armano
4259	Mary & Harry Bennett
4260	William H Ramsey
4262	Karen Silverman
4263	Ronald and Peggy Conley
4264	Joann M Joseph
4265	Dave Cedarleaf
4266	Charles H Ellis, III
4267	Michael S Sutton
4268	Diana Esher

LIST OF COMMENTERS BY AFFILIATION CODE

BUS	48	Barry F Clutter
BUS	53	Charles J Saboites
BUS	54	Jim Coffin
BUS	59	John A Carter
BUS	131	J G Hurt
BUS	143	John P Fitzgerald
BUS	145	W R. Small
BUS	166	R Scott Wallinger
BUS	174	Stephen A Bennett
BUS	280	Bill Small
BUS	282	Wayne A Dixon
BUS	286	Edward L. McCoy
BUS	370	Christopher S. Smith
BUS	374	Barry F Clutter
BUS	384	Calhoun W. Umphlett
BUS	490	John F. Rasor
BUS	570	R. K. Thacker
BUS	687	Carolyn McDonald
BUS	703	John Dennison
BUS	747	Gene Marples
BUS	749	Joseph R. Newlon
BUS	753	Charles W Whitmore
BUS	758	Wendell M Cramer
BUS	761	Thomas B. Norman
BUS	765	Mitchell O. Carr
BUS	769	C Bruce Powell
BUS	770	C Bruce Powell
BUS	771	William T. Shuler
BUS	802	Stuart Deacon
BUS	810	R E Dostf
BUS	817	Greg Chapman
BUS	820	William Maxey
BUS	839	John Homer
BUS	854	Charles W Newhall, Jr.
BUS	858	Peter Beasley
BUS	870	Randall Eller
BUS	879	Chris Lyddan
BUS	880	George C. Patrick
BUS	882	Sherry J Pierson
BUS	890	Wayne Davis
BUS	894	Lloyd Green
BUS	903	Robert Nort
BUS	922	Norman E. Murray
BUS	942	William D. Crull
BUS	948	Richard Bell, Jr
BUS	983	H Earl Longest
BUS	1060	Deborah B Baker
BUS	1117	Glenn Dixon
BUS	1138	Fred Thies
BUS	1141	F A Lugar
BUS	1142	James T Martin
BUS	1151	Jeffery A Messenger
BUS	1178	Jerry McKee
BUS	1180	Russell Fritz, Jr.
BUS	1182	Henry Thorton, Jr
BUS	1231	O'Neal
BUS	1248	C Wigenton
BUS	1264	Calvert S. Fitzgerald
BUS	1270	Philip J. Statton
BUS	1285	E. F. Oliver
BUS	1309	John M Gregory
BUS	1312	Paul H Delong
BUS	1340	Danny Moore
BUS	1353	Tom Catlett
BUS	1398	Hatler Morgan
BUS	1412	Robert F Woods
BUS	1413	Daniel Ash
BUS	1414	Donald Waugh
BUS	1415	David Mason
BUS	1416	Cindy Ash
BUS	1417	Tommy L Stanley
BUS	1418	John H Tyler
BUS	1419	Raymond Jackson
BUS	1428	B A Mullican, Sr
BUS	1432	Robert R Feagans
BUS	1549	Jeff Byrd
BUS	1624	Thomas W Current
BUS	1632	B P Schwanda
BUS	1633	O. J. Rozell
BUS	1635	R H Beauchamp
BUS	1637	Herbert B Murphy
BUS	1643	David Husaw
BUS	1657	John A Heard
BUS	1677	Harold Everson
BUS	1812	Mary F. Wirth
BUS	1846	James C Breeden
BUS	1855	Charles R Lloyd
BUS	1860	Charles T Philpott, Jr
BUS	1863	Ken C Kowalski
BUS	1865	Lawrence R Burton, Jr.
BUS	1872	Freddie L Moore
BUS	1983	Gregory W Cook
BUS	1985	Johnie F. Albanese
BUS	1986	Ronald F. Clark
BUS	1987	Stephen Bliley
BUS	1989	Robert D Bedingfield
BUS	1997	Robert B Davis, III
BUS	2024	J M Davidson, Jr.
BUS	2028	Allen Lowry
BUS	2047	James L Minter
BUS	2075	Kenneth Klahre
BUS	2161	David L Deeds
BUS	2201	Raymond A Majesty
BUS	2221	John E. Masaschi
BUS	2253	Bonnie N. Hoover
BUS	2255	Sara H. Davis
BUS	2263	Philip E. Booker
BUS	2264	W. L. Goard
BUS	2274	Stan Adams
BUS	2275	Roy Mims
BUS	2278	Curtis Miller
BUS	2284	Jerry Holloway
BUS	2286	Janet H. Lowe
BUS	2287	Fred Hardin
BUS	2293	Donna Barbour
BUS	2305	R Lynwood Scott
BUS	2315	Paul Ingram
BUS	2316	Donna Howard

BUS	2317	Susan Jones
BUS	2318	John Hicks
BUS	2338	John D Hurd
BUS	2340	Mark Jacobson
BUS	2342	W E Ragland
BUS	2343	Patrick D Sarsfield
BUS	2378	G Nelson Wilson, IV
BUS	2379	Yukon Lumber Co
BUS	2451	Kevin Arey
BUS	2452	Ed Arey
BUS	2495	J L Chafin
BUS	2499	Randall E Dolly
BUS	2506	Jeff A Webb
BUS	2507	Dillard Hylton
BUS	2516	James L. Franklin, Jr.
BUS	2552	Elmer Grimm, Jr
BUS	2563	Jeff Hicks
BUS	2582	Paul G. Barringer
BUS	2586	David Jones
BUS	2590	R E Russell
BUS	2610	Gary Miller
BUS	2646	Lloyd Flury
BUS	2647	James G Dunsmore
BUS	2658	Phillip W. Deacon
BUS	2662	James Blake
BUS	2672	Stuart L Deacon
BUS	2676	J D Thomas, Jr
BUS	2679	Joseph G Savery
BUS	2682	Brian W Edson
BUS	2833	Jo Anne Scott Webb
BUS	2886	Marvin Q Tinsley
BUS	2891	Mark D Sims
BUS	2893	Robert T Forney
BUS	2919	J Carlton Courter, III
BUS	2928	Stephan T Clark
BUS	3095	John M Parfell & Dorothy Day
BUS	3121	Claude Gittinger
BUS	3122	Claude L Gittinger
BUS	3134	Pete Evans
BUS	3439	Rea Klosky
BUS	3440	Henry York
BUS	3446	Richard Cartwright Austin
BUS	3484	G W Monk
BUS	3500	Bruce Griffith
BUS	3514	Joe R Meadors
BUS	3592	Michele C Wright
BUS	3609	Daniel H Turner, II
BUS	3611	Thomas E Carroll
BUS	3617	Richard G Breeden
BUS	3618	Daniel B Deeds
BUS	3664	Jim Philpott
BUS	3668	Kent Bartley
BUS	3673	Jerry Hooke
BUS	3686	E E (Gene) Dixon, Jr
BUS	3714	Cliff Gunst
BUS	3721	William L Johnson, II
BUS	3722	John W MacIlroy
BUS	3754	Duncan C Augustine
BUS	3759	Jo Ann N Milander
BUS	3760	Herbert A Kwasniewski
BUS	3765	John E Allen
BUS	3767	Brian Bowen
BUS	3773	John A Carter
BUS	3790	Jim Martin
BUS	3791	Leslie B Dayton
BUS	3805	Karl F Plitt
BUS	3813	W R Deacon
BUS	3815	Jerry W Deacon
BUS	3823	John Johnson
BUS	3831	Stephen A Bennett
BUS	3842	William L Harris
BUS	3891	John A Luke
BUS	3904	Edward G Frazee
BUS	3909	Robert Bardwell, Ph D
BUS	3912	Edward G Kraynok
BUS	3913	G B Ragsdale
BUS	3915	George Smith
BUS	3917	Richard L Youmans
BUS	3967	Edward White
BUS	3982	Adena Cook
BUS	4016	David Skeval
BUS	4017	William H Ramsey
BUS	4020	James G Landis
BUS	4037	Keith Harbour
BUS	4054	William (Butch) Perrine
BUS	4236	Tim Hoffman
BUS	4256	Mark A Smith
BUS	4257	Barry L Cook
BUS	4260	William H Ramsey
BUS	4265	Dave Cedarleaf
FED	62	Richard Grabowski
FED	91	Gary Everhardt
FED	875	Jerry C McMaster
FED	895	Jennings G Mcabee
FED	2066	Jim Olin, Member Of Congress
FED	2630	John W Warner
FED	2900	Constance A Morella, Member Of Congress
FED	3643	Don Henne
FED	4268	Diana Esher, Chief
IND	1	Peter Frustaci
IND	2	Greg Demieville
IND	3	McKelden Smith, M D
IND	4	Andrew Macskimming
IND	5	Walter and Dorothy Peleck
IND	6	Jeff Taylor
IND	7	Barbara Teach
IND	9	W R Vaiden
IND	10	Diane Eubanks
IND	11	Richard P Grist
IND	12	John Mash
IND	13	Pat Drouillard
IND	14	Gregory J Balcerek
IND	15	Bob Mueller
IND	18	Frank Overbey
IND	19	Thomas G Traver, Jr
IND	20	Jesse P Moore
IND	21	Vern Henderson
IND	22	Skip and Pam Goodrich
IND	23	Morgan Saxby
IND	24	John S Barr
IND	25	Debra C Welch

IND	26	Myranne O Wylie
IND	27	Michael Welch
IND	28	Dennis T. Conroy
IND	29	Kris Jones
IND	30	Donald & Claudia Tyler
IND	31	Sandra Thompson
IND	32	Elise Galloway
IND	33	Emmett Allen
IND	34	Connie Fisher
IND	35	David J Michel
IND	36	Steven Wylie
IND	37	Michael Jones
IND	38	William A Hook, Jr
IND	39	Brain and Jean Mccarthy
IND	40	Bob Mueller
IND	41	Janice and Jimmy Salmon
IND	42	David Dagenhart, Jr
IND	43	Gary Ullrsi
IND	44	Steve Winder
IND	45	Dolores C. Acebo
IND	46	Carl Parsons
IND	47	John L. Nachman
IND	49	Michael J Papay
IND	50	Stanley B Griffin
IND	51	Elizabeth Murray
IND	52	Bob Mueller
IND	55	Lewis M. Prichard
IND	56	Edward Dauchess
IND	57	Leon S Minckler, Ph D
IND	61	Richard Spotts
IND	63	Clarence J Bennett
IND	64	Mark Wallner
IND	66	William H Craig
IND	67	Robin Leonard
IND	68	Terry E Van Natter
IND	69	Dwaine Boone
IND	70	J. W Puckett
IND	71	David M Lupsha
IND	73	Ted Harriman
IND	74	Gary Crawford
IND	75	Chris Burdette
IND	76	Eston Norton, Jr
IND	77	Jenny McBride
IND	80	Julie A Kutruff
IND	81	W. E Swygert, Jr
IND	83	Keith M Light
IND	84	Vernon Garber
IND	85	Vernon Garber
IND	86	Keith Light
IND	88	Richard P Grist
IND	89	Chas A Tanner, Jr
IND	90	C E McCallister
IND	92	Robert E Lockhart
IND	93	William A Regan
IND	94	Frederick Maisel, III
IND	95	Larry Kemper
IND	96	David Rose
IND	97	Mark Milenbaugh
IND	98	Howard C Bailey
IND	99	Ted Kyer
IND	100	David Naylor
IND	101	Steve Reinhold
IND	102	Rodney Knight
IND	103	Reed Taylor
IND	104	James R. Road
IND	105	Terry R. Gives
IND	106	Kevin Bennett
IND	107	Daniel H Bragg, Jr
IND	108	Philip Green
IND	109	William D Martin
IND	110	Randall Mullins
IND	111	Sherry L Keffer
IND	112	Charles R. Stavers
IND	113	Roger Legg
IND	114	Robert Moss
IND	115	Robert Van Der Ham
IND	116	Gary L. Owens
IND	117	Jimmy D Lawson
IND	118	D McMillin
IND	119	Betty Stacey
IND	120	James Bouyer
IND	121	Michael E Hinely
IND	122	Ernest L. Lake
IND	123	Vernon Young
IND	124	Eugene K. Ward
IND	125	Harold W Hilton
IND	126	Bill Miller
IND	127	Johnni Madison
IND	128	Roy Hilton
IND	129	Carl E Gower
IND	130	George David Green
IND	132	Joseph M Giuliani
IND	134	Robert F Mueller
IND	135	Elton A. Ellison
IND	136	David E. Marsh
IND	137	Sue J Wright
IND	138	Donald G. Kirkpatrick
IND	140	Vernon Garber
IND	141	Richard A Jordan
IND	144	Petition
IND	147	Doug Herbert
IND	148	Melinda N Ross
IND	149	Timothy J. Cox
IND	150	Alan Rice
IND	151	John R Erskine
IND	152	John Edwards
IND	153	Mike Juban
IND	154	Illegible Signature
IND	155	Thomas D Meisel
IND	156	Russell L Self
IND	157	John Hannan
IND	158	D E Cox
IND	159	Michael R Gay
IND	160	Chris Scott
IND	161	Andre Johnson
IND	162	Illegible Signature
IND	163	Andrew Mchellon
IND	164	Kallene R. Purl
IND	165	Ross Weaver
IND	168	Catherine E Dick
IND	169	Tom Eick
IND	170	Greg Lemieux

IND	172	Ione Dusinberre
IND	173	Marione Cobb
IND	176	Mark Gardner
IND	177	R J. Beahm
IND	178	Robert Hunsvcker
IND	180	Alexis Zeigler
IND	182	Charles W. Houghton, D D S, M.S.
IND	183	Harry L. Sargent
IND	184	John E. Montague
IND	185	Robert F Mueller
IND	186	G B Foltz
IND	189	Steve Henson
IND	190	Don McElwee
IND	192	Franklin D Groves
IND	193	John R Branch
IND	194	Mr. and Mrs Charles Curtin
IND	195	Christopher A Spraker
IND	196	M L Jennings, Jr
IND	197	Roger Thompson
IND	198	Ann G Williams
IND	199	Peter K Zimmerman
IND	200	William J Thurston
IND	201	Robert E Williams
IND	202	Charles E Smith
IND	203	M Scott Vail
IND	204	Gary M Wilcher
IND	205	Ralph E Helper
IND	206	Otenia V Wallace
IND	207	Donald L. Simpson
IND	208	Danny Ross
IND	209	Richard L Terrell
IND	210	John Jackson
IND	211	Mary T Ellis
IND	212	Randy L Lawson
IND	213	Jerry R Taylor, Sr
IND	214	William T Hevener
IND	215	Richard A Barber
IND	216	James B Kelley, Jr
IND	217	Gail P Good
IND	218	Vanessa Robinson
IND	219	Ruth P Altizer
IND	220	John C Bazzren
IND	221	R Berkley Mays
IND	222	Lonnie A Hayslett
IND	223	Jerry E Ginger
IND	224	Bobby C. Augell
IND	225	Donald D Scruggs
IND	226	Darrel W Tucker
IND	227	William H Tucker
IND	228	Stuart C Johnson
IND	229	Richard K. Keith
IND	230	Edward F Lesher
IND	231	Herbert C Fruland
IND	232	James W Railey, Jr
IND	233	Lawrence L Carpenter
IND	234	Stephen R Burgess
IND	235	James E Salyen
IND	236	Patsy G Snead
IND	237	William M Conner
IND	238	Thomas F Bowman
IND	239	Jim Given
IND	240	Russell W Lerrio
IND	241	William E. Hinkle
IND	242	William P. Barber
IND	243	Greg Lee
IND	244	Robert S Liggins
IND	245	Arnold R Persinger
IND	246	John R Ruble
IND	247	Ezra G Halterman
IND	248	T. L. Neal
IND	249	Charles W Myers
IND	250	Lindy Bazzria
IND	251	Beverly R Ervin
IND	252	S Edward Woodcock
IND	253	Ellen J Candler
IND	254	Freddie Z Feazell
IND	255	E G Huntington, Jr
IND	256	Dow E Mongold
IND	257	Mike Grist
IND	258	Jenny C Fenderson
IND	259	R. Wayne Ogden
IND	260	G Pettit
IND	261	Dennis L Hall
IND	262	June Klement
IND	263	Wesley L McClung
IND	264	Timothy H Altizer
IND	265	Henry C. Jackson, Jr
IND	266	Diane C Hicks
IND	267	Ronald D Bakes
IND	268	Michael P Wade
IND	269	James E. Burnette
IND	270	Kevin Miller
IND	271	Charles Demoss
IND	272	Brett A Laudermill
IND	273	Jeffrey Bulischeck
IND	274	W A Nikkel
IND	275	C. S Gailland
IND	276	Charles L Horn
IND	277	Glenn L Whitehead
IND	279	Dan Phillipon
IND	283	Gloria A Brooks
IND	284	Collette Anderson
IND	285	Lynn Cameron
IND	288	E D Woodson
IND	289	Rodney G Strong
IND	290	Don P. Ruedi
IND	292	Charles S Yates
IND	293	Stephen D Delappe
IND	296	Curtis Seltzer
IND	297	Anita J Haymaker
IND	298	Kenneth R Haymaker
IND	299	Ronald L Childs
IND	300	Charles E Givens
IND	301	James R Gibson, Jr
IND	302	Gary E Thacker
IND	303	Harvey L Mustoe
IND	304	Ernest Jones
IND	305	William F Staton
IND	306	Jennings L Morton
IND	307	Robert W Honts
IND	308	Robert L Cook

IND	309	George M Talley
IND	310	Anthony E. Campbell
IND	311	Steve M Crawford
IND	312	James M. Simmons
IND	313	C N. Robertson
IND	314	Darrell Z Paxton
IND	315	James V. Hefner
IND	316	Richard Paul Lilly
IND	317	Patricia K. Hartman
IND	318	Calvin R Worley, Sr.
IND	319	Jerry Vess, Sr.
IND	320	Patricia McPeek
IND	321	David R White
IND	322	Bertrand R. Sway
IND	323	Amanda, Angelina, Mimi Woo
IND	326	John D Farmer, Jr
IND	327	Frederic Bocock
IND	328	James Watson
IND	329	Kenyon Kramer
IND	330	David A Moyer
IND	331	John H. Burns, Jr.
IND	332	Richard E Lee
IND	333	B N Stallard
IND	334	Homer A Simmons
IND	335	Floyd P Flangan
IND	336	Ralph D Hamilton
IND	337	Billy Bostic
IND	338	Jennie Hatcher
IND	339	David K Blankenship
IND	340	Raymond C Hunter
IND	341	Stanley E. Wright, Sr.
IND	342	Michael A. Smith
IND	343	Robert W. Honts, II
IND	344	Marlin G Rexrode
IND	345	Charles H Zimmerman, Jr
IND	346	Carl W Dressler
IND	347	Garland H Altizer
IND	348	Wilbur J Carpenter, Jr
IND	349	Kenneth Hacker
IND	350	Anest Lake
IND	351	Robert Moss
IND	352	Michael Lee Barnhouse
IND	353	Vernon H Young
IND	354	Larry Knighton
IND	355	James S Birchfield
IND	356	Ray A Lockhart
IND	357	Carl E Linkenhocker, Sr.
IND	358	Mont Andrew
IND	359	Daniel Tyson
IND	360	Alfred W. Paxton
IND	361	Estel B Clark
IND	362	Sylvia R. Ehlsinger
IND	363	Gerall M Pullin
IND	364	James A Stinnett
IND	365	Henry F Turner
IND	366	Owen R Beale
IND	367	James T Phipps
IND	371	J J Murray
IND	372	Ione Dusinberre
IND	373	James R Burruss
IND	375	Shireen I Parsons

IND	377	Thomas M. Stanley
IND	378	Michelle R Fletcher
IND	380	John H. Wick, III
IND	381	Duke Keeter
IND	382	Jay Farrell
IND	383	Ronald Elliott
IND	385	Rick Holtz
IND	386	Larry D. Look
IND	387	Stephen P Troxell
IND	388	George Oxner
IND	389	Stanford Green
IND	390	H Neil Smith
IND	391	W Sloan Gavin
IND	392	Mae Bolt
IND	393	Hazel Green Meeke
IND	394	Illegible
IND	395	Charles M Gavin, III
IND	396	William Shelhorse
IND	397	Robert Fickling
IND	398	Steve Brown
IND	399	W. C Blalcevey, Jr
IND	400	St Clair Walters
IND	401	D Topper
IND	402	Thomas Brinson
IND	403	Kenneth & Carol Rexrode
IND	404	J R Swanbeck
IND	405	W. Haoris, Jr
IND	406	Illegible
IND	407	Ralph White
IND	408	Angelyn Ladue
IND	409	Albert Shaleal
IND	410	Daniel Sturkie
IND	411	Larry Horne
IND	412	A. C Thomas
IND	413	A B Jones
IND	414	A W Minchew
IND	415	Clarence & Helen Harrison
IND	416	Mary Kayaselcuk
IND	417	Vince D. Elliott
IND	418	Stephen T.
IND	419	Robert Rose
IND	420	A Mason Gibbes
IND	421	Illegible
IND	422	Shelby Green
IND	423	Lagarr Burton
IND	424	Mrs. K. C Nash
IND	425	L Burton
IND	426	Jesse Shirer
IND	427	Robert P Taylor
IND	428	David Naylor
IND	429	Eugene K Ward
IND	430	Grady A Isenhart
IND	431	William C. Thomas
IND	432	Carles Ellinkle
IND	433	Gary E. Isenhart
IND	434	W C Williams
IND	435	Charles R. Clewery
IND	436	Davis E Stull
IND	437	Ruhl A Givens
IND	438	William D Martin
IND	439	Michael E. Hively

IND	440	James Dempsy
IND	441	Greg Hively
IND	442	Johnnie Madison
IND	443	Jeff Perkins
IND	444	Jim C. Homer
IND	445	Danny Hopkins
IND	446	Orval J Russell
IND	447	Wayne Smith
IND	448	Robert Malasheirch
IND	449	Timothy A Dick
IND	450	Michael Ferrell
IND	451	Michael W Mytich
IND	452	Michael Curtis
IND	453	David W Clarke
IND	454	Patricia C Watts
IND	455	Wayland A. Laudermilk
IND	456	Mary Jane Mitchell
IND	457	John C Harris
IND	458	Mary Ann Tucker
IND	459	Ronnal D. Bostic
IND	460	Robinson Claytor
IND	461	Alec White
IND	462	Scott A Lacks
IND	463	Donald W Wolfe
IND	464	Charles R Campbell
IND	465	Shelby Goode
IND	466	Hunter A Smith
IND	467	L. Doug Smith
IND	468	L E Smith
IND	469	Kenny Goode
IND	470	Kathy H Campbell
IND	471	Diana J Twitty
IND	472	Mrs A W Harding
IND	473	Ear D Hanna
IND	474	Alston McClung
IND	475	Ronnie Eaves
IND	476	Douglas Creasey
IND	477	Stephen Bradebaur
IND	478	Jimmie Shelton
IND	479	W Lane McComas
IND	480	Sarah Neal
IND	481	Russell Mooney, Jr
IND	482	Charles Miller
IND	483	Mrs Roni Wilkins
IND	484	James Wilkins
IND	485	Norman L Persinger
IND	486	Dick Mortimer
IND	487	Joseph W Lancaster
IND	488	Vickie A Boone
IND	489	Roger F Freedman
IND	491	Corinne Le Bovit
IND	492	Joseph Mcnamara
IND	493	Ned Poyser
IND	494	Harold E Spode
IND	495	Paul B Lacy, Jr
IND	496	Beverly Worsley
IND	497	David M Newkirk
IND	498	Ernest O Pugh
IND	499	Donnie E Wheatley
IND	501	Rachel Bardwell-Jones
IND	502	Donald R Ober
IND	503	Jennifer Gaden
IND	504	Anne W Kavanaugh
IND	505	Stephen Nicholson, Ph.D.
IND	506	Jesse E Pullin, Jr
IND	507	A. W Harding
IND	508	Richard M Downer
IND	509	Ricky W. Daily
IND	510	Judy D King
IND	511	Otis D Boone
IND	512	E. L Norton, Jr
IND	513	Leonard R Waid
IND	514	Greg Sparks
IND	515	Jeff Morrison
IND	516	Curtis McClung
IND	517	Randy Berry
IND	518	Danny R Brown
IND	519	Samuel M. Goodson
IND	520	Steve Lamontagne
IND	521	Jerry A Mullins
IND	522	Gary A Roach
IND	523	Steven A Brooks
IND	524	Kenneth Posten
IND	525	William D Hicks
IND	526	Kevin D Walters
IND	527	Kelly D. Vandall
IND	528	Steve Gill
IND	529	Ken Gunter
IND	530	Raymond L Taylor
IND	531	Charles W Walters
IND	532	Tawny L. Boggs
IND	533	Benjamin E Campbell
IND	534	Chris Burdette
IND	535	Terry E VanNatter
IND	536	Jacob Brown
IND	537	Aruel Walters
IND	538	Burnell Hamrick
IND	539	Gary Crawford
IND	540	Harry Carter
IND	541	Robert W. Mayer
IND	542	Eugene Brugg
IND	543	John Ferrell
IND	544	Samuel K Shaffer
IND	545	Marshall D Woods
IND	546	Tim Goodson
IND	547	David Simms
IND	548	Garth D Gunter
IND	549	Charles M Hite
IND	550	Michael Hardy
IND	551	Ernest C. Holliday
IND	552	Macil Sandy
IND	553	Richard D Redden
IND	554	Brian Herndon
IND	555	Ted Harriman
IND	556	Billy Joe Harris
IND	557	Jerry Martin
IND	558	Dwight R. Roach
IND	559	Matthew S Tasker
IND	560	Clyde S Swartz
IND	561	Jerry W Forbes
IND	562	T B Perry
IND	563	Susie M Plasters

IND	564	D F Miller
IND	565	Jesse L Drennen
IND	566	Dreama R Hostetler
IND	567	Robert E Loving
IND	568	Richard C. Findley
IND	569	Michael S Bartley
IND	571	Norman J Garvis
IND	572	Kathryn H. Craft
IND	573	Ron Jeffries
IND	574	Gary A Porterfield
IND	575	Robert L Deitz
IND	576	Randall Caterbury
IND	577	Alvin L Fox
IND	578	Dwight S. Hicks
IND	579	Harold N Lacks
IND	580	Charles and Debbie Jamison
IND	581	Robert B Hale
IND	582	W M Hayslett
IND	583	John J Gillian
IND	584	Richard E. Cooke, Jr.
IND	585	Jarret Perry, Jr
IND	586	Jackie A. Keyser
IND	587	Gary M. Bowers
IND	588	Charles Jones
IND	589	Eugene E Young
IND	590	David W McCormack
IND	591	George Clark
IND	592	Rodney Brown
IND	593	Marvin E Faudice
IND	594	Marcus G. Smith
IND	595	John and Aleata Gregory
IND	596	Maynard A Clark, Jr.
IND	597	Cynthia D Lucas
IND	598	Carrie E. Gaines
IND	599	Carolyn L. Phillips
IND	600	Charles W Pettigren
IND	601	Jerry A Pugh
IND	602	Joseph A Wimer
IND	603	Mary E. Azes
IND	604	Ray Quarles
IND	605	Gene N Snyder
IND	606	Rober M Carter
IND	607	Chester N Smith
IND	608	Vernon Blankenship
IND	609	Jimmie F Skelton
IND	610	Roger D Smith
IND	611	Nicholas T. Kern
IND	612	Dana R Humphreys
IND	613	Ellis W Sellers
IND	614	Jennifer Spraker
IND	615	John Bennett
IND	616	Barry G Calvert
IND	617	Roger E. Smith
IND	618	Kenneth W Downes
IND	619	Mr and Mrs Thomas E Ayers
IND	620	William Sortain
IND	621	Bruce A Chapman
IND	622	Frederick J Giles
IND	623	Peggy Cash
IND	624	Art & Janice Brumit
IND	625	Larry W Ruble
IND	626	Gene B Breeden
IND	627	Glenden L. Comer
IND	628	Marcus C Weikle
IND	629	Nancy H Pearman
IND	630	Hugh Robinson
IND	631	Richard Ford
IND	632	L Bryall
IND	633	Charles Stuart
IND	634	John Boothe
IND	635	John Pitt
IND	636	Harold Swuher
IND	637	Eldon Hart
IND	638	Steve Conrad
IND	639	Claude Reams
IND	640	William Rogers
IND	641	James Woolford
IND	642	Bob Dunn
IND	643	William Carr
IND	644	Homer Rewer
IND	645	Mary Hall
IND	646	Sara Richey
IND	647	John Wilson
IND	648	C M Powell
IND	649	Illegible
IND	650	Randolph Guthrie
IND	651	Raymond Beers
IND	652	Illegible
IND	653	John Todd
IND	654	Sarah Eggleston
IND	655	Albert J Meyer, Jr
IND	656	Veronica Horton
IND	657	Illegible
IND	658	Julian Sider, Jr.
IND	659	Arthur Johnston
IND	660	Emanuel Strauss
IND	661	E M. Strauss
IND	662	Chalen Gordon
IND	663	Betty Myurek
IND	664	Ray P. Quarles
IND	665	I B Loueton, Jr
IND	666	Gerald Jetton
IND	667	Jean Gower
IND	668	T Charles Gower
IND	669	F J Bowman
IND	670	John Mentzer
IND	671	Dr Andrew Arnold
IND	672	J T McCoulb
IND	673	Richard F
IND	674	Irvine Kectledge
IND	675	Charles Blanton Blackburn
IND	676	Glenn Whitlow
IND	677	Roy Byers
IND	678	Ralph Dolan
IND	679	Vivian Daniels
IND	680	Ronald & Jean Hawk
IND	681	W W Baber
IND	682	Leroy Parker
IND	683	Illegible
IND	684	B Norford
IND	685	Richard Ferguson
IND	686	Dewey Camp

IND	688	Francis Sheild
IND	689	David Rost
IND	690	Daniel Mann
IND	691	John Gardner
IND	692	John Heilmann
IND	693	Edwin, Roy, Lorrain & Donald Reaves
IND	694	Harry Chiles
IND	695	Rachel Hourn
IND	696	Lisa Eled
IND	697	C. Benton Burns, M.D.
IND	698	Lewis Cootes
IND	699	Claude & Lucille Webster
IND	700	Lizzy Burge
IND	701	John Parker, Jr.
IND	702	R. N Parker
IND	704	W. L. Bailey, III
IND	705	Rodney E Wolfe, Sr.
IND	706	Leonard W. Val
IND	707	Don Hershey
IND	708	Rebecca R Strong
IND	709	Mike Bucher
IND	710	Latane D. Brugh, Jr.
IND	711	James R. Light
IND	712	Charles S Wingfield
IND	713	R Scott Peterson
IND	714	Ray F Cheatham
IND	715	Robert L Smith
IND	716	Randy Morgan
IND	717	Katherine Woodson
IND	718	Andy Davis
IND	719	Hal H. Sharp
IND	720	Richard Preston Lilly
IND	721	Lana Oyler
IND	722	Lonny A Zilkofoose
IND	723	Homer Boggess
IND	724	J. W. Puckett
IND	725	Michael Rybarczyk
IND	726	Harold Steele
IND	727	W J. Peters
IND	728	Robert H Thompson
IND	729	John V Glover
IND	731	Frank Cauraugh
IND	732	Wm. Lee Hildebrandt
IND	733	Raymond W Mullins
IND	734	Hugh T. Henderson
IND	736	Harold M. Wilson
IND	737	E. W Mays, Jr
IND	738	Lin C Hartung
IND	739	Ben V Peaman, Jr
IND	740	Neal R Fisher
IND	741	James K Saunders
IND	742	Thomas Erff
IND	743	Mark Buzzard
IND	744	Gary R Wilson
IND	745	G W Colbert
IND	746	Jaycee Persinger, Jr
IND	748	Donald Seifert
IND	750	Danny R Arnold
IND	751	William L Paxton, Jr
IND	752	Gloria Dressler
IND	754	Alice Persinger
IND	755	David E Rideout
IND	756	Harold B. Risher
IND	757	Richard C Rakes
IND	759	Anne F. Hunter
IND	760	Debra L. Weaver
IND	762	David W. Yates
IND	763	Edgar Pessemier
IND	764	Donald A Williamson, Jr.
IND	766	Mark Trainer
IND	767	Jennifer Howard
IND	768	R. W. Denman
IND	772	Linzy A. Zickofoose
IND	773	H. Lang Gilbert
IND	774	John F. L Bell
IND	775	Keith E. Simmons
IND	776	Dewey M. Eary
IND	777	Sterling R. Snedegor
IND	778	T. H. Leighton
IND	779	Gary E Neyer
IND	780	James A Terry
IND	781	Louise K. Dooley
IND	782	Oakey L. Pruett, Jr.
IND	783	Robert R Terry
IND	784	Matthew G. Young
IND	785	Carolyn D. Young
IND	786	Mary E. Young
IND	787	Michael D. Henderson
IND	788	Bobbie J. Tucker
IND	789	Oakland L. Eggleston
IND	790	Patricia F. Amos
IND	791	Wanda K. Hepler
IND	792	James J. Foster, Ph.D
IND	793	Richard W. Shiflett
IND	794	Gerald D. Burks
IND	795	Charles Bodie
IND	796	Adrienne Hall-Bodie
IND	797	Eric Sheffield
IND	798	Norman C. King
IND	799	Wendy E. Richards
IND	800	Steve Richards
IND	801	Albert Simoirds
IND	803	William Brewer
IND	804	Harold Douglas
IND	805	Mr. & Mrs. Ward McDavidson, III & Family
IND	806	E R Moss
IND	807	Steve Allen
IND	808	Jessie McCollough
IND	809	No Signature
IND	811	James Toflinger
IND	812	Illegible
IND	813	Illegible
IND	814	Edwin Abbott
IND	815	Mary Jane Hamilton
IND	816	J Boyd
IND	818	George Shriles
IND	819	E A Tuckevilles
IND	821	Gene Glatfelty
IND	822	Mr & Mrs Robert Darden
IND	823	Richard Starky

IND	824	Francis Lewis
IND	825	Mary Rose Martin
IND	826	Clyde Pope
IND	827	Vinson Bragg
IND	828	Walter Jenkins
IND	829	Gloria Shreue
IND	830	Mark Hargin
IND	831	Caroline Butts
IND	832	A. McMelkin
IND	833	Boyd Riddle
IND	834	Maurice Eckman
IND	835	Daniel Baxley
IND	836	Jerry Dean
IND	837	Walter Coles
IND	838	Richard Carter
IND	840	Illegible
IND	841	Greg Burupas
IND	842	Dick Grist
IND	843	J. Calame, Sr.
IND	844	Linda C. Criser
IND	845	Glen H Criser
IND	846	James R McAllister
IND	847	Michael Drusinsky
IND	848	A. J. "Chip" Corley
IND	849	Thomas Beard
IND	850	James Powell
IND	851	Marlin Lawson
IND	852	David A. Dandridge
IND	855	Mark E. Wallner
IND	856	Franklin Early
IND	859	Clarence Bennett
IND	860	Harry S. McIlvaine
IND	863	Robert B. Seiple
IND	864	Howard E Cobb
IND	865	Robert E. Shively, Jr
IND	866	Dwain A. Tyree
IND	867	William Edwin Winn
IND	868	Chearyl Rogers
IND	869	Steven Heinitz
IND	871	Alden Holeywell Dreyer
IND	872	Gerald J. Black
IND	873	Thomas G Merring
IND	874	David Guggenheim
IND	877	Margaret Sacuto
IND	878	Marguerite Dickerson
IND	881	Oliver Richards
IND	883	William R. Small
IND	884	Mike Bodkin
IND	885	E Gray Baird
IND	886	Jerry R Taylor, Jr
IND	887	O'Neill S Umberger
IND	888	Diana Oddenino
IND	889	Wayne A. Rhodes
IND	891	Elizabeth B Carson
IND	892	Lee Mercer
IND	893	William V. Parker
IND	896	Ralph Adams
IND	897	Sidney Woodson
IND	898	Fred Whipple, Jr
IND	899	William Thompson
IND	900	Melvin Stroud
IND	901	J. Thompson
IND	902	Patricia Estes
IND	904	Peter Beasley, II
IND	905	Billy Margan
IND	906	Howard Vincent
IND	907	Philip Edwards
IND	908	D. W Northern
IND	909	Bobby Taylor
IND	910	J. Rhett Frazier, Jr.
IND	911	Harper Galford
IND	912	Bill Walker
IND	913	Willard Finney
IND	914	Leroy Hinson, Jr.
IND	915	Nancy F. Qubain
IND	916	Fahim I. Qubain
IND	917	James S. Hill
IND	918	Jean S Porterfield
IND	919	Ronald Porterfield
IND	920	James A Tyree, Jr.
IND	921	John Jordan, Jr
IND	923	Edna Claire Thomas
IND	924	Kathi J. Baker
IND	925	Wendy L. Reardon
IND	926	Melissa J. Keppel
IND	927	L. C. Burks, Jr
IND	928	Richard and Meredith Childress
IND	929	Tim and Donna Stalnaker
IND	930	Connie S. Johnson
IND	931	Clinton G. Sizemore, Sr.
IND	932	Christopher Barlow
IND	933	Pauline and Fred Dickens
IND	934	Ken Novak
IND	935	William G. O'Brien
IND	936	D G. Austin
IND	937	Richard P Grist
IND	938	Frances Lee-Vandell
IND	939	Marino D. Medici
IND	943	William K. Murray
IND	944	Thomas M. Debutts
IND	945	Aubrey A. Smith
IND	946	E B Gorham
IND	947	Mr. and Mrs Gene Whorley
IND	949	(Mrs.) M Moser
IND	950	Trish Dinsmore
IND	951	Steven L. Wylie
IND	952	Steve E. Day
IND	953	Frank Overbay
IND	954	David Thompson
IND	955	Carolyn Green
IND	956	Johnathan Green
IND	957	David Meise
IND	963	Dana Craster
IND	964	Jonathan Roth
IND	965	Andrew V. Goodell
IND	966	C T Young
IND	967	Mary & William Thompson
IND	968	Henry Kopple
IND	969	James E Mcclary, Jr
IND	970	Susan Crawford
IND	971	Steve M Lawrence
IND	972	Wallace D Bowman

IND	973	Peter Hartzler
IND	974	Dwayne L Pretzer
IND	975	John J Clarke
IND	976	Frank & Katja Richards
IND	977	Ralph Perry
IND	978	Frits & Jacqueline Van Der Leeden
IND	979	E Cameron Pond
IND	980	Boby Pittman
IND	981	Charles A. Bodie
IND	982	Adrienne Hall Bodie
IND	984	Al R Pugh
IND	986	Valerie Cook
IND	987	Ralph W Bolgiano
IND	988	Pete Davis
IND	991	John Crites
IND	992	William H Fiest, Jr
IND	993	R Carroll & D Conley, R Gibson
IND	994	Rodney D Chestnut
IND	995	Harold Perry
IND	996	Charles D Cauley
IND	997	Jerry Taylor
IND	998	Jake Fauste
IND	999	William C Miller
IND	1000	James W. Sullivan
IND	1001	Lisa and Steve Shaughnessy
IND	1002	Paula Childress Sullivan
IND	1003	Larry Bolt
IND	1004	Peggy Leasure
IND	1005	Nancy Anderson Letcher
IND	1006	Robert R Clemons
IND	1007	B C Tucker
IND	1008	Fred M. Humphreys
IND	1009	Glen R Hugus
IND	1010	Dorothy Schoenberg
IND	1011	Ray Crush
IND	1012	Richard Schoenberg
IND	1013	W A Strang, Jr
IND	1014	Thurmon Noel, Jr.
IND	1015	Kevin Donovan
IND	1016	Thomas E Staudt
IND	1017	Nancy Strang
IND	1018	Mollie J Messimer
IND	1019	Jesse Taylor
IND	1020	Herbert & Mary Stotter
IND	1021	Leslie L Youngblood
IND	1022	Elizabeth Watson
IND	1023	H S Crouch, Sr
IND	1024	Mary R White
IND	1025	Donald G Drake
IND	1026	Eunia Lee Austin
IND	1027	Bailey Dixon
IND	1028	Mrs Roma Nell Rowland
IND	1029	Don Taylor
IND	1030	John E Johnson
IND	1031	Kay D Wyatt
IND	1032	William L Gable, Jr
IND	1033	Noble & Elizabeth Laesch
IND	1034	Leslie W Ponton
IND	1035	Carolyn S Baber
IND	1036	Leonard B Compton
IND	1037	Anne Whitfield
IND	1038	Florine Sweeney
IND	1039	James W Owens
IND	1040	Raymond S Uromer
IND	1041	William S Tuey
IND	1042	Gene Berry
IND	1043	Carroll Pinnen, III
IND	1044	Edward Struck
IND	1045	Larry Hower
IND	1046	Jeff Clark
IND	1047	Troy Williams
IND	1048	Barbara Rain
IND	1049	Timothy J. Wedding
IND	1050	Christopher Breault
IND	1051	Betty M Rosson
IND	1052	Michael T Goinger
IND	1053	Greg Gingerich
IND	1054	Linda Frye
IND	1055	Margaret Shady
IND	1056	James W McFarland
IND	1057	Melanie W Rickett
IND	1058	Gary D. Rickett
IND	1059	Gary Taylor, M D
IND	1061	Jack Rogers
IND	1062	Mr & Mrs Edward Ward
IND	1063	Lowell Henry Johnson
IND	1065	Ross M. Brown
IND	1068	Lillian E Rodgers
IND	1069	Nancy Bower
IND	1070	John L Vicoli
IND	1071	Joan S Lindsey
IND	1072	Ian J Torrence
IND	1073	Gregory J Vassilakos
IND	1074	Ron Griswold
IND	1075	Jane Heyward
IND	1076	R E Kidder, Md
IND	1077	E Palmer Taylor
IND	1078	Lorri Gruner
IND	1079	Jeffrey M Jensen
IND	1080	Sally M Staudt
IND	1081	Christina Bolgiano
IND	1082	Sue Gier
IND	1083	Thomas Y Savage
IND	1084	David L Pack
IND	1085	Traci Hickson
IND	1086	Betty G Ware
IND	1087	Allen L Hammer
IND	1088	Barry L Crutchfield
IND	1089	Brian K Peckins
IND	1090	Larry Uman
IND	1091	William C Sugg, Jr
IND	1092	Dean S Owens
IND	1093	Joyce Rowan
IND	1094	Malcolm A Crosbie
IND	1095	Michael R Skrovanek
IND	1096	Gary H Swope
IND	1097	Scott Craig
IND	1098	Renee Hernandez
IND	1099	E Judge Cohen
IND	1100	Robert E Thomas
IND	1101	Richard Weidner, Jr
IND	1102	Henry W Lancaster

IND	1103	Tim Sprouse
IND	1104	Laura Brown
IND	1105	Sara Maze
IND	1107	Gene McElwel
IND	1108	Ronnie L. Keyser
IND	1109	Rodney D Chestnut
IND	1110	Janet N. Batten
IND	1111	Helen P Burnette
IND	1112	John W Smith
IND	1113	C. J. Entsminger, Jr
IND	1114	Charlotte W Smith
IND	1115	T. A Brown
IND	1116	J. Richards
IND	1118	A. Hydrick, Jr.
IND	1119	Robert Little
IND	1120	Illegible
IND	1121	Betty Butler
IND	1122	T R Kiser
IND	1123	Nora Wagoner
IND	1124	William Dukes, Jr
IND	1125	Garland Humphries
IND	1126	Linda P Williams
IND	1127	Gary L. Williams
IND	1128	Margaret M Hottel
IND	1130	Margarel Foth
IND	1131	Robert M Bontrager
IND	1132	Jo Ellen Emswiler
IND	1133	Patti Warner
IND	1134	Betty and William Springston
IND	1135	Sharon Lucille Morris
IND	1136	Nicole M Freson
IND	1137	James D Williams
IND	1139	Beth Swanson Kuhn
IND	1140	B. R McCartney
IND	1143	Ginger L Bucher
IND	1145	William J Kautter
IND	1146	Hamlet Tenel
IND	1147	Bruce B Brenneman
IND	1148	Will Kidd
IND	1149	Gary C Murray, M D
IND	1150	James Faulconer
IND	1152	Caroline E McCullough
IND	1153	Charles E. Sullivan
IND	1154	Edwin C Bumbaugh
IND	1155	Lynn & Malcolm Cameron
IND	1156	Betsy Washington
IND	1157	W. A Chapin
IND	1158	Lloyd and June Smith
IND	1159	David W Hardy
IND	1160	John K. Byron
IND	1161	L. Philip Bailey
IND	1162	William F. Piccolo, Jr.
IND	1163	Kevin McCormack
IND	1165	Kathie S Ritchey
IND	1166	James R Hileman
IND	1167	Dorothy W Painter
IND	1169	Marlin P Krouse
IND	1170	M E Plett
IND	1171	Ron Swoope
IND	1172	John P. Cone
IND	1173	Jack Fuson
IND	1174	Madelyn Miller
IND	1175	Rupert Palmer
IND	1176	Roy Hanna
IND	1177	John Jalmatr
IND	1179	Bobby Hipp
IND	1181	Johhny Lambert
IND	1183	Harper K. Loury
IND	1184	Don M Ailstock
IND	1185	Harry W Simmons
IND	1186	William C. Robertson
IND	1187	Raymond Relbach
IND	1188	John S
IND	1189	Jeanne Causin
IND	1190	Tim Medley
IND	1191	Philip Hyre
IND	1192	Kenneth Novak
IND	1193	Marion Brown
IND	1194	Scott Williams
IND	1195	Robert French
IND	1196	Robert Garst
IND	1197	Sara Lagerholm
IND	1198	Joanna Martin
IND	1199	Coleman Easterly
IND	1200	Frank Mackey
IND	1201	John D Vice, Sr.
IND	1202	David Jarrett
IND	1203	Catherine B. Martin
IND	1204	John H Reeves, Jr
IND	1205	Ms Carter Stubbs Drake
IND	1206	Cheryl A. Beswick
IND	1207	Mildred M Cox
IND	1208	Carol Felton
IND	1209	Ed Houff
IND	1210	Terry Houff
IND	1211	Mel Maher
IND	1212	John Burcham
IND	1213	Heather Juls
IND	1214	Charles J. Churchman
IND	1215	Jane E. Cox
IND	1216	Thomas Vison, III
IND	1217	Sandra Stuart
IND	1218	Pete Mohoney
IND	1219	William B. Grant
IND	1220	Bruce A. Wiggins, Ph d
IND	1221	James R. Smuler
IND	1222	Warren Crowder
IND	1223	Cary Ashly
IND	1224	Polly H Taylor
IND	1225	Charles A Nalley
IND	1226	Nathaniel H. Axtell
IND	1228	Richard McClung
IND	1229	James Mccoy
IND	1230	Robert Merrill
IND	1232	James Rice, Jr
IND	1233	Ardelle Cole
IND	1234	Gene Oliner
IND	1235	Robert Speten
IND	1236	James Wilson
IND	1237	George Garman
IND	1238	Winston Sibley
IND	1239	Stanley Higdon

IND	1240	J. Yowell
IND	1241	Howard Hevener
IND	1242	Ethelind McIntosh
IND	1243	Otto Warner
IND	1244	Frances Judy
IND	1245	Carl Lipton
IND	1246	Dr. & Mrs William Courtney
IND	1247	Ethelind McIntosh
IND	1249	Adele Wood
IND	1250	Charles D Pritts
IND	1251	Woodrow W Wallis
IND	1252	Thomas G. Eick
IND	1253	Harry S. McIlvaine
IND	1254	Bonnie R. Walker
IND	1255	Wm Phillip Gibbs
IND	1256	M. M. Homan, Jr.
IND	1257	Edwin L McCoy
IND	1258	Lawrence Straus
IND	1259	Lisa G. Schoener
IND	1260	Jill & Rich Hoehlein
IND	1261	J. D. Martin
IND	1262	Henry J Eick
IND	1263	Jennifer L Hupp
IND	1266	Tony and Wanda Hubbard
IND	1267	Michael Field
IND	1268	Joseph E Conley
IND	1269	Steve Collins
IND	1271	Douglas E Fletcher
IND	1272	Mr. & Mrs C. A Hazen, Jr
IND	1273	Ed Walters
IND	1274	Betty L. Sullivan
IND	1275	Alice J. Towne
IND	1276	Paul J. Belczyk
IND	1277	Crystal Theodore
IND	1278	E. Anne Susen
IND	1279	A B. Sayers Jr.
IND	1280	Clinton W Mills
IND	1281	James W Youngblood
IND	1282	Charles W Green
IND	1283	David R. Forrer
IND	1284	Kenneth F Powell
IND	1286	William A. Cobb
IND	1287	Clifton Ellis
IND	1288	Linda A Barton
IND	1289	Daniel W Dougherty
IND	1290	Wallace E McIntyre
IND	1291	Charles W Hamric
IND	1292	Judy L Barr
IND	1293	James C. Phillips
IND	1294	Marin E. Glaze
IND	1295	Charles E Lugar
IND	1296	Pam Malley
IND	1297	Suzanne R Schaeffer
IND	1299	Virgina B Jordan
IND	1300	David E Ayers
IND	1302	Michael J Sullivan
IND	1303	Paul D. Zimmerman
IND	1305	Timothy Woody
IND	1306	Kenny A Grandstaff
IND	1307	Larry E Orr
IND	1308	Reid Harris, Ph D
IND	1310	James W Clarke
IND	1311	Doug Davis
IND	1313	Betty Golloway
IND	1314	Joe D Perdue
IND	1315	John F Vallelonga
IND	1316	Warren R Dickens
IND	1317	Margaret R White
IND	1318	R. E. Fawley
IND	1319	Jimmie F Shelton
IND	1320	Sarah Drain
IND	1321	Conrad B Burriss
IND	1322	Willard R Owens
IND	1323	Hazel Heddings
IND	1324	Harold D Hunt
IND	1325	Orest Pizzoferrato
IND	1326	Roger Lyon
IND	1327	Simon D Fenney
IND	1328	Melvin G Truman
IND	1329	David Luthin
IND	1330	M Kirsten Luescher
IND	1331	Ken Archer
IND	1332	James C Ayres
IND	1333	Donald D Reed
IND	1334	Curtis F. Ball
IND	1335	Earl G Reedy
IND	1336	Claudie R Koon
IND	1337	Cyril I Kendrick
IND	1339	Garry T. Griffith
IND	1341	J Bradley Rhodenizer
IND	1343	Michael Gray
IND	1345	Thurman Mace
IND	1346	Earl T. Chandler
IND	1347	John L Burkett
IND	1348	H. D Pole
IND	1349	Janet Eddy
IND	1350	Opal Ruth Baker
IND	1351	William W Gainer
IND	1352	David E. Denham
IND	1354	Kevin J. Smead
IND	1355	M. L McClung
IND	1356	Mr. & Mrs Lewis L. Mays
IND	1357	Anne Y. Stagdale
IND	1358	R. E Owens
IND	1359	Hal A Fuller
IND	1360	Edgar Spencer
IND	1361	Tunis J. Lyon
IND	1362	Menil F Powell
IND	1363	Larry Martin
IND	1365	Thomas E. Street
IND	1366	Jack C. Sturgill
IND	1367	Leonard A. Smith, Jr.
IND	1369	Joe T. Evans
IND	1370	John A Cruickshank
IND	1371	James Elwood Perry
IND	1372	John H Spencer
IND	1373	David P. Bookman
IND	1374	Herbert L Freeman, Jr
IND	1375	Stan Parham
IND	1376	Paul D Powell
IND	1377	Michael Lee McCoy
IND	1378	Kenneth L Heitner

IND	1379	Joe Young
IND	1380	Ann Stuart
IND	1381	Dennis Harbour
IND	1382	Robert Harbour
IND	1383	Ricky Harbour
IND	1384	Joe Young
IND	1385	John Franklin
IND	1386	Thomas Childress
IND	1387	Gail Pigeon
IND	1388	Joe Nasr
IND	1389	T. Novry
IND	1390	James A. Arritt
IND	1391	Freddy E Holley, Jr
IND	1392	Thomas L. Long
IND	1393	Garland Ebert
IND	1394	Willie Craig
IND	1395	Charles Logsden
IND	1396	Gary Strawderman
IND	1397	Howard Dempsey
IND	1399	Michael Moghtader
IND	1400	Guy M. Henderson
IND	1402	Cary Roebuck
IND	1403	Snoda Hendricks
IND	1404	Don Megert
IND	1405	Charles Lloyd, II
IND	1406	William Garrett
IND	1407	Philip Green
IND	1408	Betty Stacy
IND	1409	Alan Rice
IND	1410	Marshall Clendenin
IND	1411	Gus Grisson
IND	1420	Joseph Rogers
IND	1421	Carl E Clark
IND	1422	April E. Staudt
IND	1423	Samuel T. Staudt
IND	1425	Bruce A. Schick
IND	1426	Dave Lupsha
IND	1427	Charles Matlock
IND	1429	James A. Parker
IND	1430	Wayne K. Newcomb
IND	1431	Bob Radspinner
IND	1433	Forest R Wiest
IND	1434	Nancy M. Wilson
IND	1435	John E. Estep
IND	1436	Mark W. Younkins
IND	1437	Lynn Cameron
IND	1438	Michael Dagerhart
IND	1439	Kenneth Watson-Jones
IND	1440	Stephanie Billon
IND	1441	Robert C Deacon
IND	1442	Thomas D. Scanlan
IND	1443	Mary M. Haney
IND	1444	Robert E. Hepfner
IND	1445	J. B Murray
IND	1446	Kenney P. Funderburke, Jr.
IND	1448	Luca Di Cecco
IND	1450	L. Ryan Hodges, III
IND	1451	Allen W. Stultz
IND	1452	Randall L Mullins
IND	1453	William F Cox
IND	1454	Alan Kincheloe
IND	1455	David E. Gouthers
IND	1456	H Thomas Fretwell
IND	1457	Samuel B. Mozza
IND	1458	Ellen Chan
IND	1459	Jimmy D Lawson
IND	1460	William W Hacker
IND	1461	Donald L Beale
IND	1462	Samuel Kesterson
IND	1463	Carl E Gowen
IND	1464	James R. Roach
IND	1465	David Rose
IND	1466	James E Bowyer
IND	1467	Tony Gwinn
IND	1468	Harold W. Hilton
IND	1469	Roger D Legg
IND	1470	Robert Van Der Horn
IND	1471	Gary L. Owens
IND	1472	Stephen Nicholas
IND	1473	Drexel McMillion
IND	1474	Roger Lyon
IND	1475	Todd Martin
IND	1476	Barbara S Miller
IND	1477	Ronald G Rain
IND	1478	Darlene L Newman
IND	1479	Dale Diaz
IND	1480	Donna Brooks
IND	1481	Dennis Referir
IND	1482	Fred and Cheryl Lavy
IND	1484	Ann E Miller
IND	1485	Ernie Dickerman
IND	1486	Nee-Yin Chou
IND	1487	Marian G. Taliaferro
IND	1488	Amy V. Derezinski
IND	1489	Lynn Smith
IND	1490	Elaine S Smith
IND	1491	Mearl Witcher
IND	1492	John Hickman
IND	1493	Andy Gall
IND	1494	D. W. Kirby
IND	1495	Dan Lynch
IND	1496	Harry Hale
IND	1497	Dale Simmons
IND	1498	Lester Hodges
IND	1499	Jonathan Long
IND	1500	Joe Lewis
IND	1501	J. R. Summerlin
IND	1502	Ernest Stebbins
IND	1503	Marlene Clendenin
IND	1504	J Little
IND	1505	B Stewart
IND	1506	Wallace Buchanan
IND	1507	John Reed
IND	1508	Roy Shryock
IND	1509	Harold Lott
IND	1510	H. McCoy
IND	1511	Mrs. C Osborn
IND	1512	Louis B
IND	1513	W. Cellie
IND	1514	Beth Plummer
IND	1515	Charles Feagans, Jr.
IND	1516	Robert Neary

IND	1517	Larry Loden
IND	1518	Roy Helmick
IND	1519	Michael L Massey
IND	1520	Tijana Radoaevic'
IND	1521	April L. Bush
IND	1522	Jody Venn
IND	1523	James Snyder
IND	1524	June Arnold
IND	1525	Earl Henderson
IND	1526	Rena Henderson
IND	1527	Sandra Andrick
IND	1528	Ben Ritter
IND	1529	Charles D. Pierce
IND	1530	Lois Pieper
IND	1531	Roger Andrick
IND	1532	Harvey Ferris
IND	1533	Lanan Staunton
IND	1534	Alan Moore
IND	1535	Greg Cantley
IND	1536	Ty Cantley
IND	1537	W Steve Thompson
IND	1538	Robert L Thompson
IND	1539	Robert J Wood
IND	1540	Dale Early
IND	1541	Harold Templeton
IND	1542	Thomas R
IND	1543	Wayne A Barfield
IND	1545	Edward O Stinson
IND	1546	Katherine S Firsching
IND	1547	Clarence Chapman
IND	1548	Robert D Wells
IND	1550	Leslie Ray Brown
IND	1551	Ivan H Shefrin
IND	1552	Karl P Ritchey
IND	1553	Richard L Crodelock
IND	1554	Rachel Easterly
IND	1556	John G Leigh
IND	1557	Benjamin Axleroad
IND	1558	Gail Taber Steele
IND	1559	Charles W Thompson
IND	1560	James Carter
IND	1561	Louis Bernstein
IND	1562	John B Veach, Jr
IND	1563	Ronald O Sheets
IND	1564	James E Waller
IND	1565	Curtis Zopp
IND	1566	Donald McCaig
IND	1567	Lossie F Walker
IND	1568	Tom Marchensky
IND	1569	Dale A McMillen
IND	1570	B L Tackett
IND	1571	Frank W Saunders
IND	1572	Kenny Rhoades
IND	1573	Mark Williams
IND	1574	Gene Pullin
IND	1575	Misty Williams
IND	1576	Brad Hickman
IND	1577	Lorie Keyser
IND	1578	Karen Kling
IND	1579	Wendy King
IND	1580	Greg Woodzell
IND	1581	No Signature
IND	1582	Timothy Morton
IND	1583	Becky Hanson
IND	1584	Andrea Gram
IND	1585	Lee Roy Glimer
IND	1586	Melissa Ryder
IND	1587	Melinda Cauley
IND	1588	Tracey Kay
IND	1589	Jennifer Roberts
IND	1590	Carol Hicks
IND	1591	Brandy Tidd
IND	1592	Nathan
IND	1593	Corey McElwee
IND	1594	Antonio Presey
IND	1595	Kevin Campbell
IND	1596	Heather Morgan
IND	1597	Josh Smith
IND	1598	Amanda M Gibson
IND	1599	Eric Essex
IND	1600	Heather Bryan
IND	1601	Y Intercept
IND	1602	Maury Young
IND	1603	Victoria E Walton
IND	1604	Alexander Gattinger
IND	1605	Amanda Ray
IND	1606	Warren Woodzell
IND	1607	Terry A. King
IND	1608	Joe David, M d.
IND	1611	Dawn M Leland
IND	1612	Mack C Weaver
IND	1613	Helen Timbrook
IND	1614	David W Moles
IND	1616	Malcolm Henry
IND	1617	Fred Lockard
IND	1618	Denver Sheets
IND	1619	Alonzo Sirianni
IND	1620	S E Breeden
IND	1621	J Eddy G Craig Jr.
IND	1622	William Foot
IND	1623	Laurel Foot
IND	1625	Richard Dye
IND	1626	Marina Gopadze
IND	1627	R Scott Criss
IND	1628	Peter D Gayer
IND	1629	Franklin D Chestnut
IND	1630	Luca Di Ceco
IND	1631	Johnny L Hill
IND	1634	Bernice C Renn
IND	1638	Richard K Hamilton
IND	1639	Les Strawderman
IND	1640	Philip D Pannill
IND	1641	Gary Totten
IND	1642	William S Kerr
IND	1646	Karl R Abner
IND	1647	David Conrad
IND	1648	Charles G Backus
IND	1649	Dave Crites
IND	1650	Stacey D Clevenger
IND	1651	Julianne Craig
IND	1652	Wingate H Lucas
IND	1653	Tony Wilt

IND	1654	Ted Bowen
IND	1655	Gregory A Shilling
IND	1656	Kay Peaslee
IND	1659	Terry Short
IND	1661	Jerry Thompson
IND	1664	Robert G Schoonover
IND	1665	Tony Rosi
IND	1666	Gary L. Wooldridge
IND	1667	Alfred W Cumby
IND	1668	John H Gilbert
IND	1669	Philip C. Johnson
IND	1670	Gary G. Youngblood
IND	1671	Linda S Murr
IND	1672	Rufus H. Parker, Jr.
IND	1673	Eric Sheffield
IND	1674	William D Scherer
IND	1678	Kirby P Funderburke
IND	1679	Robin F Leonard
IND	1680	R Cassidy
IND	1681	James E Crosier
IND	1682	Robert L. Miller
IND	1683	Kathie Jensen
IND	1685	John McPheter
IND	1686	William M Meredith
IND	1687	Andy Foster
IND	1688	Gary Godfrey
IND	1689	Bobby D Gibson
IND	1690	Karen Green
IND	1691	Anna Alford
IND	1692	Randy Coots
IND	1693	Richard Ray
IND	1694	Raymond Goad
IND	1695	Harold Adkins
IND	1696	Fred Muir
IND	1697	Anthony Quinn
IND	1698	Ricky Diller
IND	1699	Tanya L K. Denckla
IND	1700	Richard P Wettstone
IND	1701	Susan B Lynch
IND	1702	Robert J Derenge
IND	1703	Shireen I Parsons
IND	1704	Janene E Osborn
IND	1705	Kathi Baker
IND	1706	Elizabeth K Hetz
IND	1707	Andy Hetz
IND	1708	Gary Dubler
IND	1709	Jane Mechem
IND	1710	Gerard Fitzpatrick
IND	1711	John Wooley
IND	1712	Hollis Large
IND	1713	Chandler Warner
IND	1714	Gary Robinson
IND	1715	Scott Hatfield
IND	1716	Stan Retzaldr
IND	1717	Joyce Gross
IND	1718	Illegible
IND	1719	Stanley Gazelle
IND	1720	J. E Harris
IND	1721	James Hill, Jr.
IND	1722	Gary Swain
IND	1723	Arleno Serafini
IND	1724	J Powell, Jr
IND	1725	Bill Hoffman
IND	1726	Kenton & Robin Bower
IND	1727	Donald Studer
IND	1728	Robert Baker
IND	1729	Garland W Kessinger
IND	1730	Kristen Umstattd
IND	1731	Jean Patten
IND	1732	Elizabeth Cottrell
IND	1733	Jay Roberts
IND	1734	Cindy Spencer
IND	1735	Dicker Peverall
IND	1736	Chris Peverall
IND	1737	Steven and Jamie Greenway
IND	1738	Emily Coleman-Wolf
IND	1739	Billy Mitchell
IND	1740	Crystal Coleman-Wolf
IND	1741	Laurence Loesel
IND	1742	William Edward Loesel
IND	1743	Howdy Henritz
IND	1744	Jim Huthrip
IND	1745	Frankie Greenway
IND	1746	Brandi Spence
IND	1747	Elizabeth McCory-Irons
IND	1748	Ed Lyons
IND	1749	Virginia L. Decher
IND	1750	Illegible Signature
IND	1751	Pete D Corbett, III
IND	1752	Grover C Mitchell
IND	1753	Calie Mitchell, Jr.
IND	1754	Natalie Tritt
IND	1755	W. R. Tritt
IND	1756	Susan H Peverall
IND	1757	Eugene T. Nervo
IND	1758	Robert Stahl
IND	1759	Betty Vermillion
IND	1760	Karen S Stahl
IND	1761	Laura J Spitzer
IND	1762	David L. Weiss
IND	1763	Illegible Signature
IND	1764	Anne Cutler
IND	1765	Ellen Coleman
IND	1766	Chris Rich
IND	1767	Lois M Welele
IND	1768	Ed Tucker
IND	1769	Garnett Mohler
IND	1770	Beth Stahl
IND	1771	Tom Brobson
IND	1772	Elizabeth Rich
IND	1773	Harriet Hodges
IND	1774	Fred C Jones, III
IND	1775	Paul Herling
IND	1776	William W. Richardson
IND	1777	Mark Willis
IND	1778	Donna Willis
IND	1779	Emily Peverall
IND	1780	John Pollock
IND	1781	Laura Williams
IND	1782	Gaea Rich
IND	1783	Mitchell Davis
IND	1784	Kelly Pollock

IND	1785	John Flynn
IND	1786	Joyce Morgan
IND	1787	David J Hirschman
IND	1788	Mary Pearl Compton
IND	1789	Jane E Johnston
IND	1790	A W. Webb, Jr
IND	1791	Robert H Hunt
IND	1792	Olivia Bilenky
IND	1793	Matthew S Thomas
IND	1794	Carrie Crawford
IND	1795	Bill Wolf
IND	1797	William L. Mays
IND	1798	Barry C Jeffries
IND	1799	Richard Addison Siler
IND	1800	Richard C Siler
IND	1802	Mike McCormack
IND	1803	Randy Spear
IND	1804	W. C Mead
IND	1805	Mr. & Mrs Ted Berg
IND	1806	Hugo Kosteini
IND	1807	Fred Lockard
IND	1808	Randal Flanagan
IND	1809	Eve D Fout
IND	1810	John Watson-Jones
IND	1811	Mr Stanley B Griffin
IND	1813	Walter Barker
IND	1814	R. L Saunders
IND	1815	Robert M Inghram
IND	1816	Bill Rosolowsky
IND	1817	Richard J Byrd
IND	1818	Charles P Allen
IND	1819	William E Matics
IND	1820	Robert A Bare
IND	1821	Anthony P Mollish
IND	1822	Kay Peaslee
IND	1823	Dr Donna R Kuroda
IND	1824	James G Tennant
IND	1825	Franklin D Lambert
IND	1826	Stephen Patterson
IND	1827	Donald L. Evans
IND	1828	Charlie Patterson
IND	1829	F. L Greer
IND	1830	Clayton L Cowan
IND	1831	Richard W Martin
IND	1832	A. G Burris, Jr.
IND	1833	Ross Whitacre
IND	1834	Sherman G. White
IND	1835	Suzanne S Warden
IND	1837	Michael McCarley
IND	1838	John L Eye
IND	1839	Larry G Farley
IND	1840	Joseph Mollish
IND	1841	Jane Bay
IND	1842	Raymond L Hawkins
IND	1843	William J Woods
IND	1845	Stephen Troxill
IND	1847	Rick Wellbeloved-Stone
IND	1848	Richard A Currence
IND	1850	John R Martin
IND	1851	William A Scofield
IND	1852	Raymond W & Esther P Locke
IND	1853	Daniel J Holt
IND	1854	Dr David Dwight Mulligan
IND	1856	Ray Binaco
IND	1857	Patrick J Murray
IND	1858	Eric S. Smith
IND	1861	Kathleen Wissinger
IND	1862	Louise N Medman
IND	1864	Christobel B Keathley
IND	1866	Craig Alan Atkins
IND	1867	Marvin B Rexrode
IND	1868	Mardell K. George
IND	1869	Ted Brenig
IND	1870	Mike Nelson
IND	1871	Richard Woody
IND	1873	James J Geary
IND	1874	Charles Montague
IND	1875	Betty Rosson
IND	1876	Patrick T. Sullivan
IND	1877	Herbert Murray
IND	1878	Samuel J Gamble
IND	1879	Donald A Barrow
IND	1880	Jeffrey L. Lowman
IND	1882	Hobart O Butler, Jr
IND	1885	R M Loeser
IND	1886	Henry Lea Mason
IND	1888	Frank J Shole
IND	1889	Robert L Boroughman
IND	1890	William B. Fenderson
IND	1891	Wanda L Fenderson
IND	1892	Randall B Fenderson
IND	1893	Russell F Deems
IND	1894	Dayton Workman
IND	1895	Edgar E Taylor
IND	1896	Steve Noll
IND	1897	Robert Elkins
IND	1898	David Sheppard
IND	1899	Mike Sheppard
IND	1900	George Sheppard
IND	1901	Charles May
IND	1902	Virginia Fauntleroy Carter
IND	1903	James D Starr
IND	1905	Bernard Calvert, III
IND	1907	Gerald Luck
IND	1908	David W Suttner
IND	1909	Illegible Signature
IND	1910	W. E & Millie Woodroff
IND	1911	Brooks Tuttle & Heather Williams
IND	1912	James E. Loesel
IND	1913	Scott McElwee
IND	1914	Loring B Timbrook, Sr.
IND	1915	Joseph McNamara
IND	1916	Hal and Helen Davis
IND	1917	Nancy Watkins
IND	1918	Susan T Manpin
IND	1919	Susan Eckenrode
IND	1920	Lois M Pieper
IND	1921	Dave Hall
IND	1922	Mildred H Misour
IND	1923	Mary Louise Fisher
IND	1924	N Gerald and Sara Shenk
IND	1925	Debra and Randy Mitchell

IND	1926	Henry Heller
IND	1927	Rodney W Burnette
IND	1928	Elwood Persinger
IND	1929	Marvin Mitchell
IND	1930	James Clayborne
IND	1931	Bobby Nichols, Jr.
IND	1932	Cathy Harrison
IND	1933	R S. Rodgers
IND	1934	Peter Fremgen
IND	1935	Maria Berger
IND	1936	Matthias Kayhoe
IND	1937	John Kaye
IND	1938	Kathryn Plumb
IND	1939	Leonard Tosto
IND	1940	Mark Robb
IND	1941	Jean Tignor
IND	1942	Selden Menefee
IND	1943	Juliana Simpson
IND	1944	Elizabeth Herbert
IND	1945	William Wotmas
IND	1946	Benjamin Hicks
IND	1947	Stephen Reckner
IND	1948	Mary Clark Wilkes
IND	1949	J. Snyder
IND	1950	Mr & Mrs Robert Nolan
IND	1951	Rachel & James Schlesinger
IND	1952	Harry and Maxine Scruggs
IND	1953	William Maiden
IND	1954	No Signature
IND	1955	Thomas Farley, Jr
IND	1956	Samuel L. Campbell
IND	1957	Trevor Corbin
IND	1958	Deborah Shifflett
IND	1959	Paul Almorde, IV
IND	1960	Fred A Kurt
IND	1961	Richard T. Moore
IND	1962	Elizabeth J Moore
IND	1963	Harvey G Wilson
IND	1964	Lloyd S. Younker
IND	1965	Robert E. Griffin
IND	1966	Ed Gilliam
IND	1967	Ralph E. Ramsey
IND	1968	Pete Mohoney
IND	1969	H. A. Siler
IND	1970	R S. Rosser
IND	1971	Nicole Lassiter
IND	1972	Bob Mahanes
IND	1973	Jeffrey A. Taylor
IND	1974	Kathryn and John Fairfield
IND	1975	Daniel D. Hamrick
IND	1976	Danny Lubovich
IND	1977	Jake Henry, Jr
IND	1978	Julie Vehle
IND	1979	Sidney O Feaster, III
IND	1980	W T. Colvin
IND	1981	Patricia K Maier
IND	1982	Lois B Austin
IND	1984	Alva E Sizemore
IND	1988	C David Pruitt
IND	1991	Richard Fletcher
IND	1992	Teresa Friedlander
IND	1993	John E. Lambert
IND	1994	Suzanne Noonan
IND	1995	Perry T Hunt
IND	1996	Louise T Williams
IND	1998	Donna Whitmarsh
IND	1999	Joy Satterwhite
IND	2000	R Ronald Sutton
IND	2001	Billy A Joy
IND	2002	Ruth H. Ball
IND	2003	Les Mahoney
IND	2004	Jeanne Kibbee
IND	2005	Jean L. Suter
IND	2006	Chandler Stewart
IND	2007	Catherine Jost
IND	2008	B. J. Sunderland
IND	2009	Judy Gattis Smith
IND	2010	Noelle Borders
IND	2011	David M Dolly
IND	2012	Kathi Baker
IND	2013	Melinda J Lukei
IND	2014	Reese F Lukei, Jr
IND	2015	Evelyn Tatman
IND	2016	Lorvell Dillon
IND	2017	James L. Venture
IND	2019	Merle Beatty
IND	2020	Kate Lambdin
IND	2021	Heidi Targee
IND	2022	Rosalie Talbert
IND	2023	Jan H. Smith
IND	2025	David Baisden, Sr & Jr.
IND	2026	John Held
IND	2027	Janine L Winegard
IND	2029	John F. Pagels, Ph D
IND	2030	Mr & Mrs S Todd Lowry
IND	2032	Jeff Powelson
IND	2033	Mary C. Orr
IND	2034	Robert A Huddleston
IND	2035	F. P Aldhizer
IND	2036	Charlotte and Henry Schreiber
IND	2037	F. G Dean, Jr
IND	2038	R. Mark Jones
IND	2039	Tamara Smith
IND	2040	Andrew, Mack & Ben Trank
IND	2041	Andrew E. Freszen
IND	2042	Kenneth Clements
IND	2043	Allen B Farmer
IND	2044	John Lesher
IND	2045	Whitney Lonsdale
IND	2046	Susan Wiedman
IND	2048	Lucius H Bracey, Jr.
IND	2049	Rachel B. Pattison
IND	2050	Doris K. Baker
IND	2051	R. L. Mason
IND	2052	E. Palmer Taylor
IND	2053	Cyane Lowden
IND	2054	Jennifer Soles
IND	2055	Patricia Sexton
IND	2056	Walter Mehring, II
IND	2057	Dave Peters
IND	2058	Franklin L. Griffith
IND	2059	Joseph V King

IND	2060	Paul F Torrence
IND	2061	Ms Terry Gabrielson
IND	2062	James Hancock
IND	2063	Roger N Canfield
IND	2064	Petition
IND	2065	Thomas W. Schneider
IND	2067	Luke Campbell
IND	2068	Lewis Crummett
IND	2069	John Robert Jackson
IND	2070	D. Kiser
IND	2071	Lyle Marshall
IND	2072	Thomas Nichel, Jr
IND	2073	Elizabeth Fuller
IND	2074	Ellis Klahre
IND	2076	Donald Klahre
IND	2077	George Lees
IND	2078	David Smith
IND	2079	Thomas Thrash
IND	2080	Troy Reinhart
IND	2081	Richard Conner, Jr
IND	2082	J. Nevin White
IND	2083	J Powell, Jr.
IND	2084	Fred Williams
IND	2085	Norman Apter
IND	2086	Barbara D. Kaufman
IND	2087	Gina E Bondurant
IND	2089	Linda Bancropt
IND	2090	Matthew L Shields
IND	2091	D A. Pabst
IND	2092	Emily Baxtar
IND	2093	Jessica D Conaway
IND	2094	Jacob H Kahn
IND	2095	L. Wettstone
IND	2096	Stephen M Fredrick
IND	2097	Katharine Whitfield
IND	2098	Glen Mitchell
IND	2099	Leonard J Uttal
IND	2100	Sara Srome-Shomsen
IND	2101	Debra R Neves
IND	2102	Frank Karichoff
IND	2103	Mark E Karichoff
IND	2104	David L Weutz
IND	2105	Evelyn Karichoff
IND	2106	Kelly Colner
IND	2107	Jodie Ann Colner
IND	2108	Elmer L. Fix
IND	2109	D Jim Terrell
IND	2110	Michael D Lowery
IND	2111	Barbara A Hunter
IND	2112	Lyle W Hunter
IND	2113	Michael W. Jarvis
IND	2114	William Wilson
IND	2115	Edgar W Patterson
IND	2116	William G Truslow
IND	2117	William D Fields
IND	2118	Eric T Colner
IND	2119	Paul E Balsley
IND	2120	Jesse W Bridge
IND	2121	Donald F Wright, Jr
IND	2122	David Truslow
IND	2123	Thomas L. Fix
IND	2124	John B Brooks
IND	2125	Roger L Welcher
IND	2126	Stacy Bridge
IND	2127	Harvey Belew
IND	2128	Beatrice T Colner
IND	2129	Angela Rasmusser
IND	2130	Anneliese Scouten
IND	2131	Sara Board
IND	2132	Jennifer Conway
IND	2133	Daisy Stevens
IND	2134	Sara Chilstrom
IND	2135	Amy Moler
IND	2136	Emily Kaiser
IND	2137	Tracy Urech
IND	2138	Jennifer Hepler
IND	2139	Peggy S. Kirby
IND	2140	William H Sizemore, Jr
IND	2141	W W Rinker
IND	2142	Robert L. Ewing
IND	2143	Coleman Grandstaff
IND	2144	Amanda Marsh
IND	2145	Eugenia Grandstaff
IND	2146	Lawrence I Field
IND	2147	Harley Kierstead
IND	2148	Eleanore Towe
IND	2149	Gregory Peterson
IND	2150	Kenneth Lang
IND	2151	James Herbert, Sr.
IND	2152	Thomas Eyring
IND	2153	S Abeel
IND	2154	John Rappole
IND	2155	Allen Barker
IND	2156	Raymond Burns
IND	2157	William P Gadd, II
IND	2159	Sheri R Cox
IND	2160	Daniel B Deeds
IND	2162	Barry Jeffries
IND	2163	Norman R Deacon
IND	2164	Barry C. Dutter
IND	2165	Steve Miller
IND	2166	Greg Nicely
IND	2167	Wesley Keith
IND	2168	Bobby D Rogers
IND	2169	Randall Pursley
IND	2170	Lyle Alphin
IND	2171	George Alphin
IND	2172	Julie Alphin
IND	2173	Glenn Alphin
IND	2174	Vernon Alphin
IND	2175	Paul R Kennedy
IND	2176	James L Will
IND	2177	Algen P Eckard
IND	2178	Joyce Persinger
IND	2179	Berkly Persinger
IND	2181	Wilson R Shank
IND	2182	Edwin P Darty
IND	2183	Edwin Parkey
IND	2184	David H Leach
IND	2185	Gerald Cox
IND	2186	Charles H Hartman
IND	2187	C W Hepler, Jr.

IND	2188	Charles Benny Reid
IND	2189	Elizabeth Maxfield
IND	2190	Michelle L. Boyer
IND	2191	Thomas L Austin
IND	2192	James R Flint
IND	2193	James H Gum
IND	2194	David Charles
IND	2195	Rodney Vess
IND	2196	Douglas S Deacon
IND	2197	Douglas W Conner
IND	2198	Ricky S Deacon
IND	2199	Donald E Burtt
IND	2200	Clemmer Byer
IND	2202	Tim Wales
IND	2203	Brian D Gingerich
IND	2204	Bobby Hubbard
IND	2205	Edward S. Burk
IND	2206	S F. Simons
IND	2207	Richard L Smith
IND	2208	Calvin G Gum
IND	2209	Gary Flint
IND	2210	Tim and Kristi Pleasants
IND	2211	Wesley B Johnson
IND	2212	Steve Thomas
IND	2213	Gary Lynn Reery
IND	2214	Robert M. Flint
IND	2215	Bill Ragette
IND	2216	Ronald Flint
IND	2217	Maynard Kessler
IND	2218	Amanda D Hubbard
IND	2219	Robert C. Langkamer
IND	2220	David Mollish
IND	2222	Thomas J Wasmer
IND	2223	David Wilcher
IND	2224	Russel E. Carter
IND	2225	Mack Jay Howard, Sr.
IND	2226	Ivan M. Gum
IND	2227	Anna Ayer
IND	2228	Randy Lee & Family
IND	2230	William A Mugg
IND	2231	Jeff Flint
IND	2232	Jim Loesel
IND	2233	Frank Persinger
IND	2235	Ernest E Treadway
IND	2236	Harry Walton
IND	2237	Steven A Jost
IND	2239	Carolyn C Bates
IND	2240	Marianne J Skeen
IND	2241	James E Vadas
IND	2242	Richard Barnes
IND	2243	David P. Hancock
IND	2244	Donald O. Furler
IND	2245	Calvin T. Bane
IND	2246	Charles E Richardson
IND	2247	Kermit E Evan
IND	2249	Thomas Webley
IND	2250	Jim Hersey
IND	2254	H. E Matics
IND	2256	Alan E Carlson
IND	2257	Dan Abston
IND	2258	Edmund T Bridge
IND	2259	James R Godsey
IND	2260	Mrs Carol Godsey
IND	2261	Mark C Jewell
IND	2262	E. F Knipling
IND	2265	Bradley E Clarke
IND	2266	Mark A Brown
IND	2267	John Middleton
IND	2268	French W Armstrong
IND	2269	Sara Clark Mehring
IND	2270	Ernest P Ogden, Jr
IND	2271	John Hesse
IND	2272	Kristine E Jost
IND	2273	William D Fawcett
IND	2276	Scott Wiggins
IND	2277	Edith A Duguay
IND	2279	Donald R Harless
IND	2280	David F. Lange
IND	2281	Theodore M Wright
IND	2282	Frank Defonsera
IND	2283	Bonnie Johnson
IND	2285	Conrad J Marshall
IND	2288	James L Duncan
IND	2289	R E Fawley
IND	2290	Richard A. Miale
IND	2291	Sandra Elder
IND	2292	Virginia J. Grossman
IND	2294	Galen E. Shingleton
IND	2295	Buddy R Gragg
IND	2296	Delbert Thorne
IND	2297	Milton Tolley
IND	2298	Brown Sensebaugh
IND	2299	Joel M Weber, M.D.
IND	2300	James Martin
IND	2301	Randy Terry
IND	2302	Mark E. Wilkins
IND	2303	Bunny Clifton
IND	2304	David Clark
IND	2306	Joseph L Garrett
IND	2308	Ernie Dickerman
IND	2310	Joe Lenviel
IND	2311	Mrs. Samuel Stevens
IND	2312	Paul E Miller
IND	2313	R L Carpenter
IND	2314	James H. Swanson
IND	2319	Charles M. Moss
IND	2320	John Franklin Higgins
IND	2321	Ted Ade
IND	2322	Hal Bush
IND	2323	Mike Paynter
IND	2324	Roger Thigpen
IND	2325	Steve Pullinger
IND	2326	Colleen Williams
IND	2327	Roger Williams
IND	2328	Harriet Shaffer
IND	2330	Paula A Linder
IND	2331	E V Werner
IND	2332	Lisa Dabek
IND	2333	Dale Lunsford
IND	2335	Garvis M Reynolds, Jr.
IND	2336	Steven K Ashcraft
IND	2337	Gene K. McGuire

IND	2339	Mark Peneonil
IND	2341	John R Lynch
IND	2344	Lesley Davis Arnold
IND	2345	Lynn Cameron
IND	2346	Robert O. Richardson
IND	2347	Lafayette Bluford Adams, III
IND	2348	Roger F Timbrook
IND	2351	William Staton
IND	2353	James D Beck
IND	2355	Robin Cage
IND	2356	Dean Ottby
IND	2357	Charles W Green
IND	2358	Jeffrey J Bracken
IND	2360	Michael J Papay
IND	2361	William D Jones, Jr
IND	2362	G T Tibbs
IND	2363	Leah B Johnson
IND	2364	Mike Hill
IND	2365	Jim Patterson
IND	2366	James P Davis, III
IND	2367	I A. Signorelli
IND	2368	F Dallas Parsons
IND	2369	Lynn Dickerson
IND	2370	Janice & Jimmy Salmon
IND	2371	Lynn E Griffin, Jr
IND	2372	Lynn Cameron
IND	2373	John R Northrop
IND	2374	Lynn E. Griffin, Sr
IND	2375	Ania Pospicszalska
IND	2376	Jennifer Brammer
IND	2377	Jean L McCarthy
IND	2380	Kenny Carroll
IND	2381	Daniel E Hammer
IND	2382	John L Nachman
IND	2383	Pauline Tibbs
IND	2384	Petition
IND	2385	Fred W. Shields, Jr
IND	2386	Scott Roberts
IND	2388	Michael D Erickson
IND	2389	Joyce C Faw
IND	2390	Pieter Van Beek
IND	2391	Darrell B Cogar
IND	2392	Clyde & Imogene Littlejohn
IND	2393	John Jordan
IND	2394	Ernie Metz
IND	2395	G. O. Farrow
IND	2396	Edwin Brown
IND	2397	David Hopkins
IND	2398	James Alvis, Jr.
IND	2399	Dane Ohler
IND	2400	Sally Anderson
IND	2401	Anderson Flues
IND	2402	Mark Huffman
IND	2403	Kevin Steinbo
IND	2404	Ray M Brown
IND	2405	John H Halterman, Jr
IND	2406	Gary L Brubaker
IND	2407	E R Lunsford
IND	2408	William L Sensabaugh
IND	2409	Catherine H Pugh
IND	2410	Melvin Lee Baber
IND	2411	Andy Baber
IND	2412	Michael Bartley
IND	2413	Barbara Campbell
IND	2414	Jesse J. Campbell
IND	2415	Carolyn B Campbell
IND	2416	Edgar E. Taylor
IND	2417	R. L. Staton
IND	2418	Michael J Colland
IND	2419	Bob Hess
IND	2420	Karen B Debord
IND	2421	Ted Debord
IND	2422	Edith G Bradbury
IND	2423	Mark E Thomas
IND	2424	Avalene C. Jones
IND	2425	Doug and Tina Grandle
IND	2426	Christi Carver
IND	2427	Steve Tabscott
IND	2428	Laurine White
IND	2429	Beverly P Silver
IND	2430	Jeanette Hess
IND	2431	Linda J Hopkins
IND	2432	Harold Grossman
IND	2433	Peggy H. Harper
IND	2434	Jacqueline A Sobirshi
IND	2435	Tracy L Petersen
IND	2436	Laura A Kiefer
IND	2437	Jack Erons
IND	2438	Howard A Acheson
IND	2439	Michael Lieb
IND	2440	Henry H Wise
IND	2441	Helen Ware and Collen Smith
IND	2442	Janet and Leonard Jarrard
IND	2443	B Webster
IND	2444	Jennifer Bramer
IND	2445	Ania Pospleszalska
IND	2446	Lynn Mouvery
IND	2447	Adam and Elizabeth Hupert
IND	2448	Bonita White
IND	2449	Jacquelyn E. Mosby
IND	2450	Celia L Sweeney
IND	2453	Carol Lee Short
IND	2454	Patricia Attkisson
IND	2456	Deanna Andrews
IND	2457	Betty Schewel
IND	2458	Chauney F Kutz
IND	2459	William H. Bowers
IND	2460	M/M R S Fortune
IND	2461	William E. Clarkson
IND	2462	Charles H Wiesneth
IND	2463	Richard Flinchbaugh
IND	2464	M M Sanford
IND	2465	Ernie Thomas
IND	2466	John W. Stewart
IND	2467	Clint Thomas
IND	2468	Lisa G Ottley
IND	2469	Betty Peters
IND	2470	Steven P Jordan
IND	2471	Barbara Lambert
IND	2472	Robert P Kyle
IND	2473	J Norvill Jones
IND	2474	Mary Barnes

IND	2475	George L. Ziegenfuss
IND	2477	Dave Bryant
IND	2478	David R. Fix
IND	2479	Thornton W Burnet
IND	2480	Barbara P Kenyon
IND	2481	Lenn Lennard
IND	2482	Lawrence B Griffin
IND	2483	Randy Garrison
IND	2484	Christopher D Boch
IND	2485	Victoria Parriex
IND	2486	R. Ross Roby, M.D
IND	2487	William F Bennett
IND	2488	Marvin L Dowdy
IND	2489	No Signature
IND	2490	Steven M Scott
IND	2491	V Ray Phillips, Jr
IND	2492	Cleora J Scott
IND	2493	Paul A Von Hoene
IND	2494	Richard Dowdy
IND	2496	Michael G. Shanks
IND	2497	Ray F Tesh
IND	2498	Ann Burchard
IND	2500	Thomas S Williams, III
IND	2501	Kris Christensen
IND	2502	Blenda Duckworth
IND	2503	David R Richmond
IND	2504	Terry L. Deiss
IND	2505	Rachel Johnson
IND	2508	Jean C Bratton
IND	2509	Kenneth R Landon
IND	2510	Thomas Neely
IND	2511	Richard P. Wahl, Jr
IND	2512	Carla H Perrenot
IND	2513	Richard I Crouthamel
IND	2514	Edward R. Johnson
IND	2515	Craig E. Peterson
IND	2517	Cliff W. Clark
IND	2518	Willard L Ball
IND	2519	Brian Krate
IND	2520	Kaye Chandler
IND	2521	Susan Demoss
IND	2522	Butch and Dale West
IND	2523	Marcus K. Lundmark
IND	2524	David Flint
IND	2525	Glen Adkins
IND	2526	Ronald Bowman
IND	2527	James R. Bezanson
IND	2528	George Beon
IND	2529	Roger Diedrich
IND	2530	Miriam L. Weaver
IND	2532	Charles W Rhodes
IND	2534	A Joanne Bates
IND	2535	Easton Loving
IND	2536	Rebecca Smith
IND	2537	Leon Ellis
IND	2538	J Terrill McCall
IND	2539	O.O Neely, Jr.
IND	2540	Barbara S Smith
IND	2541	Charles Demoss
IND	2544	Harold O'Dell
IND	2545	William B Stuart
IND	2546	James O Logan
IND	2547	Georgia Persinger
IND	2548	W Allan Sharrett
IND	2549	Mike Norris
IND	2550	Earl Z Damewood, Ph D
IND	2551	Jane S Jessee
IND	2553	Wayne Atkins
IND	2554	William G Susling, Jr.
IND	2555	Rick Thomas
IND	2556	Terrance Allan Sidley
IND	2557	Dean F Amel
IND	2558	Robert L. Henke
IND	2559	Robert R. Putman
IND	2560	Linda G Akers
IND	2561	Don Barrier
IND	2562	Carolyn S Forbes
IND	2564	Connie Mercie
IND	2565	Allen J Cline
IND	2566	Andrew D Claxton
IND	2567	Joel M Sowers
IND	2568	Michael Welch
IND	2569	John D Hurd
IND	2570	Sharon M Ripley
IND	2571	Delmer D Aylor
IND	2572	John F Marshall, Ph D
IND	2573	Susan Makurat
IND	2574	Johnathan Wright
IND	2575	Terry M. Brooks
IND	2576	Steve Dixon
IND	2577	Joseph A. Duda
IND	2578	Kent Fleming
IND	2580	Randy Hoover
IND	2581	Warren D. Pinnick
IND	2583	Douglas N Toothman
IND	2584	Charles W Sloan
IND	2585	Skip Goodrich
IND	2587	Larry N Fuller
IND	2588	Alan Darke
IND	2589	Michael D Buckland
IND	2591	Margaret L Gibson
IND	2592	Scott W Shallenberger
IND	2593	Mark F. Caron
IND	2594	C Richard Devore
IND	2595	David Thomas
IND	2596	W.F Lee
IND	2597	Elton Riffee
IND	2598	Dr. and Mrs David K. Dirlam
IND	2599	Robert Baird
IND	2600	Robert Trelawny
IND	2601	John A. Lackman
IND	2602	Bob Adkisson
IND	2603	Charles T. Lane
IND	2604	Sandy Hart
IND	2605	Tom R Davenport
IND	2606	Jenny L. White
IND	2607	William S. Jones
IND	2611	John Garner
IND	2612	William L. Yochum
IND	2614	Dorothy C Bliss
IND	2615	Kurt N. Detweiler
IND	2616	J. Francis Palmer

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IND	2618	David G Brewer
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IND	2620	A W Shelhorse, Jr
IND	2621	Emil Friberg
IND	2623	Rodney L. Willis
IND	2624	James B Loan Jr.
IND	2625	Gary R Greenstein
IND	2626	J C. Watts, Jr
IND	2627	M. Ann Phillippi, Ph.D.
IND	2631	Bob Dixon
IND	2632	Greg Mick
IND	2637	James W Deeds
IND	2638	Rosemary Richards
IND	2639	Ruth A Lillard
IND	2640	Nancy J Martin-Perdue
IND	2641	Ellen V. Aylor
IND	2642	Maynard Feury
IND	2643	David Dunsmore
IND	2644	Charles Kessinger
IND	2645	Charles Redman
IND	2648	Craig J Bradley
IND	2649	John M. Roberts
IND	2650	Charlie E Givens
IND	2651	Helen Hamilton
IND	2652	Roger R Forrest
IND	2653	William B Stewart
IND	2654	Robert Hueston
IND	2655	Jeffrey K. Riggs
IND	2656	G Esler Inskeep
IND	2657	Janet M Malcolm
IND	2660	Bernard Chestnut
IND	2661	Russell Broyles, Jr
IND	2663	Brenda S Goff
IND	2665	Ernie Reed
IND	2666	Sarah P Faulconer
IND	2667	W Gentz
IND	2668	Bobby D Roges
IND	2669	Lloyd A Deeds
IND	2670	Robert M Carey
IND	2671	Charles D Pierce
IND	2673	Donald P Mimmo
IND	2674	Laura A Harders
IND	2675	Susan G Bender
IND	2677	Morris Daniel
IND	2678	Andrew J Mccoy
IND	2680	M James Menk
IND	2681	Betty J Owens
IND	2683	Randall A Lillard
IND	2684	Alice Menks
IND	2685	Albert L. Huber, M D
IND	2686	Tony Tomlinson
IND	2687	Janet P Drumheller
IND	2688	Gary Mahly
IND	2689	Grover M Nicely
IND	2690	Bonnie J Smith
IND	2691	David Lynn Dumonsau
IND	2692	Grant P Thompson
IND	2693	Brian Woods
IND	2694	Douglas C Ramsey
IND	2695	Dick Shutt
IND	2696	Jerry L Jacobsen
IND	2697	Kennie G Underwood
IND	2698	Gregory Orndorff
IND	2699	Austin Mantz
IND	2700	Richard Broyles
IND	2701	Bernice Eubank
IND	2702	Rosalind Wilson
IND	2703	H.C. Edwards
IND	2704	George M Deeds
IND	2705	Ann W Boldin
IND	2706	Darrin Marbley
IND	2707	Wanda C Warlitner
IND	2708	Richard W Ayers
IND	2710	Chris J Hyland
IND	2711	Chris Almond
IND	2712	Art Fovogue
IND	2713	Beverley Carver
IND	2714	Peter Adams
IND	2715	Jeri Thomas
IND	2716	Randall Williams
IND	2717	Luigi Morelli
IND	2718	Helen M McCoy
IND	2719	Cecil Holler, Sr.
IND	2720	Ronald G. Wasem
IND	2721	Elmer L Shifflett
IND	2722	James W Jarrell
IND	2723	Georgia Thomas
IND	2724	John W Ballard, III
IND	2725	Ronnie J Simmons
IND	2726	Thomas W. Deeds
IND	2727	Marcus N O'Conner
IND	2728	Jack W Smith
IND	2729	Samuel L Rogen
IND	2730	Jackie L Smith
IND	2731	Gerald W Huffman
IND	2732	Mike Iwanik
IND	2733	Ruth D Nicely
IND	2734	Harold R Woodward, Jr
IND	2735	Rev Heather A Warren
IND	2736	George G Givens
IND	2737	Charles R Douglass
IND	2738	Mrs Julie C Blunt
IND	2739	Jesse L Daries
IND	2740	Leona M. Sonne
IND	2741	Charles Perdue, Sr , Ph D
IND	2742	Joseph A Schifrin
IND	2743	Terry L Meade
IND	2744	John M Hancock
IND	2745	William R Moodispaw
IND	2746	R L. Owens, Jr
IND	2747	Jack J Schilthuis
IND	2748	Michael Allen
IND	2749	Ellen Halbert
IND	2750	Lawrence P O'Donnell
IND	2751	Richard Lambert
IND	2752	Shyla Vesitis
IND	2753	T H Lillard, Jr
IND	2754	Mary M Harshfield
IND	2756	Stanley Spitler
IND	2757	John W Rogers
IND	2758	William Gimbel

IND	2759	Larry L. Baker
IND	2760	Helen G -A.
IND	2761	Heidi Haverson
IND	2762	Jehu Austnr
IND	2763	Manton Frierson, Jr
IND	2764	Heather Taylor
IND	2765	Jane Gaidos
IND	2766	William Gaidos
IND	2767	Linda Thomas
IND	2768	Patricia Brubaker
IND	2769	Bonnie Jones
IND	2770	Steven M. Fox
IND	2771	Kristine J Olka
IND	2772	John Dean
IND	2773	Lynn Allen
IND	2774	Gail Dussere
IND	2775	Wes Allen
IND	2776	Tracey Homen
IND	2777	William G Maddox
IND	2778	Paul Rosen
IND	2779	Ralph T Dameron
IND	2780	Conley E Daughtry
IND	2781	Kenneth B Lunsford
IND	2782	Raymond E. Lunsford
IND	2783	Romonda Barkley
IND	2784	Roger E Bartley, II
IND	2785	Dennis M Campbell
IND	2786	Lyman D Allen, Jr.
IND	2787	Betty J Baber
IND	2788	J W. Baber, III
IND	2789	Henry W Barber
IND	2790	Jean and Dillard Morris
IND	2791	Keith A Mays
IND	2792	Robert Patterson
IND	2793	John W Baber
IND	2794	Junior C Fox
IND	2795	Pamela Pride Eaton
IND	2796	Sergeo Levy
IND	2797	Cheryl Chapman
IND	2798	Gregory H Aplet
IND	2799	M L Sheffer
IND	2800	Tricia Grant
IND	2801	Gayle Petersen
IND	2802	Ann E. Werner
IND	2803	Lucinda Bishop
IND	2804	Mary Henley
IND	2805	Barbara Dowell
IND	2806	Neil Andreal
IND	2807	Patrick Knighton
IND	2808	Neil O Rider
IND	2809	Ginny Sonne-Peteson
IND	2810	Liz Wilsdorf
IND	2811	Tal Munasifi
IND	2812	Samuel Fisher
IND	2813	Robert V Clagett
IND	2814	Greg Benson
IND	2815	Rodney G Duley
IND	2816	Doc Blanchard
IND	2817	George Burgess, Esq
IND	2818	Charles Dillon
IND	2819	Dr. Dennis Carlini
IND	2820	Edward Farmer
IND	2825	Mac McDaniel
IND	2826	L B Hills
IND	2827	Art Ostdiek
IND	2828	David H Morris
IND	2829	R H McFaddin
IND	2830	Anthony P. Mollish
IND	2831	Donald L. Pritt
IND	2832	Kenneth A Pritt
IND	2833	Jo Anne Scott Webb
IND	2834	Douglas G Barbour
IND	2835	Roland and Itsuko Walters
IND	2836	Eva M. Lively
IND	2837	Ronald J Falyar
IND	2838	Jesse C. Thompson, Jr
IND	2839	N Wayne Yoder
IND	2840	James R Barrett
IND	2841	Cleveland H Porter, Jr , D.D.S
IND	2842	Joe Cheney
IND	2843	Floyd C Ryman
IND	2844	Todd Shauger
IND	2845	Patricia J. Fraser
IND	2846	S Ed Kuhn
IND	2847	Sue Carolyn Smith
IND	2848	Fred M Dean
IND	2849	Billy Perry
IND	2850	Donald E Shires
IND	2851	Clyde H Shipp
IND	2852	Donald L. Ryman
IND	2853	Mr Blaine E. Peet
IND	2854	Marie Dills
IND	2855	Diane C Bowman
IND	2856	Henry and Jill Bruhl
IND	2857	Daisy Oblinger
IND	2858	Armpie Tauman
IND	2859	Owen R Beale
IND	2860	Ann Marks
IND	2861	William E Gayle
IND	2862	Lee Kelleher
IND	2863	T Ritchie Peery, D D.S
IND	2864	Victor Dunsmore, Sr.
IND	2865	Roger D Groot
IND	2866	Donald H Lentz
IND	2867	George Fralin
IND	2868	David W Carr, Jr
IND	2869	John R Fowler
IND	2870	David Bhlob
IND	2871	David R Olund
IND	2872	Jack Williams
IND	2873	James A. Ruckman
IND	2874	Steve M Hundley
IND	2875	James A McCann
IND	2876	Victor Dunsmore, Jr.
IND	2877	Jeanette B. Robinson
IND	2879	George & Mary Bobenia
IND	2880	Ollie W Kitchen, Jr.
IND	2881	Clifford Miller
IND	2882	Kenneth B Kirkham
IND	2883	T J. Daly
IND	2884	Rose A Magnarella
IND	2885	Tonya Grinde

IND	2888	Paul F Torrence
IND	2889	H A Turner
IND	2892	Jacob A. Kamerow
IND	2894	Adeline B Lyle
IND	2895	Richard G. Dowlavage
IND	2896	Charlotte L. Umholtz
IND	2898	Craig R Kaderavek
IND	2899	Reese Bull
IND	2901	Sue M. Haley
IND	2902	Kelly Mackey
IND	2903	David E. Nees
IND	2904	Thomas E Carroll
IND	2905	Herbert Hardbarger, Jr.
IND	2906	Fred Burke
IND	2907	Linda Wade
IND	2908	Timothy Wade
IND	2909	Petition
IND	2910	Gary Dellinger
IND	2911	Richard L. Hundley
IND	2912	David A Snebold
IND	2913	I Fredrick Trew
IND	2915	N E Houser
IND	2916	Brooks Irwin, Jr
IND	2917	Arnold L Warlitner
IND	2918	John M Yeago
IND	2920	Charles T Campbell
IND	2921	Bruce & Bonnie Benedict
IND	2922	Clyde T. Smith
IND	2923	Terry S Templeton
IND	2924	David G Wilcher
IND	2925	Sue Carlyle
IND	2926	Trenor L Hypes
IND	2927	Ken Isaac
IND	2929	Charles T. Boggs
IND	2930	R. Lee Kernell
IND	2931	Gary J Close
IND	2932	Larry Gochenour
IND	2933	Nora M Taylor
IND	2934	Rob and Sandy Fountain
IND	2936	Bryan Barb
IND	2937	Mark Burton
IND	2938	Danny B Goodbar
IND	2939	Ike Knox
IND	2940	Alan E. Bellinoff
IND	2941	Waitman Wade
IND	2942	Steve Parks
IND	2943	Layne W Beverly
IND	2944	Betty Cochran
IND	2945	Mary Ruley
IND	2946	Robert Spight
IND	2947	Daryl E Reed
IND	2948	Robert Bowyor, Jr.
IND	2949	Glen W Snider
IND	2950	Wayne Huffman
IND	2951	Troy Beverley
IND	2952	David Eggleston
IND	2953	Lowell A Davis
IND	2954	Donnie Wines
IND	2955	Tammy Johnson
IND	2956	Larry A Clark
IND	2957	Donnie Huffman
IND	2958	A K. Miller
IND	2959	William M Hall
IND	2960	Mike Bare
IND	2961	Martha Garrett
IND	2962	Frank Dawdra
IND	2963	J David Hall
IND	2964	Randy Camden
IND	2965	Gary Spence
IND	2966	Ronald N Gilman
IND	2967	Randy Humphries
IND	2968	Warre Maddox
IND	2969	Mike Gunter
IND	2970	Michael D. Cheatham
IND	2971	H P. Brown, III
IND	2972	Wayne D Peterson
IND	2973	H. P Brown, IV
IND	2974	Gregory Syle
IND	2975	Eric Snyder
IND	2976	Thomas J. Lloyd
IND	2977	E A Villafranca
IND	2978	Arthur W. Hurt
IND	2979	Jason Amos
IND	2980	C. Thilsims
IND	2981	V. Owen Warr
IND	2982	Timothy M. White
IND	2983	Steve Slagle
IND	2984	Robert R. Floyd, Sr
IND	2985	Tollie D. Moore
IND	2986	E R. Glass
IND	2987	Joe Glass
IND	2988	Ronald E. White
IND	2989	Eddie Foster
IND	2990	Barry W. Tyree
IND	2991	John Merrison
IND	2992	Hershell Burr
IND	2993	Lloyd Pennington
IND	2994	Jerylene Mason
IND	2995	Nancy R. Hartless
IND	2996	Henry L Henson
IND	2997	Wendell Lee Fitz, Sr.
IND	2998	David Coleman
IND	2999	E. R Montgomery, Jr
IND	3000	Lee Wright
IND	3001	Delores Humphries
IND	3002	William A. Rudford
IND	3003	May Lowe
IND	3004	Edmond Floyd
IND	3005	W C. Biller, Jr
IND	3006	Bill Floyd
IND	3007	C. S Hesk
IND	3008	Delmas Clark
IND	3009	Newassa Huffman
IND	3010	Carrie Mason
IND	3011	Frances Fields
IND	3012	Audrey Staton
IND	3013	Gary Knick
IND	3014	Pam Shiley
IND	3015	V Eugene Wood
IND	3016	H P Brown, IV
IND	3017	Frank Davidson
IND	3018	Randy Humphries

IND	3019	Gary Spence
IND	3020	Randy Camden
IND	3021	Fred Catlett
IND	3022	William M. Hall
IND	3023	Donnie Huffman
IND	3024	A. K. Miller
IND	3025	Russel Glen
IND	3026	David L. Eggleston
IND	3027	Lee Wright
IND	3028	Wayne Huffman
IND	3029	Daryl E Reed
IND	3030	Robert C. Spylt
IND	3031	Troy Beverly
IND	3032	Glen W. Snider
IND	3033	Robert L. Bowyer Jr.
IND	3034	Layne W. Beverly
IND	3035	V. Eugene Wood
IND	3036	Edward M. Hamilton
IND	3037	Mike Bare
IND	3038	Warren Muddox
IND	3039	Michael D, Cheathen
IND	3040	H. P. Brown, IV
IND	3041	G. Sythe
IND	3042	Jason S Amos
IND	3043	Eric Snyder
IND	3044	C. Russell Williams
IND	3045	V. Owen Ware
IND	3046	Timothy M. White
IND	3047	Steve Slagle
IND	3048	Tollie D. Moore
IND	3049	C. R. Glass
IND	3050	Joe Glass
IND	3051	Ronald E White
IND	3052	Eddie Foster
IND	3053	Barry W. Tyree
IND	3054	John Morrison
IND	3055	Herbert H. Brown
IND	3056	Mike Gunter
IND	3057	Martha J. Garrett
IND	3058	Robert Miller, III
IND	3059	Paul Wisman
IND	3060	Betty Troumadd
IND	3061	James Parsons
IND	3062	John Kemp
IND	3063	Illegible
IND	3064	Joe Archambeault, P.E.
IND	3065	Yolanda Spencer
IND	3066	David H. Kinney
IND	3067	Stella M. Koch
IND	3068	John S. Gottschalk
IND	3069	Patricia A. Jackson
IND	3070	Heloise D. H Dornin
IND	3071	Robert T. Dornin
IND	3072	Megan Gallagher
IND	3073	Katheryne L. Goodman
IND	3074	Kate Goodman
IND	3075	Joseph P Weeks
IND	3076	Susan C. Weeks
IND	3077	David Chuse
IND	3078	Lind Kolodziej
IND	3079	Neal D Emerald
IND	3080	Loudell R Staunton
IND	3081	Brian W Moores
IND	3082	Georgia H. Herbert
IND	3083	Josephine De Give
IND	3084	Timothy Cook
IND	3085	Shelley G Bourdon
IND	3086	James F. Brown
IND	3087	Laura Thicker
IND	3088	Rebecca Conway
IND	3089	Stephen Parks
IND	3090	Marilyn & Pat Lockhart
IND	3091	Jennifer Hiebert
IND	3092	Debra Livramento
IND	3093	Helen Oldenberg
IND	3094	Kurt J Erchinson
IND	3096	Michael Farabaugh
IND	3097	Rev. Rick Hill
IND	3098	Mary P Sease
IND	3099	Chas Grady
IND	3100	Samuel and Margaret Johnson
IND	3101	Theron Smalbidre
IND	3102	Kenny Wagoner
IND	3103	Robert Rogers
IND	3104	Jack Barker
IND	3105	Thomas McClain
IND	3106	Ronald Shingleton
IND	3107	Lonnie Lackey
IND	3108	John Taylor
IND	3109	Douglas Perry
IND	3110	Jeff Swiger
IND	3111	Steve Lawson
IND	3112	Franklin Taylor
IND	3113	Tip Starkey
IND	3114	Roger L. Robertson, Jr.
IND	3115	Donald S. Sims, Jr.
IND	3116	Gordon L Souz
IND	3117	Roger Ellewod King
IND	3118	Margaret J Simms
IND	3119	Roger L. Robertson
IND	3120	Reed Probst
IND	3123	Thomas Symmes Jr
IND	3125	M. Hartman
IND	3126	Sandra Hauser
IND	3127	Dwight Bolyard
IND	3128	Bill & Helen Braunworth
IND	3129	Calvin Pifer
IND	3130	John Lipscomb
IND	3131	Max White
IND	3132	Joseph Hauser
IND	3133	William Hauser
IND	3135	Wade Hanser
IND	3136	Robert Harsh
IND	3137	Jackie Snyde
IND	3138	David Wiles
IND	3139	Kevin Wiles
IND	3140	John C Hall
IND	3141	H Hartruss
IND	3142	Ralph Buckley
IND	3143	Herbert Richey
IND	3144	Warren Groves
IND	3145	W Myer, II

IND	3146	Mark Crummett
IND	3147	Oliver Bauer
IND	3148	Jane Harrison
IND	3149	Barbara Phillipson
IND	3150	Larry Collins
IND	3151	Chad Mays
IND	3152	Kenny Mays
IND	3153	Edward B Decker
IND	3154	W. B Waggy
IND	3155	Anne B Dale
IND	3156	Edward M Dale
IND	3157	Willie L. McCune
IND	3158	Sharon Griffin
IND	3159	Eddie T Allen
IND	3160	Roger C Allen
IND	3161	Manley T. Allen
IND	3162	Stephen P. Troxell
IND	3163	Terry L Shifflett
IND	3165	Tim Chandler
IND	3166	Chris Fretwell
IND	3167	Danny Clinedinst
IND	3168	Chris Marshall
IND	3169	Ronnie Henderson
IND	3170	James C. Ratcliffe, III
IND	3171	David L. Campbell
IND	3172	W H Reid
IND	3173	J L Aikens
IND	3174	R C Roger
IND	3175	Frank Pyanue
IND	3176	Rebecca L Thompson
IND	3177	Ralph E. Griffin, Jr.
IND	3178	O Martin Wheeler
IND	3179	Brenda F Thompson
IND	3180	H Paul Thompson
IND	3181	Steve Sutton
IND	3182	Whitney P Terrell
IND	3183	Gary L Brubaker
IND	3184	John Abshire
IND	3185	Paul Driner
IND	3186	William Warren, Jr
IND	3187	T Payton Coyner
IND	3188	Rick Hicklin
IND	3189	B Whalen
IND	3190	Steve Coffman
IND	3191	Mark Schleupner
IND	3192	Thomas G Eick
IND	3193	G Van Pelt
IND	3194	Dr Brosius, Ph D
IND	3195	Anna Hall
IND	3196	Martha P Makel
IND	3197	Bruce L Legge
IND	3198	David Rockman
IND	3199	Karen Silver
IND	3200	Jennifer Oman
IND	3201	Dave Corban
IND	3202	Mark R Woodie
IND	3203	Greg Sandage
IND	3204	Sarah Swank & Jon Kastendick
IND	3205	Carol Gardner
IND	3206	Thelma G Strehle
IND	3207	Doug Sease
IND	3208	Suzanne Sease
IND	3209	C Pfeifer
IND	3210	Charles B Fenster
IND	3211	Michele R Rudash
IND	3212	Nan Jack
IND	3213	Dana Kirley
IND	3214	Louise and Milton Perlman
IND	3215	Lacey L Leffel
IND	3216	Charles and Martha Maddox
IND	3217	Bill and Joyce Fuller
IND	3218	Thomas J Gillerfrie
IND	3219	E Whelty Hopt
IND	3220	Aubor T Bloh
IND	3221	Jonathan Stanly
IND	3222	Illegible Signature
IND	3223	Brian Port
IND	3224	Donald J Skelly and Chad Fears
IND	3225	Allison Babs
IND	3226	Christopher F Tricarick
IND	3227	Harvey W Ollinger
IND	3228	Carl Dale
IND	3229	Laura Musser
IND	3230	Kathleen A Griffin
IND	3231	Jo Ellen Capstack
IND	3232	Merriheth Neal
IND	3233	Nancy Steller
IND	3234	Mary Ann Yarsinske & John Cunningham
IND	3235	Ted Urappel
IND	3236	Wendy J Garpow
IND	3237	Marsha Shank
IND	3238	Carl W Fritzinger
IND	3239	Dawn Kern
IND	3240	Gena Tenney Phenix
IND	3241	Elizabeth Chappell
IND	3242	Rose McNameric
IND	3243	Susan Aaren
IND	3244	Erin Lise Tabscott
IND	3245	Patricia Rust
IND	3246	Dr and Mrs T Keith Vest
IND	3247	Karen Day
IND	3248	Carolyn Alkire
IND	3249	Nicole Gravatt
IND	3250	Steven L Gray
IND	3251	James Terrill
IND	3252	Luther Brown, Jr
IND	3253	B Palmer
IND	3254	Rose Koogle
IND	3255	Robert Adams
IND	3256	Jeff Hatfield
IND	3257	Belle Dreyfuss
IND	3258	Charles N Adams, Jr
IND	3259	William A Keely
IND	3260	Dr R Michael Erwin
IND	3261	Kate Matthews
IND	3262	Robert Holley
IND	3263	Joan Adams
IND	3264	Arthur Chambers
IND	3265	Sharon Dreyfuss
IND	3266	Wayne Crider, Sr
IND	3267	Regina Shapley

IND	3268	Sandra S Howard
IND	3269	Allen Alexander
IND	3270	Steven Whitney
IND	3271	James L. Claybrook
IND	3272	Eleanor D Campbell
IND	3273	Chris Leitch
IND	3274	Marion R. White
IND	3275	Mark Campbell
IND	3276	David Charles
IND	3277	Steven Byer
IND	3278	Kenneth Callahan
IND	3279	Stacy Depriest
IND	3280	Robert Bradley
IND	3281	Steven Southall
IND	3282	Brian Bland
IND	3283	Dennis Campbell
IND	3284	Ronnie Williamson
IND	3285	Gerald Rogers
IND	3286	Bryan Knids
IND	3287	Randy Shifflett
IND	3288	Kenneth Hill
IND	3289	Curtis Kincaid
IND	3290	Lonnie Pagans
IND	3291	Eli Perrine
IND	3292	Clyde Pagans
IND	3293	Cindy Jackson
IND	3294	Linda David
IND	3295	Gretchen Robb
IND	3296	Christian Smith
IND	3297	M McKenna
IND	3298	Patricia Sandage
IND	3299	Cameron Mvir
IND	3300	Bruce Batling-Austin
IND	3301	Leland Keller, Jr
IND	3302	Mark Schleupner
IND	3303	J Smith
IND	3304	Jeff Herrin
IND	3305	Judy Lachappalli
IND	3306	Jonathan Evans, Ph D & Amy Evans, M D.
IND	3307	Elizabeth & William Solomon
IND	3308	Elizabeth Bignell
IND	3309	Tami Arbogast
IND	3310	John Jackson
IND	3311	Blair Sharpe
IND	3312	Jackie Cooke
IND	3313	Frankline Brown, Jr.
IND	3314	John Marston
IND	3315	June Yager
IND	3316	David Carter
IND	3317	Katherine Orff
IND	3318	Stephanie Login
IND	3319	Camille Means
IND	3320	Dale Dunsmore
IND	3321	Maynard L. Patterson
IND	3322	Edward, Scotty, Jean Dawson
IND	3323	Dan Brownlee
IND	3324	David Cook
IND	3325	Helen & Bill Braunworth
IND	3326	C C. Manning, Jr.
IND	3327	Jean K. Loesel
IND	3328	Charlotte Morgan
IND	3329	Cathy Meister
IND	3330	Natalie Hawkins
IND	3331	Malcolm Crosbie
IND	3332	John K. Camper
IND	3333	Edward B Hamer
IND	3334	Herb Goldstein
IND	3335	Jo Ellen Parent
IND	3336	Glen Leasure
IND	3337	Steven R. Parent
IND	3338	Wylma Davis
IND	3339	Fred Baker
IND	3340	A Foster, III
IND	3341	Paul Mallos
IND	3342	Negesh P Mehta
IND	3343	Raymond Cohen
IND	3344	Wayne Raynal
IND	3345	Ella Baker
IND	3346	Cathy Wells
IND	3347	Rita Jean Leasure
IND	3348	David F. Harris
IND	3349	Melvin N Leasure
IND	3350	Mary Barnes
IND	3351	Helen Haniz
IND	3352	Mrs. Farris Hotchkiss
IND	3353	John C. Wise
IND	3354	Laura Neale
IND	3355	Lois E Leasure
IND	3356	Virginia McGhee
IND	3357	John E Friedrichs
IND	3358	John D Morgan
IND	3359	Thomas H Ahnemann
IND	3360	Karen Ahnemann
IND	3361	Andrew C Johnson, Jr
IND	3362	Rebecca McGhee
IND	3363	Morgan Harris
IND	3364	Betty Lemon
IND	3365	Richard G Barnes
IND	3366	David Daystar
IND	3367	Yaviah Renner
IND	3368	Margaret Dyson-Cobb
IND	3369	Nancy Spencer
IND	3370	David Purly
IND	3371	Tom Marshall
IND	3372	Ed Moore
IND	3373	Michael R Sexton, II
IND	3374	Lee Sauder
IND	3375	Ruth P. McCormick-Goodliat
IND	3376	Zephy Renner
IND	3377	Margaret Sharbel
IND	3378	Betty L Putnay
IND	3379	Stephanie Bond
IND	3380	Gabriel Leasure
IND	3381	Phillip R Welch
IND	3382	Harvest Leasure
IND	3383	Larry McNeil
IND	3384	Ann Henderson
IND	3385	Lenna and Terry Ojure
IND	3386	Summer Welch
IND	3387	Katie McNeil
IND	3388	Katherine Smith

IND	3389	David A Johnston
IND	3390	Pamela E. Breil
IND	3391	Dan Frese
IND	3392	Florence G. Cook
IND	3393	Mark K. Cathey
IND	3394	Eliot Balazs
IND	3395	Peter O'Shaughnessy & Frank Hawkins
IND	3396	Joan Robins
IND	3397	Gary Sizer
IND	3398	Billie Jean Sizer
IND	3399	Drew Winterer
IND	3400	Richard H. Moore
IND	3401	John Grant
IND	3402	Tom Oxendine
IND	3403	Andrew H Williams
IND	3404	Sally Hutcheson
IND	3405	Paula Sullivan
IND	3406	Mark Corrales
IND	3407	Diane Melton
IND	3408	Ben Brown
IND	3409	James A Strock
IND	3410	Ellen Jennings
IND	3411	Eric Renner
IND	3412	Josephine R. Morrison
IND	3413	Alex H. Morrison
IND	3414	Haines Sprunt
IND	3415	Dr David Sprunt
IND	3416	Elise Sprunt
IND	3417	Eric Sheffield
IND	3418	Elise Sheffield
IND	3419	Reid T Putney
IND	3420	Darryl Knick
IND	3421	Nancy Bidlack
IND	3422	Patrick Conner
IND	3423	Steven R. Brads
IND	3424	Steven Brads
IND	3425	James Benton
IND	3426	Susan Benton
IND	3427	Dianna Williams
IND	3428	Pam Olvers
IND	3429	Barbara Ruddick
IND	3430	Jean Nalley
IND	3431	Linda Jackson
IND	3432	Brian Nalley
IND	3433	Linda & Bill Raines
IND	3434	Betty Gordon
IND	3435	Pearline Nalley
IND	3436	Jeff Allen
IND	3437	Jeff & Tonya McDaniel
IND	3438	Anna-Marie York
IND	3441	Colon R Mcmath
IND	3442	Alma McMath
IND	3443	Kirk McMath
IND	3444	Darren McMath
IND	3445	Larry Hale
IND	3447	Jeff Hedrick
IND	3448	David Work
IND	3449	J L. Hedrick
IND	3450	Petition
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IND	3457	T.C. Pinckney
IND	3458	Donna Murphy
IND	3459	Stephen Templeton
IND	3460	Jeanne Biggart
IND	3461	Eve D. Fout
IND	3462	Kathy M. Taylor
IND	3463	Colin Bruce Macleod
IND	3464	S.J. Kolmstetter
IND	3465	Laura G Dervishian
IND	3466	Sharon E. Mohney
IND	3467	Bonnie Pulliam
IND	3468	Stephen L. Stoner
IND	3469	Philip Paschall
IND	3470	Elizabeth & Robert Alcock
IND	3471	Ginger Herring
IND	3472	Benjamin F. Livingston, III
IND	3473	Chris Brinton
IND	3474	Ruth Hudson
IND	3475	Emily Johnson
IND	3476	Lynda Cozart
IND	3477	Catherine A Anderson
IND	3478	Madeline Delgado
IND	3479	Eileen G. Popp
IND	3480	Mrs. W. J Nelson
IND	3481	Kirk Lunsford, Jr.
IND	3482	Monroe Phillips
IND	3483	Ned Kahns
IND	3485	Cindy Bowen
IND	3486	Donald L. Ash
IND	3487	Carlos Marie Ellis
IND	3488	Vernon L Matpey, Jr
IND	3489	Lawrence W. Deitz
IND	3490	Alan S Warden
IND	3491	Temple Kessinger
IND	3492	Sharon H and G Gray Puryear
IND	3493	Dorothy H. Briggs
IND	3494	Susan Fisher
IND	3495	Betty W Marr
IND	3496	Virginia M. Driver
IND	3497	Michelle & Ruth Poignant
IND	3498	James Kelly
IND	3499	Newell Irwin
IND	3501	Roger J. Cufton
IND	3502	Sara Stewart
IND	3503	Sandra Marre
IND	3504	Robert N. Porter, Jr
IND	3505	David & Julie Coffman
IND	3507	Wm J. Ellis, M D
IND	3508	Kathy Bilton
IND	3509	Ann M Patterson
IND	3510	Carol C. Gray
IND	3511	Ralph W Hart
IND	3512	Hallie B Albergotti
IND	3513	Victoria Rizzi
IND	3515	Bell Martin
IND	3516	Morton M Smith

IND	3517	Rosemarie Sawdon
IND	3518	Aj. John Jordan Ty & Carly Eccles
IND	3519	Larry & Cindy Linville
IND	3520	Christopher M. Stinnetts
IND	3521	Aubrey Neas
IND	3522	Laurie and Leonard Adin
IND	3523	Phyllis M. Dawson
IND	3524	R. Lynn Browder
IND	3525	Rickey Shortt
IND	3526	John D. Doyle, Jr.
IND	3527	Jill Harper Sease
IND	3528	Karen Waldren
IND	3529	C. Kunkel
IND	3530	Sylvia Staukavich
IND	3531	Howard Sturgeon
IND	3532	Joe Malloy
IND	3533	Elizabeth Travis
IND	3534	Thomas Sowers
IND	3535	Homer W. Witcher
IND	3536	David Siskind
IND	3538	Debby Thoma
IND	3539	Ron Boyd
IND	3541	Frederick E. Rose
IND	3542	Del McNeely
IND	3543	Robert B. Turk
IND	3544	James Troy
IND	3545	Dan Miles
IND	3546	Elizabeth I Vander Berg
IND	3548	Mr. and Mrs. B. R. Lamb
IND	3549	Ralph Benton
IND	3550	N A. Fitzpatrick
IND	3551	R Holt Hogan
IND	3552	James E. Grobowski
IND	3553	Joan Chapman
IND	3554	Charles H. Hartman
IND	3555	Andrew Nimmo
IND	3556	Roger L. Sherman
IND	3557	Mark. M. Lloyd
IND	3558	J. Bryan Wibberley
IND	3559	Thomas E. Flora, Sr.
IND	3560	Elmer E Hatcher
IND	3561	Tom Evans
IND	3563	Terri Ikard
IND	3564	K. A. Toombs
IND	3565	Marjorie Griffith
IND	3566	N. Haynie & Sarah E. Kabler
IND	3568	Crickett Hammond
IND	3569	Marshall Brooks
IND	3570	Michael L. Lee
IND	3571	Irv Gupton
IND	3572	Mary Jane A. & J. B Linker
IND	3573	Arnold Scott
IND	3574	James Foley
IND	3575	Gordon Jeffries
IND	3576	Clinton Handey
IND	3577	William Smith
IND	3578	Melvin D. Jones
IND	3579	Larry Lawless
IND	3580	J W. Belcher
IND	3581	Albert L. Lance
IND	3582	(Illegible 1st Name) Griffith
IND	3583	Winston Aldermon
IND	3584	M. D. Skelton
IND	3585	Garland Cochran
IND	3586	A L. Skelton
IND	3587	James A Gorton
IND	3588	R. Clifford Belcher
IND	3589	Clifford A. Bowman
IND	3591	Mary Lou Speckheuer
IND	3593	Betty Treuey
IND	3594	Michael Jamison
IND	3595	Sammy L. Stewart
IND	3596	Sammy L Stewart
IND	3597	Kenneth K. Patrick
IND	3598	E. F. Friess
IND	3599	Anthony B Bolen
IND	3600	George Roger Clark, III
IND	3601	Charlie Smithers
IND	3602	John K. Sheldon
IND	3603	Wayne Finch
IND	3604	Elizabeth L. Neill
IND	3606	Bill and Sally Miller
IND	3607	Laura Bliss
IND	3608	Richard D. Jacques
IND	3610	John P Newmarker
IND	3613	Roger Dexter
IND	3614	Larry W. George, Attorney-At-Law
IND	3615	Nina Pfeiffer
IND	3616	Peter Robinson
IND	3619	Kristen A. Ciarrocchi
IND	3620	Gilliam Kirkpatrick
IND	3621	Robert M. Garrison
IND	3622	Mr. Louis Makey
IND	3623	David Copley
IND	3624	Emmitt Clark
IND	3625	Ed Page
IND	3626	Roy E St. John, Jr.
IND	3627	Kenneth A Gibbs
IND	3628	Jim McAvoy
IND	3629	Kristin B Peckman
IND	3632	Dave Patrick
IND	3633	Nat Mawby
IND	3634	Joseph P. Briggs
IND	3635	Ronald R Knipling
IND	3636	Max Kendall
IND	3638	David A. Clark
IND	3639	James C. Campbell
IND	3640	Eric Seaborg
IND	3641	Sam & Dora Lee Ellington
IND	3642	L Guy
IND	3644	Andrew Woody
IND	3645	Marie B. Tyree
IND	3646	P. Albright
IND	3647	Jean E Hiatt
IND	3648	Michael C. Cundiff
IND	3649	William D Rice
IND	3650	Robert E Wallace
IND	3651	Diane Goodhart
IND	3652	Melinda L. McCaniel
IND	3653	Donald R Nulpy
IND	3654	Norman E. Beam
IND	3655	Erik W. Robeler

IND	3656	Tom Phillips
IND	3657	David B Spears
IND	3658	Bert Caul
IND	3659	Mary & Harry Bennett
IND	3660	Dennis Austin
IND	3661	Tammy Browning
IND	3662	Arlene B Green
IND	3663	Teresa Taylor
IND	3666	Thomas G. Black
IND	3667	Juanita Roe
IND	3670	William Baum
IND	3671	George Wetzel
IND	3672	Roy D Zangari
IND	3674	Mo Duncan
IND	3675	Gary Leggett
IND	3676	Frederick, Margaret, Dr. Carmen Rexrode
IND	3677	Kimberly Richardson
IND	3678	Patricia Mankin
IND	3679	John T. Deacon
IND	3680	Mary Le Grand
IND	3681	L Craig Carr
IND	3682	Preston L. Leitch
IND	3685	Stephanie A Michaels
IND	3687	Kathleen Fovargue
IND	3688	W. L Wilsher
IND	3689	Mark Hollberg
IND	3690	Marilyn Peters
IND	3691	Joseph P. Morra
IND	3692	Brian Blankenship
IND	3693	James Johnson
IND	3694	Robert G Mason
IND	3695	Anthony L Blow
IND	3696	Duncan Fairlie
IND	3697	William Aypen
IND	3698	Charles D. Engle
IND	3699	Barbara Rebert
IND	3700	Daniel Lam
IND	3701	Kelly Hutcheson
IND	3702	David Griffiths
IND	3703	Jane Coleman
IND	3704	Harold G Snead
IND	3706	Pennie & Dennis Dunham
IND	3707	Humphrey Moynihan
IND	3708	Charles W. Perdue
IND	3709	Gene Gendersen
IND	3712	Neal D. Emerald
IND	3713	Michael L. McGlothlin
IND	3715	Phillip V Bagdon
IND	3716	Philip Scott Park
IND	3717	Dennis C. Vincent
IND	3718	W E. Berthrong
IND	3719	Harmonson J. Floyd, Jr.
IND	3720	Patrick Vaccarino
IND	3723	Mary M. Bechtold
IND	3724	David A West
IND	3725	Robert Richards
IND	3726	Steven & Wendy Richards
IND	3727	Robert K. Egbert
IND	3729	John C Barber
IND	3731	Tad Eareckson
IND	3732	A Wayne & Teresa Allen
IND	3733	Peter and Leslie Mehring
IND	3734	Miles Hartman
IND	3735	Richard L Seeman
IND	3736	John H. Woolwine
IND	3737	Steve Bond
IND	3738	Ann B Bowles
IND	3739	Kenneth Edlund
IND	3740	William Wenthe
IND	3741	Bill & Helen Braunworth
IND	3744	Martin P. Albert, M D
IND	3745	Brenda M Jeffries
IND	3746	Ed Allen
IND	3748	Mike L. Mays
IND	3749	James Gormy
IND	3752	Robert J Gregorio
IND	3753	Frank T Chesson
IND	3755	Don L. Long
IND	3756	Vaughan Webb
IND	3757	Steven C Wilson
IND	3761	Jim Hutchings
IND	3762	Robert K. Schlawin
IND	3763	Stefan Bechtel
IND	3764	Dan E. French
IND	3766	Katherine Anne Rolph
IND	3768	Larry Barb
IND	3769	Michael Benton
IND	3772	Walter A Berg
IND	3774	Eldon R Plaugher
IND	3775	Dosie Breeden
IND	3777	Fran Genovese
IND	3778	Jay Shutte
IND	3779	Leona M Sonne
IND	3780	Jerry Wilson
IND	3781	Lewis G Nichols
IND	3782	Dana Clark
IND	3783	Petition
IND	3784	Peter M Schumann
IND	3785	Bob Peckman
IND	3786	Charles J. Parry
IND	3787	Kenneth E. Graybill
IND	3788	Mr. & Mrs William A Blatter
IND	3789	Charles F Hudson
IND	3792	Donald L. Champion
IND	3793	Frank V Sherwood
IND	3794	Robert B Szablinski
IND	3795	Dawne R Trainer
IND	3796	Sharon Whitlock
IND	3797	Nancy & Robert Roig
IND	3798	David M Andrews
IND	3799	Jefferson M Bean
IND	3800	Helen Y Scott
IND	3801	Wanda B Henwood
IND	3802	Kirk Lunsford
IND	3803	Frank Davidson
IND	3804	William S Hartless
IND	3806	Dan Fadely
IND	3807	Harold Silcott
IND	3808	David L Posca
IND	3809	Shelly Zoumbaris
IND	3810	Keith M Light

IND	3811	Allen Belden, Jr
IND	3812	Christopher Bailey
IND	3814	Heather D Newmarker
IND	3816	Margie Jeffries
IND	3817	Bob Rice
IND	3818	Austin Mantz, Jr.
IND	3819	J E Raynor
IND	3820	David W. Gillespie
IND	3821	John Richard Ale
IND	3822	Joseph L. Lehnen
IND	3824	Curtis Seltzer
IND	3825	Bennett H. Beach
IND	3826	Glen Flanagan
IND	3827	Jane Fellows
IND	3828	David E. Larch
IND	3830	Susan "Butch" Henley
IND	3832	Lynda V Houck
IND	3833	Edward B. Wright
IND	3834	Cindy Denchfield
IND	3835	Mark Hervig
IND	3836	Laura Lyons
IND	3837	Thomas Rooney
IND	3839	William & Elizabeth Lamson
IND	3840	J Dana McCarron
IND	3841	Walter W. Daggett
IND	3843	Zetta M Campbell
IND	3844	Christy Huddle
IND	3845	Lloyd Sumner
IND	3846	Ethan Shenkman
IND	3847	James & Dianne Rusnak
IND	3849	Matthew C. Allen
IND	3850	Francis Racette
IND	3851	Marilyn Horvath
IND	3852	Mrs. Julie C Blunt
IND	3853	John M Yeago
IND	3854	Norris Q Bruke
IND	3855	Daniel P Small
IND	3856	J. Michael & Royce Oxley
IND	3857	David Dagenhart, Jr.
IND	3858	Jeanne Darling
IND	3859	Kimberly M Jones
IND	3860	James D Terry
IND	3861	Sam Patten
IND	3862	Paul Bourdon
IND	3863	Eleanor J. Marshall
IND	3864	Charley W. Banks
IND	3865	David L. Posca
IND	3866	Robert A. Coulter
IND	3867	Kenneth A Scott
IND	3868	Richard S Oiseth
IND	3869	Dennis T Conroy
IND	3870	Robert J Soltess
IND	3871	Dr Holden Direskendi
IND	3872	L. Ryan Hodges
IND	3873	Douglas Avery
IND	3874	W. C. Bowling
IND	3875	Bennie N Shaver
IND	3876	Gordon Avery
IND	3877	Basil H Tenney
IND	3878	Randy Fasler
IND	3879	Cecil Holler, Jr.
IND	3880	William J. Brill
IND	3881	Tommy Jamerson
IND	3882	Michael D Brewer
IND	3883	John B Smith
IND	3884	Myra G. Karacofe
IND	3885	Howard Cartwright
IND	3886	John M Sibold
IND	3888	Miles Hartman
IND	3889	Kenneth R Rexrode
IND	3890	J. R. Dixon
IND	3892	Marie M. Muller
IND	3893	R Timothy R Romett
IND	3894	Jonathan L. Thoma
IND	3895	Myrtle Conner
IND	3896	Dr. R Bradley Pierce
IND	3897	W. Alex Sasamoto
IND	3898	Sue F Lee
IND	3899	William L Adams
IND	3900	Ginger Sanderson
IND	3902	David L. Bowers
IND	3903	Christopher G Gelliug
IND	3905	Phyllis Shutte
IND	3906	Jack Albright
IND	3907	H. Marshall Jarrett
IND	3908	Mr John S Meckley
IND	3910	Phillip Hanood
IND	3911	Seth Heminway
IND	3914	Charles C Hooks, Jr
IND	3916	Thomas W Woodward
IND	3918	Clyde K Venable
IND	3919	James M Hoye
IND	3920	Mr & Mrs Eugene Meekins
IND	3921	Elizabeth H Belcher
IND	3922	Dennis Hendricks
IND	3923	Brian D Shirley
IND	3924	Jordan Luke
IND	3925	Denver Tiller
IND	3926	Brenton H Staples
IND	3927	Henry D. Carr
IND	3928	Doris L Magee
IND	3929	Ross S. Shearer, Jr
IND	3930	William S Graybeal
IND	3931	Dona Davis
IND	3932	J E & Darleen S Martin
IND	3935	B L Weimer
IND	3938	Malcolm Cameron, Jr
IND	3942	Lynn Cameron
IND	3944	Howard McClanahan & Donald Cook
IND	3948	Sharon L Cooper
IND	3949	Richard A Harris, Jr
IND	3950	Scott H. Wingfield
IND	3951	William B. Leichter
IND	3954	Melvin J Burch, Jr.
IND	3955	S L. Spradlin, Jr
IND	3956	Gary G Youngblood
IND	3958	John B Kulstad
IND	3959	William N Gordge, M.D.
IND	3960	Calvin Harris
IND	3961	Charles E. Sullivan
IND	3965	Steven A Rapp

IND	3968	Alan Lane
IND	3969	Robert J Shura
IND	3970	Richard Buzard, Jr.
IND	3971	James C Clark
IND	3972	Lester L Campbell
IND	3973	Stephen Brown
IND	3974	Richard D Persinger
IND	3975	James M. Boone
IND	3976	A. R. Schroeder
IND	3977	Michael O'Brien
IND	3978	Kenneth J Roberts
IND	3979	James Earl Kennamer
IND	3980	Karen C Wittig
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IND	3984	David James
IND	3985	Elizabeth Hutchinson
IND	3986	John D Hutchinson
IND	3987	Jesse Jones
IND	3989	Jackie Taylor
IND	3990	Greg Harris
IND	3991	W. R Garland
IND	3992	Richard L Clark
IND	3993	Rick Webb
IND	3994	Daniel N. Jack
IND	3995	Patrick Donnelly
IND	3996	Julie Engsberg
IND	3999	T H. Watkins
IND	4000	Nicky Staunton
IND	4001	John R. Sweet
IND	4002	E. W. Irving, Jr
IND	4004	Brian Knox
IND	4005	Robert D Forster
IND	4006	Donald E Baird
IND	4007	J D Brackenrich
IND	4008	Jonathan E. Parker
IND	4009	Edward T Walters
IND	4011	Thomas M Bennett
IND	4014	Stuart and Joan White
IND	4015	Dolly Voss
IND	4018	Robert J Lowe
IND	4019	W. Raleigh Novak
IND	4021	Frank Watson
IND	4022	W Edward Hopkins, III
IND	4023	Benjamin T King
IND	4024	Thomas M. Schofield
IND	4025	Eric D Hoover
IND	4026	Mickey Deike
IND	4028	Oscar F. Baxter, IV
IND	4029	Kurt R Weiss
IND	4030	Michael Ballinger
IND	4031	Dr. Geo. Deike
IND	4032	Michael W Slimak
IND	4033	Thomas F Wieboldt
IND	4034	David Zimmerman
IND	4039	Cynthia Sutton
IND	4040	Sherman Bamford
IND	4041	George Waxter
IND	4042	S R Gochenour
IND	4043	Patricia O'Connell
IND	4044	M L Howley
IND	4045	Malfourd W. Trumbo
IND	4047	Warren Fitzgerald
IND	4048	Ron Brown
IND	4049	Cecil and Hellen Armstrong
IND	4050	Mark Kelsey
IND	4051	Irene C Marston
IND	4053	Karl Krueger
IND	4055	Arvid Christiansen
IND	4056	John B Tonkins
IND	4058	Donna E Berg
IND	4059	Michael S Hoover
IND	4060	F Eugene Wirwahn
IND	4061	Christy Henshaw
IND	4062	James S Armentrout
IND	4063	Christopher W Hoover
IND	4064	Artist Menks
IND	4065	James D Sutton
IND	4067	J Bradley
IND	4068	Betty Anne Hoplie
IND	4069	Sandra Dean
IND	4070	A J. Pema
IND	4071	Harry S McIlvaine
IND	4072	Joseph R. Martin
IND	4073	Audrey Dannenberg
IND	4074	Anita Thomasson
IND	4075	Eve Haverson
IND	4076	Michael Foxx
IND	4077	Joann G Hewitt
IND	4078	Travis Hewitt
IND	4079	Ernie G. Hewitt
IND	4080	Eddie H Hewitt
IND	4081	D. N Clark
IND	4082	Terry M Brooks, II
IND	4083	George Null
IND	4084	Carla Schnerman
IND	4085	Patti Driggers
IND	4086	Nancy McDonald
IND	4087	Michelle Moring
IND	4088	Dorothy Siviard
IND	4089	Debbie Sawyer
IND	4090	Jonathan Wirth
IND	4091	Linda Hatch
IND	4092	Richard L Herz
IND	4093	R Payler
IND	4094	Sandy Greene
IND	4095	Agnes T Rollins
IND	4096	Patricia Wade
IND	4097	Odell S McGuire
IND	4098	Jean S Sumner
IND	4099	George M Skinnett
IND	4100	Franz-Hakr Smith
IND	4101	Anne Houston
IND	4102	Shirley Atkinson
IND	4103	Pat Pratali
IND	4104	Jessica Bur
IND	4105	Andrew Schwartz
IND	4106	Nancy Walker
IND	4107	James Wilson
IND	4108	Michele L Smith
IND	4109	Rebecca Bier
IND	4110	Jim Bir
IND	4111	Thomas W Goodin

IND	4112	Maggie Turggle
IND	4113	Peggy Edwards-Frabell
IND	4114	Mary Jane Huber
IN	4115	Leslie Edwards
IND	4116	Sharon Wojno
IND	4117	Dawn J Grener
IND	4118	Louis E. Eukise, Jr.
IND	4119	Erick Gregory
IND	4120	Lizz Szafran
IND	4121	L. Morgan Forsee
IND	4122	Grace Herzog
IND	4123	Elizeth Labega
IND	4124	Cathy Miller
IND	4125	Eugenia Acree
IND	4126	Donna Lowe
IND	4127	K. J Lowe, Jr
IND	4128	W. Craig Sease, M D.
IND	4129	Jonathan Achille
IND	4130	R. Philip Irwin
IND	4131	Kathlee Maier
IND	4132	Marc Malik
IND	4133	Patricia Jaspen Chuse
IND	4134	John Lanier
IND	4135	Elizeth Labega
IND	4136	Phillip W. Hammons
IND	4137	Laurie Awens
IND	4138	Catherine Miller
IND	4139	Greg Morrison
IND	4140	Elisabeth Derringer
IND	4141	Angela Hill
IND	4142	Robert J Derenge
IND	4143	Carla Ponciroli
IND	4144	Grace Herzong
IND	4145	Pat Pratali
IND	4146	Peggy Edwards Frabell
IND	4147	Mary Jane Huber
IND	4148	Shirley Atkinson
IND	4149	Anne Houston
IND	4150	Tom Kihm
IND	4151	Greg Tucker
IND	4152	Ann Monnig
IND	4153	Peter Osenton
IND	4154	Mary Matherne
IND	4155	Jason Kwok
IND	4156	Melanie Parks
IND	4157	Kathy Knight
IND	4158	Sarah Drain
IND	4159	Charlotte Venable
IND	4160	Frank & Shirley Hobbs
IND	4161	Martha Manner
IND	4162	J. M Manner, Jr
IND	4163	Jean Mauner
IND	4164	Perry Johnson
IND	4165	Ingrid Simanis
IND	4166	W T Coleman
IND	4167	Mrs F M Cahoon
IND	4168	Virginia Jones
IND	4169	E W. Mays, Jr
IND	4170	William & Elizabeth Washburn
IND	4171	Nancy Slusser
IND	4172	H Merrill Pasco
IND	4173	Robert M. Bozic
IND	4174	Norman Dean
IND	4175	Paula Nachman
IND	4176	Patty Fox
IND	4177	David F. Robinson
IND	4178	John Nachman
IND	4179	Jane Dean
IND	4180	Kenneth B. Alexander
IND	4181	Faye Alexander
IND	4183	Jennifer Williams
IND	4184	Robert T. Jordan
IND	4185	Harold and Margaret Crate
IND	4186	Francis G Haas
IND	4187	Ginny Shoosuit
IND	4188	Greg Godbey
IND	4189	No Signature
IND	4190	Greg Weaver
IND	4191	Gayle C. Carson
IND	4192	Mary F. Greenlee
IND	4193	Ginger Hawver
IND	4194	Nicole E. Droitsen
IND	4195	Dan Pearson
IND	4196	Christa Hill
IND	4197	Wayne C McLaughlin
IND	4198	Rosemary Boure
IND	4199	Gerald McKinney
IND	4200	Phil Fonel
IND	4201	Michael Petro
IND	4202	David Griffith
IND	4203	Matthew Greenway
IND	4204	Leigh Majer
IND	4205	Peter D Schaller
IND	4206	Stephanie Wycoff
IND	4207	Patrick Holan
IND	4208	Mark McGinn
IND	4209	Lisa Bagby
IND	4210	M. J Linn
IND	4211	Carolyn C Cosgrove
IND	4212	Ann McCaffrey
IND	4213	Robert G Humphrey
IND	4214	Kat Neal
IND	4215	A. Gilliam
IND	4216	Ron Bloom
IND	4217	Ophelia Van Ludwig
IND	4218	Ron Shinner
IND	4221	Steven Sutton
IND	4223	Lynwood H. Sours
IND	4224	Jeffrey Kosteini
IND	4225	Gary Williams Riffer
IND	4226	Curtis Seltzer
IND	4227	Daniel A Grosch
IND	4228	Matthew J Blackwood
IND	4229	O B. Honell
IND	4230	Edward Mainland
IND	4231	Nancy Gilliam
IND	4232	Doris Deel Hall
IND	4233	James E Bryant, Jr
IND	4234	Kay Hanes
IND	4235	David B Mathison
IND	4237	Thomas M Ricker
IND	4238	Daniel Hicks

IND	4239	Phillip D. Coulombe
IND	4240	Clay Williamson
IND	4242	Michael O'Brien
IND	4243	William P. Scudder, Jr.
IND	4245	Sue McDonald
IND	4246	Charles T. Warren
IND	4247	George N. Keefe
IND	4248	Allen Kreger
IND	4249	Sylvia A Brugh
IND	4252	Margaret Lindsay
IND	4253	Donald Walden
IND	4254	Bob Liebman
IND	4255	Thomas J Messenger
IND	4258	Andrew A. Armano
IND	4259	Mary & Harry Bennett
IND	4262	Karen Silverman
IND	4263	Ronald and Peggy Conley
IND	4264	Joann M Joseph
IND	4266	Charles H. Ellis, III
IND	4267	Michael S. Sutton
IND	4311	Carolyn C Cosgrove
LOC	167	Macon C. Sammons, Jr
LOC	744	Gary R Wilson
LOC	935	William G. O'Brien
LOC	936	D G Austin
LOC	1447	Nancy K. Harding
LOC	1544	Walter F. Perkins
LOC	1636	Dan E. French
LOC	1990	Clarence Farmer and Macon Sammons, Jr.
LOC	2307	Randolph J Maupin
LOC	2334	Richard P Coon
LOC	2608	Sneed T Adams
LOC	2329	Stewart E. Shaner
LOC	2387	H D. Carter, Jr
LOC	2659	B Clayton Goodman, III
LOC	2897	Stephen R Haines
LOC	3540	Ronald T Malcolm
LOC	3562	Raymond A Booth
LOC	3630	Dan E. French
LOC	3711	Claire A Collins
LOC	3758	Patrick J Coffield
ORG	8	Peter Preston
ORG	16	James E. Loesel
ORG	17	James E Loesel
ORG	58	Kenneth Friend
ORG	60	Preston Stevens
ORG	65	Mark Wallner
ORG	72	James E Loesel
ORG	78	James E Loesel
ORG	79	Frank A Devineу, Jr
ORG	82	James E Loesel
ORG	87	James E Loesel
ORG	133	James Rowan
ORG	139	Appalachian Forest Management Group
ORG	142	Ernie Dickerman
ORG	146	James E Loesel
ORG	171	M A Jones
ORG	179	Larry W George
ORG	181	R E Hammond
ORG	187	Ralph E Main, Jr
ORG	188	James E Loesel
ORG	191	Robert F Nay
ORG	278	James E. Loesel
ORG	281	Raymond C Thomas, Jr.
ORG	287	Jody A. Willoughby-Pesch
ORG	291	Fred Austin
ORG	294	Leff Moore
ORG	295	Robert Mueller
ORG	324	Steve Kelliher
ORG	368	Frank Sauber
ORG	369	Harry McIlvaine
ORG	376	Gene Smithson
ORG	379	B Jack Warren
ORG	500	James E Loesel
ORG	730	Dan Dessecker
ORG	735	Dan Miles
ORG	853	Charles W Poland
ORG	857	Bev Anderson
ORG	940	William H Tanger
ORG	958	Osborne L Wade, Jr
ORG	959	Chris Boucher
ORG	960	Jason M Huss
ORG	961	Clayton W Rhodes
ORG	962	Kathleen M Rhodes
ORG	989	David L Hook
ORG	990	James E. Loesel
ORG	1064	H. J Michaels, Jr.
ORG	1066	Bob Kerns
ORG	1067	Charles D Pierce
ORG	1106	Russell W Watkins
ORG	1129	Susan A Hess
ORG	1144	Mike Stone
ORG	1164	Eric J Lundquist, Esq
ORG	1168	Julie Davis
ORG	1265	Donald E Buckland
ORG	1298	Bernard C Ziomek
ORG	1304	Charles F Finley, Jr.
ORG	1338	Carey M. Copeland
ORG	1364	Tom Balas
ORG	1368	Faye C. Cooper
ORG	1401	Mike Roebuck
ORG	1609	Glenn M Birch
ORG	1610	E W Lautenschlager
ORG	1615	Paul M Hendricks, M D.
ORG	1644	James E Loesel
ORG	1645	James E. Loesel
ORG	1660	Ronald Seiss
ORG	1662	David Horton
ORG	1663	Loretta D Reeves
ORG	1675	Donald L Dorrier
ORG	1676	Jane Melbourne
ORG	1684	Angelica Heath
ORG	1844	Steven S McCauley
ORG	1849	Sarah Faulconer
ORG	1859	Autumn Bell
ORG	1881	Leroy Cochran
ORG	1883	Craig Melby
ORG	1884	Pete Givan
ORG	1887	Mary W Smith
ORG	1904	Ron Mulinex

ORG	1906	Steve Bridge
ORG	2031	Richard G Ephgrave
ORG	2088	Ed Pearson
ORG	2158	Sandra Thompson
ORG	2180	Harvey Ferris
ORG	2229	Norman J Sykora
ORG	2234	William Hughes
ORG	2238	Kenneth E. Stevens
ORG	2248	William C. Young
ORG	2251	Ken & Georgie Shufran
ORG	2252	Alton H. Davis
ORG	2349	Stanley W. Thomas
ORG	2350	Kim Repp
ORG	2352	Ed Foley
ORG	2354	Eric C. Bocci
ORG	2359	Dennis Harbin
ORG	2455	Susan Barry
ORG	2476	Doug Nelson
ORG	2531	G. Wayne Martin
ORG	2542	S. L. Spradlin, Jr
ORG	2543	Jeff Devol
ORG	2579	Emmett S. Grogan
ORG	2609	Neil D. Emerald
ORG	2613	David Simon
ORG	2622	Sam Ripley
ORG	2628	James E. Loesel
ORG	2629	Preston Stevens
ORG	2636	James E Loesel
ORG	2664	Bert Caul
ORG	2709	David J Heiser
ORG	2755	Sarah Faulconer and Lynn Cameron
ORG	2821	Rosene Tippett
ORG	2822	James D. Bailey
ORG	2823	Pat Loving, Jr.
ORG	2824	James E Loesel
ORG	2887	Rick Bonifant
ORG	2890	James Farmer
ORG	2935	Carvel Blair
ORG	3124	George Depke
ORG	3164	Dennis M. Campbell
ORG	3506	Gregory A Stull
ORG	3537	Michael A Francis
ORG	3547	John P Cone, Jr
ORG	3567	Watt Bradshaw
ORG	3590	Cas Marszal
ORG	3605	James M Whitney, Jr.
ORG	3631	Steve Letterman
ORG	3637	Benny Southall
ORG	3665	Nicky Staunton
ORG	3669	Scott and Virginia Shackelford
ORG	3705	Josephine F De Give
ORG	3710	F Kaid Benfield & Robbin S Marks
ORG	3742	James E Loesel
ORG	3743	Randy Bush
ORG	3750	Michael Roebuck
ORG	3751	Virgil R Groves
ORG	3770	Charles T. Cushwa
ORG	3771	William J Floyd
ORG	3776	S. L. Spradlin, Jr
ORG	3829	Susan A Henley
ORG	3838	Sylvia Brugh
ORG	3848	Daniel M Downey
ORG	3887	John Fairfield
ORG	3901	Philip J Rossano
ORG	3933	M A. Jones
ORG	3934	Curtis I. Taylor
ORG	3936	James E Loesel
ORG	3937	James E Loesel
ORG	3939	Daniel B Deeds
ORG	3940	David E Steffen
ORG	3941	David N. Startzell
ORG	3943	Lou Schmidt
ORG	3945	William L. Hardbarger
ORG	3946	James E. Loesel
ORG	3947	Judith B Williams
ORG	3953	Cecil L Boggs, Jr
ORG	3957	John B. Bazuin, Jr.
ORG	3962	Lee Bowen
ORG	3963	James E. Loesel
ORG	3964	James E Loesel
ORG	3966	Hal Cantrill
ORG	3981	Steven Krichbaum
ORG	3988	Wayne D Iverson
ORG	3997	Michael L. Lipford
ORG	3998	Jack Reeder
ORG	4010	Nelson Lewis
ORG	4012	Donald H White
ORG	4013	Gary Marr
ORG	4027	Theresa A Duffey
ORG	4035	Adena Cook
ORG	4036	Ben Turley
ORG	4046	James Earl Kennamer, Ph D.
ORG	4052	Cynthia L Rinker
ORG	4057	James E Loesel
ORG	4066	Joseph C. Mitchell, Ph D
ORG	4219	James E Loesel
ORG	4220	James E Loesel
ORG	4241	Mark L Shaffer
ORG	4244	Carol Jensen
ORG	4250	Andy Mahler
ORG	4251	Carl R Fischer
ST	175	Kermit D Reel
ST	325	William H Gillespie
ST	861	David G Lilly
ST	862	James R Hays
ST	941	Cleve Benedict
ST	985	R Creigh Deeds
ST	1342	Herbert W Taylor
ST	1424	Carl E Gainer
ST	1449	Roy S. Sites, Ph D.
ST	1555	Watkins M Abbitt, Jr.
ST	1658	Robert D. Whipkey
ST	1836	H Bryan Mitchell
ST	2018	Joseph C. Kelley
ST	2309	Aubrey Pritchett
ST	2533	Fred L Bagley
ST	2633	S. Vance Wilkins, Jr
ST	2634	Lacey E Putney
ST	2635	Joe Martin
ST	2878	Daniel M Bayer

ST	2914	Frank Baber, III	ST	3747	J D. Brackenrich
ST	3612	James A. Britt	ST	3952	James W Garner
ST	3683	Kenneth H. Lowery	ST	4003	Elliot Schewel
ST	3684	Charles E Horn	ST	4038	Elizabeth H Haskell
ST	3728	J Edward Hamrick, III	ST	4182	Worthy Martin, Ph D
ST	3730	James A Carter			

COMMENTS AND RESPONSES

BIODIVERSITY: Natural Values of the George Washington National Forest

Letter 4001 — Management strategies for the Forest should emphasize regeneration of the natural biodiversity of the original forest and low-impact recreation opportunities High-impact or intrusive uses, whether economic or recreational, should be severely restricted

Letter 4050 — Native biodiversity and increasing the total intact natural habitat must be the ultimate goal of the plan for the "First Forest" for the next hundred years

Response — The American public want and need a wide variety of uses, values, products and conditions from the Forest By only limiting the goal of the Revised Plan to "native biodiversity and increasing the total intact natural habitat", the Forest Service would be denying the opportunity to provide other legitimate multiple uses

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Letter 77 — Commodity extraction must take a back seat to conservation biology at this late date

Letter 132 — I strongly endorse a forest plan based on conservation biology This methodology is the only one which will preserve the forest

Letter 885 — Timbering should be for above purposes only [diversity, plants & animals]

Letter 2060 — Biodiversity must be the trump suit in all management considerations

Letter 3568 — We most certainly need more emphasis on the natural products of the GW.

Letter 3850 — It disturbs me that the preferred Alternative for adoption as the new Forest Plan lacks essential protection for so precious an ecosystem

Response — The Forest Service will use ecosystem management as the means to meet goals specified in the Revised Plan Ecosystem management is the means to an end. It is not the end itself The Forest Service does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the Forest Service, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems

This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

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Letter 143 — Alternative 3 would enable literally millions of citizens in the Washington, DC and Baltimore metropolitan areas to observe climax forest conditions without travelling a great distance

Response — This opportunity is afforded on the Shenandoah National Park Additionally, the fourteen alternatives offer differing amounts of climax forest conditions in Management Areas 1, 2, 3, 4, 5, 6, 8, 9, 12, 13, 19 and 21 and also on lands unsuitable for timber production in other management areas

Letter 1546 Should everybody's clamoring be given equal weight? Shouldn't the Forest examine what unique needs it is able to fulfill and just concentrate on those instead of stretching itself in 40 directions trying to be all to everyone? Forests are found mostly on private lands that the govt has no power to preserve Solitude and unbroken habitat are increasingly scarce in this world.

Response The Forest Service preferred alternative is designed to manage the Forest to accomplish multiple use management The issues and concerns of individuals, agencies and organizations are used to help determine the appropriate mixture of uses, services, products and conditions that will be offered These concerns, however, have to be balanced against agency policies and the ability of the Forest to provide desired multiple uses while maintaining the diversity and sustainability of ecosystems.

Letter 4241 The assertion in the vegetation section of the EIS (page 3-114) that logging in high site index forest types would enable understory plant communities to maintain diversity needs explanation. Research on wildflower communities in cove hardwood forests in the Southern Appalachians indicates quite the opposite effect, especially from even-aged management Research sponsored by the Forest Service in western North Carolina has recently documented that even-aged timber management is causing chronic, long-term declines in salamander populations throughout the Appalachians Evidence to support the claim that logging promotes understory diversity, should be cited or the statement should be modified or deleted.

Response The statement has been modified Refer to Chapter 3 of the Final EIS.

Letter 869 We must set aside more acreage for wildlife, to protect the biodiversity of the park.. I see a lack of effort to really preserve a good part of the forest for wildlife refuges and the unique biodiversity that GWNF encompasses.

Letter 1065 I am concerned for the safety of the George Washington National Forest. I am against non-motor recreational vehicles in this area destroying the park I wish to protect fish, birds, and other wildlife and wish to minimize timber destruction These areas should remain as untouched as possible

Letter 1165 I wish to express my strong feelings against any cutting of trees, etc , in any of our national parks - specifically the lovely GW National Park I think the park should be left in the natural state.

Response The George Washington NF is part of the National Forest Service System in the U S Department of Agriculture and is not a National Park administered by the U S Department of Interior National Forests are managed to provide for multiple uses including wildlife and biodiversity. Refer to Chapter 2 of the Revised Forest Plan

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Letter 1310 We don no have many large tracts of unbroken and uncut forested land left in the eastern US except in places like the GWNF Therefore we need to maintain these large, unbroken, uncut tracts of forested land that over time are sure to yield far more benefits when used for recreation, wildlife, watershed protection and maintaining biological diversity than the alleged short-time benefits received from timber sales

Response Although the Forest service recognizes that the American public want and need a wider array of uses, values, products, and conditions than in the past, management of the Forest must remain in the context of maximizing net public benefits. Simply maintaining large, unbroken and uncut tracts of forested land over time will not accommodate this legal mandate.

Letter 933 The forest must be managed to protect biological and recreational values

Letter 1642 As much as possible the forest should be left in its natural state. Many species of game and other forest animals require a stand of hardwood timber and the fallen or dead hardwood.

Letter 1816 Place preservation and enhancement of biological diversity first among all the competing demands on the GWNF

Letter 2327	Species diversity be preserved
Letter 2536	Protecting biological diversity and wildlife habitat - needs of the state, region, nation, that will not be provided for on private land [should be] concentrated on public lands in the light of the global environmental condition It's time to eliminate logging on the George Washington National Forest
Letter 2613	The Plan as it stands does not take a broad ecosystem view of both short and long term environmental changes which will be brought about if the draft is adopted. In particular, the fragmentation, preservation and extension of wildlife migration corridors, and preservation and expansion of large wilderness reserves where natural processes can continue unabated on a large enough scale to be biologically meaningful The draft plan's concern with biological diversity seems to be limited to listed rare, threatened, or endangered species
Letter 3840	The percentages of land allocated to each of the habitat types should be determined by the ecologists and biologists on the forest
Letter 3894	Preserving biological values is the highest priority to be considered when managing the GWNF If, after the biological values are protected and preserved, natural resources (such as timber) are needed in quantities larger than can be provided by the GWNF, these additional natural resources should be generated from privately owned lands.
Response	The Forest, by law, will be managed to provide for the uses, services, and conditions desired by the public While doing so it will maintain viable populations of all native and desirable non-native plants and animals during the implementation of all projects Coupled with this maintenance will be the restoration of natural communities and populations of plant and animal species This work will be carried out by a wide variety of specialists who are part of the Forest Service staff and will include biologists, botanists, and ecologists among many others.
Letter 1809	Maximize the NATURE of the forest, that is, the protection of its many wilderness areas, and the accompanying animal, waterfowl, and bird populations, as well as its forests and streams
Letter 2347	A sensible plan would acknowledge the fact that the GW is an ecosystem under severe stress. It would provide for the preservation of the forest's biodiversity and work to restore areas damaged by exploitation and over-use.
Response	The Forest Service preferred alternative includes standards and funding for the revegetation of disturbed areas, the closing and revegetation of system and non-system roads which are causing environmental damage, plus the control of erosion from man-caused activities The restoration of natural community structure and functioning plus the restoration of plant and animal populations is included in the standards and funding for the recovery of threatened, endangered, and sensitive species Additional standards and funding for management considered restoration and maintenance is found under wildlife and fisheries All designated wildernesses are protected under all alternatives.
Letter 3981	Prepare detailed plans for the restoration and protection of all natural community types and landscape types in the GWNF
Response	The preparation of implementation schedules and project plans is an ongoing activity These will depend on research and inventory to be done on the Forest as outlined in Chapter 4 and 5 of the Revised Plan
Letter 10	I am in support of the managing of unique areas for natural values
Letter 3601	Large areas should be set aside for the natural growth of flora and fauna
Letter 3705	Greater attention must be paid to management of the forest for biodiversity A diversity of habitats must be provided to meet the needs and wide selection of flora and fauna The establishment of special biological areas to protect the habitat of rare, threatened and endangered species is a good element in this plan Emphasis should be placed on providing habitat not generally found on private land and on habitats for non game species

Letter 3840 — Biological philosophy of Alternative #8 needs to be significantly strengthened to underline biological diversity concept, providing habitat types not available on private lands in local areas All projects should be driven by this concept

Response — The Forest Service recognizes the need to manage unique natural communities and occurrences of threatened, endangered, and sensitive (TES) species with separate management areas and specific standards The preferred alternative includes Management Area 4, contains special interest areas with biological values. Specific common standards are also included for caves and TES species In many cases, these communities and species are not found on private land and the Forest Service welcomes the opportunity to manage and maintain these unique elements of biodiversity on public lands for the benefit of all people. These Biological Areas provide a solid foundation for maintaining biological diversity on the Forest and will be managed for that purpose.

Letter 57 — Try to keep the diversity.

Letter 134 — U S. Forest Service Alternative 8 fails to recognize the principles of conservation biology, the values of unfragmented habitat, old growth and native biodiversity

Letter 738 — Maintain our forest's biological diversity, peacefulness, and beauty

Letter 685 — NF's should be homes for the most possible diversity of healthy populations of native plants and critters (Forests in different stages of growth; open areas maintained, etc.)

Letter 1170 — The encouraging aspect of plan 8 is the biodiversity focus. We need to see more of this

Letter 1252 — Alt. 8 does not promote true, native biodiversity but rather the false, common diversity of weeds and animals that result from the disturbances of clearcutting and wildlife habitat mgt practices.

Letter 1292 — Native biodiversity is being replaced by artificial tree farming Numerous bird species no longer find a home through much of their historical range, including the GWNF Most at risk are neo-tropic warblers. Researchers have concluded their decline stems from loss of habitat and habitat fragmentation. The result of logging operations

Letter 1816 — I find the current draft version of the mgt plan sorely deficient. There is insufficient protection offered for current roadless areas to remain wild Preservation of biological diversity necessitates setting aside more and larger tracts of land to be preserved in a wild state. Serious effort needs to be devoted to provide for corridors of wilderness connecting larger tracts to allow for the easy migration of wildlife from one tract to another. I see no direction in the plan to achieve this

Letter 1884 — The present draft fails to address adequately true biodiversity.

Letter 3933 — Biodiversity was treated like a special interest group instead of the dominant factor.

Letter 3556 — Alternative 8 will destine the Forest to fundamental changes in the diversity of its biotic community and, in decades to come, result in far fewer species of trees, other plants, and wildlife species than are present today

Letter 3981 — Sustaining biodiversity must be a major goal of the new forest plan This biodiversity concept must be based on native fauna and floral integrity, not some commercially desirable goal of timber age classes and stand compositions

Response — Maintaining the biological diversity on the Forest is a major goal of the Revised Plan Biological diversity, or biodiversity, is the variety of life and its many processes in an area Depending on scale it can be viewed as the maintenance of the variety of genes, species, biological communities, or ecosystems of particular areas.

The Forest Service views the conservation of biodiversity as a multiple-use issue, not simply a land preservation scheme. Management actions are designed and implemented which conserve specific elements of biodiversity. Efforts will increase in developing knowledge, implementing conservation measures, and demonstrating land and resource management approaches that conserve biodiversity as an integral part of sustaining overall multiple-use objectives while achieving a desired future condition These efforts will be based in large part on the science of conservation biology including the principles of island biogeography, population biology, and

ecosystem functioning. Cumulative effects resulting from landscape fragmentation and water runoff are analyzed and monitored as part of project implementation.

Further explanation of how the Revised Plan provides for biodiversity is provided in Chapter 2 under "ISSUE 1 – BIODIVERSITY." Chapter 3 of the FEIS contains information on biodiversity and how it is affected by the various alternatives.

Letter 1072 — Think about how you are affecting things on a regional scale, including Shenandoah National Park.

Letter 2613 — All actions considered on GWNF lands should be carefully analyzed by a team of conservation biologists with a view to the long term consequences of proposals on ecological integrity of Shenandoah National Park and the surrounding bio-region. Considerations should be based on a landscape perspective with a view to trends on private lands in the region. This team should be composed of biologists from the Forest Service, the National Park Service, and the Environmental Protection Agency with a mechanism for input from experts in private organizations and academia.

Letter 3537 — The landscape level of biological diversity should be a major concern for the GW. Planning for the protection of biodiversity should evaluate the type, quality and configuration of habitat in the region surrounding the national forest. The GIS technology that is being implemented on the GW would be an ideal tool to conduct this essential analysis The GW could then manage for those habitat conditions that are scarce in the landscape.

Letter 3665 — Wildlife corridors are essential. They should be planned and coordinated with Jefferson National Forest, Shenandoah National Park, State parks and forests and with private landowners to extend north-south and east-west.

Letter 3840 — The Forest should be managed to provide a spectrum of habitat types ranging from a "climax" forest through open fields The habitat types would approximate the bear, turkey, and grouse management areas but would emphasize a full range of biodiversity both plant and animal including such things as fungus that may not be evident on the forest because habitat type is not advanced sufficiently Significant attention needs to be given private lands adjacent to the forest How they are managed and how they fill a certain niche in that area rendering duplication of that habitat type in the adjacent forest possibly not necessary

Letter 3977 — Begin to consider long-term contingency planning for influences beyond Forest boundaries, such as changing regional land patterns and the possible effects of climate change. As a minimum practice, identification of these influences on the forest ecosystem is necessary to better inform the short-term decisions of the 10-year plans

Letter 3981 — With other agencies, public and private, prepare a detailed report and set of maps on landscape patterns in the GW and associated private and public lands (include the Monongahela and Jefferson NFs) Use this information as a guide for the regional restoration and protection of core habitats and corridors

Response — The Forest Service recognizes the need for regional landscape planning as it relates to biodiversity and will cooperate to the fullest extent possible with agencies, groups, and managers of adjacent state and federal lands As the Forest Service implements ecosystem management we are inventorying, classifying, and mapping ecosystems This information will assist in regional planning and cooperation.

Letter 171 — What is the total acreage of MA 4 (excluding Big Levels) and the total acreage of MA 11? Do isolated pockets (island biogeography) of "sensitive species" (or habitats or ecosystems) have high survival rates? Are they "viable"?

Response — The total acreage of special interest areas containing biological areas (excluding Big Levels) is 82,400 acres and the total acreage of Management Area 11 is 11,000. It is unknown whether all occurrences of sensitive species and unique natural communities are viable or have high survival rates. Their presence on the Forest would indicate that they are viable and have survived in light of the drastic habitat alterations which occurred in this region during the latter part of the 19th century and early 20th century

Letter 2280 My strongest wish is that you leave the Forest alone

Response The Forest Service has found that concern for a "healthy" forest involves the question of social, economic and environmental values During the public comment period the Forest has encountered two opposing viewpoints on this subject. Many people believe that the Forest is an ecosystem where natural processes should proceed with minimal interference from humans. Many others believe that the Forest is a repository of natural resources which need to be developed and used for the benefit of mankind. The Forest Service is moving away from the concept that the National Forest need to be managed based primarily on maximizing certain natural resource products. This concept is being replaced with the realization that the Forest must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people.

Letter 3894 Natural timber mortality is not "waste" (pg. 194 "Addressing Issues") and contributes to maintenance of biological values.

Response The reference the commenter refers to was a comment made by someone else under the issue of resource sustainability in a planning paper titled "Addressing Issues and Concerns of the Revision of the LRMP for the GWNF." The Forest Service agrees that natural timber mortality is not a waste and contributes to biological values such as snags, dens, and large woody debris for wildlife habitat plus ecosystem functioning such as nutrient cycling.

Chapter 2 of the Revised Plan, under "ISSUE 2 — BELOW-COST TIMBER SALES", discusses the salvage policy to be followed under the Revised Plan. This point is addressed in that decision.

BIODIVERSITY: Conversion

Letter 146 The plan does not allow for conversion of species, especially to white pine. This represents a great improvement over the discredited 1986 plan.

Response There are sufficient pine forest types to provide habitat diversity, and the expense of conversion made this an uneconomical practice.

Letter 3710 NRDC remains opposed to any alteration [conversion] of natural species composition on the George Washington In the absence of thorough analysis and justification, the inconsistency in the new planning documents must be reconciled by retaining the approach of the DEIS and deleting that of the draft plan with regard to the two management areas If the planning team persists in pursuing the approach of its proposal, any planned type conversion must, at a minimum, "be justified by an analysis showing biological, economic, social and environmental design consequences, and the relation of such conversions to the process of natural change." 36 CFR 219.27(g). Such an analysis will be required also to support any proposed conversion because of gypsy moth mortality

Letter 3710 Eliminate conversion of hardwood stands to pine.

Letter 3946 We support the elimination of conversion to white pine stands

Letter 3962 Pg. 2-174. [Forest Standard] 1004 Add to this standard Mixed pine hardwood and hardwood forest types cannot be regenerated artificially to white pine. Planting a single species tree is not biological diversity

Response The Revised Plan contains a discussion of the conversion policy under "ISSUE 1 — BIODIVERSITY"

Letter 1372 I don't hunt on the National Forest, but keep cutting the big timber and planting pines It won't be nothing but pines and nothing for the game to feed on

Response The Forest has reduced the amount of land suitable for timber production from the 1986 Plan, but has not appreciably reduced the amount of lands on which a variety of management practices can occur. Even on most of the lands unsuitable for timber production, other management activities may take place. The expanded wildlife management program provides habitat manipulation in areas where timber quality is poor, where there

are weak markets for such products, and/or in remote areas where associated roading costs are extremely high. These conditions exist in many portions of the forest, and designating such areas as unsuitable for timber production helps avoid below cost timber sales Overall habitat management increases, compared to Alternative 2 (Interim Management), and estimates made for game species' populations do not show declines

Most roadless areas retain their roadless status, and are contained primarily within Management Areas 4, 9 and 21. Management for wildlife is not excluded. Other management areas such as 14, 15, 16, and 22 are managed primarily for wildlife The values that these areas provide are detailed in Chapter 3 of the Revised Plan.

BIODIVERSITY: Old Growth

Letter 3981

EIS. 3-135, paragraph 5 - There is said to be no quantified old growth objective for Alternative 8 Yet on page 2-178 of the DLRMP it is stated that at least 5% of the Forest should be maintained in the 135+ year class. Approximately 5% of the forest is to be kept in Preservation VQO (the old growth promoting VQO) under Alternative 8 Where in the DEIS is the rationale for arriving at these quantities revealed?

Letter 4241

We encourage the designation of large acreage of old-growth reserves throughout the forest We oppose the limitation of this rare ecosystem to 5% of the landbase, and reject the premise that this habitat be limited to small tracts scattered throughout the landbase.

Response

The 5% figure was derived from Harris, 1984 as a minimum amount of a national forest's timber acreage which should be committed to old growth with surrounding additional acres in long rotation support stands The 135 year age figure is the mean of minimum ages which various forest types begin to develop old growth characteristics The Forest Service agrees that old growth should not be limited to small tracts scattered throughout the Forest. These numbers and the discussion on old growth has been expanded and revisited Please refer to Chapter 3, under "WILDLIFE", and Appendix 4 of the Final EIS and Chapter 2 of the Revised Plan under "ISSUE 1 – BIODIVERSITY"

Letter 3537

To maintain the integrity of old-growth ecosystems, salvage of dead or dying trees should not be permitted Even if road access is available, the value of snags and coarse woody debris to the forest ecosystem should more than offset the justification to salvage timber or otherwise "improve" forest conditions through logging Lands designated unsuitable for timber management should not be subject to salvage unless there are compelling safety or biodiversity reasons to remove some mortality.

Response

The contribution that snags and down woody debris make to the integrity of old-growth ecosystems is recognized Lands designated as unsuitable for timber management are not available for salvage unless by doing so it helps achieve the desired future condition of the management area or contributes to visitor safety

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Letter 892

The Shenandoah Mountain Range contains the largest concentrations of old growth on the GWNF

Letter 1615

Old Growth: This precious and rare resource needs to be defined, identified and protected in the Plan All existing old growth should be preserved and opportunities sought to increase this resource.

Letters 2182, 2183

What is needed is undivided tracts of undisturbed old growth, the environment in which most of the Eastern Biota originally evolved

Letter 2239

The forest can be managed for even greater biodiversity, partly by protecting existing old growth stands and by giving added attention to riparian zones

Letter 2868

The Forest Plan must go further to ensure that biological diversity is at least as great as that which would be found in a natural forest The Forest Plan must provide for more protection for existing older growth stands and the development of future old growth stands

Letter 3498	*The few areas of true virgin old growth should be guarded from intrusion with utmost vigilance*
Letter 3537	We encourage the designation of large acreage of old-growth reserves throughout the forest However, we strongly oppose the limitation of this rare ecosystem to 5% of the landbase, and reject the premise that this habitat be limited to small tracts scattered through the landbase.
Letter 3567	Old Growth is one of the areas which this Plan does not sufficiently address Define what old growth areas are and how many of them we have and, finally delineate which (other) areas are aging to be allowed to climax into these forests.
Letter 3660	Maintain 5% of the Forest in old growth This will not be a problem since over 1/2 of the Forest is unsuitable Do not use suitable lands to do this
Letter 3665	Old growth areas should receive priority protective management.
Letter 3695	*Consider further steps to protect old growth forests and their "managed" counterparts.*
Letter 3705	Old growth protection and development need to be addressed more clearly and whenever possible, integrating bits and pieces of existing old stands into a functioning old growth corridor throughout the GWNF This corridor should link special biological areas and wilderness to ensure gene transfer across the landscape over time
Letter 3733	" the desired future condition is to retain old growth characteristics on at least 5 percent of the forest" is a drastic understatement
Letter 3814	Alternative 8 calls for large areas to be set aside for their old growth values. It does not provide any way to protect these areas from Gypsy Moth How long will their old growth value be present when Gypsy Moth kills all of the trees?
Letter 3840	These habitat types should probably occur in some reasonable pattern such as concentric circles The mosaic pattern where all habitat types occur in some given area would make more sense than the Lee District providing *climax forest and Warm Springs District being extensively clearcuts*
Letter 3840	Old growth lands need to be identified and mapped Until old growth is formally identified the older trees on the forest should be protected by incorporation into MA 9, MA 4, MA 13B, MA 2, etc.
Letter 3940	The Draft Plan does not adequately address old growth concerns We encourage the GWNF to clearly define old growth and to state the long-term goal and management direction for old growth forest stands
Letter 3940	*Plan· Page 2-17, Paragraph 1· The definition of old growth should be biologically-based and old growth sites* should be managed with their associated ecosystems, rather than as idividual stands.
Letter 3960	I cannot accept Alt 8 One example of why is there is no definition of old growth as yet How can you manage for something that you don't know what it is? Older trees do not provide as good mast crops as do younger, more vigorous trees And over time, there will be a change to species like maple which have little value to anyone or anything
Letter 4241	*The draft plan should be amended to indicate that the desired future condition for the GW should be 50-75%* old-growth (pages 2-17 and 4-17). Up to 75% of the GW's landbase should be managed to perpetuate the natural disturbance regime associated with old-growth forest in this region.
Letter 4241	Development and agriculture have consumed 5% of the timberland between 1977 to 1985 This is strong justification for the Revised Plan to emphasize the restoration of old-growth forest conditions, configured as large tracts of forest interior habitat, on most if not all of its landbase
Letter 4241	*To maintain the integrity of old-growth ecosystems, salvage of dead or dying trees should not be permitted.*
Response	The Revised Plan recognizes the contribution which old growth forests make towards providing for biodiversity Old growth characteristics will develop in all forest types, from dry pine dominated wind swept ridgetops to mesic riparian and forested wetlands. Some characteristics, or attributes, are specific to one or a few types while others are generic and occur in all types Analysis of forest types by present age and future age shows that all

forest types naturally occurring in the region will be represented on the Forest as old growth in a size, location, and configuration which will contribute to landscape connectivity and ecosystem sustainability.

Existing stands of old growth forests, which are known to be in areas that have not been disturbed by timber activities, are in Management Areas 4, 8, 9, and 21 in the preferred alternative The largest concentration of existing old growth forests are on Shenandoah Mountain.

Lands unsuitable for timber production in other management areas will provide additional acres of old growth in future years These acres will total more than 2/3 of the Forest.

Management of old growth stands will consist only of those activities which mimic natural disturbances, such as prescribed burning, at a frequency under which this may have occurred in a natural regime. Naturalized undesirable exotic pest plants and animals will be controlled or eliminated to the fullest extent possible while maintaining the biological features of the area. Gypsy moth establishment will effect old growth conditions in some forest types where oak dominates by decreasing the percentage of live oaks in the canopy These will become standing and down snags thus contributing to structural diversity and down large woody debris accumulation.

Refer to Chapter 3 (under wildlife) of the FEIS and Chapter 2 of the Revised Plan (under "ISSUE 1 — BIODIVERSITY") for additional information.

Letter 3537

The draft EIS (page A-6) indicates that approximately 250,000 acres on the GW contain stands in excess of 100 years in age (25% of landbase), and about 85,000 of these acres are at least 150 years in age (8% of landbase) Timber management is proposed for less than 25% of the landbase Consequently, the draft plan should be amended to indicate that the desired future condition for the GW should be 50-75% old-growth (pages 2-17 and 4-17). To adequately ensure the maintenance of the ecosystem component of biological diversity, up to 75% of the GW's landbase should be managed to perpetuate the natural disturbance regime associated with old-growth forest in this region

Letter 4241

Table 2-1 of the Revised Plan identifies 179,677 acres (or 17% of the Forest) that consists of stands with "a high probability of now containing old growth policies." Chapter 2 also contains a discussion of how the ten "old growth forest types" will be managed until a Regional policy is completed Appendix H of the FEIS contains a description of these ten old growth forest types

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Letters 3537, 4241

We recommend that the Forest Service re-evaluate its concepts of the eastern old-growth forest ecosystem. There appears to be a basic misunderstanding of the dynamic nature of deciduous old-growth The repeated usage of the term "steady state" in the vegetation section of The Affected Environment (page 3-95 through 3-115 in the draft EIS) implies that a stable (climax-like) condition will be able to perpetuate itself indefinitely on a large percentage of old-growth stands. Natural disturbances are an unavoidable condition in forest landscapes, especially in old-growth ecosystems. When you factor in the gypsy moth, disturbances to the canopy are practically impossible to avoid Please refer to William H Martin's paper on defining old-growth deciduous forests in Restoration of old growth forests in the interior highlands of Arkansas and Oklahoma. proceedings of the conference, 1991, available through the Ouachita National Forest

Response

The Forest Service recognizes that forested ecosystems are dynamic and that old growth forests are not "stable," "steady," or "climax " Different forest types are subject to a wide variety of disturbances each with its own frequency The use of the term "steady state" is inappropriate in this context and has been removed. Refer to vegetation section of Chapter 3 of the Final EIS

Letter 3537

The Forest Inventory and Analysis (FIA) program currently supplies useful evidence about the landscape condition The 1986 Forest Statistics for the Northern Mountains of Virginia and for the State of Virginia by Mark Brown (USDA Forest Service, Resource Bulletins SE-85 and SE-87) provide data indicating that the region containing the GW is composed mostly of early successional forests, with very few stands containing large trees Old forest conditions are uncommon statewide, with less than 0 5% of all growing-stock trees greater than 19 inches in diameter, and over 87% under 7 inches DBH There appears to be very little old forest in the region or throughout the State, and even moderately-sized trees are quite rare

Response — *Information from these references has been incorporated into Chapter 3 of the Final EIS.*

Letter 3625 — There is a constant demand for timber including large old growth trees A standard should be established to stop cutting trees over a certain diameter (for a tree type). Because there is more concern for recreation in forests, special natural attractions such as large trees should be preserved

Response — *Old growth, as a condition of forested habitat, will be managed and provided for on an area basis, not single trees. Large trees which occur in or near recreation areas are recognized for their aesthetic contribution.*

Letter 4265 — I prefer a plan for GWNF that would promote lots of wildlife in a climax forest system

Response — Lots of wildlife will not be provided for in a climax forest system. The concept of a "Climax" system which does *not change is erroneous. All ecosystems are dynamic and it is the ever changing diversity of habitats which provide for a diversity of wildlife.*

BIODIVERSITY: Fragmentation

Letter 55 — Roads should not be cut through the forest because construction of roads would obstruct the natural succession of tree species, which must be free to migrate as environmental conditions change.

Response — While the fragmentation of habitat is a concern for area-sensitive animals and animals or plants with small home *ranges, there are no tree species whose habitat could be fragmented by roads*

Letter 61 — No further habitat fragmentation or isolation should occur due to future human activities. Recent studies have demonstrated that the indirect impacts from such fragmentation can be much more severe than the direct impacts of localized activities. In other words, if the necessary movement of species is blocked, the populations of these species can become extirpated, and a series of extirpations can lead a species to extinction.

Letter 2050 — *The acreage protected as Remote Highlands is important These areas provide the unusual habitat upon which* some bird species depend for feeding, nesting and migration

Response — Fragmentation of habitat for some species with limited ranges and sensitivity to roads and clearings can be a problem The allocation of land to Management Areas 4 and 21 for the home range of the Cow Knob Salamander is one example where the Forest Service is providing for the recovery of a sensitive species

One of the major purposes of "Remote Highlands" is to provide habitat for area-sensitive neo-tropical migratory birds. Where such opportunities exist, the Revised Plan attempts to provide these conditions while staying with the framework of the multiple use concept.

Support is not given to the designation of lands solely for migration corridors. The long term viability needs of species vary considerably by species, and habitat corridors are provided in other management areas depending on the species being discussed.

Letter 16 — *Considering the biological theme of the preferred alternative, we would expect more use of MA 2.*

Letter 171 — Shouldn't this landform be considered rare on the GWNF? It is a corridor and should be regarded as such. Corridors facilitate east-west dispersals, too Nationally, it will highlight the positive effects of landscape management in the severely-fragmented eastern forests, a "showcase"...maybe even a white hat.

Letter 279 — [Suggest] movement toward acquisition of buffer lands along a wilderness corridor system for the migration of species.

Letter 491 A suggested amendment to your Plan is unfragmented habitat and migration corridors for non-game wildlife

Letter 501 The Plan does not allow for migration corridors for forest animals. The animals need these corridors through devastated forest in order to survive

Letters 766, 767
The Plan should stress providing unfragmented habitat for non-game wildlife. Acreage should be preserved to protect wildlife migration corridors

Letter 1069 Provide unfragmented habitat Protect wildlife migration corridors.

Letters 1152, 1167, 1439, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1557, 1634, 1671, 1730, 1731, 1732, 1943, 1944, 2010, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 2925, 3087, 3088, 3147, 3148, 3149, 3150, 3931, 4093
Acreage must be provided to protect wildlife migration corridors.

Letter 1615 Wildlife corridors should be provided for in the plan Deer need to be de-emphasized (there seem to be plenty) There should be no new roads in bear and turkey habitat

Letter 2648 Land must be set aside and protected in wildlife migration areas Both game and non-game animals need room to move about in their "natural" habitats

Letter 2740 The need for migration corridors, especially along riparian areas, is a critical one These serve to allow the forest to function in a sustainable manner because large areas exist With patchwork timbering, road building, expanded parking lots, clearcutting for the Gypsy Moth The forest is fragmented and left to be nothing more than biological islands

Letter 3779 EIS Alternative 8 - 0 acres set aside for migration corridors, p. 9 0 acres for protection of watersheds/riparian areas, p.9 Whereas on p 3-136, it is stated "A network of corridors suitable for the movement and dispersal of plants and animals between unfragmented habitats is provided by riparian areas and lands considered unsuitable for timber production"

Letter 3840 MA #9 lands, "climax" forest habitat type lands need to provide long linear links along mountains connecting wilderness, and MA 9 lands and providing for physical and genetic movement of plant and animal species requiring such corridors These corridors as indicated by MAs need to be mapped and displayed as corridors with their intent specified

Letter 3962 This Plan is biologically driven, yet there are no acres assigned to Management Area 2, Migration Corridors for Wildlife

Letter 4034 On p A-6 the DEIS says that the forest "provides blocks of unfragmented habitat and interlinking corridors." But on p 3-78 and 3-79, the statistics paint an entirely different scenario Much of the Forest fails to meet the criteria for corridors which require habitat undisturbed by timber sales Roads are in fact allowed to be built to reach the boundaries of research natural areas (p 2-35 of Plan), subjecting them to incursions by ORV's. Even in Management Area 9, which is classified as "remote and isolated", "existing roads may continue to be used" (p 2-63)

Response The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat which provide for the movement and continued viability of plants and animals In particular, Management Areas 4 and 8 provide a 33 mile long corridor on the upper elevations of Shenandoah Mountain where relatively unfragmented habitat is needed to maintain and enhance habitat for the Cow Knob Salamander. Also, Management Area 9 has been allocated to the western side of the Pedlar Ranger District to create a relatively unfragmented corridor from the James River Face Wilderness and Three Sisters Roadless Area to the St Marys Wilderness

The Forest does not support the designation of lands solely for migration corridors Long term viability needs vary considerably by species Habitat corridors are provided in all management areas depending on the species being considered

Letter 3779 Highlights· Selection or corridors for movement and dispersal of plants and animals is driven by selection of riparian areas or areas "unsuitable for timber production" not by biological need This is another example of the G W.F S. view of the National Forest as a timber producing facility p 2

Response The ID Team does not support the designation of lands solely for "migration" corridors The movement and dispersal of plants and animals and their long term viability needs vary considerably by species The statement that these are provided for in areas unsuitable for timber production is meant to be for easy reference and does not reflect a bias towards timber production In reality, habitat corridors are provided for in all management areas, depending on the species being discussed, regardless of whether it is suitable or unsuitable for timber production

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Letter 134 *True native biodiversity, that which includes the rarest and most threatened species on the Forest and which occurs largely in forest interior habitat, continues to take a back seat to the false diversity of common, early successional (grass, brush, small trees) habitat suited to common birds, animals, and weeds which results from clearcutting and "wildlife openings."*

Letter 496 Unfragmented habitat for wildlife

Letter 933 The unfragmented habitat for non-game wildlife must be accentuated

Letter 982 There appears to be little if any encouragement of non-game wildlife in Plan #8. An important part of the biodiversity of the forest is its non-game wildlife, which needs unfragmented habitat Corridors for this fauna must be provided

Letter 1072 Stop altering interior forest habitat to benefit a few game species, like deer We need the interior forest which we are losing too rapidly

Letter 1078 *The Final Plan must emphasize providing an unfragmented habitat for all wildlife not just game wildlife To provide an ecological balance it should also protect wildlife migration corridors*

Letters 1149, 1429, 1443, 1886, 2007, 2036, 2237, 2272, 2276, 2283, 2292, 2674, 2749, 2892, 3647, 3911, 3965
Emphasize providing unfragmented habitat for nongame wildlife Acreage must be provided to protect wildlife migration corridors

Letter 1292 Less than 3% of the available land in the GWNF exists as designated wilderness areas These are too small and isolated to serve as ecological preserves, as they should There should be large wilderness areas with appropriate buffer zones to minimize edge effects, with connecting corridors These corridors serve as important migration routes for genetic diversity among species They are a crucial feature of any healthy forest ecosystem

Letter 1608 Please emphasize providing unfragmented habitat for non-game wildlife. This would include providing acreage to protect wildlife migration corridors Total contiguous acreage is one of the factors along with total acreage added up by parcel.

Letter 1611 Provide undisturbed habitat for nongame wildlife

Letter 1652 The plan needs to emphasize providing unfragmented habitat for both non-game and game wildlife

Letter 1885 *Leave a continuous network, based on the roadless areas, of land to be left intact as wild ecologically undisturbed areas*

Letter 2029 I largely support preferred Alternative 8, I feel it reflects a functional amalgamation of interests that will provide for diverse uses and needs while not having too great a negative impact on the biology of the Forest. But I do have some reservation(s). I am especially concerned about the potential for continuing and in some instances increasing, forest fragmentation By fragmentation I mean intrusions by unnatural processes, or activities that alter or decrease the amount of habitat that is critical to typical forest species, endemics and rare and endangered species, while at the same time creating corridors for immigration, and habitat for species that are already common in and outside of the Forest Such disturbances in the Forest may result from timbering, roadbuilding, developing and maintaining recreational facilities, management for wildlife and creating trails for birdwatchers.

Throughout Alternative 8, and in almost all management areas we see the term wildlife, i e wildlife objectives, wildlife habitat. In almost all instances it is implied, or otherwise stated, that wildlife means game species and in most cases habitat means early successional situations or various manipulations of the Forest Such species represent an exceedingly small fraction of the species of animals and plants that occur in and outside the Forest I strongly encourage that the term biology, and biological objectives, be given still higher priority/greater usage in the plan

You and your planners have bent over backwards for wildlife management, the opportunity for much timbering, and the opportunity for perhaps too much OHV activity. I feel that the activities being built into preferred Alternative 8 strain the limits of appropriateness for stating that it emphasizes biological values. Multiple use--yes.

Letter 2056 Reduce the roads in the forest to limit ecosystem fragmentation and reduce the heavy human population pressures on the forest environment.

Letter 2060 There is no lack of edge habitat and associated species in the region As population and development pressures mount in the area, even more edge habitat will be created due to construction and agriculture. Large uninterrupted tracts of wooded land will become even more rare than now, considerable exacerbating the fecundity decline of interior forest-dwelling species and thus reducing biological diversity. In this context, the fragmentation and edge habitat that will be created by clearcutting are unacceptable In addition, forests with trees nearing or exceeding the 100+ year class should be left to proceed to old-growth to replace a scarce ecosystem resource. In support, see Scientific American, "Why American Songbirds are Vanishing," May 1992, 98-104

Letter 2498 The plan should provide for non game wildlife as well as game management Migration corridors must be provided and should not be intersected by roads

Letter 2613 Practices that lead to habitat and landscape fragmentation and the creation of edge should be eliminated. Interior forest-breeding species should be given paramount concern in any habitat alteration practice.

Letter 2685 Fragmentation of forest continuity, and the resultant generation of more edge habitat do not favor the most endangered species, but promote population increases of such potential problem species as deer and raccoon

Letter 2740 I want to see the concept of "wildlife" expanded to include all forest dwellers not only to those of interest to hunters Consider the ramifications when you create "wildlife openings" and other edge effects that favor deer, turkeys, and grouse but threaten the survival of deeper forest animals and plants Roads are a danger to the forest because exotic plants and animals can enter and gain a foothold, competing with the deep forest dwellers

Letter 2868 The Forest Plan should provide for more habitat unfragmented by the intrusion of roads and timber harvests The plan should also provide for and protect wildlife migration corridors between large areas of unfragmented habitat The Forest Plan should place more emphasis on non-game species. It is clear that there is an adequate deer population in the Forest and on surrounding private lands

Letter 2942 Study should be given to the need for an unfragmented area of adequate size to allow for the return of natural forest evolution.

Letter 3537 There are over 2,600 miles of road in the total road network on the GW, nearly 3,000 miles of boundary lines on the Forest, and over 4,000 acres of utility rights-of-way (e g , powerlines, pipelines, etc), road easements, and public water impoundments fragmenting this National Forest. Therefore, no new road construction to access timber or wildlife food plots should be built in order to prevent excessive fragmentation Large portions of the road network should be evaluated to determine priorities for permanent road closure or obliteration This evaluation should be administered on basis of new standards, requiring the closure of old roads where, there is excessive road density in or around black bear habitats, resource damage is occurring, roads are causing fragmentation in non-game wildlife habitats, and where areas require additional semi-primitive non-motorized recreational opportunities

Letter 3619 The plan emphasizes game management, and virtually ignores non-game wildlife The plan must further emphasize wildlife preservation, providing unfragmented habitat and increasing acreage to allow for wildlife migration corridors

Letter 3643	One of the major concerns is the retention of large areas of unfragmented forests to provide nesting habitat for neotropical migratory birds Of the eleven timber harvesting options, Alternative 10 provides the second highest potential for providing unfragmented forest habitat. However, this potential would only be achieved if this alternative is modified to provide for the preservation of the 251,978 acres within the GWNF Preservation of these roadless areas offers the most cost-effective solution for retaining unfragmented forest habitat. Most of the roadless areas in the GWNF are steep and unproductive (shallow, droughty soils) for timber management. It is recommended that these areas be maintained in a roadless condition in perpetuity,
Letter 3643	Alternative 10 limits forest fragmentation to 11 percent (120,308 acres) of the forest Much of the remaining 89 percent (944,361 acres) of the forest could be left in an unfragmented condition for neotropical migratory bird nesting habitat and endangered, threatened and sensitive species. This area would also be valuable
Letter 3665	Increase of unfragmented habitats would benefit flora as well as neotropical migratory birds
Letter 3665	Migration corridors and protection of watersheds/Riparian areas need to be part of Alternative 8 Many plants need wildlife to propagate and many wet areas are home to plants unable to exist without seasonal inundation.
Letter 3700	I ask that plans for the GWNF include providing unfragmented habitats for non-game, as well as game, wildlife.
Letter 3728	We feel the designation of 409,303 ac to unfragmented habitat will result in an imbalance favoring older, shade-tolerant vegetation and a lack of multiple use mgmt. We recommend modifications in MA boundaries which will reduce the size of some MA 4 and MA 9 lands We request to be involved with any area boundary modification in West Va
Letter 3849	Reduce the fragmentation of the forest That goal could be better achieved by controlling timber harvest to maintain corridors of wilderness, closing unnecessary roads, and barring the use of ATVs
Letter 3977	First, ensure the maintenance of biological diversity and habitat integrity [by] provid[ing] for the allocation and restoration of wildlife corridors and make stricter regulation of riparian areas then is presently prescribed.
Letter 4241	No new road construction to access timber or wildlife food plots should be built in order to prevent excessive fragmentation
Letter 4242	First, ensure the maintenance of biological diversity and habitat integrity. The plan should provide for the allocation and restoration of wildlife corridors and make stricter regulations of riparian areas then is presently prescribed
Letter 4250	Only public forests, and the national forests in particular contain sufficient acreages in continuous management to provide for the interior forest habitat that is currently in short supply at the regional scale
Letter 4253	The plan should emphasize unfragmented habitat for all wildlife in the Forest Wildlife migration corridors must be designated so species diversity will be maintained within the bio-region
Letter 4266	Wildlife Most of the emphasis of the Plan is on different kinds of game management The Plan must provide effective non-game management through protection of migration corridors and unfragmented habitat. There are a good many species of plants, insects, and animals in the Forest besides game species These do not require the degree of human activity associated with management of game species, but they do require consideration and careful management in their own right.
Letter 4268	EPA recommends that to better address biodiversity concerns and contribute to the Neotropical Migratory Bird Conservation Program, Additional large tracts of contiguous forest lands be afforded protection through wilderness designation or other longterm mechanisms We also recommend that wildlife/habitat corridors be established to link those areas
Letter 4268	Plan - Corridors may also serve to mitigate for the effects of fragmentation. EPA recommends that corridors be established, as appropriate, to link the wilderness, special biological areas and/or roadless areas
Response	The Forest Service preferred alternative emphasizes both game and non-game species. This alternative contains the appropriate mixture of emphases given the wide array of uses, values, products and services needed and wanted by interested and affected publics.

The suggestion to emphasize non-game species is not one that leads to easy analysis "Non-game" can refer to a wide diversity of animals including small mammals, birds, and other species that live in a variety of habitats including forest openings. The majority of the people making this comment are concerned for those animal and plant species that require older habitat, particularly those animal species that are sensitive to fragmentation

There is a good deal of disagreement over the subject of "fragmentation" and resulting "edge effects" The Forest Service recognizes that fragmentation of habitat for proposed, threatened, endangered and sensitive species or unique biological communities is a real concern that needs to be addressed in the Revised Plan The Forest also recognizes that there is an opportunity to provide habitat for "area-sensitive" species (such as neo-tropical migratory birds) that require relatively large and undisturbed late successional forested habitats for survival The Forest does not, however, accept the premise that large tracts of unfragmented and connected habitats are necessary for the survival of every plant and animal species. Habitat for species that are area-sensitive where reasonable opportunities exist has been incorporated. The ID Team has also worked with representatives of the USDI Fish & Wildlife Service and state agencies to ensure that habitat conditions favorable for the recovery and enhancement of threatened, endangered, and sensitive species and unique biological communities are maintained and restored, and, where feasible, enhanced.

There is very little area (virtually only small, isolated pockets) of the George Washington National Forest that has not been fragmented by past human activities In many areas, the old roads and timber harvests have regenerated and recovered to a state where there is minimal, if any, fragmentation of habitat Some of the largest blocks of this "unfragmented" habitat lie within the roadless areas. The Forest Service preferred alternative has allocated most of the roadless area acreage to management areas where further fragmentation will not occur Although there will be some vehicular use on existing roads and some salvaging and fuelwood gathering in the immediate vicinity of system roads, these activities will not increase the amount of edge or affect the unfragmented core of these roadless areas

The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat which provide for the movement and continued viability of plants and animals In particular, Management Areas 4 and 8 provide a 33 mile long corridor on the upper elevations of Shenandoah Mountain where relatively unfragmented habitat is needed to maintain and enhance habitat for the Cow Knob Salamander Also, Management Area 9 has been allocated to the western side of the Pedlar Ranger District to create a relatively unfragmented corridor from the James River Face Wilderness and Three Sisters Roadless Area to the St. Marys Wilderness The Forest does not support the designation of lands solely for migration corridors Long term viability needs vary considerably by species Habitat corridors are provided in all management areas depending on the species being considered

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Letter 4241

Large portions of the road network should be evaluated to determine priorities for permanent closure or obliteration This evaluation should be administered on basis of new standards, requiring the closure of old roads where, bear habitants, and where areas require additional semi-primitive non-motorized recreational opportunities

Response

Management of system roads under the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS"

Alternatives 3, 9, 11 and 13 provide a more positive response to these concerns by limiting or prohibiting system road construction, and having a more aggressive road closure policy than Alternative 8A These four alternatives are considered in detail in the FEIS Any one of these alternatives will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits

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Letter 892

The proposed block in the Shenandoah Range fulfills these criteria (mature riparian habitats, rich flood plains with alluvial soils, wetlands and rivers) within the framework of a large, contiguous bio-region It is also the home of some threatened species of fauna and flora Also, there is no high-use road Further, no major footway traverses the Shenandoah Range with it's resultant biological degradation and site overuse

Letter 3537

The preferred alternative's allocation of management areas establishes numerous relatively large blocks of contiguous forest for maintaining forest interior conditions, the effectiveness of this network could easily be enhanced The largest block of relatively unfragmented forest surrounds the Ramsey's Draft Wilderness (composed of parts of Management Areas 4, 9, and 13) By changing the management area designation for Hone Quarry Ridge from 15 to 13, the contiguity of this remote forest habitat is enhanced considerably Management

Area 14 along the north side of Dry River and along Shenandoah Mountain east of Forest Road 61, and Management Area 15 around the North River and Braley Pond campgrounds, should be changed to a management area classification that excludes the fragmentation and edge effects caused by timber management and road construction Changing the management emphasis on these seven areas would basically connect over 300 square miles of contiguous, relatively unfragmented forest. This "bioreserve" could eventually become the largest old-growth ecosystem in the Central Appalachians. Its protection would greatly contribute to maintaining the integrity of this landscape and the biological diversity of this region.

Response

The Revised Plan recognizes the 43,000 acre Shenandoah Mountain Crest Special Interest Area under Management Area 4 The Revised Plan assigns the remainder of Little River Roadless Area to Management Area 21 The remainder of the Gum Fun, most of the remainder of the Oak Knob and the remainder of the Ramseys Draft Addition have been allocated to Management Area 9 Most of the remainder of the North River drainage lies within Management Areas 10 and 13 Portions of The North River drainage within Management Area 13, however, are suitable for timber production.

The Revised Plan does not recognize the need for a large block of unfragmented habitat along the entire Shenandoah Range This concept is incorporated into Alternative 3 and to a lesser extent into Alternatives 9, 11, and 13. One of these four alternatives will be selected as the Revised plan if it is identified in the Record of Decision as the alternative that maximizes the net public benefits.

Letter 3728

While the WVDNR does support portions of the Forest to be designated as unfragmented habitat, we feel the designation of 409,303 acres will result in an imbalance favoring older, shade-tolerant vegetation.

Response

The distribution of well-balanced age classes provides the optimum habitat for many of the game species. While the Forest Service believes that providing habitat for these species remains important, they should not be emphasized on every acre across the entire Forest.

Analysis shows that most of the game species benefit from a variety of habitats, not just early successional stages Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 10, 11, 13, 14, 15, 16 and 17. Non-timber wildlife management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas

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Letter 3981

EIS The "Visual Resources" section needs to be expanded - what are the effects of VQO designations on fragmentation and loss of interior habitat (putting timber sales away from roads and eyesight) - a breakdown by Alternative is needed

Response

VQO has no effect on fragmentation or loss of interior habitat VQO is a means by which the Forest Service determines the impact of project implementation on visual resources

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Letter 134

On page A-6 of the DEIS we read that the forest "provides blocks of unfragmented habitat and interlinking corridors." However this hardly squares with statistics presented on p 3-78 and 3-79 of the DEIS that there are already 1850 miles of Forest Development Roads as well as many other roads that fragment the Forest The preferred alternative is the second highest in proposed road construction of all the alternatives It proposes 200 miles of new roads for the next ten years as compared with only 70 miles for the existing plan. Also much of the Forest fails to meet the criteria for corridors which require habitat undisturbed by timber sales

Response

The numbers presented in that section have been re-analyzed between the draft and final Refer to the Final EIS.

Letter 3883

Special attention should be given by GWNF to protection of the habitats of rare species, to migration corridors for waterfowl, songbirds, game and non-game animals and marine life. GWNF should cooperate actively in helping to establish extensive greenways that foster forest growth and the survival of species

Response

Special attention to these species and habitants are given by the Forest in its preferred alternative, however, the ID team planning staff knows of no marine organisms which occur on or near the Forest

Letter 3981

EIS. 3-137, Table 3-32 - How is it that Alternative 3 which closes 900 miles of road is 52% roadless, while Alternative 9 closes only 100 miles, yet is 50% roadless? How exactly are the mileages and percentages determined? How can Alternative 3, which manages the entire forest under biological needs and builds no new roads, be said to have only 15% of its lands with controlled road densities for biological needs? This table is misleading Edge effects last longer than ten years - what criteria were used to come up with the 10 year figure - documentation please. Early successional habitat is created naturally - what are the estimates for this quantity if the forest were allowed to progress naturally as under the structure of Alternative 3?

Response

Please refer to Table in Chapter 3 of the Final EIS for a reanalysis and display of habitat attributes by alternative. The length of time which edge effects last in the oak dominated forest types in this region is ten years (per personal communication with Chandler S. Robbins of the U.S Fish and Wildlife Service.) Natural disturbance rate in large forested areas ranges from 0 5 to 2% per year

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Letter 4241

Careful consideration should be given to changing the management area designation of the entire headwaters of the Cowpasture River above West Augusta to ensure old-growth restoration and preclude forest fragmentation activities The Dry River above Rawley Springs should also be considered for similar protection, even though much of the floodplain is still in private ownership

Response

A wide range of alternatives were developed which considered different allocations of land in these areas. The Forest Service recognizes the importance of providing for old growth restoration and precluding forest fragmentation within the framework of ecosystem management The preferred alternative allocates these headwater areas to Management Areas 4, 7, 9, 14, 15, 18, and 21which through appropriate standards provide for old growth and minimize fragmentation

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Letter 4241

Dendritically-branching watersheds provide a diversity of aspect and slope configurations, which represent a wide amplitude and variety of evapotranspiration gradients The connectivity of the watershed's branches could facilitate the shift of vegetation assemblages following moisture gradients in the event of rapid climate change (see Petes and Darling 1985, The greenhouse effect and nature reserves Bioscience 35 707-717) There are numerous other reasons to designate several large watershed systems for ensuring the protection of biological diversity at the regional landscape level

Response

The Revised Forest Plan provides for the protection of biological diversity and associated ecological processes in and between watershed systems by allocating lands with large blocks of forested land, mostly now in later successional stages, to Management Areas 4, 5, 6, 7, 8, 9, 10, 13, 14, 18, 21 and the remote portions of 15

Letter 4241

The largest block of relatively unfragmented forest surrounds the Ramsey's Draft Wilderness (composed of parts of Management Areas 4, 9, and 13) By changing the management area designation for Hone Quarry Ridge from 15 to 13, the contiguity of this remote forest habitat is enhanced considerably Likewise, Management Area 14 along the north side of Dry River and along Shenandoah Mountain east of Forest Road 61, and Management Area 15 around the North River and Braley Pond campgrounds, should be changed to a management area classification that excludes the fragmentation and edge effects caused by timber management and road construction Changing the management emphasis on these seven areas would basically connect over 300 square miles of contiguous, relatively unfragmented forest

Response

In a separate action, the Forest Service has assisted the USDI Fish and Wildlife Service in the preparation of a "pre-listing" recovery plan for the Cow Knob Salamander along the Shenandoah Mountain The hopeful result of this conservation strategy will be no further consideration of the Cow Knob Salamander as a candidate for federal listing under the Endangered Species Act

The USDI Fish and Wildlife Service has been added as a "cooperating agency" in the preparation of the FEIS They provided information and expertise on the Cow Knob Salamander and ensured that provisions of the pre-listing recovery plan were incorporated into the Revised Plan

BIODIVERSITY: Late Successional Habitat and Species

Letter 1329 — *A more "environmentally correct" Plan would stress the harvest of large, quality hardwood rather than low quality* pulpwood By harvesting timber for pulpwood, the forest is maintained at a "young" age with respect to forest succession, therefore, limiting biodiversity. With a lack of biodiversity, the forest is not only less attractive, but *also much more susceptible to the plight of disease and pests such as the gypsy moth*

Response — The production of timber in the preferred alternative places an emphasis on quality hardwood sawtimber with very little volume resulting from pulpwood. Refer to Chapter 2 of the Revised Plan

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Letter 3660 — As the Forest ages, mast production will decline. Need to offset or prevent this

Response — The age of a forest is but one of many variables such as weather or natural disturbances which effect mast production The Forest Service cannot control these factors of nature but through the use of prescribed fire in bear oak stands and timber harvests, we will help provide for additional mast production

BIODIVERSITY: Early Successional Habitat and Species

Letter 874 — Those of use who are familiar with the needs of such species as the ruffed grouse, white-eyed vireo, and the chestnut-sided warbler, find it hard to believe that so little attention has been give to the species that can not *exist in vast stretches of unbroken forest.*

Response — Alternative 8A has been formulated to provide a mixture of habitats beneficial to both game and non-game *species Those species requiring older vegetation are primarily emphasized There is a particular shortage of* habitat for these species in northwestern Virginia and adjoining West Virginia

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Letter 730 — It is imperative that the Forest be actively managed to promote the development of young forest stands on a substantial acreage The ephemeral nature of early-successional habitats necessitates the identification and implementation of a program of sound forest management that will ensure the appropriate spatial and temporal distribution of this important habitat component.

Letter 730 — The combination of the reduction in acreage identified as suitable for timber harvest and the shift in emphasis from even-aged, to uneven-aged mgt., will ultimately lead to dramatic reductions from current population levels for those species of forest wildlife that require the young forest stands created by periodic disturbance The Ruffed Grouse Society is extremely concerned about the impact that the shift in mgt strategy proposed in Alt 8 will have on ruffed grouse populations

Letter 874 — I was appalled to hear of the Forest Service decision to limit the practice of scientific silviculture to just 2% of the George Washington National Forest Perhaps your decision is based on the small but very vocal outcry from people whose agenda is to lock up the Forest and throw the key away. There's a short-sighted attitude that is certainly not in the best interest of the general public; nor is it in the best interest of many wildlife species that depend on early successional habitat for their survival

Letter 1163 — With only about 2% of the forest managed as early successional habitat, exactly the type of habitat preferred by deer, turkey, and grouse, I am understandably concerned about the inconsistencies in the plan in terms of *ensuring future suitable habitat for this and other species.*

Letter 3660 — In order to maintain diversity, you must manipulate vegetation. Letter 3660 You need to blend habitats better. *Do not need a small area with lots of diversity surrounded by a large unbroken area.*

Letter 3729 — Without intensive forest mgt you cannot maintain ecological diversity on the GW Fire control has eliminated *the major catastrophic event which provided that diversity in the past It assured a continuum from pioneer* species to mature climax. Only by harvesting trees or other silvicultural practices can the full scope of ecological diversity (both plants and animals) be restored

Response	The distribution of well-balanced age classes provides the optimum habitat for many of the game species While the Forest Service believes that providing habitat for these species remains important, they should not be emphasized on every acre across the entire Forest. Analysis shows that most of the game species benefit from a variety of habitats, not just early successional stages. Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 11, 13, 14, 15, 16 and 17. Non-timber wildlife management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas It is incorrect to refer to the acres regenerated under even-aged management as the only early successional habitat on the Forest. Very few wildlife species live only in the openings created by regeneration harvests Most early successional species require a mixture of habitats including openings These species also benefit from prescribed burning, wildlife openings and openings created by other forms of timber harvests.
Letter 3660	Good opportunities exist to manage utility sites and corridors for wildlife openings
Response	Each major utility corridor requires a site management plan Consideration is given to easing methods that will establish communities of plant species that exhibit little vertical growth and will provide valuable habitat as well as reducing the total maintenance cost to the user
Letter 12	The habitats of all wildlife species must be taken into account, not only those of old growth, whatever that is.
Letter 704	Alternative (#8) is not my choice I have enough trouble with deer damage to my crops without the Forest Service forcing more deer onto my property Alternative 8 will do just that by not providing enough habitat on its own land
Letter 730	This critical component (early successional habitat) of the forest landscape appears to have received insufficient emphasis in the development of Alt 8, which has been identified by the GWNF as the selected Alt
Letter 1341	If the amount of clearcutting and overall reduction in timber cutting is implemented, the ruffed grouse will not be available in huntable numbers Grouse (as well as many songbirds and other animals) require young growth If you eliminate the habitat, you diminish the species and you end the noble sport of grouse hunting I would like for the FS to take care of the ruffed grouse
Letter 1686	Increase the acreage managed for early successional habitat
Letter 2281	Allowing fire to create a natural landscape of variously aged forests is not a realistic alternative in the Eastern United States Many wildlife species rely on early successional habitat in all or some life stages The proposed plan would virtually eliminate these critical habitats.
Letter 2664	A reduction in timber harvesting and greatly reduced use of the clearcutting method on the GWNF combined with the loss of quantity and quality of turkey nesting habitat as the forest matures, may cause a reduction in not only turkey populations but also other wildlife and plant species that require openings and early succession forest stands
Letter 2926	Alternative #12 is more balanced to a wider variety of wildlife, as many species (grouse, quail, deer, etc) require the type of habitat provided in early successional stages, such as is created by timber harvests
Letter 3659	We desperately need more clearcut plots to provide the wildlife (especially deer) some food or browse My Son and I operate a dairy farm and the heavy population of deer in the forest nearby are costing us and other farmers thousands of dollars in destroyed crops each year Last year our loss was valued at $9,000 00 Providing food in the forest would prevent much of this crop damage
Letter 3660	Maintain and increase grass/forb component to 5%+
Letter 3660	The FS should not consider openings on adjacent private lands The Forest should provide additional habitat Farmers receive enough damage as it is, the FS should not make matters worse

Letter 3956

Grouse habitat matures and bird numbers continue to decline. Of the two areas designated for grouse mgt., one -- Pleasant View -- is on the edge of the Piedmont, practically outside the ruffed grouse's natural range Regular *clearcuts remain as the most effective grouse mgt tool*

Response

Analysis performed shows that most of the game species benefit from a variety of habitats, not just early successional stages Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 10, 11, 13, 14, 15, 16 and 17. *Non-timber management practices (such as prescribed burning, creation of waterholes and creation of wildlife* openings) will enhance habitat for game species in these and adjacent management areas.

It is incorrect to refer to the acres regenerated under even-aged management as the only early successional habitat on the Forest. Very few wildlife species live only in the openings created by regeneration harvests Most *early successional species require a mixture of habitats including openings These species also benefit from* prescribed burning, wildlife openings and openings created by other forms of timber harvests

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Letter 2060

The creation of early successional habitat by clearcutting or modified shelterwood techniques will cause a *significant decrease in interior forest species. This will be manifested in a variety of ways, including, but not* limited to detrimental effects on the fecundity of neotropical migrants such as the hooded warbler, the woodthrush, the redeyed vireo, etc This is caused by massive increases in brownheaded cowbird parasitism which parasites nests within 100-200 meters of a forest edge Nest predators will also increase, including blue jays, crows, common grackle, eastern chipmunk, raccoon, and oppossum Clearcutting will also affect black bear populations by decreasing mast, displacing bears, increasing hunter contact, and facilitating poaching This manipulation will also benefit deer which are already overabundant in the forests having major detrimental effects on other plant and animals species. Edge is also expected to be detrimental to amphibians, reptiles, and many interior-dwelling invertebrates Moreover, edge facilitates introduction of undesirable species such as Japanese honeysuckle and Kudzu Road construction provides a perfect conduit for such exotics introduction

Response

The Revised Plan generally limits the lands suitable to timber production to locations of the Forest that have been largely fragmented by past management practices. Thus, the creation of early successional habitat will not cause a significant decline in interior forest species Table 3-39 in Chapter 3 under "wildlife" displays the amount of "*relatively Fragmented*" and "*Relatively Unfragmented*" *habitat in each alternative* Under the Forest Service preferred alternative, 45% of the Forest is "relatively unfragmented".

Letter 3537

Since early successional, even-aged habitat is well represented in the region and the landscape, the GW is *unlikely to enhance biodiversity by creating any more young or even-aged habitat In fact, continuing this policy* would jeopardize biodiversity FIA information also implies that forest fragmentation and edge creation are frequent and continuing disturbances to the region's formerly extensive forested landscape.

Letter 3981

EIS. 3-142, paragraph 2 - Add after 1st sentence "Habitats on the Forest are critical for preventing species from *becoming endangered in the first place." This brings up the important factor of the context of the GWNF. The* economic region of the Forest has been addressed, but its ecological matrix has been ignored. This is what "New Perspectives" is all about - ecosystem management. It is imperative that the EIS address this issue - it is affected environment The GW affects and is affected by the land use patterns outside its borders This is particularly important as regards its role in maintaining TESS and biodiversity at all scales How the different *alternatives address regional ecological integrity and conservation of biodiversity needs a thorough discussion*

Letter 4034

The issue of true native biodiversity has been consistently ignored in favor of the fallacy of false diversity of common, early successional (grass, brush, small trees) habitat suited to common birds, animals, and weeds, which results from clearcutting and "wildlife openings" The DEIS states (p 3-105, p 3-111) that logging *maintains diversity Yet this is a blatant lie - it is only false diversity that is created*

Letter 4241

Since early successional, even-aged habitat is well represented in the region and the landscape, the GW is unlikely to enhance biodiversity by creating any more young or even-aged habitat In fact, continuing this policy would jeopardize biodiversity

Response

Maintaining the biological diversity on the Forest is a major goal of the Revised Plan Biological diversity, or biodiversity, is the variety of life and its many processes in an area. Depending on scale it can be viewed as the maintenance of the variety of genes, species, biological communities, or ecosystems of particular areas.

The Forest Service views the conservation of biodiversity as a multiple-use issue, not simply a land preservation scheme. Management actions are designed and implemented which conserve specific elements of biodiversity Efforts will increase in developing knowledge, implementing conservation measures, and demonstrating land and resource management approaches that conserve biodiversity as an integral part of sustaining overall multiple-use objectives while achieving a desired future condition These efforts will be based in large part on the science of conservation biology including the principles of island biogeography, population biology, and ecosystem functioning. Cumulative effects resulting from landscape fragmentation and water runoff are analyzed and monitored as part of project implementation.

Further explanation of how the Revised Plan provides for biodiversity is provided in Chapter 2 under "ISSUE 1 — BIODIVERSITY" Chapter 3 of the FEIS contains information on biodiversity and how it is affected by the various alternatives

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Letter 3643

Alternative 10 allows clearcutting as a harvest method This logging method is the most cost effective and provides the best conditions for the natural regeneration of hardwoods. It also provides early successional forest habitat for white-tailed deer, wild turkey, common flicker (Colaptes auratus), and ruffed grouse (Bonasa umbellus)

Response

There is clear National Policy that directs the Forests to reduce the amount of clearcutting Clearcutting is not the only way to manage wildlife, and the Revised Plan provides many methods for managing for wildlife, including timber management with alternative cutting methods such as modified shelterwood. Wildlife management can occur on the vast majority of the forest Using timber management to enhance wildlife habitat will be emphasized on about 1/3 percent of the Forest

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Letter 3710

The planning team must perform a much more thorough analysis of the costs, benefits and alternatives in order to demonstrate that harvests [for wildlife] are warranted There is ample reason to doubt that such harvests can be justified. The wildlife most likely to benefit from logging are early successional species, such as deer These animals are hardly in short supply on the George Washington or in this part of the country In the absence of better justification, it would be particularly inappropriate to contemplate additional harvests for this purpose on unsuited land

Response

A major concern, as determined by comments on the DEIS and Draft Revised Plan, centered around the level of habitat management (in the form of direct wildlife habitat improvements and timber sales). Comments expressed a desire to increase active habitat management. Other comments expressed a desire to reduce the levels of habitat management, preferring more emphasis to be placed on providing unfragmented habitats

The preferred alternative does not maximize the potential value for either early successional or late successional unfragmented habitats It recognizes the value of both somewhat conflicting needs and within a large forested area provide for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

Unfragmented habitats, such as provided in Management Areas 4, 6, 8, 9, 13, 21, and portions of several other management areas are described in Chapters 2 and 3 of the Revised Plan

The Revised Plan recognizes the values of forest management and vegetation manipulation within the context of multiple use management Much of the timber harvesting will be conducted specifically to regenerate portions of an aging forest to provide early successional habitats The amount of regeneration provided varies among the thirteen alternatives considered in detail in the FEIS Several factors come into play including the values that unfragmented habitats and roadless areas provide, value of and need for forest products that can be provided, and the costs versus benefits derived from this action

Estimated white-tailed deer carrying capacity is maintained at present levels Currently, in some areas of the forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some rare plant species are preferred as deer foods Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters Based on past sales declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas. However, there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate. Grouse hunting accounts for approximately five percent of the hunting days afield on this Forest In light of a below cost timber program, it is economically difficult to justify an increased timber program to increase ruffed grouse hunting success rates.

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2 under "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species"). Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife.

Letter 3981

EIS. 3-136, paragraph 5 - A discussion of the difference between the unnatural, connected by roads openings and natural forest patchiness is needed. What are the adverse impacts on biodiversity? What are the ecological effects of road closure as would be implemented under Alternative 3?

Response

The FEIS does not analyze the effects of specific actions, such as road closures, for each of the alternatives. Instead, it discloses the effects of the cumulation of management practices inherent in each alternative.

Table 3-39 in Chapter 3 under the heading of "wildlife" displays the amount of "relatively fragmented" and "relatively unfragmented" habitat in each alternative. This information is one of the indicators of the effects of the alternatives on biodiversity.

Letter 3643

This would be partially accomplished by eliminating or substantially reducing the prescribed burning program for maintaining early successional vegetation. We do recommend that the program be maintained for the 100-300 acres per year that may need to burned to preserve the special Biological Areas in a natural state Prescribed burning does not provide substantially different habitats than clearcutting We believe that the prescribed burning funds would be better spent on the development and administration of camping facilities as planned under Alternative 8

Response

The results achieved from prescribed burning for ecosystem management are drastically different than the affects which result from clearcutting Prescribed burning generally maintains the vertical structure in the stand and creates a mosaic of vegetative responses which resulted from varying fire intensities Fire also stimulates sprout growth, flowering, and fruit set in many plant species plus they benefit from the release of nutrients The Forest Service has clear national policy direction which reduces clearcutting thus making the use of prescribed fire more important for wildlife management. The use of these funds for camping facilities is therefore not in the best interest of ecosystem management objectives

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BIODIVERSITY: Riparian Areas, Wetlands, Bogs

Letter 57

When it comes to Riparian Areas don't get any artificial ideas but emulate nature

Response

The desired future condition of riparian areas includes self-sustaining aquatic and riparian habitats. Some vegetation management and fishery and wildlife improvements may occur to protect or enhance riparian-dependent resources and work toward self-sustaining conditions

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Letter 87

The amount of timber harvesting planned in MA 18 appears excessive considering the ecological purpose of the preferred alternative.

Letters 134, 4034

The preferred alternative backslides seriously from the interim management guidelines now in effect with respect to stream protection. On p 3-128 of the DEIS we read that 16% of riparian areas are suitable for timber management, while on p 2-131 of the Draft Plan a table is presented that shows only 66 foot vehicle exclusion

filter and shade strips for most streams while cutting is permitted to the very banks of the streams Compare this with the 100 foot no cutting zones in the interim guidelines now in effect Also salvage logging is permitted in stream beds while at the same time it is admitted that the coarse woody debris is an asset to fish habitat

Letter 146 In Alternative 12, the riparian areas are not protected as well as the current management Currently, no timber harvesting can take place within 100 feet of perennial streams or 30 feet of intermittent streams The standards in Alternative 12 would make the protected zones variable in width and would allow timber harvesting in 27% of these zones

Letters 491, 1167, 1260, 1268, 1297, 1439, 1443, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1557, 1671, 1730, 1731, 1732, 1886, 1943, 1944, 2007, 2010, 2012, 2049, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2237, 2272, 2276, 2283, 2292, 2400, 2401, 2674, 2738, 2764, 2765, 2766, 2767, 2925, 3087, 3088, 3147, 3148, 3149, 3150, 3558, 3863, 4009, 4093
No timber cutting should be allowed in riparian areas (or wetlands) There should be at least a 100-ft buffer on each side of "streams"

Letters 492, 503, 748, 760, 762, 763, 766, 767, 867, 877, ,891, 933, 963, 970, 972, 987, 1059, 1069, 1070, 1078, 1139, 1149, 1152, 1158, 1160, 1162, 1258, 1260, 1268, 1320, 1329, 1330, 1350, 1354, 1365, 1370, 1378, 1434, 1652, 1656, 1822, 1823, 1978, 1992, 2005, 2022, 2035, 2040, 2052, 2053, 2230, 2375, 2376, 2471, 2505, 2534, 2536, 2603, 2670, 2705, 2710, 2712, 2732, 2749, 2839, 3543, 3545, 3594, 3635, 3647, 3662, 3687, 3691, 3695, 3735, 3736, 3796, 3809, 3834, 3846, 3849, 3870, 3899, 3909, 3931, 3980, 4015, 4021, 4255
Streams must be protected with a minimum 100-foot wide buffer in which no timber cutting is allowed

Letters 496, 2039
Protect the streams

Letter 498 To allow timber cutting closer than 100 feet to streams is a shortsighted gain for long-term damage

Letter 504 Timber mgmt should protect streams Buffer zones on either side of streams should be established and enforced to ensure riparian quality

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 3478, 4068, 4073, 4074, 4075
Riparian areas are to be protected from any logging for 100 feet on each side of a stream, 200 feet for native trout streams

Letter 759 As to timber-cutting, we must allow a minimum of 100 feet on each side of streams to protect from runoff damage

Letter 884 I strongly support a 100-foot buffer zone on each side of streams and no timber cutting for salvage in riparian areas

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1454, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2027, 2063, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2750, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2836, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 3527, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4172, 4183, 4231
Riparian areas should be protected by a 100 ft buffer on each side of streams

Letter 892 Most significant, however, is the lack of representation of mature riparian habitats, the rich floodplains with alluvial soils, wetlands and rivers Option 3 addresses these issues, and provides for a greater aggregate representation of these critical riparian habitats

Letter 934 *(supports Sierra Club view on) streams protected*

Letter 940 The plan needs stronger riparian protection guidelines. The minimum buffer zone on each side of a stream or river should be 100 feet We believe no timber cutting should occur in these riparian buffer zones. These zones are the most critical habitat areas in the entire national forest, without question

Letter 940 We believe no timber cutting should occur in these riparian buffer zones These zones are the most critical habitat areas in the entire national forest, without question.

Letter 948 I'm concerned about deficient streamside protection (should always be a minimum of 100')

Letter 971 I worry about clean water That is keeping it clean. I worry about our watershed This includes riparian zones The further away the timber cutting is away from the streams the better.

Letter 976 Considering the impact that development or timber cutting may have on watersheds, we feel that nothing less than 100 yards (of buffer zone around riparian areas) will suffice.

Letter 981 To more properly protect riparian zones, the Plan should set aside minimum widths of at least 60 feet on either side for perennial streams and 30 feet for intermittent streams; the Plan should specify that cutting is permitted in riparian zones only to benefit riparian-dependent species, and it should use the Forest Service's existing definition of "riparian zone."

Letter 982 There should be zones of 100 feet on either side of perennial streams and 30 feet for intermittent streams in which no timber can be logged

Letter 988 We need solid riparian protection to 66' either side of perennial streams. By protection I mean no harvest.

Letter 1072 Riparian areas need more protection

Letter 1074 Timber cutting should be restricted near streams.

Letter 1075 At least a 100 foot buffer should be mandated between any timbering and streams to reduce the eroding sediment and pollution

Letter 1076 Streams have been significantly damaged by timber cutting and require adequate tree buffer zones to protect them from erosion.

Letter 1077 Designate a 100' wide buffer (at least) along streams to protect water flow in timber cutting areas.

Letter 1083 I am extremely concerned about the impact that "forest mgmt." would have on streams.

Letter 1086 A 100' minimum buffer should be required on each side of a stream to protect riparian areas and prevent pollution of the water

Letter 1090 Protect your valuable streams with large buffer

Letters 1081, 1094, 1169, 1310, 1314, 1981, 1982, 3553, 3827, 3962
Riparian areas are to be protected from any logging for 100 feet on each side of a stream, 200' for native trout streams.

Letter 1099 Limit logging activities near streams

Letter 1156 Tighten the mgmt plan's protection of our riparian areas Timber harvest should be prohibited from at least 100 feet on either side of any stream in order to protect water quality and prevent erosion and degradation of riparian habitat.

Letter 1161 I urge protection for more than the prescribed 100 feet on each side of a stream 200 feet seems more reasonable to me, with possibly some consideration of the size of the stream Not to complicate matters too much, but I could see logic for having the margin at one figure up to a certain mean stream flow (cfs) and a wider margin above that

Letter 1168	Streams are particularly vulnerable to damage from changes in the land around them. Watersheds must be protected For this reason variable-sized riparian zones are needed, with a 100-foot minimum buffer. No timber cutting should be allowed in these areas
Letter 1250	No timber cutting in riparian areas. A buffer area of at least 200 feet should be required on each side of a stream.
Letter 1281	A 100-ft wide, no-cutting buffer strip at streamside will help prevent fouling of the rivers and streams
Letter 1313	Your plan does not go far enough in protecting riparian areas.
Letter 1317	I support the Sierra Club's call for a 100-ft minimum buffer on each side of a stream Timber cutting is too damaging to occur so close to sensitive waterways.
Letter 1318	Protection of forest water resources means adequate buffer strips of forest remain along a stream.
Letter 1360	Special attention should be given to the protection of streams. I am disturbed to find that the buffer zones which should exist in the forest along streams are not always left. Loggers encroach on these buffer zones, and the damage is done before FS personnel can stop it. The best and most reasonable protection is afforded by making these buffers wider.
Letter 1429	A 100-ft minimum buffer should be required on each side of every stream, whether a full-time stream or an intermittent stream
Letter 1445	Protect riparian areas by at least a 200 ft buffer to reduce siltation
Letter 1551	Streams need protection on each side with a buffer zone of a quarter mile where no timber cutting would be allowed.
Letter 1552	[Flaws to the draft plan include] deficient stream protection.
Letter 1555	There should be no logging within three hundred feet on either side of any stream
Letter 1611	Protect streams and designate a buffer on each side within which no timber may be cut
Letter 1615	Riparian areas must be defined at a minimum of 100 feet from streams, and more in sensitive areas such as native trout streams. There should be no silvicultural activities in these areas
Letter 1621	To help maintain the water quality of streams, at least a 100-ft buffer should be required on each side of the stream
Letter 1634	No timber cutting should be allowed in riparian areas or wetlands
Letters 1661, 1976, 2189, 2347	No timber cutting should be allowed in riparian areas
Letter 1684	Riparian areas should be protected by a minimum 100-ft buffer on either side of the watercourse, 200 ft on either side of native trout streams. No cutting should be allowed in wetlands
Letter 1816	I find the protection offered watersheds and streams to be weak. I would like to see your plan require a 200' buffer along streams in which no logging would be allowed. This would afford adequate protection to the stream by decreasing siltation and enhancing water quality for the fish.
Letter 1861	Make sure riparian zones are geared toward protection of water/soil resources and not toward harvesting.
Letter 1884	All streams, including intermittent ones, should be given an absolute minimum of 100 ft of buffer on EACH side Such areas are sites of relatively high biological diversity and are therefore extremely sensitive to disturbance Logging of any type as well as road building, should be prohibited altogether in such habitat
Letter 2045	Riparian protection is essential to the health of the forest. Logging, if it must occur at all, must be prohibited within 200 yards of streams & rivers to prevent sediment run-off

Letter 2048	Protect all rivers and streams by providing at least a 150 foot buffer zone on each side which is exempt from timber harvest.
Letter 2060	No intrusions of any kind that involve land disturbance or habitat manipulation should be permitted in riparian areas with the possible exception of well-evaluated efforts to benefit rare, threatened or endangered species. At least 1000 feet on each side of the stream should be set aside. This number has been quoted by some experts as being needed to ensure unharassed movement of black bears.
Letter 2061	I feel that when a road is constructed near a stream, a 100-foot wide buffer strip be observed. No timber cutting should be allowed within at least 100 feet of stream. This is the only way to protect our water resources.
Letter 2066	I believe streams should be protected in all areas.
Letter 2189	No timber cutting should be permitted in riparian areas.
Letter 2215	Logging is allowed in most riparian areas. Only generous filter strips and a ban on all activities near perennial and intermittent streams will protect our waters and the creatures that live there. Some forms of logging are even allowed in the stream itself.
Letter 2232	Riparian areas should be protected. Maintain the current standard of 100 feet on either side of perennial streams and 30 feet on either side of intermittent streams. Double this for streams leading into municipal water supplies.
Letter 2242	Do not allow logging within 100 feet of streams and roads.
Letter 2280	Do not build any roads or cut down trees within 100 yards of the streams.
Letter 2285	No cutting should be permitted anywhere near the streams or rivers in the forest There should be a buffer of at least 500 feet on either side of streams, brooks, rivers, etc
Letter 2308	In Riparian Areas both timber harvest and road construction may be permitted to protect or enhance riparian dependent resources This broad loophole coupled with the wide range of choice in establishing the official boundary of any riparian area leaves entirely too much latitude in the field application of Management Area 18
Letter 2308	[Without] a standard minimum width, adequate citizen monitoring of streams all too often will become meaningless because of lack of reliable information re riparian boundaries
Letter 2308	No timber harvesting of any kind, no road construction nor reconstruction, no building of new trails of any sort should be permitted within a minimum distance of 100 feet on each side of any and all perennial streams. With this provision then any employee of the Forest Service of whatever level would know what he may not do and every concerned citizen would know what to expect
Letter 2308	What citizens want from the proposed new management plan for the George Washington Forest, as much as any one thing, is a reliable understanding of what we can expect or not expect to happen on the forest
Letter 2319	Riparian areas need special attention and no wood cutting or encroachment should be tolerated at all.
Letter 2327	No timber cutting in wetland or riparian areas.
Letter 2380	[We are in favor of] better protection of streams, especially those used for municipal water sources.
Letter 2355	I support greater protection of streams.
Letter 2366	Avoid timber harvesting in riparian areas Water resources are the pre-eminent multiple use of the future.
Letter 2498	A 100 foot buffer should be required on each side of a stream to protect water quality. No timber should be allowed in these areas
Letter 2513	In the past the U.S Forest Service has not enforced sufficient buffer zones along lakes and streams where buildings, roads and timber harvesting are prohibited. I should think that a buffer easement of 150 feet would be sufficient.

Letter 2529 Protect areas adjacent to streams, leaving a substantial buffer on either side (allow no timber cutting in the buffer)

Letter 2557 The revised management plan should protect water quality by maintaining at least a 100 foot buffer along all streams No timber cutting should be allowed in the buffer zones.

Letter 2602 I support the Wilderness Society in its call for 100 foot buffer areas along streams and rivers--no trees should be cut in these areas.

Letter 2609 All riparian areas should be a minimum of 100 feet wide (horizontal measurement) on each side of all perennial and intermittent streams All riparian areas are off-limits to timber harvesting and no portion of a riparian areas should be considered for timber cutting All-terrain vehicles (ATV), off-road vehicle (ORV), and four-wheel drive (4WD) use should be restricted from all riparian areas.

Letters 2609, 3705, 3943
All riparian areas should be a minimum of 100 feet wide (horizontal measurement) on each side of all perennial and intermittent streams.

Letter 2613 Since riparian areas are often vital migration corridors and areas of high biological diversity, a minimum 200 feet of buffer centered on the stream should be established

Letter 2665 Riparian protection is totally absent from Plan The GW will maintain no excellent management practices (EIS, 2-19), will allow 16% of all areas open for logging, and 20% overstory removal (EIS, 3-36, 3-127, 3-128) There are no set widths (EIS, 2-28) for protection and this eliminates those instigated under interim management due to overwhelming public concern

Letter 2665 56,000 [tons] of sediment per year as totally unacceptable (EIS, 2-47) as it will continue to choke streams, decrease native fish populations and degrade the Chesapeake Bay

Letter 2666 Riparian areas need more protection. A 100 ft. area on each side of streams should be protected from timber harvest and along native trout streams the area should be 200 ft on each side

Letter 2691 No logging or major roadbuilding within a hundred feet of a stream or forest wetland The lack of protection to water resources and erosion control is unacceptable

Letter 2754 Riparian protection [should] be increased to 200 feet either side of perennial streams

Letter 2755 All riparian areas should be protected from all harvesting for 100' on each side Native trout streams should be protected for 200' on each side

Letter 2822 Commercial timber harvesting and ATV use should be prohibited in riparian areas Wildlife and fisheries habitat enhancement projects should be permitted and encouraged in riparian areas where necessary and compatible with the Plan's mgt objectives and desired future conditions

Letter 2835 Protect streambeds with 100 feet of woodland buffer on each side

Letter 2868 We recommend that logging be eliminated from the 100 foot buffer zone and that this buffer be expanded to 200 feet on either side of native trout streams Road-building should also be precluded from the riparian zone

Letter 2899 This alternative [#8] was not as restrictive as some other alternatives with regard to timber harvesting in riparian areas The Forest should be managed in such a way so as to ensure minimal soil loss

Letter 2929 Set minimum widths of at least sixty feet on either side for perennial streams and thirty feet for intermittent streams to protect the riparian zones from logging, the Forest Plan should specify that timber cutting is permitted in riparian zones only to benefit riparian dependent species, the Forest Plan should use the Forest Service's existing definition of "riparian zone "

Letter 2935 We support wise mgt of riparian areas.

Letters 3438, 3439, 3440
Watersheds and riparian areas need protection, Alternative #8 protects neither

Letter 3512 It is very important to provide more protection to the streams in the area. Municipal water supplies certainly outweigh logging interests.

Letters 3537, 4241
One hundred foot minimum no-cut or disturbance buffers on both sides of all streams, lakes, ponds and wetlands should be adopted as part of the preferred alternative. This is the minimum necessary to obtain optimum fish habitat conditions and achieve maximum carry capacities The 100 foot no-cut or disturbance buffers should replace all streamside management zones and should be the minimum requirements, subject to secondary objectives of establishing wind-firm buffer strip boundaries Standards to measure the success of streamside buffers should include fisheries habitat capability and no potential for soil from earth disturbing activities to reach streams. In addition, the suitable timber land base [in the preferred alternative] should be amended to remove those acres that comprise the 100 foot no-cut or disturbance buffer zones.

Letter 3546 Riparian zones should be protected from logging for at least 100 feet.

Letter 3563 Please maintain current standards for riparian areas or, better yet, strengthen current standards.

Letter 3567 I support Alternative 8 [with] better riparian protection than that offered There should be a 100 foot minimum buffer on each side of streams which is not disturbed, except for fisheries habitat manipulations. Tis buffer strip should also apply at a 60 foot width to intermittent streams. Protection of our surface waters should take priority over all other considerations in these sensitive areas. There should be no salvage in riparian areas

Letter 3606 Greater stream protection

Letter 3619 Timber cutting and other silvicultural practices should not be permitted in riparian areas under any circumstances. A minimum buffer of 100 feet should be required on each side of a stream to provide for improved water quality

Letter 3625 There is major concern regarding stream pollution resulting from road construction and timber harvesting Any compromise in the 100 foot filter strip would be a major step backward in protecting streams

Letter 3629 I applaud your choice of Alt 8 One change to the draft plan should be to increase the protection of streams, with a 200-ft riparian area

Letter 3656 100 foot minimum buffers should be required for streams

Letter 3699 Too little stream protection

Letter 3701 Protect stream and river boundaries with 100-foot "buffer zones" in which no timber cuts shall be allowed.

Letter 3705 All riparian areas are off-limits to timber harvesting and no portion of a riparian area should be considered for timber cutting.

Letter 3709 Protect riparian areas. A minimum buffer of 100 ft on each side would allow these areas to retain a viability necessary for the diverse life forms of the area Unfragmented habitat must be provided throughout the forests.

Letter 3710 The draft plan would unnecessarily permit logging in certain riparian areas. In some respects, the draft would actually weaken current protective practices in these zones. There is no reason to do so, and the current protections should be maintained and strengthened in the final plan

Letter 3710 [For riparian areas,] the final plan should adopt the current practice as its minimum standard Moreover, certain riparian areas – in particular, those surrounding wild trout streams and those that feed municipal water supplies -- warrant a greater increment of protection For these, we recommend that the final plan adopt the approach of management area 3B in alternative 6 existing roads and trails should be closed and logging prohibited within 200 feet of these waterways

Letter 3710 Prohibit logging in riparian areas.

Letters 3720, 3766, 3782
Riparian areas must be protected from any logging with a minimum 100-foot wide buffer (on each side of the stream) in which no timber cutting is allowed. The buffer must be a least 200 feet for native trout streams.

Letter 3744 Protect riparian areas. Don't cut or allow equipment within 100-200 feet of streams.

Letter 3763 Logging should be restricted to at least 100 feet on each side of streams and 200 feet for native trout streams.

Letter 3785 Trout streams, and all streams which lead into municipal water supplies, should be protected with a 200 foot riparian area.

Letter 3797 YES to providing adequate buffers for streams and NO to timber cutting in these areas

Letter 3821 Streams need to be protected with buffer zones in all situations.

Letter 3838 Alternative 8 needs to be modified to insure that riparian zones have better than the current standards (Relying on assorted and varying judgments of "desired future conditions of riparian dependent resources" is simply not acceptable!) We would like to see trout streams ("cold-water streams") have 200 feet of protection, at a minimum, 100 feet for perennial streams and better than the present 30 feet for intermittent streams

Letter 3742 All streams shown as "Wild Trout" streams should be managed under MA 3B This Management Area should also apply to all streams which lead into municipal water supply impoundments within the proclamation boundaries of the GW

Letter 3742 Streams which are shown on the fisheries inventory as "Cool Water", "Stocked", or "Stockable" should be managed under MA 19A to protect the fisheries resource and recreation experience in these riparian zones

Letter 3840 Pg 2-128, [Standard] #680 - The area is unsuitable for timber production. (I don't know what riparian dependent resources refers to except possibly the timber shop)

Letter 3840 Full protection for riparian areas 200-foot zone on each side of stream off limits to any timbering

Letter 3840 Perennial streams 200-foot zone of protection Intermittent streams 100-foot protection zone No timbering, roadbuilding, etc. in these zones

Letter 3840 Riparian areas should have full protection as provided in intermittent guidelines. Intermittent streams receive same protections

Letter 3840 No timbering salvage or any timber management scheme may be used in riparian areas - perennial or intermittent

Letter 3840 Riparian Areas should be unsuitable for timber production

Letter 3847 - Protect riparian and wetland areas

Letter 3861 You should not allow timber cutting in riparian areas or wetlands I prefer that such areas extend 100 yards from the stream bank or edge of wetlands

Letter 3883 Timber cutting operations should not be permitted within 100 feet of any streams, not only for scenic reasons, but also to curb erosion of soil into the stream.

Letters 3892, 3911
A minimum of a 100 foot buffer should be required on each side of streams and rivers. No timber cutting should be allowed in these areas unless by absolute necessity for the welfare of the forest, e g , for gypsy moth damage control, and new trees should be planted where those by necessity have been removed

Letter 3929 Areas that are harvested should be more than 150 ft from streams/rivers and 100 ft from streambed runoffs that are dry part of the year

Letter 3934	Management opportunity should be available for terrestrial as well as aquatic organisms The standards in riparian management areas should allow for the construction and maintenance of permanent wildlife openings *if such openings are required to meet management objectives and desired future conditions. Commercial* timber harvesting and off-highway vehicle use should be prohibited in riparian areas.
Letter 3938	Riparian Areas: All riparian areas need to be protected with a buffer zone extending from 100-feet on both sides of the streams in which no timber harvesting, road or new trail construction would be allowed. This should include intermittent streams with more than one square mile drainage areas.
Letter 3940	Plan. Page 2-13, Paragraph 5: *Should specify minimum buffer widths for riparian areas*
Letter 3942	Riparian areas are especially important to protect from logging activity. In the prescription for Management Area 18, 4750 acres is designated suitable for timber. All of MA 18 should be unsuitable for timber, and no cutting should be done for 100' on each side of a stream Intermittent streams should be protected 30' on each side. Native trout streams should be protected 200' on each side No justification is given in the plan for cutting along riparian areas.
Letter 3943	*All-terrain vehicle (ATV), off-road vehicle (ORV), and four-wheel drive (4WD) use should be restricted from all* riparian areas
Letter 3943	All riparian areas should be a minimum of 100 feet wide (horizontal measurement) on each side of all perennial and intermittent streams.
Letter 3943	All riparian areas are off-limits to timber harvesting and no portion of a riparian area should be considered for *timber cutting*
Letter 3945	Riparian protection needs to be more clearly and specifically identified in general rather than the implied site-specific decision at the time of the sale planning Minimal riparian zones of 100 feet for perennial streams and 30 feet for intermittent streams should remain inflexible, but should be enlarged as the site-specific sale might dictate
Letter 3957	The VA Society of Ornithology favors Alt 8; however, we would like complete protection of a 200-ft riparian area *added to this alt for all streams (these are among the most productive areas for birds, including nesting* neotropical migrants).
Letter 3959	I do not believe there should be any timber harvesting within a riparian ecosystems It seems that Alt. 8 emphasizes biological values but allows 18% of these areas to be open for timber harvest - higher than any other Alt An additional measure to protect riparian areas which we were able to implement successfully for Sprout's Run on the Jefferson was to create an additional 100 ft strip outside the 100 ft. riparian zone in which selective *cutting was done Understory and mid-story trees were left, quality saw logs were harvested but hemlock and beech were left This gave a feathering effect which enhanced the visual quality from the stream and added* valuable protection to the riparian zone. I wish this could be instituted for all streams.
Letters 3985, 3986	No timber harvesting should occur within a 100 foot buffer of all streams and wetlands
Letter 4028	No timber cutting within 500 feet of a stream
Letter 4038	*Replace the fifth paragraph on page 2-13 of the Draft Revised Forest Plan with the following. "Riparian areas are* unsuitable for timber production, however, limited vegetative management is permitted if needed to meet the desired future conditions of riparian-dependent resources "
Letters 4157, 4158	Riparian areas (pertaining to the bank of a river, pond or small lake) should be protected by a 100 ft. buffer on each side of streams
Letter 4182	The heart of many of the ecosystems is the water supply, so I urge you to specify in the plan that each bank of every stream will have a non-logged buffer zone of at least 150 feet.
Letter 4232	Wider riparian zones are needed--especially for perennial streams. Change the standards in Alternative 8, the present standards are much wiser than trying to figure what "desired future conditions" should be!!

Letter 4241 — The suitable timber land base should be amended to remove those acres that comprise the 100 foot no-cut or disturbance buffer zones

Letter 4249 — I would like to see a riparian zone of 200 feet for all streams to afford maximum protection to water quality, to aid in flood control, and for productive avian zones. Alternative 8 needs radical improvement in riparian standards.

Letter 4253 — Riparian zones to reduce soil erosion and maintain proper stream temperatures should be a minimum of 100 feet on both sides of all streams No timber cutting should be allowed with the riparian . zones

Response — To address this concern, riparian areas with set minimum widths and no timber harvesting are prescribed in a number of alternatives. Management Area prescription 19A, which is used in Alternative 2, requires widths of 100 feet, management area prescription 19B, which is used in Alternative 7, has riparian widths of 100 feet on wild trout streams and 50 feet on other streams, while Management Area prescription 19C, used in Alternatives 6, 11, and 13, doubles these widths. Management area 19D, which is used in Alternative 9, requires 200-foot riparian widths.

In the preferred alternative, the widths of riparian management areas (Management Area 18) are determined using natural features of landform, soils, and vegetation, rather than set arbitrary distances This will ensure protection and enhancement of the actual riparian dependent resources and ecosystem functioning Even the narrowest riparian management areas will be protected by filter strips, shade strips, and vehicle exclusion zones of at least 66 feet from each bank

Vegetative management occurs in riparian management areas only if consistent with the desired future condition of those areas. Riparian management areas are suitable for timber management only if they are adjacent to suitable lands in Management Areas 13, 14, 15, 16, or 17 and do not include native trout streams Moreover, only those portions of these riparian management areas that extend beyond 66 feet from a bank are suitable Salvage of dead and dying timber is allowed only on a site-specific basis and only if the desired future condition can be met Logging is not permitted in stream beds.

Riparian areas bordering and upstream from municipal water supply reservoirs are in Management Area 18C, which places special emphasis on water quality and is classified as unsuitable for timber management Lakeside management zones bordering these reservoirs are widened to 100 to 200 feet, depending on land slope, and are also unsuitable for timber management

Intermittent streams are protected by filter strips, shade strips, and vehicle exclusion zones of at least 33 feet from each bank.

Limestone aquifers are protected by standards that include buffers around drainages into caves, sinkholes, and cave collapse areas

In Management Area 18, roads are not permitted in riparian areas except at designated crossings unless alternative routes have been reviewed and rejected as more environmentally damaging ATV trails are prohibited in riparian management areas except at designated crossings.

Monitoring insures that protective standards are implemented and effective Effectiveness of streamside management zones for protecting streams is evaluated through monitoring of aquatic macroinvertebrates, which includes habitat assessment

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Letter 188 — A very general description of the desired future condition of the riparian mgt area is given in the Plan, but no effort is made to show how the timber harvesting would achieve this desired future condition Specifics must be outlined in the plan

Response — Measures needed to attain the desired future condition of riparian areas will be determined on a site specific basis

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Letter 188 — MA 18 purports to define the width of riparian areas through soils, landform, and vegetation However, the characteristics must be defined sufficiently so that the public can clearly know what plants will be used, what year floodplain, and what soils

Letters 2609, 3705, 3943,

Criteria used for defining riparian areas by the aforementioned professionals should be published

Response — A detailed description of the criteria for delineating riparian management areas is included in Appendix K to the Revised Plan.

Letter 1368 — Soil/Water/Air· Watershed protection should be viewed as a critical component of the mgt plan Soil erosion and stream siltation must be kept at an absolute minimum.

Response — Watersheds are protected through standards designed to minimize soil erosion and sediment, so that long-term soil productivity is maintained and beneficial uses of water are protected

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Letter 2665 — Wetlands and floodplains are not protected in the Plan (Plan, 169-70).

Response — Each standard referenced implements floodplain or wetland protection, as guided by executive orders and the *Clean Water Act*

Letter 87 — On the Pedlar RD, Buena Vista quad, it is recommended that Management Area 15 be changed to Management Area 3 for the watershed immediately above Lynchburg Reservoir.

Letter 87 — On the James River RD, Clifton Forge quad, it is recommended that Management Area 17 be changed to Management Area 3 for the watershed immediately above Smith Creek Reservoir

Letter 87 — On the Dry River RD, Reddish Knob quad, it is recommended that Management Area 16 be changed to Management Area 3 around Hearthstone Lake.

Letter 87 — On the Lee RD, Strasburg quad, it is recommended that Management Area 7 be changed to Management Area 3 around Strasburg Reservoir.

Letter 87 — *On the Lee RD, Wolf Gap quad, it is recommended that Management Area 15 be changed to Management Area* 3 around Woodstock Reservoir because that is what this area is in alternatsive 6

Letter 507 — I support your Alternative 8 with modifications as follows. protect the Pounding Mill Water Supply; protect the water supply to Valley Ridge; protect the water supply in the McGraw Area to Clifton Forge

Letter 1337 — The plan makes no specifications for watershed protection areas

Letters 2334, 3684

MA3 should be employed to protect water quality in watersheds and riparian areas

Letter 2665 — No acreage is provided for watershed protection, even though this is the precise prescription and purpose for which GWNF was created

Letter 3764 — I would like to recommend the following minor changes in Alt 8 in and around Amherst County· (1) Protection of the Buffalo River and Pedlar River Watersheds from sedimentation and nutrient enrichment. These sources serve as the primary drinking water supplies for approximately 85,000 citizens Broad riparian protection zones *need to be established around all tributaries of the Buffalo and the Pedlar Limit the size of timber and ORV* activity areas in all portions of the watersheds not included in the protected riparian zones.

Letter 3838 — Please place streams leading into municipal watersheds in Management Area 3B and Management Area 3A is more appropriate for areas immediately surrounding municipal water supplies

Letter 3894 — All watersheds should be protected to the fullest extent as this water will be needed in the future when water at lower elevations is unsafe due to contamination caused by the local poultry industry.

Letter 4003 — Whichever alternative is selected it is imperative that water quality in these (Buffalo and Pedlar) watersheds be protected Specifically, the need to establish broader protection zones around all tributaries of the Buffalo and

Pedlar Rivers Any timber harvesting in these critical watersheds must be closely monitored and should only be permitted on small tracts of land, so that the impact on the surrounding waters will be limited

Letter 4038 — Management Area 3 on page 2-25 of the Draft Revised Forest Plan· We strongly recommend that this management area be established to provide management direction for the municipal watersheds located on the George Washington National Forest.

Letter 4038 — On the James River RD, Clifton Forge quad, it is recommended that MA 17 be changed to MA 3 above Smith Creek Reservoir.

Letter 4241 — The preferred alternative's reduction of Protected Watershed/Riparian Areas (Management Area 3) from 8,677 acres to zero (0) acres is a serious flaw in the draft. It is questionable whether the down grading of riparian protection meets the intent of the National Forest Management Act Regulation (Sec 219 27(e))

Letter 4241 — The preferred alternative should be amended to provide Management Area 3 protection to a minimum of 35,000 acres similar to those protected in Alternative 9

Response — Management area prescription 3A is designed to provide special protection for the Little River watershed, which has a history of damaged stream channels and debris slides. This prescription is used in Alternatives 2, 4, 5, 10, and 12 In the preferred alternative, Little River watershed is managed as a Special Management Area (Management Area 21), which basically maintains the unfragmented habitat, roadless nature, and primitive appearance of the area and classifies it as unsuitable for timber management

In the DEIS, Management Area prescription 3B prescribed riparian zones as a minimum 200 feet from each bank The area was unsuitable for timber management. In the FEIS this concept is carried forward in management area prescription 19D, which is used in Alternative 9.

In the FEIS, management area prescription 3B provides one way to protect watersheds above municipal reservoirs Under this management prescription, these watersheds would be designated municipal watersheds, for which Forest Service policy requires that the benefiting municipality be charged a fee to compensate for other uses foregone. Alternatives 6, 9 and 11 examine a range of management area prescription 3B allocations in watersheds above existing reservoirs, such as Clifton Forge, Lynchburg, and Woodstock reservoirs. One of these alternatives could be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits This form of protection and additional cost to municipalities went beyond what was needed to fully protect water supplies. Instead, in the preferred alternative, riparian areas bordering and upstream from municipal water supply reservoirs are in Management Area 18C, which places special emphasis on water quality and is classified as unsuitable for timber management. Lakeside management zones bordering these reservoirs are widened to 100 to 200 feet, depending on land slopes, and are also unsuitable for timber management.

All watersheds are managed using standards designed to protect and maintain the beneficial uses of water, in compliance with the Clean Water Act. Monitoring insures that standards are implemented and are effective

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Letter 507 — Do your best to control run-off that would add to flooding of the Jackson River

Response — As described in Chapter 3 of the FEIS, research and analysis indicate that proposed management activities will have no significant effects on flooding

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Letter 2823 — There is a need to allow timber harvesting within riparian areas These are some of the best sites for timber growth and provides some of the best wildlife habitats Placing these lands in a no management status will not allow for improvement of these very important lands. Flexibility must be built into the final plan to permit the on-the-ground manager to make sound decisions on these areas based on site information and resource needs of the areas

Response — Vegetative management occurs in riparian management areas if consistent with the desired future condition of those areas Riparian management areas are suitable for timber production if they are adjacent to suitable lands in Management Areas 13, 14, 15, 16, or 17 and do not include native trout streams. Those portions of these riparian management areas that extend beyond 66 feet from a bank are suitable

Letter 3544 — Alternative 3 would protect riparian areas. As an estimated 23,000 tons of sediment are being lost per year now, it is critical that we put a stop to this loss of precious topsoil

Response — In the preferred alternative, riparian areas are managed in Management Area 18, which extends the full width of the riparian ecosystem. This ensures protection and enhancement of the actual riparian dependent resources. Vegetative management occurs in these areas only if consistent with the desired future condition Riparian areas are suitable for timber management only under very limited circumstances

Watersheds are protected through standards designed to minimize soil erosion and sediment so that long-term soil productivity is maintained and beneficial uses of water are protected

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Letter 3660 — Permit vegetation manipulation in Riparian Areas for other resource needs besides just timber.

Response — Vegetation management is permitted to rehabilitate riparian areas and speed the recovery of the diversity and complexity of vegetation

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Letter 3660 — I support allowing cable yarding corridors in riparian areas.

Response — In the Revised Plan corridors for cable logging in adjacent non-riparian areas may be cut through riparian areas.

Letter 3831 — Your final Land Management Plan must include riparian areas managed by BMP standards only

Letter 3951 — Riparian Areas - Permit timber harvest in these areas by thinnings and shelterwood harvest systems Prescribe the use of "Best Management Practices" and let the site specific information set the width of the area. Do not include intermittent stream areas in riparian area designation Let the fishery biologist direct the percent of tree removal in the trout stream riparian zones. These are the most important wildlife habitat areas and also the most valuable timber producing areas (economics) There is no sound reason to exclude these areas from management activities, including timber management. Artificial widths should not be mandated for this, let the professionals on the ground make the width determination for riparian areas based on site specific data.

Response — Alternatives 4 and 5 were developed to permit timber harvesting and other activities within riparian areas to only be limited by state best management practices (BMPs) BMPs provide the minimum protection to comply with the Clean Water Act These two alternatives are considered in detail in the FEIS

The Forest Service preferred alternative was developed to provide more protective standards for riparian-dependent resources and multiple uses. Riparian management direction in the preferred alternative reflects people's increasing desire for amenity values and environmental services of healthy, diverse lands and waters

The widths of riparian management areas (Management Areas 18) are determined using natural features of landform, soils, and vegetation, rather than set arbitrary distances. Riparian areas are suitable for timber management if they are adjacent to suitable lands in Management Areas 7, 11, 13, 14, 15, 16, or 17 and do not include native trout streams Only those portions of these riparian areas that extend beyond 66 feet from a bank are suitable Intermittent streams are not included in riparian area designation, but are protected by filter strips, shade strips, and vehicle exclusion zones of at least 33 feet, in which 50% overstory removal is allowed

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Letter 3981 — EIS 3-126, paragraph 8 - Add "some" between "13" and "riparian". Also add "The riparian area definition is even more restricted than at present As such, these areas will receive negligible protection. "This section is really weak, to say nothing of being false, as written Again get rid of the "enhance" biased terminology - use "alter"

Response — Alternative 8 was inadvertently included in this paragraph and is deleted in the FEIS The term "enhance" is appropriate here It indicates that any management activity will be designed to hasten attainment of the desired future condition needed for riparian dependent resources

Letter 4

The existing designated wilderness areas in Virginia mostly occupy the steepest, rockiest and most unwelcoming landscape for shy, wide-ranging species There is clearly a need for preserving mature riparian zones and rich floodplains with alluvial soils, wetlands and mainstream rivers

Response

Under the requirements of Chapter 7 ("Wilderness Evaluation") of the Land and Resource Management Planning Handbook (FSH 1901 12), there are no Forest lands along alluvial mainstream rivers that meet the criteria for wilderness designation Alternatives 3,6,9,11, and 13 employ management area prescriptions along riparian areas and wetlands that achieve, to differing degrees, riparian area "corridor "

Letter 3962

2-169, Table 2-16 Should this table be referred to by one of the standards?

Response

This suggestion was adopted

Letter 1429

The definition of an intermittent streams should be changed from one which contains water 90% of the time, to one which contains water 25% of the time

Response

An intermittent stream is defined in the EIS glossary as "a stream that flows seasonally in response to a fluctuating water table, with a scoured channel that is at least 3 feet wide " This is consistent with generally accepted distinctions between perennial and intermittent streams Intermittent streams are protected by filter strips, shade strips, and vehicle exclusion zones of at least 33 feet.

Letter 2319

I am concerned about the well and spring water that will be affected by increased wood cutting in riparian areas, road building, herbicide spraying and so on

Response

Forest management activities do not measurably impact the groundwater resources Sinkholes, aquifers, public water sources, lakes, wetlands, and streams are protected from herbicides by means of restrictive standards

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Letter 3981

EIS 3-127, paragraph 4 - This entire paragraph is a vague, biased mess What does "maintain the desired future condition" mean? How were the SMZ figures arrived at - what biological criteria for 20%, 66 feet, etc? Statements that gloss over the impacts of logging, such as the last sentence in this paragraph, do not belong in an official document What are the environmental impacts of altering species composition, community structure, and ecological function in riparian areas through timber harvesting? Nowhere does it state that 15,817 acres of riparian areas under Alt. 6 are open to timber harvesting - Say so

Response

This paragraph has been revised in the FEIS to reflect changes in standards for Management Area 18 which place further restrictions on timber harvesting in riparian areas In the DEIS, it was estimated that only 16 percent of riparian areas were suitable for timber management This percentage is further reduced to 5% in the FEIS (see Table 3-9).

Letter 4057

The George Washington National Forest should nominate eligible streams for tier three waters designation and assure that the management of these streams meets the state(s) standards

Response

A decision was not made in the Revised Plan on nomination of these streams Forest standards insure that management of these streams meet State water quality standards and anti-degradation policies

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Letter 4219

Standard 966 allows up to 50% overstory removal along intermittent streams We strongly oppose this standard Current management allows for no timber harvesting within 30 feet of intermittent streams This standard should be retained in the Plan

Response

The specified streamside management zones should provide adequate protection for these streams Along intermittent streams that are tributaries of wild trout streams, timber harvests are not allowed if the desired future condition of the downstream wild trout stream would be adversely affected

Letter 4241 — Crucial to maintaining landscape diversity in this region would be protecting the integrity of large watershed systems

Response — The integrity of watershed systems is provided for and maintained through management area allocations and standards specific for riparian areas and water quality

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Letter 4268 — Plan - For all management areas, construction of facilities (recreational, picnic areas and parking lots, roads, etc) near streams and rivers and within riparian areas should be avoided

Response — Standards specify that roads are located outside riparian areas unless alternate locations have been reviewed and rejected as being more environmentally damaging Trails and campsites are located, constructed, and maintained so as to cause minimal resource damage are closed and rehabilitated OHV/ATV trails are prohibited in riparian areas except at designated crossings. Practicable alternatives must be developed and evaluated for proposed actions involving wetlands and floodplains.

Letter 4268 — Plan - To supplement the information contained in the standards 312 and 313, EPA recommends that language be included which ensures compliance with appropriate state and federal laws regarding activities in streams and wetlands, etc

Response — Standards specify that, in any project, water quality is protected through use of standards that meet or exceed state Best Management Practices, and that the Forest stays current with state Best Management Practices. Additional standards require protection of floodplains and wetlands in accordance with Federal law and executive orders

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Letter 4268 — Plan - EPA recommends that all timber roads be closed and revegetated once the timber removal has been completed Monitoring of soil erosion and sedimentation should be achieved

Response — The Revised Plan states that new local roads are closed and managed as linear wildlife openings when resource activity is completed, unless the road is needed for recreational use To assess soil erosion, the Revised Plan calls for monitoring of percent bare soil. The effects of sedimentation will be assessed through monitoring of aquatic macroinvertebrates

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Letter 4268 — Plan - In most cases, EPA prefers bridging over culverts for stream crossings Fords are strongly discouraged due to the potential for degradation of the streambed and associated impacts to water quality, benthic invertebrate populations and other attributes If culverts are to be used, EPA recommends box culverts which maintain a natural streambed

Response — Standards specify that, generally, permanent structures or temporary stringer bridges on permanent abutments are provided when crossing wild trout streams, and that fords are not used in any trout streams without site-specific environmental analysis Gravel is applied on approaches to fords and on portions of roads on either side of stream crossings that would potentially contribute sediment to the stream

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Letter 4268 — Plan - EPA recommends that sediment fences be used to control sediment to the streams at road crossings

Response — Sediment fences and other types of sediment traps are prescribed in the Revised Plan

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Letter 4268 — Plan - EPA questions the standard which limits the "use of construction equipment in streams to the amount of time absolutely essential for completion of the project" This leaves much room for interpretation EPA also recommends that seasonal timing of construction to avoid spawning and nesting of aquatic resources

Response — This standard establishes the principle of minimizing adverse impacts on streams Because of the varied nature of possible projects, it is impossible to make this standard more specific concerning time limitations without being too restrictive on some projects and too permissive on others Standards provide seasonal restrictions for stream disturbing activities in trout streams

Letter 4268 — Plan - EPA questions the description which states that "riparian-dependent resources are actively managed toward providing self-maintaining habitats that will maintain the desired future condition for riparian-dependent resources." It is difficult to determine what this may entail and the potential impacts associated with such management.

Response — When surveys of riparian areas indicate that aspects of the dsired future condition are deficient, actions may be taken to accelerate progress toward the desired future condition. The nature of these activities will be determined through project level analysis.

Letter 4268 — Plan - EPA recommends that the vehicular exclusion zones be expanded from 66 ft to 100 ft, especially on steeper slopes. This will reduce the potential for soil erosion and sedimentation to streams, and consequently reducing the need for mitigation for such impacts.

Response — Vehicle exclusion zones are expanded to 100 to 200 feet, depending on slope, on lakeshores of municipal water supply reservoirs.

Letter 4268 — Plan - EPA recommends that intermittent streams be afforded minimal protection by adopting the buffer zones as for perennial streams

Response — The specified zones should provide adequate protection for these streams Along intermittent streams that are tributaries of wild trout streams, timber harvests are not allowed if the desired future condition of the downstream wild trout stream would be adversely affected.

BIODIVERSITY: Management Indicator Species

Letter 3981 — EIS. 3-138, The management indicator species selected are inadequate. Some are such generalists and opportunists that they thrive in a variety of habitats (such as deer, flicker, and wild turkey) and so are nondiagnostic of environmental degradation. Appropriate indicators would be those most likely to disappear from habitat islands (such as bear), those most sensitive to human disturbance, specialized feeders, creatures high on the food chain, and those dependent on dispersed resources - such as raptors, cougar, river otters, freshwater mussels, various salamanders, ground-nesting songbirds, neotropical migrants, cove hardwood understory flora, fungi from mesic habitats.

Letter 3981 — EIS: 3-186, paragraph 4 - Are these areas requirements for individuals, populations or what?

Response — These minimum area requirements refer to populations of the species indicated.

Letter 3981 — EIS: 3-139, paragraph 3 - This speaks of the "ideal rotation age" for deer and turkey habitat Ideal for whom? How is this determined? What are the ecological criteria and constraints and impacts from such a course of action?

Response — These ages were determined in cooperation with the Virginia Department of Game and Inland Fisheries and the West Virginia Department of Natural Resources and are ideal for deer and turkey management.

Letter 3981 — EIS. 3-141, Table 3-34 - Since the "ideal rotation age" for bear and turkey is the same, why is Alternative 3 #1 for bear, but #7 for turkey carrying capacity? These numbers as presented are based on such nebulous suppositions that this table needs to be greatly amended and elucidated or thrown out

Response — The rotation age may be the same but the mixture of stand ages and conditions which provide optimum carrying capacity are different

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Letter 3981 — EIS 3-138, paragraph 6 - The statement "All alternatives provide large quantities of habitat for these species" is obviously false The differences in quantity and quality of habitat between Alternatives needs to be thoroughly discussed, the table isn't enough Sentence 4 is not accurate. Revise with "The result in virtually all of the Forest

is the development of habitat for all species including those that require remote habitats and large undisrupted areas A shifting mosaic of seral stages and tree ages provides for the habitat requirements of all communities

Response This paragraph has been re-written Please refer to Chapter 3 of the Final EIS.

Letter 3981 *EIS: 3-139, Table 3-33 - This is entirely misleading and inaccurate. How can Alternative 3, which gets rid of* logging, game management, and road construction, have only 67% of its lands to be free from continued disturbance? This is even less than Alternative 8 This table misrepresents Alternative 3 and needs to be changed

Response Table 3-33 in the DEIS has been replaced by Table 3-39 in the FEIS which displays the amount of "Relatively fragmented habitat" and "relatively unfragmented habitat" in each alternative.

Letter 3981 EIS: 3-140, paragraph 1 - Sentence 2 needs to be amended. Add to end (after "Alternative 3 provides the least") "amount of artificially fabricated early successional habitat, but the most naturally developed habitat of this type." As now written this section leads one to believe that under Alternative 3 there would somehow be a "shortage" of early successional habitat. This is simply not true.

Response Management allowed by Alternative 3 during the 10 to 15 year span that this plan will be in effect will provide the lowest amount of early successional habitat. This is simply due to the fact that the naturally occurring disturbance regime for the forests in this region will not create more early successional habitat than any other alternative.

Letter 3981 EIS: 3-140, paragraph 2 - This section is misleading We are lead to believe that somehow roads and timber harvests are better for black bears than leaving their homelands alone. Robert Giles, perhaps the state's preeminent wildlife biologist has called the black bear "...one of the Easts few remaining truly wilderness species" while Forest service documents state that the best bear habitat in the state is the Shenandoah National Park (no timber sales!) and Crawford Mountain (roadless area!) I want the record to state as much, and not just the one-sided view as presented now What studies were used to recommend a rotation age of 135 years? How is this better than undisrupted habitat? What biological criteria (not commercial) were used for this determination Documentation please.

Response As stated, the black bear is an opportunistic species that can thrive in a variety of habitats The Shenandoah National Park does not allow hunting which is probably the main reason why it has a higher bear density. The Park does not harvest timber, but due to the long linear nature of the Park many, if not most, bears in this area have ample opportunity to access adjacent areas where early successional habitat resulting from timber harvests, orchards, and farms is available Freedom from disturbance by open roads and hunting is probably the single biggest factor affecting bear densities, not lack of suitable habitat The recommended rotation age of 135 years is from studies carried out by Virginia and West Virginia wildlife agencies They may be contacted for additional information

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Letter 3981 EIS· 3-140, paragraph 3 - Here we are told of the importance of "controlled road densities for biological purposes." This is entirely inadequate Full disclosure of the effects of each alternatives program of road construction, road closure, and maintenance of the present road system on biodiversity at all scales is necessary

Response The FEIS displays the cumulative effects of all management practices inherent in the formulation of each *alternative It does not differentiate the effects of specific management practices on the environment*

Letter 3981 EIS: 3-141, paragraph 1 - In sentence 2, what "desired regeneration (species composition) goals "are being referred to here? The numbers of deer? How are the desired goals determined for each alternative? What are the ecological standards and criteria for these judgements? What of economic losses due to deer predation on adjacent farms?

Response The desired regeneration and species composition goals referred to here relate to vegetational composition, not to deer or other wildlife

BIODIVERSITY: Special Interest/Research Natural Areas

Letter 2380	[We are in favor of] more plants and animals to be protected in 48 areas which total more than 51,000 acres
Response	The Revised Plan contains an increased acreage in Management Area 4
Letter 3728	After reviewing MA 4 boundaries, we feel that many of these boundaries were designated without conducting appropriate surveys to determine if these special values are present.
Response	This is an incorrect assumption The Forest has accurate, up to date survey of these areas Corrections have been made to boundaries
Letter 2754	Mount Pleasant [should] be added to the list of 48 special biological areas that will protect unique plants and animals
Response	The special biological areas included in Management Area 4 consist of unique plant and animal communities recommended by the Natural Heritage Programs of the Commonwealth of Virginia or the State of West Virginia, the USDI Fish & Wildlife Service or the USDA Forest Service for special management None of these agencies have recommended Mount Pleasant for inclusion in Management Area 4
Letter 146	The draft plan has created 48 areas totalling more than 51,000 acres to protect the special biological resources of rare plants or animals This represents a great improvement over the discredited 1986 plan, which proposed to protect only one area for its unique plants or animals
Response	The establishment of special biological areas is one of the best examples of how Alternative 8A is using an ecological approach to management
Letter 4066	We strongly urge the GWNF to implement the Special Biological Area that contains all tracts above 3400' elevation This single designation will help to insure the long-term protection of an important vertebrate species, the Cow Knob Salamander
Response	In a separate action, the Forest Service has assisted the USDI Fish and Wildlife Service in the preparation of a "pre-listing" recovery plan for the Cow Knob Salamander along the Shenandoah Mountain. The hopeful result of this conservation strategy will be no further consideration of the Cow Knob Salamander as a candidate for federal listing under the Endangered Species Act The USDI Fish and Wildlife Service has been added as a "cooperating agency" in the preparation of the FEIS They provided information and expertise on the Cow Knob Salamander and ensured that provisions of the pre-listing recovery plan were incorporated into the Revised Plan
Letter 4066	The Maple Flats area, with its mosaic of sinkhole ponds, is rich in herpetofaunal (and plant) biodiversity It contains the only known viable population of the endangered Tiger Salamander in Virginia The ponds and the surrounding forest habitat is crucial to the continued survival of this species and its associates. We urge that this area be designated a Research Natural Area and be off limits to any future timber harvest This sensitive area should also be periodically patrolled by law enforcement to insure that no illegal activities are taking place
Response	Maple Flats has been recommended to the Chief as a Research Natural Area No Action has been taken on this recommendation, however the Forest Service believes that this designation will be forthcoming Refer to the introduction to Management Area 4 in Chapter 3 of the Revised Plan for more discussion on this subject
Letter 296	MA4 Special Biological Area (SBA) status does not provide adequate protection from high-impact activities and certain uses with irreversible consequences

Letter 2050 I am especially pleased to see Special Biological Areas addressing the needs of non-game species.

Letter 3537 The Heritage Program's site reports and ecological justification for proposed Research Natural Areas (RNA) and *Special Interest Areas (SIA) on the GW should provide the national standard for addressing Threatened,* Endangered, and Sensitive Species in all future management plans. We strongly urge the Forest Service to implement all of the Heritage Program's recommendations for designation, management, and Natural Areas Registry of proposed RNAs and SIAs

Letter 3537 The Wilderness Society supports the designation of RNAs and SIAs to help protect the region's ecosystem diversity

Letter 3665 Areas with non-threatened and endangered species should receive protective management to assure they not become weakened

Letter 3665 Designate six Research Natural Areas recommended

Letter 3981 EIS· 3-142, paragraph 4 - It is stated "Special Biological Areas also provide a solid foundation for maintaining *biological diversity on the Forest " A plethora of evidence indicates otherwise (see Saunders et al for a start)* Small isolated *fragments are not a solid foundation. Strike this sentence.*

Letter 4241 We strongly urge the Forest Service to implement all of the Heritage Program's recommendations for designation, management, and Natural Areas Registry of proposed RNAs and SIAs

Letter 4241 The Wilderness Society supports the designation of RNAs and SIAs to help protect the region's ecosystem *diversity*

Response The Forest Service recognizes the need to manage unique natural communities and occurrences of threatened, endangered, and sensitive (TES) species with separate management areas and specific standards The preferred alternative includes Management Area 4 contains special interest areas with biological values Specific common standards are also included for caves and TES species In many cases these communities and species are not found on private land and the Forest Service welcomes the opportunity to manage and maintain these unique elements of biodiversity on public lands for the benefit of all people These Biological Areas provide a *solid foundation for maintaining biological diversity on the Forest and will be managed for that purpose*

Letter 1357 I do not support Big Levels as a Research Natural Area

Letter 1612 I support Alt 8 except for Big Level Research National Area I want to continue to manage Big Levels, 3 Ridges, and Priest as currently utilized

Letter 1845 I support the #8 proposal except the portion dealing with Big Levels in Augusta County. The 7000 acres designated to become a research area in the Big Levels/St,. Mary's is an excessive amount of land to remove from public use Please reduce the size of your research area

Letters 1888, 1889, 1906, 1963, 1964, 1965, 1966, 1967, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 3114, 3115, 3116, 3117, 3118, 3119, 3151, 3152, 3153, 3154, 3155, 3156, 3157, 3158, 3159, 3160, 3161, 3162, 3163, 3164, 3165, 3166, 3167, 3168, 3169, 3170, 3171, 3172, 3173, 3174, 3175, 3176, 3177, 3178, 3179, 3180, 3181, 3182, 3183, 3184, 3185, 4076, 4077, 4078, 4079, 4080, 4081, 4082
The consideration of the Big Levels for a potential Research Natural Area (RNA) is an option we are completely opposed to We feel the potential restrictions as listed in the draft plan (pages 2-34 and 2-35) will severely restrict the traditional recreational uses (hiking, hunting, fishing, driving, etc) of this very popular area After considering all the options, we recommend that the Big Levels be managed under Management Option 14, 15, or 16.

Letter 1895 *I do not agree with the Research Natural Area proposal for this area [Big Levels] I would like to see this area used in the same way it has been in years past*

Letters 1953, 1954, 1955, 1956, 1957, 1958, 1959, 2067, 2068, 2768, 3058, 3146
I recommend Big Levels be managed as a "managed for wildlife habitat area" as defined under management option #'s 14, 15, 16 I am opposed to designating Big Levels as a Research Natural Areas (RNA) for the

following reasons: A. RNA could have an adverse effect on how this area is used. b RNA could limit or prevent handicap access c. RNA would greatly curtail recreational acreage and options

Letter 1980 — Recommend Big Levels be managed as a"managed-for-wildlife-habitat area" as defined under mgt. options 14,15,16. I am opposed to designating Big Levels as an RNA for the following reasons It is possible that under RNA, the amount of usage in Big Levels could be deemed excessive for an RNA area and ultimately close the area to the public; RNA could limit or prevent handicap access, RNA would greatly curtail recreational acreage and options

Letter 2694 — My most specific objection to the plan is managing the Big Levels area as a special interest area, and more importantly, its proposal for future designation as a Research Natural Area This would completely change the historical use of the Big Levels area. This area of 7000 acres is considerably larger, and almost unheard of, for designation as a RNA I question the motives behind this designation

Letter 2768 — I don't recommend Big Levels as a Research Natural Area for the following reasons. R N A could have an adverse effect on how this area is used Amount of usage in Big Levels could be deemed excessive for an R N.A area and ultimately close the area to the public. R N A. could limit or prevent handicap access and would greatly curtail recreational acreage and options

Letter 2918 — Oppose New Proposed Bid Levels Designation (RNA).

Letter 2918 — To totally close the area (an euphemism for 'restrict foot travel'?) would be an injustice to me and the few hundred area residents

Letter 3853 — The proposed Management changes upsets me To totally close the area (an euphemism for 'restrict foot travel'?) would be an injustice to me and the few hundred area residents who have grown up with this heritage and use the area often

Letter 3853 — Oppose new proposed Big Levels designation (RNA).

Letter 3927 — I am opposed to [Big Levels as a Research Natural Area] for the following reasons.

1 It goes against the traditional uses of the area
2 It reduces management options
3 It reduces access for the Handicapped and the Elderly person
4 The area proposed is much larger than other Research Natural Areas
5. It drastically reduces the amount of recreational acreages

Letter 3953 — We are opposed to long range plans for the Big Levels areas (Kelly Mtn etc) becoming LARGE Research Areas Since human activity (except for researchers) would be discouraged, excess wildlife from lack of hunting would create unnecessary damage problems for neighbors of the area.

Response — The Revised Plan recognizes the Big Levels area as a Special Interest Area (SIA), Management Area 4, and as a candidate for possible designation as a Research Natural Area (RNA). Boundary changes have been incorporated between draft and final which better reflect past management practices and uses along with public input concerning the area Neither designation of the area as a SIA, nor perhaps its future designation as a RNA, will affect traditional uses as they now occur such as hunting, berry-picking, hiking, or fishing These designations will not affect access for these activities, as it is now allowed Travel by foot is allowed throughout the area and by motorized vehicle on open roads

Additionally, the Bald Mountain Road (FDR 162) is one of the OHV routes in Management Area 11 As such, it will be managed as an open road to provide OHV opportunities

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Letter 296 — That portion of Laurel Fork which is suited for a Research Natural Area should be studied and so designated

Letter 296 — Laurel Fork, as a single unit, qualifies as a MA4A/Research Natural Area (RNA) inasmuch as it includes some of the best remaining habitat for many state-rare species and the federally-listed Northern Flying Squirrel Laurel Fork is one of the few red spruce areas east of the Allegheny Front in Virginia, and the distribution of its spruce stands "is similar to the distribution which existed before human influence "

Letter 296 — The Draft Plan fails to recommend Locust Springs Run for inclusion in the MA4A/RNA status despite the Heritage Program's find of 16 S-1 to S-3 species, on SU species (Status Uncertain) and S-2 status for the red spruce-northern hardwood forest itself. Neither the Draft nor the EIS offers any explanation for this decision

Letter 296 — The GWNF should spell out explicitly the standards by which the Slabcamp and Bearwallow RNA are to be managed during the RNA study period and its Final Plan

Letter 296 — Laurel Fork, in addition, compares favorably with the three Roadless Areas the Draft recommends for wilderness study on all other wilderness criteria· evidence of man's influence is minimal; the area appears natural; no private holdings exist, roadwork is minimal, capability, manageability and availability are all compatible with wilderness status. What distinguishes Laurel Fork from the three recommend wilderness-study areas is its unparalleled concentration of ETS species.

Letter 296 — Virginia Natural Heritage Program states that Laurel Fork contains the finest examples of northern boreal natural community complexes within Virginia, and is the only representative of the Allegheny Plateau Ecoregion within the Commonwealth. For many species of animals and plants this proposed SIA (Special Interest Area) is the only occurrence for the state.

Letter 3824 — I am opposed to MA9 status for the eastern half of Laurel Fork. The entire parcel should be designated as MA4/SBA/Laurel Fork with the additions and deletions of mgt. prescriptions I outlined in my earlier letter. I support RNA status for Bearwallow Run, Slabcamp Run and Locust Springs Holler (below the campsite)

Letter 3824 — While Laurel Fork is not a perfectly homogeneous ecosystem, it is a reasonably integrated one ETS species are found on both sides of the stream, and non-plant ETS species use both areas MA 9 status is less restrictive and less protective than MA 4. Activities that would be permitted in MA 9 would affect the biological community both there and on the MA 4 western side of the stream. Before implementing the MA 9 status, I request that the FS undertake a site-specific inventory (by species, prevalence and placement) of ETS species in the entire Laurel Fork tract. Absent such an inventory, the MA 9 proposal is premature and of questionable validity

Letter 3824 — Lacking a site-specific inventory and analysis that would justify MA9 status for the eastern half of Laurel Fork, I urge the FS to manage the entire 10,000-acre tract as MA4/SBA, with RNA status for the three runs on the western side

Response — That portion of the Forest known as "Laurel Fork" which includes Slab Camp Run, Bear Wallow Run and Locust Springs, has been allocated to Special Management Area designation as part of Management Area 21 in the preferred alternative. The unique biological features in this area are given special consideration for management.

The Slab Camp/Bearwallow drainages west of Laurel Fork are considered candidate areas for possible RNA designation

Refer to the discussion in Chapter 2 (under the heading ISSUE 1 BIODIVERSITY") and in Chapter 3 of the Revised Plan, under Management Area 21

Letter 296 — The actual number of ETS species in Laurel Fork is at least 37-48 percent higher than the 25 species listed in the Draft EIS

Letter 296 — None of the other 25 Roadless Areas surveyed in the EIS approaches the 37 ETS confirmed species in Laurel Fork

Letter 296 — Laurel Fork contains 26 percent of the ETS species listed in the Draft EIS for the GWNF as a whole.

Letter 296 — It is incumbent on the GWNF to use and/or provide an accurate, field-based count of ETS plant species found in the Laurel Fork area alone.

Letter 296 — Some 66 percent of the ETS species in the Warm Springs District are found in Laurel Fork, and 40 percent of ETS species for the GWNF as a whole are to be found there

Letter 296	It is imperative for the GWNF to provide an accurate, field-confirmed total of non-plant ETS species in the Laurel Fork area This number is likely to show that a significant portion of non-plant ETS species in the GWNF are found in Laurel Fork And some portion of these are likely to found nowhere else
Letter 296	Virginia Natural Heritage Program lists ten species in Laurel Fork that do not appear in the EIS.
Letter 296	Laurel Fork contains 33 of the 140 GWNF's ETS species--or 24 percent--identified in the GWNF as a whole.
Letter 296	The Draft EIS fails to include in its list of "endangered, threatened and sensitive" species eight such species that Theodose discovered in her Laurel Fork field research
Response	The Revised Plan recognizes the many unique biological features of the Laurel Fork Roadless Area. The Forest, in cooperation with the Virginia Division of Natural Heritage and university researchers, have included many species which occur here on the Forest list of threatened, endangered, and sensitive (TES) species This area contains the largest concentration of TES species on the Forest However, some species formerly considered rare or unique to Virginia are not on the list of TES species They were not listed due to recent inventory information provided by the Virginia Division of Natural Heritage, or they did not meet the necessary criteria for addition to the list
Letter 2664	Special interest areas and special management areas should be kept to a minimum size needed to protect unique features and to allow flexibility for future management changes The VWTF does not believe that this flexibility is maintained in the Draft Plan
Response	The Forest worked with appropriate state, federal, and private organizations in order to determine boundaries for special interest areas and special management areas Designated boundaries and management area standards allow for the flexibility needed for management
Letter 3537	Money should be requested in the GW's budget to support biological diversity inventories for rare species and their habitat, with funds so allocated to develop management plans for identified Special Biological Areas Since the Natural Heritage Programs have inventoried only about 10% of the GW's acreage, financial support for fieldwork and management plans would help ensure the identification and protection of an important component of the region's biological diversity
Response	The budget presented in the Revised Plan will support biological diversity inventories and subsequent management. Refer to the threatened, endangered and sensitive species (NFTE) section of the budget in Appendix F of the Revised Plan
Letter 2273	Six areas have been identified as potential candidates for "Research Natural Areas" These areas are currently categorized, under Alternative 8, as "Special Biological Areas" What concerns me is the possible lack of public input should such formal classification be made Perhaps some clarification could be made in the final version of the Forest Plan regarding this classification process
Response	The designation of any area as a research natural area requires a decision by the Chief of the Forest Service As such, it is beyond the scope of the revision The Revised Forest Plan, in compliance with the NFMA Regulations, only recommends areas for wilderness study This subject is discussed in more detail in the Process paper *Incorporation of the NFMA Requirements on Research Natural Areas into the Revision of the Land and Resource Management Plan for the George Washington National Forest*
Letter 1066	We feel that the proposed plan for the preservation of the existing bog or marsh areas off Peters Mill Run (west side) is, as we understand it, too severe While we have no qualms with the preservation in itself, it could be protected without closing off as large an area as discussed
Response	Boundary changes have been incorporated between draft and final which better reflect past management practices and input from agencies and the public concerning this area

Letter 2665 — *Biological areas should exclude roadbuilding, reconstruction and salvage sales in order to protect this habitat (Plan 2-27, 2-29)*

Response — Refer to Chapter 3, Management Area 4, of the Revised Plan

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Letter 3643 — Place 200-foot wide buffer zones, that are protected from logging operations and roadbuilding, around areas designated as Special Biological Areas

Letter 4268 — Plan - EPA recommends that the Management Area 4 include a guideline which will prohibit incompatible activities along the borders of the SBA's This will help to ameliorate cumulative impacts which may degrade the area over time

Response — The Forest Wildlife Biologist and Botanist have worked carefully with the Virginia and West Virginia Natural Heritage Programs and USDI Fish & Wildlife Service to define the locations of the biological areas in Management Area 4 Necessary "buffers" are built into Management Area 4

Letter 134 — Roads are allowed to be built to reach the boundaries of research natural areas (p 2-35 of plan) subjecting them to incursions by ORVs Even in Management Area 9, which is classified as "remote and isolated," "existing roads may continue to be used" (p 2-63).

Response — The existence of a road near or adjacent to the boundary of a RNA does not mean it will be intruded upon by illegal ORV activity The use of ORVs and ATVs are limited to designated routes and any illegal use will be subject to appropriate law enforcement regulations

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Letter 735 — I feel it would be appropriate to safeguard Little Cove Creek and other remnant stands of unusually large old trees by placing them in MA 4 as Special Biological Areas along with Staton's Creek and Little Irish Creek Additional such areas which I refer to as virgin forest of which I am aware are the midsections of Rocky Branch and Indian Creek, both in the Mt. Pleasant Area, the lower section of the west branch of Shoe Creek, and the upper section of Harper's Creek *Designation as Special Biological areas under MA 4 would receive little or no opposition from user groups while awarding a substantial degree of protection from disturbance (Rough preliminary boundaries are enclosed)*

Response — The Revised Plan allocates these areas to Management Area 4, 8, 13, or 21. The management of these areas is consistent with providing for old growth development and maintenance

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Letter 2273 — Under the "Research Natural Area" designation public recreation use is discouraged, or even prohibited. I assume this includes hunting and fishing activities. Vehicular use is prohibited, and roads possibly "closed and obliterated" I object to these provisions

Response — The standards referred to by this comment apply to the Little Laurel Run RNA which was established in 1938 Hunting and fishing are allowed. Vehicular use is prohibited, however, no open roads currently exist within the area If other areas of the Forest are designated as RNAs, the past uses and management practices are taken into account as plans are developed under which the area is to be managed

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Letter 2273 — *Of the six areas, I am familiar with the Skidmore area* It's inclusion as a candidate for Research Natural Area is due, I suspect, to the existence of the Cow Knob Salamander The Skidmore region also has some really nice old growth hemlocks Both hemlock and salamander flourish in spite of man's presence in this area Hunting, four-wheeling (Slate Springs Road), hiking and camping are quite popular. In fact, the Flagpole Knob area has very heavy "party" usage, as well as amateur radio "field day" activities Yet Bobcat sign, which could be considered a wilderness "indicator", is quite prevalent along the ridge-tops

Response — The inclusion of the Skidmore area as a candidate for possible designation as a RNA is not due to the existence of the Cow Knob Salamander It is due to the overall uniqueness of the Skidmore Fork watershed and condition of the forests in this area The Revised Plan recognizes this special interest area on Shenandoah Mountain as Management Area 4 which allows for continued dispersed recreational activities including those along Slate

Springs Road. The presence of the bobcat sign you mention is a reflection of habitat quality and management which has occurred and will continue in this area.

Letter 2273

As existing management plans have proven sufficient to maintain the uncommon biological resources in this area, it appears likely that the designation under "Special Biological Area" would only improve the situation There does not appear to be an overwhelming mandate to place these areas within the even more restrictive classification of "Research Natural Area" It is even possible, due to factors which we don't fully understand, that the exclusion of man's activities from these areas could have a detrimental effect on the very resources we desire to protect.

Letter 2273

The principles of "natural selection" may mean that in time some species may become extinct If the Cow Knob salamander cannot evolve to survive man's presence, then maybe it should pass away To exclude man and his traditional activities from portions of the National Forest without any substantial scientific evidence to back it up would be completely unwarranted

Response

It is true that extinction is a naturally occurring process in the evolution of species and ecosystem processes on Earth However, to say that a species deserves to become extinct if it cannot survive man's presence is a belief that very few have in our society This most basic of moral tenants manifested itself with the passage of the Endangered Species Act in 1973 The Forest Service, as policy, will maintain viable populations of all native and desirable non-native plants and animals on the Forest This does not mean that man and his associated activities will be excluded from all portions of the Forest

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Letter 3643

The Department commends the Forest Service for their foresight in establishing the 48 Special Biological Areas We believe the preservation of these unique habitat areas is an effective method for maintaining biodiversity within the GWNF. It is recommended that these Special Biological Areas be bordered with 200-foot wide buffer zones that would be protected from logging operations and road building Buffer zones, which are especially important for protecting riparian and wetland areas, would also be essential for maintaining water quality in these aquatic habitats

Response

In drawing the boundaries of the Special Interest Areas (Management Area 4) appropriate buffers were included within the areas as designated and shown in the attached maps of the Revised Plan Riparian and wetland areas will be buffered by a filter strip, shade strip, or vehicle exclusion zone of at least 66 feet from stream bank or wetland margin

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Letter 3951

Special Interest Areas - Only use to protect some species of plants and animals, geological, historical, and really special areas where "no management" activity is needed and desired If some type of management is needed then spell out the area and the management activities that would be permitted By definition most of these would be relatively smally areas Manage the Laurel Fork area with emphasis on wildlife using a combination of timber sales and prescribed burns Use the areas listed in alternative 12 and add Jingling Rocks The area known as Dolly Ann Hollow should not be any larger than 2,000 acres and managed as in the 1986 plan. Do not set up any large areas that would have the potential for wilderness designation at some point in the future

Response

Special Interest Areas are designated to protect concentrations of unique species and uncommon natural communities Many species require some type of active management in order to maintain viable populations The standards in the Revised Plan give programmatic direction on those activities which are and are not permitted in these areas The Laurel Fork area is placed in Management Area 21 of the Revised Plan with its own desired future condition and standards Dolly Ann Hollow and Jingling Rocks are in management areas which take into account their unique characteristics

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Letter 3998

These unlicensed vehicles are currently allowed use of the Taskers Gap northward up into Peters Mill Run Peters Mill Run contains a management area designed to protect rare plant species, some of which have been already damaged by ATV abusers

Response

The Revised Plan includes a Special Interest Area (Management Area 4) along Peters Mill Run. This area is adjacent to the Taskers Gap ATV area (Management Area 11) However, the Forest is unaware of any damage to the Special Interest Area caused by the use of ATVs along the designated trail This area is closely monitored for such illegal use and none has been noted.

Letter 4066 — *We are concerned about the apparent decline of the Jefferson Salamander in the Massanutten Mountain area of the Lee Ranger District. Monitoring of a population near Elizabeth Furnace for 19 years has documented a* dramatic decline in the salamander's numbers The cause is unknown, but acid rain and habitat alteration cannot be ruled out This observation may indicate a deteriorating environment in the Massanutten area and warrants further investigation The herpetofauna of Massanutten is unique and because it is essentially isolated from other montane habitats and because several species commonly found in the Blue Ridge do not occur there.

Response — The Forest is not aware of this study which shows this decline Monitoring is an integral part of the total management process. The Forest is interested in receiving additional information on this study and cooperating further with research and monitoring

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BIODIVERSITY. Threatened, Endangered and Sensitive Species

Letter 4241 — *Money should be requested in the GW's budget to support biological diversity inventories for rare species and* their habitat, with funds also allocated to develop management plans for identified Special Biological Areas.

Response — The monitoring program in the Revised Plan has been updated to incorporate the suggestions in this comment regarding inventory for PET species and management plans for areas with special biological values Plan Appendix F, under the Fund Name 'T&E & Sensitive Species Ops & Imp), displays the detailed budget information needed to inventory PET species and develop management plans for biological areas

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Letter 2665 — Coral skink is present in timber area and must be afforded protection under ESA (EIS, 3-144)

Response — The coal skink is not now listed, nor is it a candidate for listing, under provisions of the Endangered Species Act (ESA). The species is considered Forest Sensitive and population viability is considered in project level *environmental assessment*

Letter 3940 — Plan· Page 2-17, Paragraph 6 T & E species habitat needs should override Visual Quality Objectives (VQO)

Response — This is the case T&E species habitat needs and management override VQO objectives.

Letter 279 — [Suggest] fish & WL mgt. concentrate on helping threatened, endangered, or sensitive species, and controlling naturally occurring disturbances.

Letter 2515 — The rare biotic diversity found in the George Washington National Forest cannot survive the impact of the proposed management plan.

Letter 2590 — An area of concern is environmental protection, including protection of threatened and endangered species.

Letter 4241 — The Heritage Program's site reports and ecological justification for proposed Research Natural Areas (RNA) and Special Interest Areas (SIA) on the GW should provide the national standards for addressing Threatened, Endangered, and Sensitive Species in all future management plans.

Response — The Forest Service recognizes the need to manage unique natural communities and occurrences of threatened, endangered, and sensitive (TES) species with separate management areas and specific standards The preferred alternative includes Management Area 4, containing special interest areas with biological values Specific common standards are also included for caves and TES species In many cases, these communities and species are not found on private land and the Forest Service welcomes the opportunity to manage and maintain *these unique elements of biodiversity on public lands for the benefit of all people These Special Biological* Areas provide a solid foundation for maintaining biological diversity on the Forest and will be managed for that purpose

Letter 3660 What happens if a T&E spp is found in a wilderness area and requires substantial vegetation manipulation to provide habitat?

Response Management of T&E species habitat is allowed in wilderness areas and would be done if necessary after consultation with appropriate state and federal agencies

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Letter 1308 Pond Ridge and Clines Hacking are the only two ponds that have a good population size of the 4-toed salamander (Hemidactylium scutatum) along Long Run Road I would request that the areas around the ponds mentioned above be off-limits to timber harvest and ATVs

Response The area around Pond Ridge on Clines Hacking above 3000' elevation is in Management Area 4E in the Revised Plan This area will be managed foremost for its special biological features and does not allow timber harvests or ATVs

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Letter 3643 The Endangered Species staff of the Annapolis and West Virginia Field Offices of the Fish and Wildlife Service have reviewed the endangered species lists in the DEIS The listings are complete The DEIS and Resource Management Plan provide a good general discussion of endangered species resources We understand that a more detailed Biological Assessment dealing specifically with endangered species issues is currently being prepared by the GWNF A thorough review of effects on endangered species and compliance with Section 7 of the Endangered Species Act will be provided following receipt of that document

Response A Biological Assessment dealing with the effects of plan implementation at a programmatic level has been prepared and submitted to the U S Fish and Wildlife Service

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Letter 3665 Inventory should be of highest priority in areas not yet investigated The work of Natural Heritage Program in Virginia is to be encouraged and implemented as intensely as possible

Response The Revised Plan recognizes that resource inventories are important foundations for planning and management The Forest will include inventories of natural heritage resources among its ongoing work activities

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Letter 3824 I encourage the FS to consult with Michael L Fies, John F Pagels and Charles O Handley, Jr to determine the range of ETS mammals in the Laurel Fork area.

Response The Forest has consulted and supported species inventories with these researchers in the past and will continue to do so in the future, not only about Laurel Fork but on other areas of the Forest as well

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Letter 3824 Given the 2 to 3 dozen ETS species in Laurel Fork, it is obvious that representatives of such species would be adversely affected and/or destroyed if mineral development were to occur That prospect alone should trigger an environmental assessment by each lessee and the implementation of the cease-operation language where appropriate

Response More than eighty thousand Forest acres will be managed as biological areas emphasizing threatened, endangered and sensitive species On the other 900,000+ acres of Forest land, the threatened, endangered and sensitive species will receive special attention whenever encountered Potential habitat for threatened, endangered and sensitive species on this Forest occurs throughout the forest, and with so many species there are many opportunities The area needed for mineral development is, in comparison, small, and with so few developable minerals on the Forest there are few opportunities To ban mineral leasing in Laurel Fork would be to miss one of the few real opportunities the Forest has to provide access to mineral resources, and particularly, to natural gas, which is a cleaner fuel, a substitute for oil, gasoline, and coal

Mineral exploration and development are part of the multiple benefits available from the National Forest. There is a moderately high potential for billions of cubic feet of natural gas in Laurel Fork The exploration and development of the public's natural gas resources to meet public demands for natural gas is in the public interest

Emphasis on management of, and sensitivity to, the biological resources in Laurel Fork does not require foregoing management of the mineral resource Through the Federal leasing process, the Forest has extensive controls over all aspects of mineral leasing, including the siting, design and reclamation Mineral development can take place in a harmonious relationship with other valued resources The relatively small acreage needed for gas development can be accommodated in Laurel Fork. Proposed wells sites and other facilities can be moved to avoid particular areas Applicable laws governing the protection of threatened, endangered and sensitive species will apply to lease activities. Disturbed areas will be reclaimed Based on Forest analysis, it has been determined the potential impacts of minerals leasing in Laurel Fork will not significantly detract from other natural values of the area

You may wish to visit the Thornwood-Horton field well sites which were constructed about 30 years ago, or other well sites located on the forest, to see the effects on wildlife and the reclamation

A discussion on the Controlled Use Stipulation is found in Appendix E of the FEIS The details of the stipulation are added at the time that any lease is processed. A controlled use stipulation requires information specific to the particular lease It would be developed for any new lease on Laurel Fork depending upon the intent of the management direction for Management Area 21 and the actual area encompassed in a lease

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Letter 3997

In order to achieve effective conservation of rare species, we believe that mgt plans should be developed for each SBA in MA 4, including caves. Practices should be restricted to those necessary to restore, maintain, and enhance habitat critical to the conservation of Threatened, Endangered, and Sensitive (TE&S) species, and other associated natural communities The Conservancy supports the GWNF sensitive species list of organisms that occur or are likely to occur on the Forest We support the TE&S budget as outlined in the draft plan addendum which emphasized TE&S program operations, inventory and monitoring The Conservancy also believes that the most effective way to develop and update such a list is through consultation between forest biologists and state cooperators such as the Va Dept of Conserv & Rec Additionally, the Conservancy also supports a systematic biological inventory of the Forest and monitoring for TE&S species and their associated significant natural communities

Letter 4038

Replace the eighth paragraph on page 2-20 of the Draft Revised Forest Plan with the following. "PETS species residing inside of Management Area 4 and future discoveries outside Management Area 4 are carefully monitored to ensure protection of their habitats and their continued presence on the Forest."

Response

The Forest agrees with these comments and appreciates the support and concurrence Please refer to the Revised Plan for additional information on how these comments were incorporated into the Forest Plan.

Letter 3981

EIS 3-143, paragraph 6 - The last sentence is belied by Table 3-35 The coal skink is in an area managed for timber harvesting under Alternative 8. The McGraw Hollow sale propose to literally squash a population of these creatures This is not adequate protection and the final EIS should honestly tell the public this - that species will continue to be negatively impacted by logging

Response

Any occurrence of the coal skink and all other TES species on the Forest will be managed to maintain species viability regardless in which management area they may occur. Appropriate standards are included in the Revised Plan to maintain species viability on the Forest allowing for their protection and management

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Letter 3728

The WVDNR recommends specific guidelines for caves with endangered bats similar to those in the Monongahela NF Plan We would suggest one change from the MNF Plan: closure dates for VA big-eared bat maternity caves should be 3/15 - 9/15

Response

The only cave inhabited by endangered bats is well protected within a biological area allocated to Management Area 4 It is the Indiana bat, and the individual implementation schedule for that area will follow appropriate recovery guidelines The Forest does not contain caves that harbor Virginia big-earred bats, therefore guidelines for this species are not warranted If they are found to inhabit the cave(s) on the Forest, appropriate recovery guidelines will be followed

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Letter 3728

Appendix A of the [N flying squirrel] Recovery Plan suggests guidelines for habitat mgmt which should be incorporated in the Forest Plan

Response — After informal consultation (8/2/92) with the USDI Fish & Wildlife Service, it was decided that this was not necessary.

BELOW-COST TIMBER SALES: Below-Cost on the Forest

Letter 1060 — The issue of net revenues (more commonly referred to as "below cost timber sales") has become extremely controversial

Letter 1060 — The issue of negative returns has been confused to the point where the timber sale program is being accused of causing the net negative return Lost in the confusion is the recognition of the purposes behind the Multiple-Use Sustained Yield Act of 1960 which directs the Forest Service specifically to not manage the national forests for the greatest dollar return or the greatest unit output. If Congress had not done so, how would agency programs such as wilderness, recreation, fisheries and wildlife, and soil, air and water survive? None of these programs provide revenues which come close to covering expenses.

Letter 1369 — We have let ourselves get all wrapped up in issues such as "below cost" sales and forget the Multiple-Use Sustained Yield Act of 1960 which directs the FS specifically not to manage the NF for the greatest dollar return or the greatest unit output. If this congressional action had not been taken, how would such programs as wilderness, rec, fisheries, wildlife, soil, air and water survive? None of these programs provide revenues which come close to covering expanses Long-term forest mgt, needed to improve a forest's health, will always take time and money.

Letters 3447, 3448, 3449
It does not make economic sense to sell the timber at a loss and destroy future generation's chance to enjoy what many of us hold so dear today

Response — Timber is one of the multiple uses provided on the Forest While we cannot provide this timber at a profit based on the accounting principles in the Timber Sale Program Information Reporting System (TSPIRS), we cannot provide any of the other multiple uses at a profit using these same accounting principles

Alternative 8A was formulated to provide a wider array of uses, values, products and conditions on the Forest than in the past Timber management is employed to provide some of those benefits where timber management practices are the most cost effective practices and where they can be applied in such a way that the diversity and sustainability of ecosystems are maintained

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Letter 4268 — Plan - EPA encourages the Forest Service to limit the number of clearcuts to those areas which will provide above-cost returns

Response — Present policy only evaluates the total timber sale program (TSPIRS) and not individual timber sales. The Revised Forest Plan does provide Management Area 17, where timber production can be provided in as efficient and economical manner as is consistent with multiple-use management

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Letter 3822 — It is the accounting system on timber sale projects that is truly the culprit in making most sales below-cost Items such as administrative expenses and road construction quickly eat-up any revenues made from the timber resources Therefore I am truly puzzled as to why Alternative 8 with a limited harvesting scheme contains the second highest amount of road construction of all the Alternatives

Response — Alternative 8A has been formulated to be more responsive to the below-cost timber sale issue and does not include as much road construction

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Letter 3643 — Alternative 10 has the most cost-effective timber sale program alternative Since its timber sale program is only 26 percent as costly as the Alternative 8 timber sale program, the Forest Service would realize savings of $781,000 each year in timber sale administrative and operating costs

Response

Alternative 10 was formulated to present the best response that a timber sale program can provide to the issue of below-cost timber sales. It accomplishes this objective by concentrating a modest timber sale program on the more productive sites and limiting all regeneration harvests to clearcuts with minimal investments in silvicultural treatments. Alternative 10 does not comply with the national policy on ecosystem management because of the heavy reliance on clearcutting There is also a question of compliance with the National Forest Management Act in that clearcutting often cannot be proven to be the optimum method for meeting the multiple use objectives of the Revised Plan

By concentrating the timber sale program on a few areas of the Forest where there is a concentration of highly productive sites, Alternative 10 is severely limiting the opportunities for wildlife habitat manipulation on much of the Forest Analysis shows that a timber sale program is one of the more cost effective ways of providing early successional wildlife habitat. In fact, only prescribed burning proved to be more cost effective on most sites.

Letter 3660

If timber must be accountable for being below-cost, so should all other resources. Before you take away private sector jobs, you must clean your own house first

Response

None of the resource programs on the Forest would be above cost when revenues are compared to expenses under an accounting system similar to TSPIRS This fact, however, does not lessen the intensity of the national *issue of below-cost timber sales*

Letter 3675

I don't like the idea of the Government spending more to harvest than they receive

Letter 3703

If you must continue cutting timber in some areas, then charge enough for it to turn a profit

Response

Congress has never directed the Forest Service to base its management of the Forest on producing a profit. The Forest Service may sell timber in order to achieve the purposes of the Multiple-Use Sustained Yield Act. The Forest is responsible for preparing its budget at a level which effectively accomplishes the direction set by its land management plan

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Letter 1060

According to the DEIS, Alternative 8 provides no increase in the total income However, under Alternative 12, the total income would increase by $4 million These increased benefits (including tax revenues to the government) are not measured in the financial accounting of a timber sale.

Response

The "projected net revenue" displayed in Graph 2-25 is an indication of the estimated cash flow of the timber sale program for each alternative. The definition of a below-cost timber sale program is based on the timber receipts compared to the total costs of the timber sale program.

While socio-economic effects, such as the number of jobs or income, might be used to justify the selection of a particular alternative, it cannot be included in the calculation of projected net revenues.

Letter 2582

I am not opposed to harvesting the timber in the National Forest I am opposed to inefficient management. If the government can't make money on this where private companies could, I believe the free enterprise system should be given a chance to work I think you should get out of the business and contract the work to someone who can turn it from a $1.2 million loss into a profit center.

Response

The Forest planning process does not allow this option Only Congress can change the multiple use mission of the Forest Service.

Letter 3660

Forest Standards 756 C&H add cost to roads Timber should not foot the bill

Response

The "Vegetation Management Contrast Reducing Techniques" are mitigation measures applied to specific projects to ensure compliance with the appropriate visual quality objective Forest Service policy is that timber management funds must pay for the mitigation measures associated with any timber sale

Letter 151 — If in fact the draft Plan anticipates this being a below cost timber sale situation for the Pedlar District, I would like to hear the arguments in favor of planning the large program outlines I doubt that any explanation can be good enough to justify the U S taxpayer losing money, especially in Virginia where the economy is highly diversified

Response — All cost and revenue values are based on forest-wide values. A full range of annual timber sale volumes (from 0 to 68 MMBF) is analyzed in the fourteen alternatives considered in detail in the FEIS

Letter 974 — Areas that cannot be preserved should be properly managed to produce the maximum return for the taxpayers benefit, be it timber sales or recreational values

Response — The Multiple Use—Sustained Yield Act ant the National Forest Management Act prohibit the management of national forest lands SOLELY for the production of maximum returns to taxpayers Instead, the alternative selected as the Revised Plan must provide the mixture of uses, values, products and environmental conditions that maximizes net public values

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Letter 978 — Stop subsidizing the timber industry by selling timber below cost.

Letter 502 — All timber sales should be by bid and not awarded unless a reasonable profit is arrived at For grazing leases & timber contracts to be below the current market value is wrong because it subsidizes a select few to the detriment of the public, i e , owners

Letter 1885 — For whatever logging is allowed, definitely CHARGE the timber companies at least the FULL COST of your preparation! I see it as a disgrace for the FS to subsidize timber companies' cutting of NF land! I believe such subsidies unjustifiably enrich timber executives and encourage them to destroy the only remaining wilderness-like areas left, rather than using smaller privately owned wooded areas less functional as whole ecosystems In fact I encourage the FS to charge fees as high as what private land owners charge for similar quality timber, and use any profit to help restore damage to the NF by past logging and other human activity

Letter 2732 — No pulpwood should be harvested Charlottesville and every community in America want to recycle its newspaper and junk mail into new paper products Those efforts are stymied as long as you provide paper mills with virgin pulp at below-market prices

Letter 2885 — I am vehemently opposed to harvesting timber and selling it for market prices that discourage recycling.

Letter 3603 — If there is a sale of timber to the timber industry, let it be at market prices.

Response — Timber sales are appraised at fair market value according to 36 CFR 223 60 There is no federal regulation that requires the Forest Service to receive a profit on the sale of timber Sales are awarded competitively from sealed bids to the higher bidder, most often significantly above the advertised price This process does not provide a subsidy

Timber from private lands is usually of better quality that that from the Forest This is because private land generally has more productive sites Logging costs are usually less on private land because it is more accessible Both factors lead to higher stumpage values for timber off private land

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Letter 1060 — A recent Forest Service study conducted on the GW forest, shows the cost of management for non-timber programs is reduced by implementing a timber sale program

Response — Vegetation manipulation for developing and maintaining diverse habitats for wildlife, visuals or public safety can often be accomplished at less cost by using a timber sale

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Letter 1082 — Perhaps I am partial because I don't like trees to be cut or roads built, but both of these actions cost money We've got to cut federal spending and this seems like a good place to start to me

Response

It is beyond the scope of the Revised Plan to cut the federal budget. The Forest is responsible for preparing its operational budget at a level which most effectively accomplishes the direction of the Revised Plan It is up to the Administration and Congress to decide how much of that budget to fund

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Letter 1097

The loss of over a million dollars a year because of the program costs which exceed revenues from loggers just does not make sense Selective cutting techniques make much more sense

Response

Analysis displayed in the FEIS indicates that selective cutting will be more costly than the even-aged regeneration harvest methods and will result in more land being affected to achieve the same level of harvest

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Letter 1850

If good business principles were applied, this forest should return a profit for the taxpayers each year just as the stockholders expect from any business

Response

The George Washington National Forest is not a business. It is a government agency charged with providing uses, values, services and environmental conditions to meet the needs of the American people The managers of the Forest try to do this in the most cast effective manner.

Letter 2577

In addressing the below cost issue, what steps have been taken and how much progress has been made in reducing sale preparation costs? Has a comparison been done between costs incurred for timber sale preparation by private timber companies in the Eastern Region and Federal timber sale preparation costs? What portion of timber sale costs are attributed to uses other than timber? These would include additional costs necessary to satisfy wildlife needs, visuals, recreation uses, etc. In determining the costs associated with timber sale preparation, consideration should be given to the reduction in economic efficiency by meeting other resource needs. The cost of meeting the other resource needs and the effect on economic efficiency of individual timber sales should be clearly displayed.

Response

The Forest Service, as directed by Congress, developed the Timber Sale Program Information Reporting System (TSPIRS) to evaluate the performance of the Timber Sale Program on individual National Forests The first official report began in FY1989 The Forest has reduced costs in each of the two years since the first report The TSPIRS report does display other cast associated with the Timber Sale Program The Forest Plan sets direction for achieving efficient management of all the forest's resources

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Letters 2664, 2853

"Based strictly on income derived from timber harvesting, few if any timber sales on the GWNF are above cost Timber harvesting is the primary tool used to create a diversity of wildlife habitats on the Forest, therefore it is critical to maintain an active timber sale program which takes into account the intangible as well as tangible benefits of timber harvesting "

Response

The TSPIRS report recognizes the other non-tangible resource benefits of the Timber Sale Program The Revised Plan recognizes and provides for their benefits also through the Timber Sale Program

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Letter 2636

We repeat our skepticism expressed in our 3/8/92 letter about the reliability of the 27% figure for sawtimber as a ratio of total volume harvested. The TSPIRS figures give a lower percentage Use of an inflated sawtimber volume will skew the results to make them look more profitable than they really are

Response

The Revised Plan places emphasis on harvesting higher value sites more so than the 1986 Plan The Forest has been improving timber sale revenues in recent years by increasing the rates of sawtimber and marketing timber sales Current uncut volume under contract is 27% sawtimber Timber sold during the first 3 quarters of FY1992 is 30% sawtimber The 27% estimate for sawtimber is not inflated.

Letter 1990

The accounting and terminology must be changed so that "below-cost timber sales" do not continue to make the Forest Service sound foolish for allowing prudently harvesting the timber resources of our public lands. Also, it may be necessary to modify and relax road and other design standards, or to spread the cost of staff and improvements among more projects

Letter 3953

We urge accounting changes that will eliminate the fuel for environmentalists to claim "below cost", and also to ascertain that REAL below-cost sales are NOT made.

Response

Any suggested changes to the Timber Sale Program Information Reporting System (TSPIRS) are outside the scope of the revision of the Forest Plan. Procedures for the Financial Report have been developed by the Washington Office with the assistance of GAO and Congressional oversight

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Letter 1060

The GW needs long term investment. Strict financial accounting fails to consider the benefits of such investments However, sound land stewardship calls for this type of investment.

Response

The decision making process for the Revised Plan does considers more than just strict financial accounting However, those values that can be quantified, such as Present Net Value (PNV) and cash flow are disclosed

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Letter 3665

Reduction of clear-cut, even-age silviculture is encouraged. What timbering is allowed should reflect protected habitats and no below-cost timber sales should continue.

Letters 3985, 3986

Economically and environmentally, GWNF would provide the greatest benefit If continued commercial sales for any purpose including wildlife habitat manipulation were limited to those which directly return to the federal treasury more money than they consume for roads, site preparation, reforestation, and all other real costs.

Response

The below-cost timber sale issue will be resolved by National direction (either Agency or Congress) and not within the revision process.

Letters 3985, 3986

Include all categories of timber sales regardless of their supposed benefits and including salvage sales in one timber projection and in the Allowable Sale Quantity and require each timber sale to return all associated costs to the treasury through timber sale receipts

Response

All sales from land suitable for timber production will be included in the Allowable Sale Quantity Those from lands unsuitable for timber production will not The below-cost timber sale issue will be resolved by National direction and not within the revision process.

Letter 3821

The country cannot afford to spend money on roads in the forest while the treasury loses money on the timber sales.

Response

Federal funds are used for having our national forests managed and protected for the resource values they are capable of providing Roads are built and used for recreation and wildlife management, as well as timber management Timber sale receipts and other revenue collected help to offset the costs of managing the forest There will not necessarily be a savings if logging is eliminated

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Letter 3939

[Re Alt. 8] Group selection is the most expensive harvest system which will add fuel to the below-cost issue This will lead to greater demands from the preservation community for the elimination of timber management on this Forest.

Response

Alternative 8A has been formulated to be more responsive to the below-cost issue and does not include as much uneven-aged management

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Letter 4001

Timber sales must in ALL CASES be priced so as to realize a profit to the Govt after taking into account ALL COSTS of mgt of the timber, including direct and indirect costs of the sale itself

Response

Alternative 6 was formulated to incorporate this philosophy Stage 2 timberland suitability analysis demonstrated that only the highest sites with quality sawtimber could meet this requirement AND only through the use of clearcutting It has been concluded that no alternative with a feasible timber sale program that was sensitive to other environmental concerns could be formulated to meet this requirement

Alternative 6 is considered in detail in the FEIS It will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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BELOW-COST TIMBER SALES: Opposition to Below-Cost Timber Sales

Letter 3567 — To develop a sustainable program which doesn't lose money, the GWNF should develop a smaller timber program based on marketing high quality sawtimber serviced by the existing road system. By marketing the highest quality timber with minimal roadbuilding it should be possible to greatly increase the efficiency of the *timber program. By staying off of low productivity sites (those below SI 50) we can also improve costs. There* should be no timbering in SPNM and the existing roadless areas

Response — Alternatives 11 and 13 have been reformulated in the FEIS to explore two versions of this proposal As displayed in Graph 2-25, both of these alternatives have negative "projected net revenues", hence below-cost timber sale programs.

Letter 52 — We're really fed up with your give-away of pulpwood to Westvaco We see the pattern emerging of pillage of all low elevation wooded areas, many of which have already been severely cut. Now you're cutting between the previous clearcuts

Response — The management area allocation approach to ecological management results in some areas being intensively managed for timber resource production to meet the needs of an expanding human population This leaves *many other areas available for non-timber resource management*

Letter 61 — The taxpayers should not subsidize logging or other commercial activities These uses should pay their own way, including the costs of mitigation, monitoring, and enforcement.

Letter 869 — I am tired of hearing of how we taxpayers subsidize the U S. Forest System to build miles of unnecessary roads and promote destruction to our nations forest

Letter 1089 — I am concerned over the building of new roads in the GWNF I have read numerous articles on road building and logging on NF lands at a loss It is appalling that during these tight budget times, we are spending Federal money to have our forests cut There is no place for a "National Forest Welfare System" for the logging industry

Letter 1288 — We are opposed to the selling of our public forest timber at a loss

Letter 1329 — "Below cost" timber harvest should be discontinued.

Letter 1370 — Eliminate "below cost" timber sales and salvage sales of lumber

Letter 1429 — Harvest of timber at a loss is inexcusable in this time of budget deficits The cost of building roads and other hidden costs should all be included in calculating the cost of harvesting

Letter 1642 — I am opposed to the continued harvesting of timber in the Forest, especially the harvesting of timber where the *expenses far outstrip the revenue*

Letter 1847 — Alternative #8 allows below cost timber sales that could add up to a cost of over 1 million dollars a year in taxpayer subsidies

Letter 1869 — I am opposed to below-cost timber sales

Letter 2048 — Eliminate all "below cost" timber sales, salvage sales of lumber, and associated road building and reconstruction so that the financial burden from such activities is removed from the backs of taxpayers

Letter 2066 — I am opposed to below-cost timber sales for the commercial portion of the timber program. You should structure the various activities related to commercial timber sales to achieve at least break even on the average each year and be consistent with adequate regeneration to be sustainable over the life cycle of the trees You can do this

	by eliminating unnecessary overhead and by improving timber stand selection so that high value timber is harvested
Letter 2366	Get GWNF out of the subsidized pulp business! In an era of unprecedented federal debt, and a need to implement cost-effective paper recycling, we owe the taxpayer nothing less
Letter 2510	Permit no below cost timber sales, and all timber sales should meet cost without resorting to clear-cutting
Letter 2575	I favor clearcutting, or timber cutting, if taxpayers are not losing money, that is, the govt paying to put roads in that cost more than they get for the timber.
Letter 2710	All cutting GWNF loses money. This has got to stop
Letter 2740	I want to see an end now to subsidized timber sales so the private landowner can get a reasonable price for his or her trees
Letter 2827	I object to below-cost timber sales to benefit a few powerful companies
Letter 2868	The Forest lost over 1 3 million dollars on its timber sale program in 1991 The Plan should reduce harvesting and roadbuilding so as to avoid or at least minimize that loss The Forest Service should stop subsidizing the private timber industry with below cost sales
Letter 2922	I would like to see the timbering operations operated at a profit if at all possible, or at least on a break even system
Letter 3512	Any plan should be cost effective in other words, timber should be sold for enough to cover the loss to the forest
Letter 3521	Please stop subsidizing the logging industry
Letter 3540	We do not support below cost timber sales
Letter 3544	I an very opposed to below cost timber sales
Letter 3544	In a time when our national government is so deeply in debt, it seems almost criminal that we should be selling off our national forest heritage to lumber and pulp companies at below market cost
Letter 3545	Below-cost timber sales should be eliminated entirely, both from the standpoint of the Federal Budget and for retaining the integrity of the Forest for wildlife and recreation
Letter 3566	Why has the National Forest kept timber prices artificially low, to the enrichment of a few large entrepreneurs, but to the detriment of the small wood-lot owners?
Letter 3640	"Below cost" timber sales should be eliminated.
Letter 3666	I strongly oppose the harvesting of timber from the George Washington National Forest at taxpayer expense I believe this practice results in unfair competition with private landowners
Letter 3680	No below-cost timber sales Below-cost sales are poor management decisions. We cannot afford to short sell our Forest in any way
Letter 3703	It doesn't make any sense to lose money and lose the trees too
Letter 3809	The subsidy of private timber operations with tax dollars must cease.
Letter 3861	Timbering operations should not involve a subsidy to harvesting companies/corporations Forest expenses incurred to assist timber cutting should be recouped through charges for such operations. Alternative 8 as it now stands will cost us taxpayers a million dollars a year just to help out the Lumber Industry!
Letter 3924	Phase out the sale of timber on terms that, with all current overhead taken into account is a net loss to the Forest Service If local industries are unable to pay enough to fund the current operating expenses of the Forest Service -- which does not take into account the rent-free use of the land -- then over the long run, they should phase

out The economic distortions produced by an even larger subsidy are not in the best interests of the country The Forest Service's budget should be spent employing more personnel, with an effort to fund studies on long-term preservation of a viable balanced use.

Letter 3957 — We would like below-cost timber sales phased out and new road construction reduced to a minimum.

Response — Resolution of the below-cost timber sale policy will be decided at the national level It is beyond the scope of the revision process to resolve this issue

Taxes are used to have our National Forests protected and managed for the resource acres that they are capable of providing such as recreation, timber, water, wildlife, etc Timber receipts and other revenue collected help to offset the costs of managing the National Forest system. There will not necessarily be a "savings" if logging is eliminated

Timber sales are appraised at fair market value according to 36 CFR 223 60 There is no federal regulation that requires the Forest Service to receive a profit on the sale of timber Sales are awarded competitively from sealed bids to the highest bidder, most often significantly above the advertised price This process does not provide a subsidy.

The cost of road building is included in calculating the cost of the Timber Sale Program The Timber Sale Program Information Reporting System (TSPIRS) defines what costs are appropriate

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Letter 134 — Mix of Logging Products - Only 27% of wood products on the Forest is saw timber (p B-26 DEIS), the most valuable product Instead cheap pulpwood is the main product of the Forest (p. B-25, DEIS) Much of this pulpwood comes from young growing stock and is sold at below cost as documented in your own paper Thus valuable public timber resources are being squandered at a loss to taxpayers and to the benefit of large polluting pulp companies such as Westvaco and with great ecological destruction.

Letter 491 — Cut primarily large trees with long growing cycles, both quality hardwood and (quality) softwood

Letter 500 — Because of the low price for pulpwood compared to sawtimber (EIS table B-9), the percentage of pulpwood production should be reduced relative to the production of sawtimber; conversely, the production of sawtimber should be increased relative to the production of pulpwood

Letter 500 — Working group Site Index 50 has only 13% sawtimber and 74% pulpwood (EIS table B-10) The average sawtimber percentage of annual G W timber production during 1977-89 years is 27% (EIS p. B-26) The FY 1991 TSPIRS report shows this dropped to 23 8% If economic efficiency is to be increased, it appears necessary to drop the Site Index 50 working group from the suitable base Because the Site Index 60 working group has only 22% sawtimber vs 66% pulpwood, it also may be desirable to reduce the percentage of working group Site Index 60, if substantial improvements in economic performance is to be achieved

Letter 504 — I would urge that timber cutting be limited to quality soft and hardwood

Letters 766, 767, 933, 982, 1297, 1443, 1652, 1823, 1886, 2010, 2053, 2674, 2498, 2705
Timber management should stress large, quality hardwood and softwood sawtimber (with longer growing cycles) rather than smaller, low quality pulpwood

Letter 877 — Your new proposed plan allows far too much timber cutting--this should be restricted to areas bordering existing roads and then only slow-growing quality hardwood and softwood sawtimber should be taken

Letter 938 — We don't need more pulpwood or below-cost timber sales.

Letter 981 — Timber management should stress large, quality hardwood and softwood timber, with longer growing cycles This should improve the economics of the timber program

Letter 1069 — Plant large, quality hardwood and softwood trees rather than low quality pulpwood trees.

Letter 1076 — Harvesting of trees within the eastern national forests has been done at a significant financial loss compared with the cost of cutting Timber mgmt should move into the area of quality hardwoods over pulp wood growth.

Letter 1149 Timber management should stress mature hardwood and soft wood species with long growing cycles on a renewable and sustainable yield basis

Letter 1317 Harvest should stress the better hardwood and softwood sawtimber.

Letter 1557 Any reasonable plan must stress management of large, quality hardwood and softwood sawtimber with long growing cycles

Letter 1615 The Forest Service continues to lose money on timber sales. Clearly, biological values must be considered first, then economic If both can't be met, the sales should not go forward. Emphasis needs to be placed on high quality hardwood, not pulpwood

Letter 1884 Pulpwood production should not be the business of a National Forest

Letters 2007, 2227, 3619, 3892
The current 73% harvest rate of pulpwood should be reversed to stress harvest of large, quality hardwood and softwood sawtimber with long growing cycles.

Letter 2223 The useless clearcutting, and road building in our National Forests must stop. When timber harvesting has to be done, take only the oldest trees, leave the rest alone

Letter 2308 It makes sense for the Forest Service in a new GNWF management plan to move away from pulpwood sales which for the most part lose money and instead to concentrate on sawtimber The nation does not need national forests to raise pulpwood, a super abundance is available from private woodlands - provided the private owner is not competing with the below-cost, subsidized price of national forest pulpwood

Letter 2364 Timber management should stress large, quality hardwood and softwood sawtimber, with long growing cycles, over smaller, low-quality pulpwood Pulpwood can be produced on private lands and have the commercial possibilities of a long-term investment for the owner. The development of mature stands of hardwood can only be done by the govt. Therefore a new classification of forest mgt Mature Hardwood Mgmt. could be created Large tracts of land managed for two or three hundred years with selective cutting of chose trees harvested upon maturity

Letter 2710 Timber cutting should be managed to produce on long growing cycles, rather than using trees for growing pulpwood

Letter 3512 Only mature trees should be cut--no pulpwood If harvesting is limited, the new road mileage can likewise be limited

Letter 3529 Timber cutting - currently 73% of wood cut is for pulpwood of low quality Timber management should stress large, quality hardwood & softwood saw timber with long growing cycles

Letter 3566 In Virginia, there is little or no need for pulp-wood cutting from the National Forest. Let the woods grow and take only high quality, mature timber

Letter 3732 The reduced level of timber that is harvested should stress large, quality hardwood and softwood sawtimber, with long growing cycles, over smaller, low quality pulpwood.

Letter 3963 The Advocate, April, 1992, pg 10 The plan ought to call for less pulpwood and more hardwood That would help the loggers

Letter 3984 I suggest that you reverse the percentages so that three-fourths of the timber cut be sawtimber, and only one fourth or less to be used to make pulp You are cutting trees too young. This doesn't even make economic sense

Letter 3695 Stress hardwood logging over pulpwood sales.

Letter 3705 Improve the economics of below cost timber sales with a focus on high-quality saw timber as opposed to low-value pulp wood Timber harvesting should take advantage whenever possible of the existent road and trail network as opposed to building new roads into roadless areas

Letter 3911 Timber mgt should stress large, long-growing hardwoods and softwood sawtimber, instead of the low quality pulpwood that currently makes up some 73% of the annual GWNF harvest.

Letter 3942 Currently about 73% of the timber harvested in the George Washington National Forest is used for pulpwood I think it is unwise to rely on our public lands for such a low value product I would like to see more emphasis on high grade saw timber. Stop clearcutting large areas on the forest for pulpwood and let trees grow for future harvest of better quality and more valuable sawtimber

Letter 3945 Below-cost timber sales are prevalent and need to be eliminated, through a concentration on high-quality timber harvesting, rather than low-quality pulpwood.

Letter 3945 Increase concentration of timber harvesting on the high-quality sawtimber and reduce harvesting of low-quality pulpwood

Letter 4034 Only 27% of products on the Forest is saw timber (p. B-25, DEIS) Much of its pulpwood comes from young growing stock and is sold at below cost Thus valuable public timber resources are being squandered at a loss to the benefit of large polluting pulp companies with terrible ecological destruction

Letter 4220 Roanoke Times & World News 15 Apr 1992. This steep, mountainous land is more expensive to operate in than flat terrain. While there are pockets that produce high-quality sawtimber or veneer logs, more than two-thirds of the timber is used for pulpwood Pulpwood has very low value and is extremely plentiful The Forest Service spends some money to minimize the damage on archaeological sites, rare plants and animals, scenery and streams (It would be a good thing if private landowners also did so) But even if this extra cost is excluded, the national forests still lose money Sad, but true

Letter 4266 Timber harvest methods should be directed at large high-quality saw timber rather than the pulpwood which now comprises so much of the harvest.

Response The Forest Service preferred alternative explores the use of timber management to achieve other resource benefits. To achieve the mix of resource benefits inherent in the Forest Service preferred alternative, some site index 50 and 60 lands need to be included in the lands suitable for timber production

Harvesting a higher amount of sawtimber is one method to increase revenue from timber sales A higher reliance on harvesting just sawtimber, however, will not meet the goals, objectives and desired future condition of the Revised Plan.

Timber in a stand is harvested to provide wood products and to provide regeneration of the stand or to provide improved growth of remaining trees To accomplish all these things pulpwood size trees must be cut along with the sawtimber. The smaller trees are not younger, they have just been in a lower crown position in the stand and diameter growth was slower than other more dominant trees

Many sites are capable of growing good quality sawtimber However, they are often stocked with damaged, sparse or low quality stands of timber that will never produce quality sawtimber. In such cases, it is best to harvest the stand and begin regenerating new trees that will have a better chance to develop into quality sawtimber.

Pulpwood is harvested in conjunction with sawtimber to achieve the necessary silvicultural treatment to assure adequate regeneration to desirable species. Utilization of useable portions of a tree where markets exist must also be considered. Most pulpwood comes from the harvest of low quality mature stands and top wood from mature sawtimber trees. Harvesting only sawtimber would not provide for adequate regeneration or provide for suitable wildlife habitat.

Letter 3756 The cutting of trees for pulpwood should be curtailed, and the forest should be managed with a focus upon reasonable--and FAIR MARKET VALUE--harvest of timber for lumber production only

Response Timber sales appraised at fair market value according to 36 CFR 223 60 There is no federal regulation that requires the Forest Service to receive a profit on the sale of timber Sales are awarded competitively from sealed bids to the highest bidder, most often significantly above the advertised price This process does not provide a subsidy Pulpwood is harvested in conjunction with sawtimber to achieve the necessary silvicultural treatment to assure adequate stand regeneration to desirable species Pulpwood is also harvested from low quality or

mature stands in order to provide vegetative manipulation to meet desired future conditions Pulpwood is used to produce a variety of products

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Letter 1060 — Under Alternative 8 there will be a net revenue loss of $1 05 million Under Alternative 12, the net cost benefit ratio is improved If one is concerned with reducing the net negative return, Alternative 12 presents a viable option

Response — As displayed in Graph 2-25, both Alternatives 8 and 8A have a smaller negative projected net revenue than Alternative 12. These differences are due to changes made in the reformulation of Alternatives 8 and 12

Letter 2282 — The Forest Service is not known for its efficiency If Alternative 8 is made the GW Plan, you efficiency will drop even more

Response — As displayed in Graph 2-25 of the FEIS, Alternative 12 has a "projected net revenue" of -$918,000 per annum This involves a greater loss than the -$683,000 per annum projected for Alternative 8A

Letter 1987 — - Timber harvesting and associated activities When the costs of road building are included, it becomes obvious to us that continuation of timber sales in the GWNF is senseless While these activities cost the taxpayer money, they also flood the timber markets with unneeded production which devalues private timber holdings and hence the local tax base Timber harvesting and its attending road building also strike directly at the scenic and environmental assets that Nelson County is depending on for its economic future For similar reasons timber harvesting as a result of wildlife mgt and gypsy moth damage control as envisioned in Alt. 8 will serve no purpose other than to divert public funds much needed elsewhere

Response — Most of the National Forest land in Nelson County is recommended for wilderness study in the Forest Service preferred alternative These lands are not suitable for timber production Felling of dead or dying trees without removal could occur in these areas to provide for public safety There is a small amount of National Forest land in Management Area 15 that is suitable for timber management to help achieve the desired future condition for wildlife habitat

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Letter 2325 — Our country is too broke to build more roads to sell timber at a loss

Letter 2501 — This letter is in protest of the sale of any of the National Forest for timber sales other then for small amounts of firewood At a time when the Federal Government claims to be in a financial crunch, we cannot afford to give away any more park land

Response — It is beyond the scope of the revision to resolve concerns with the Federal budget The Forest Service is responsible for preparing its operating budget at a level which most effectively accomplishes the goals, objectives and desired future condition of the Revised Plan It is up to the Administration and Congress to decide on the budget

Alternative 6 is considered in detail in the FEIS This alternative has no lands suitable for timber production. It does, however, permit fuelwood gathering and a small amount of timber harvesting for salvaging and miscellaneous products It will be selected as the alternative to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2808 — Logging should only occur if it creates a profit for the Federal Government or at least a break even transaction

Response — Taxes are used to have our national forests protected and managed for the resource uses that they are capable of providing such as recreation, timber, water, wildlife, etc Timber receipts and other revenues collected help to offset the costs of managing the national forest system There will not necessarily be a "savings" if logging is eliminated

Letter 3660	You must be more efficient in number of road miles and acres harvested No wonder you're so below cost
Response	The preferred alternative has been formulated to reduce road miles compared to the Draft Revised Plan

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Letter 3710	A much more thorough analysis of the potential costs and benefits of this practice (salvage) must be conducted before it is endorsed in the final planning documents
Response	*Determination whether to employ salvage treatment will be made at the project level based on site specific* evaluation

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Letter 4044	Alternative 8 should be modified by further decreasing or entirely prohibiting its below cost timber sales program so as to meet the public demands for recreational activities which retain the forest's natural resources
Response	*Recreation demand is being met Reducing the timber program will do nothing to increase recreation demand*

BELOW-COST TIMBER SALES: Effects of Timber Harvests on Local Communities and Economies

Letter 190	Alternative 12 increases total jobs by 194 This is 215 more jobs than in Alternative 8
Letter 190	Alternative 12 increases timber industry by 78 This is 145 more jobs than Alternative 8.
Letter 1060	Alternative 8 reduces total employment and employment within the timber industry Total employment would be reduced by 21 jobs, while 67 timber industry jobs will be lost under Alternative 8 By contrast, Alternative 12 will *increase total employment by 194 jobs and industry jobs by 78 The agency should not take an action which* will eliminate jobs outside the government, especially when it can be avoided without sacrificing environmental protection.
Letter 2181	*Alternative 12 creates 78 additional jobs, while protecting other values of the forest*
Letter 2184	From what I hear about Alt 8, I won't be able to work because of the reduced timber cut.
Letter 2204	Reduced harvest volume will result in a loss of 67 jobs when unemployment continues to increase in the region
Letter 2296	I ask for you to change to Alternative 12 because I might not have a job if you don't
Letter 2348	Alt 12 provides jobs, especially in the timber industry and shows an increase in total area income
Letter 2886	At a time of high unemployment, we find it disturbing the Forest Service would choose an alternative that would reduce total employment in the affected area by 21 jobs By selecting Alternative #12, a more balanced multiple use plan, total area employment would increase by 194.
Letter 3823	*We urge the adoption of Alternative 12 because [it] provides an increase in available forest industry employ-* ment
Letter 3904	[We support Alternative 12 because it] would create more jobs and increase the total income in the timber industry,
Letter 3956	Timber jobs are important: they represent good wages, productive, clean, renewable work Service jobs -- recreation -- are low-paying, minimal wage and produce nothing
Letter 4257	Alt. 8 will eliminate at least 21 jobs
Response	*Appendix B has been rewritten to explain the assumptions inherent in the estimation of changes in employment* and income displayed in Figure 2-34 and Table 3-23 of the DEIS The new employment and income figures are displayed in Tables 3-19 and 3-20 of this FEIS The estimated decreases or increases in employment and income should be viewed as potential increases or decreases rather than as absolute numbers The Regional

Forester will weigh this potential for gain or loss of employment as one of the factors considered in selecting the alternative to serve as the Revised Plan.

In the job and income estimates by alternative, we are assuming that as timber declines from current levels, jobs and income will decrease also The numbers should be interpreted as potential estimates only and only show that relative impacts may occur by alternative.

Letter 11 — The Alternative 8 disregards the economic impact of reducing timber harvesting to 27 MMBF annually.

Letter 12 — You must supply the local people with a living You must ensure all of us have abundant and high quality wood products.

Letter 48 — The Draft Management Plan has several areas that will directly have a negative impact on the economy of our community and W M Cramer Lumber Co

Letter 53 — The forests in Virginia are second to agriculture in providing income/jobs in the Commonwealth The draft revised "plan" does not adequately insure that the renewable resources of the Forest will be used at a maximum

Letter 66 — Many people depend on logging for a living in the area Many schools and counties depend on taxes for assistance with their programs

Letter 73 — The timber harvests are a significant economic boost to many of the communities in the heart of the national forests and such a reduction in harvests will harm these local economies.

Letter 74 — There are those employed in the forest prod industry, as well as local economies adjoining the National Forest, that are very dependent upon the products derived from the Forest

Letters 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 141
The local economies are still suffering from the recent recession Why subject the economy to such a drastic decrease? The timber harvesting program provides a substantial amount of money to the local economy as well as generating income for public roads and schools

Letter 136 — Maintain timber harvest at least at current levels so that dependent industries and communities in and around the forest can survive The money returned to these rural counties from forest revenues is also most important to local governments.

Letter 145 — We believe that the George Washington National Forest has an affirmative responsibility to the many communities it dominates with regard to forest resources The region is diligently seeking economic opportunity for its citizens and the National Forest has the capacity to contribute to regional economic stability by actively marketing wood raw materials in a reliable fashion Alternative 12, while only providing a small fraction of the wood which the Forest could yield, does allow for some promotion of the regional forest economy.

Letter 150 — This plan would reduce the annual harvest by over 40% and only 24% of the total acreage would be classed as suitable for timber production. This is drastically lower than current levels, which would destroy the local economy that depends largely on the National Forest.

Letter 186 — Timber production from the GWNF represents an important part of the economies of many of our rural counties

Letter 286 — I support Alternative 12 as the best management plan for the people of West Virginia This plan will help secure jobs and add to the tax base, both of which are desperately needed in West Virginia

Letter 289 — Our county needs jobs Our society will not survive as one big National Forest without wise use

Letter 293 — Please remember that some communities depend on the timber harvests for their livings

Letters 374, 765, 1428, 1633, 3939
Alternative 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the regional forest economy.

Letters 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

The National Forest has the capacity to contribute to regional economic stability by actively marketing wood raw materials in a reliable fashion Alternative 12 does allow for development of the regional forest economy.

Letter 430 Alt. 12 is the best plan by reason of our poor economy. Our country cannot stand any more loss of jobs

Letter 442 I am concerned about the impact of Alt 8 on the economy and the timber industry.

Letter 443 I support Alt. 12 because of fear of lost jobs in the lumber [industry].

Letter 488 [Alternative 8 has] .a lower allowable sale cut of timber With this reduction would come the loss of many jobs and the closing of businesses. With the lost jobs and industry, the tax base obtained from the sale of timber would affect the local economies, schools, or social programs in these areas.

Letter 490 In the past, the forest has contributed to the development of a stable economy in the area and it has a responsibility to continue this contribution through goods and services it can provide. Alt 12 is a good plan that will allow area communities to enjoy a stable economy while at the same time allow for expanded use by recreational visitors

Letter 516 I am in support of Alternative #12 due to the fact that it will increase and maintain employment

Letter 518 I support the #12 issue over #8 because of more jobs that will pay more than minimum wages

Letter 526 I oppose Alternative 8 and support Alternative 12 because it provides more jobs and better economy

Letter 530 I am for cutting timber in the National Forest because it gives people jobs and helps support the community

Letter 532 This is to express my support of Alternative 12 Because it means the future of the productive use of our nation's wood lands. Also, it means the livelihood of many towns and the means of income for many thousands of people in our nation.

Letter 536 I support Alternative 12 rather than Alternative 8 in the new management plan for the George Washington National Forest Alternative 12 is important to maintain jobs and create new ones to support our local economy.

Letter 551 I support Alternative 12 because I would keep my job and more people would have jobs and the state would not have to keep my family and myself. It would provide a stable timber supply to my communities

Letter 560 I support Alternative 12 because it provides more jobs.

Letter 744 The Authority would like to address, specifically, the policy presented in Alternate 8 of reducing the timbering volume from eight million board feet to 3.5 MBF We believe that the reduced level unnecessarily restricts the opportunity for commerce in Pendleton County, West Virginia. The final approved plan should reflect the needs of the ambient communities and allow for the continued timbering at current volumes

Letter 744 The draft forest plan is arbitrary in establishing acreage use and timbering ratios The surrounding communities and related economic impact have not been weighed in the calculation to arrive at a well considered number

Letter 865 I do not believe that Alt. 8 for mgt. of the GWNF adequately meets the needs of the people This alt. is too narrowly focused and places too little emphasis on the many people whose livelihood depends on the availability of forest products for commercial use.

Letter 875 In these days of an uncertain economy, we should be encouraging high employment and the development of our renewable natural resources, not the reverse

Letter 879 Reduction of harvest down to the 27 mmbf proposed in the draft of Alt 8 would have a negative impact on our industry and our workers' families. Additional harvesting on private and corporate lands in the area will not happen because the volume is not available on these lands; therefore, area loggers would lose their jobs

Letter 880	I am very concerned about the recent Draft Mgmt Plan for the GWNF and its effects, not only on hardwood lumber people, but also on the economic stability of the region as well as the overall public benefit for everyone both now and in the future
Letter 936	. [T]he economy of Rockbridge County will be impacted negatively by the Draft Management Plan proposed for the George Washington National Forest.
Letter 936	The present Draft Plan will discourage the location of prospective forest industries and expansion of existing industries because of proposed limited timber supply from the major forest owner -- the George Washington National Forest
Letter 969	To reduce the allowable cut would place a heavier burden on private forest lands, it will reduce 25% payments to the counties in the forest which will in turn place a heavier tax burden on their citizens, and it will deprive many of their means of earning a living
Letter 1256	To further restrict timber harvest in the NF's would be yet another blow to our bad national economy and would directly affect our local economy in a negative way
Letter 1273	Alt 8 is much to be preferred in Bath County than Alt 12 For the loggers, of course, this is a bread and butter issue and for the industry (pulp, paper, forestry products) it is an economic/financial issue And reading the various alts, you can see why they would favor #12 But there are numerous conservation and environmental issues better addressed by the other alts Alt. 8 is a compromise selected after an intensive year of work in which, among other interested parties, the loggers and the timber industry participated fully
Letter 1304	Alternative 8 does not provide economic stability to the impact area of the GWNF With a loss of 88 jobs and no gain in total income, local economics will suffer severe hardships
Letters 1305, 2679, 4006	The Region is diligently seeking economic opportunity for its citizens and the national forest has the capacity to contribute to regional economic stability by actively marketing wood raw materials in a reliable fashion Alternative 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the regional forest economy
Letter 1326	Let's not allow the negative impacts economically that will ultimately result from choosing Alt #8
Letter 1366	The timber industry that has developed around the forest with sales expectations from the GWNF will suffer from adoption of Alt 8 I say no for Alt 8
Letter 1367	As most of my family is supported one way or another from our most dependable natural resources, our forests, I can wholeheartedly support only Alt 12 Our area is in such an economic recession that the reduction in any timber cut could not be majorally supported in this area The reduction of just one job is too much!
Letter 1410	I think option #12 would be better than option #8 because it would create more jobs for the community
Letter 1424	Timber harvest is our best hope in West Va for future economic development and I know rates high in Virginia. I hope your draft of this proposed plan will be reconsidered
Letter 1462	I agree with Alt. 12 Alt 12 will keep jobs and keep people working
Letter 1472	Alt 12 would be the best plan for logging. It would give people jobs and bring revenues into the counties.
Letter 1473	The local economies need at least the current level of timber production to keep going That is why I support Alt 12
Letter 1545	I support Alt 12 because I think more timber should be harvested Me and my family are supported by timber harvesting
Letter 1638	The Federal Govt has a contract with the people of this country and specifically with communities around our Federal lands to not radically change the role those lands play in the local economies The adoption of Alt 8 would be a serious breach of that contract and have a very negative impact on communities around the GWNF

Letter 1663	The economy of the Greater Alleghany Highlands will be impacted negatively
Letter 1663	The Draft Land Management Plan projects a loss in direct and indirect jobs and protects a drop in distribution of revenues for the area.
Letter 1663	Support Alternative 12 which will allow us to utilize this renewable resource This Alternative will allow for the location of additional forest related industries in our area and it will allow for expansion of existing industries rather than reducing their employment base.
Letter 1817	Alternative 8 does not adequately address the needs of local economies who depend on Forest Service timber for their income.
Letter 1821	Your reduced timber harvesting rates proposed in Alt. 8 will create a hardship on many small loggers and sawmills and will severely restrict the future expansion of the forest products industry in an area which needs additional employment opportunities
Letter 1854	There are some good economic advantages from Alternative 12. Alternative No. 8 has been estimated to cause a loss of 67 timber industry jobs, compared to an increase of 78 such jobs by Alternative 12 Some 215 total jobs more are predicted to result from Alternative 12 than from Alternative 8.
Letter 1872	Alt 8 will hurt local economies and cost me, the taxpayer, even more
Letter 1904	Alt 12 will benefit more people and create more jobs I urge you to select Alt 12
Letter 2019	Do the people who live and work in and around the GWNF enter into the management equation? Alternative 8 sure doesn't do local people any favors
Letter 2059	I work with timber every day and I hope I will be able to continue for many more years We need the NF lands. This is why I strongly support Alt 12
Letter 2160	My family supports Alt 12 Let's put some more people to work Alt 12 creates 78 additional jobs. We hear all this talk about tourism creating jobs These jobs are seasonal, minimum-wage jobs. We need good steady work in this area
Letter 2160	I am dismayed to know that you chose Alt 8 Your decision to drop sale quantity to 27 mmbf will devastate my business and my family's future
Letter 2167	I think your assumptions are incorrect when you say that Alt 8 won't have a negative impact on my county The timber industry represents a large portion of the working people here To stop cutting as much timber as you plan, our economy will be wrecked
Letter 2170	I am a professional logger and I depend on USFS timber for at least nine months of work throughout the year I employ five family members in my crew. I cannot believe you wish to lower the ASQ to 27 million board feet Alternative 8 does not suit my interest.
Letter 2181	I am dismayed to hear that you chose Alternative 8. My family's well being depends on stumpage from the national forest system The major portion of our area's timberland is in your hands Your decision to drop sale quantity to 27mmbf will devastate my business and my family's future.
Letters 2181, 2624, 2730	Alternative 12 creates 78 additional jobs, while protecting other values of the forest I hear about tourism creating jobs These jobs are seasonal, minimum wage jobs. We need good steady work in this area Alternative 12 will accomplish this goal My family supports Alternative 12
Letter 2191	Alt 8 is not a multiple use alt Isn't multiple use what the NF system is all about
Letter 2198	Alternative 8 will deepen the recession even more. Alternative 8 wants to lower the ASQ to 27 million feet and only meet 59% of the future timber demand
Letter 2203	How many industries would move into this area if you offered sustained yield sale quantity? Instead of attracting more industry, your plan figures how hard you can squeeze existing industry

Letter 2212	Alt. 8 is detrimental to the forest industry. Lowering the ASQ to 27 million feet and only wanting to meet 59% of the future timber demand will be disastrous to the timber industry and the local economy.
Letter 2213	Lowering the ASQ to 27 million feet and only wanting to meet 59% of the future timber demand will be detrimental to the timber industry and the local economy
Letter 2224	Alt 8 does not help the local economy at all
Letter 2233	50 MMBF annual sale quantity will insure stability to an industry that provides the most jobs.
Letter 2241	Adequate income should be derived if only for its financial value to the local counties where the Forest exists and who depend on it for their existence
Letter 2254	[Alternative] number five would be my first choice as it serves to stimulate our economy and return the most to our taxpayers
Letter 2297	When changing Alternative 8, you obviously did not consider the economic disaster you would be creating.
Letter 2301	Alternative 12 gives us more jobs I think you should choose Alternative 12
Letter 2306	I prefer Alternative 12 because jobs will be gained
Letter 2315	Alternative 12 will allow communities in the area to enjoy a stable economy. The timber from the forest will provide wood and paper products for the citizens of the nation which will result in monetary return to the National Forests This will result in a savings to all taxpayers of the nation, which is important during these times of economic stress.
Letter 2275	[Alternative 12] would provide continuing employment for the forest industry within the general location for the forest, indirectly for the other industries that are tied in with the wood producing industry.
Letter 2329	Consider that the timber industry plays a significant role in the local economy, both in jobs and dollars which affect timber-related business The stability of the timber industry is of prime importance and this should be a factor in the eventual plan
Letter 2338	The George Washington National Forest has the capacity to contribute to regional economic stability by actively marketing wood raw materials in a reliable fashion and has an affirmative responsibility to the many communities it dominates with regard to timber supply
Letter 2338	Alternative 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the regional forest economy.
Letter 2358	I support Alt 12. Alt 12, while only providing a small fraction of the wood which the forest could yield, does allow for some promotion of the regional forest economy Environmental and natural resource mgt. is a long-term investment and Alt 12 is the plan that is most suitable to accomplish these goals
Letters 2379, 2610	Alternative 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the regional forest economy
Letter 2387	Goshen, Virginia, will be impacted negatively by the Draft Management Plan proposed for the George Washington National Forest
Letter 2485	Keep in mind when making the final plans, the long-term effects on our own families, friends and how the final decisions will affect our own personal lives for years to come
Letter 2517	Please consider Alternative 12 which will provide more jobs for our area
Letter 2535	Alternative 12 increases total employment over present levels, generates more money for local counties than Alternative 8, and strengthens the job security of many, thereby removing them from the "threatened" or "endangered" lists

Letter 2535	From an economic standpoint, Alternative 8 decreases total employment while Alternatives 5, 7, 12 and 14 increase employment; holds the U.S Treasury directly accountable for more funds to counties than six other alternatives; and "threatens" and "endangers" the job security of many workers in and around the GWNF
Letter 2538	More jobs would be provided in the timber and wood industry in the area with Alternative 12.
Letter 2553	*I support Alternative 12. Without adoption of Alternative 12, there will be increased unemployment due to company closings which in turn would slow any economic recovery and ultimately send more american jobs overseas*
Letter 2587	Alternative 12 will allow area communities to enjoy a stable economy while at the same time allow for expanded use by recreational visitors
Letter 2624	I am dismayed to hear that you choose Alternative 8 for the future management of the forest. My families wellbeing depends on stumpage from the national forest system. Your decision to drop sale quantity to 27 mmbf will devastate my company and my children's welfare.
Letter 2637	We need to keep the forest industry and the forest healthy. Replace Alternative 8 with Alternative 12.
Letter 2662	Alternative 8 will result in a loss of 21 jobs, but Alternative 12 will result in a gain of 194 jobs
Letter 2667	*The local communities would benefit most from Alternative 12. It creates jobs and pays more to the counties You are the largest landowner in many of the effected counties. You don't pay taxes. The least you can do is provide some jobs*
Letter 2668	Alt. 8 will put many loggers out of work.
Letter 2681	The local communities would benefit most from Alt 12. It creates jobs and pays more to the counties. You are the largest landowner in many of the affected counties You don't pay taxes. The least you can do is provide some jobs
Letter 2684	Pick Alt 12. It creates jobs.
Letter 2684	I don't believe enough consideration was given to the local communities that are dependent on your timber for jobs. This region is already suffering from high unemployment You don't need to add to the problem
Letter 2687	*I don't like alternative 8. Managing only 25% of the forest for timber production will place a great hardship on the local communities*
Letters 2716, 2721	Single use emphasis like preservation (alternative 8) provides little to most citizens and absolutely zero to the economy. People say tourism is the answer to all our problems. They say preservation is tourism. We have enough seasonal, low pay, no benefit jobs
Letter 2728	27 mmbf ASQ will put many of us loggers out of work Wasn't the FS supposed to provide stability in the community? Only meeting 59% of demand will upset the apple cart!
Letter 2731	More people would benefit economically [with Alternative 12]
Letters 2741, 2746	Alternative 12 creates jobs and pays more to the counties. You are the largest landowner in many of the effected counties. You don't pay taxes. The least you can do is provide some jobs
Letter 2753	I don't like your choice of Alt. 8. Managing only 25% of the forest for timber production will place a great hardship on the local communities Trees need to be thinned and harvested to keep stands healthy Jobs are created in the communities around the forest to complete these tasks
Letter 2859	*I vote for Alternative 12 [because] Alternative 8 will result in a loss of 21 jobs, but Alternative 12 will result in a gain of 194 jobs*

Letter 2897	Thank you for your consideration of the adoption of Alternative 12 and not Alternative 8, which would discourage the location of prospective forest related industries and the expansion of existing industries in our region
Letter 2914	The greatly reduced allowable sale quantity does not adequately meet the existing timber demand and causes loss of jobs.
Letters 3423, 3424	Under Alternative 8, millions of board feet would be wasted as trees die and rot. With proper management, more of these trees could be harvested, providing jobs for people in the area, and raw material for mills
Letter 3599	I do not want to see the GWNF grow to mortality and die while people without jobs are going hungry Trees are a renewable resource, people are not The economical impact of your decision is crucial. I urge you to choose Alt 12
Letter 3533	I support Alternative 8 More intensive timber harvesting may provide some jobs at least temporarily and some more money in the state's coffers but are running out of untouched natural areas and our population is growing Preserving these areas is worth a few lost jobs and lower state income and even increased prices for wood and paper products.
Letter 3609	With an already strapped National Budget, a deficit of record amounts, and many localities scraping for tax dollars Alternative 8 would just increase this burden
Letter 3610	Alternative 8 decreases both timber industry jobs and total jobs, while Alt. 12 increases timber industry jobs by 78 and total jobs by 194 With unemployment already high in these counties (Bath County is over 23%), how in the world can we afford more loss of jobs? Where do people get new jobs when the job market is already stretched to its limit? Many of those who would lose their jobs have no other training and would not be able to compete for jobs even if they were available
Letter 3637	We do not support any alternative that reduces jobs, lessens timber industry employment or falls short in the distribution of receipts to Counties
Letter 3659	Alternative Plan 12 would have a more positive economic impact for this area
Letter 3659	The economic impact to this area would be very severe. Plan No 8 greatly reduces the timber harvest Many timber related jobs would be lost in this, one of the highest unemployment areas of the State The Counties would also lose revenue due to the reduction of the Distribution of Receipts to Counties The primary industry in this area, The West Virginia Pulp & Paper Co , would be adversely affected by a reduction of the timber harvest
Letter 3660	With today's economy you must maximize jobs, revenue, and returns to counties A loss of even one job is unacceptable
Letter 3660	Lots of small communities around the GW depend on a stable timber harvest Maintain one
Letter 3673	Alternative 12 will create jobs which are a benefit to all communities Alternative 8 will suppress jobs which a negative economic factor in our area Therefore, I strongly favor alternative 12 over alternative 8
Letter 3702	I support Alternative 12 I feel that the jobs provided are important, and cast my vote mainly for that reason
Letter 3711	With a 30% unemployment rate, the Board does not want to affect the livelihood of timber harvesters while maintaining the beauty of the County
Letter 3730	The greatly reduced allowable sale quantity does not adequately meet the existing timber demand and causes loss of jobs
Letter 3734	To reduce the timber harvest in the GW Forest is an economic hardship that the people of Western VA should not be subject to
Letter 3734	The schools of the area, the roads of the area, the economy of the area, the people of the nation and the national treasury will all suffer if the maximum harvest of the area is not maintained using proven forest management practices

Letter 3734	Not to utilize the economic value of the GW Forest to support the economic advancement of the area is contrary to the intentions of Congress in establishing the Appalachian Development.
Letter 3743	Alternative 12 provides for 194 new workers, which amounts to a net increase of 215 compared to Alternative 8.
Letter 3759	Alt. 12 is the better plan It would create jobs in the timber industry. This would also create a gain in jobs in the economy
Letter 3831	The economic impact of your plan must be favorable to the localities where your land is located
Letter 3860	I find that Alternative 8 is too narrow in focus Alternative does not address the needs of rural economics located in and around the George Washington National Forest Jobs will be lost and counties will lose money as a result of choosing Alternative 8.
Letter 3860	Change your preferred Alternative to Alternative 12. Alternative 12 provides additional jobs and provides counties with a greater return than both Alternative 8 levels and current levels.
Letter 3886	Alt 8 doesn't care about jobs, the local economy or people who really use the forest.
Letter 3914	Alternative 8 will threaten the jobs of thousands of people in the region and endanger the already fragile economies of many western Virginia and West Virginia communities
Letter 3927	The current level of timber harvesting provides an important economic stability for the areas because it provides jobs
Letter 3939	Alternative 12 will create employment
Letter 3939	Major flaws in the analysis are evident especially in the area of demand and economics Little to no consideration is given to the economic importance of the Forest and its timber sales to the local rural communities. The local counties receive little from the 25% and PILT funds but carry the load of having approximately 50 percent of their land tax base, from which it receives no property taxes, in federal ownership While private property taxes (for comparable land) will run from $1 50 to $2.00 per acre the counties usually don't receive the full $0 75 per acre that they are supposed to receive from the 25% and PILT funds The National Forest places additional burdens on the local governments for law enforcement, search & rescue operations, fire protection, etc with little to no compensation from the Forst Service or added economic income from the National Forest
Letter 3939	Alternative 8 does not adequately consider the local needs and impacts that the Forest has on the local rural counties. Does not provide for sound long term management of the Forest to provide the greatest goods for the greatest number of the citizens Forest Planners must give added weight to what the Management Plan does to and/or for the local area and seriously attempt to reduce the negative impacts.
Letter 3951	Rural counties receive little money from having the National Forests as their back yard but are hurt by National Forest practices that causes a loss of direct and indirect jobs and a loss of economic activity and gain for the area
Letter 3963	Virginia Review (Clifton Forge), 13 Mar 1992 Economic repercussions alternative eight would bring to Alleghany County [are] going to be negative "We have so many loggers here that actually make their living out of the George Washington National Forest, and they will have to go elsewhere to do their logging if this alternative is approved "
Letter 3967	It is imperative that we continue to protect our local timber sources I support Alternative #12 This plan would go a long way in protecting the jobs of those in the Virginia furniture industry
Letter 3972	I prefer alternative 12 Alternative 12 meets the demands of employment
Letter 4054	I feel sure that Alternative 8 can be detrimental to the environment and the economy in the surrounding local areas of the George Washington National Forest.
Letter 4071	I am writing to express my extreme disappointment with the Forest Service choice of Alternative 8 as the most suitable plan for management of the George Washington National Forest At this critical time in America's

history, when jobs and global competitiveness are so important, the Forest Service produces a Draft Management Plan which decreases jobs, increases costs, reduces productivity, and decreases benefits to the largest portion of society This is irresponsible management.

Letter 4180

The national forest has a direct effect on the lives of the people and the economy in the part of the country where they are located.

Response

As discussed in Chapter 3 of the DEIS, counties receive funds from the Forest Service 25 Percent Fund and Payments-in-Lieu-of-Taxes (PILT). The "Estimated Change in 25 Percent Fund" in Table 3-16 is supplemented by corresponding changes in PILT Therefore, the ID Team has concluded that all of the alternatives should provide the same funding to the counties

Appendix B of the FEIS has been rewritten to explain the assumptions inherent in the estimation of changes in employment and income displayed in Figure 2-34 and Table 3-23 in the DEIS. The ID Team wishes to stress that these are *relative* numbers and cannot be viewed as *absolute* changes in employment and income. The decrease in employment and income predicted for the Forest Service preferred alternative should be viewed as *potential* for decreases in employment and income. The Regional Forester will weigh this potential for loss of employment and income as one of the factors considered in selecting the alternative to serve as the Revised Plan

There are serious questions about the appropriate role of the Forest in terms of its responsibilities to the citizens within or adjacent to the National Forest boundary compared to its responsibilities to other interested citizens or the American public in general

The Forest Service policy on the role of the agency in maintaining community stability has been articulated in appeal decisions of other land and resource management plans.

> "Although there is no statutory requirement for, nor definition of, community stability within the Organic Act, Multiple-Use Sustained-Yield Act, or the Resources Planning Act, as amended by the National Forest Management Act, the stability of local communities has long been a concern of the Forest Service The requirement that Forest Plans maximize "long term net public benefits in an environmentally sound manner" allows the Forest Service to include stabilization of local communities as one of the criteria in choosing the alternative to be the Forest Plan.. . However, stabilization of local communities is subject to the multiple-use mandate "

Thus, the Revised Plan could include maintenance of community stability if it was consistent with other multiple use objectives. The decision to supply a given amount of forest products for this purpose depends on the relative ability of the Forest to appreciably contribute to a stable regional economy as well as the environmental effects and multiple use values foregone as a result of this action.

Hard evidence that permits a conclusion as to the relative ability of the potential supply of forest products from the Forest to contribute to a stable regional economy is unavailable There is reason to believe that the constraining factor on the number and size of manufacturing facilities in the Socio-Economic Impact Areas is the national and international demand for the goods and services produced from stumpage rather than the supply of stumpage This principle is discussed in detail in the process paper *The Concept of Demand*

The process paper *Economic Diversity and Dependency Assessment* concluded that the economy of northern Virginia is relatively diverse, albeit the timber industry is a major industrial component. The economic stability of any region can best be achieved by diversifying the mixture of industries and employment opportunities so that the region is less susceptible to any changes in demand for wood products or any other product or service

In formulating Alternative 8A as the Forest Service preferred alternative, modifications which should mitigate the economic impact of a modest reduction in timber harvest were incorporated

1 The allowable sale quantity has been increased to 330 million board feet (or an average annual offer of 33 million board feet)

2. Lands suitable for timber production are more concentrated on sites with higher productivity This should permit a higher percentage of the offered volume to be high quality hardwood and pine sawtimber (Refer to Table 2-5)

3. To the extent consistent with other multiple use objectives, a higher percentage of the allowable sale quantity will be offered on districts where the strongest timber demand has historically been exhibited (Refer to Table A-7 in Appendix A of the Revised Plan.)

4. The Forest will continue to work with counties under the Rural Development program to seek ways to provide additional employment in those counties where unemployment is high and opportunities for employment outside the forest products industry are limited.

In attempting to provide for a wider array of uses, values, products and conditions that people need and want from the Forest than in the past, the Forest Supervisor and Regional Forester are carefully weighing the effects such changes would have on local communities, particularly those within the national forest boundary.

Letter 369 — Payments to Counties is not really guaranteed. PILT payments ARE SUBJECT TO CONGRESSIONAL APPROPRIATION Alt. 12 projects an annual return to counties of $362,000 an INCREASE of $70,000 over current levels Alt 12 not only provides more revenue, it provides more RELIABLE revenue since a greater proportion of it comes from timber sales, not Congress.

Response — PILT is not a discretionary budget item but rather an entitlement. As such, it is not subject to the annual appropriation process It would take a change in federal law to reduce the amount of funding that each county receives.

Letter 167 — The Alleghany County Board of Supervisors, County staff members, and citizens groups feel the entire region could be adversely affected and experience a loss of jobs unless the recommended Management Alternative 8 is replaced with a better alternative

Letter 167 — .[T]he economy of Alleghany County and the Greater Alleghany Highlands will be impacted negatively by the Draft Land Management Plan proposed for the George Washington National Forest . [T]he George Washington National Forest owns 142,097 acres, which is 57% of the total forest land in Alleghany County... [T]he economic well being of the Greater Alleghany Highlands is heavily impacted by the George Washington National Forest

Letters 167, 2387, 3617 — The economy of Alleghany County and the Greater Alleghany Highlands will be impacted negatively by the Draft Mgt. Plan The present Draft Plan will discourage the location of prospective forest industries and expansion of existing industries because of proposed limited timber supply from the major forest owner -- the GWNF.

Letter 499 — There are many families in the Alleghany Highlands area dependent upon the national forest timber industry.

Letter 741 — Alternative 8 would have a disastrous impact on the county in which I live (Alleghany) and on many surrounding counties, especially in the loss of jobs and higher costs incurred by industries operating here

Letter 2898 — The timber industry is vital to the well-being of the Alleghany Highlands. An alternative that emphasizes jobs and the continued utilization of the timber resource is essential to this community. The value of the recreation, wildlife and wilderness resources is also important to the Alleghany Highlands area for potential tourism, and related jobs. However, recreation-related jobs are even less reliable in recessionary times than are timber-related jobs To stabilize the local economy, we need a strong balance in utilizing all the natural resources the Highlands have to offer

Response — Although the Forest Service is working with officials of Alleghany County to find ways to diversify their economy, Alternative 8A does not include the goal of encouraging the expansion of forest-related industries through an increased timber supply off the Forest. The formulation of Alternative 8A contains a very small reduction in the timber volume historically offered on the James River and Warm Springs Ranger Districts

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Letter 183 — Timber production from these lands are essential to the economic well-being of this country.

Letter 2033 — I am very active in recycling, but finding it difficult and expensive. A major reason for this is that the market for recycled paper products is hampered by the subsidies given to the logging and paper industries These

subsidies make paper made from wood pulp less expensive than paper made from recycled paper pulp This is costing the government money, it is costing the environment dearly, it is costing private individuals who would like to sell their timber but are underbid by the government, and it is ultimately costing the consumer

Letter 3734 — To allow timber of the GW to rot - decay - is inflationary and injurious to the national economy.

Response — These statements greatly overstate the importance of the relatively small volume of timber offered from the George Washington National Forest

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Letter 190 — Alternative 12 pays $362,000 to counties Alternative 8 pays 223,000 to counties or $139,000 less than Alternative 12

Letter 1060 — Revenue returns to the counties are of major importance to the people in the George Washington forest area Under Alternative 8 the counties would receive only $223,000 By contrast Alternative 12 would increase county revenues to $362,000 The counties should benefit at the higher level as provided for in Alternative 12, especially when such levels can be achieved while still providing for multiple-use management and environmental protection throughout the forest land base

Letter 1253 — The Draft Plan reduces Distribution of Receipts to Counties by $69,000

Letter 2306 — Greater returns in revenue to counties

Letter 2538 — Local counties would receive more money in lieu of land taxes from the additional timber sales

Letter 3743 — Alternative 12 will provide additional funds ($362,000) to the localities in the area, which is 62% more than the Draft Alternative's payments of $223,000

Letter 3823 — [We urge the adoption of Alternative 12 because it] provides greater income to the localities from timber sales

Letter 4030 — Alternative 8 would return only $223,000 to the counties in lieu of taxes, Alternative 12 would pay $362,000

Response — As discussed in Chapter 3 of the DEIS, counties receive funds from the Forest Service 25 Percent Fund and Payments-in-Lieu-of-Taxes (PILT) The "Estimated Change in 25 Percent Fund" in Table 3-16 is supplemented by corresponding changes in PILT Therefore, all of the alternatives should provide the same funding to the counties

In light of this fact, a decision has been made to remove the "Returns to Counties (M$)" in Table 1 (Page 9 of the DEIS) The discussion under "Money Returned to Counties" on pages 3-85 and 3-86 of the DEIS has been supplemented in the FEIS to document this finding

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Letter 3610 — From an economic standpoint, Alt 12 is much preferred over Alt 8 The total budget under Alt 12 is $2,749,000 less than under Alt 8.

Response — A common question that comes to most people's minds whenever something is proposed is: "How much is this thing going to cost?" The budget information in FEIS chapter 2 is intended to highlight the major cost differences between the alternatives In the DEIS, the Forest did recognize that the preferred alternative had one of the highest budgets In this FEIS, the budget has been updated to better reflect the money needed to implement each alternative

The final decision will consider the budget needed to implement the Plan. In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan However, no single factor, such as the budget, will lead to this selection

The Forest will budget to implement the Revised Plan [1982 NFMA regulations at 36 CFR 219.10(e)] Yearly, Forest budget proposals are aggregated nationwide by the Forest Service and submitted to the President These proposals then become part of the President's budget request to Congress

The Forest's annual budget, as authorized by Congress, may vary from that which is indicated in Plan Appendix F The Plan will be monitored to provide the quality control necessary to ensure it is implemented properly The Implementation Monitoring Summary in the Plan's Chapter 4 provides for monitoring the budget If annual budgets over time vary significantly from long-term direction, a Plan amendment may become necessary [36 CFR 219 10(e)]

Chapter 4 of the Revised Plan also discusses yearly budget proposals Plan Appendix F displays the detailed budget information needed yearly to achieve the Plan goals and objectives

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Letter 143 — The longer the investment horizon, the more likely it may be that the recreational and educational benefits derived from implementing Alternative 3 will prove to be much more profitable to the local and regional economies than one with a greater focus on benefits derived from the sale of forest products.

Letter 944 — With respect to the local economies which are supposedly benefited by subsidized timber production, the long-term benefits of eco-tourism will more than compensate for short-term losses

Response — The ID Team has no information that would substantiate these assumptions

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Letter 2215 — All timbering on the GW should be banned, as it only costs us money and competes with private timber owners making their timber less valuable.

Letter 3981 — What of the economic benefits of increased cutting on private lands to meet demand?

Letter 4250 — Elimination of timber sales from the Forest should actually improve economic returns for rural Virginia communities as decreased supply increases prices to paid to small private landowners in rural communities Increased cutting on private land will make up for any shortfall resulting from elimination of subsidized public timber Timber employment should remain relatively constant, with demand being the dominant factor, rather than supply, though some specific jobs may be replaced by others Money paid to private woodland owners is more likely to circulate through the local communities, as compared to federal timber sales where any revenues are quickly absorbed into the federal bureaucracy Old growth forest conditions on the national forest make nearby rural communities attractive destinations for tourism and vacation opportunities Others find the quality of life in such location ideal for second homes, retirement, or the startup of a new business

Response — As discussed in detail in the process paper *The Concept of Demand*, the demand for wood (stumpage) by the producers of wood-based products and services is relatively "elastic" It is questionable if changes in the amount of stumpage offered on the Forest would cause more than a small, short-term increase in the price of stumpage The key point is that the amount of stumpage offered on the Forest is a small percentage (8 5%) of the total stumpage sold in northern Virginia and adjoining West Virginia

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Letter 181 — The draft plan is seriously deficient in addressing the economic impact of reduced timber sales and reduced recreational usage

Letter 369 — We believe the loss of jobs resulting from Alt 8 to be seriously underestimated by the Forest Service. The reduction from an ASQ of 49 MMBF in 1986 has already had a profound effect on surrounding communities Independent loggers who have relied on the GWNF to support their families and $200,000+ businesses are already going elsewhere to purchase their timber, fuel, etc , Some argue that timber jobs lost will be made up for by recreation jobs gained Yet both Alt 8 and Alt 12 greatly exceed current demand for SPNM and SPM recreation. Alt 8 will not result in more recreation jobs Even if timber job loss did balance with recreation job gain, recreation jobs are lower paying service-oriented jobs Being production oriented, timber jobs are generally higher paying Also, a 1984 Virginia Dept of Forestry study showed that for every $1 000 spent by a logger to purchase timber, $27 000 of economic activity was generated And addition jobs should be lost from the GWNF staff The FS projects Alt 8 will result in a LOSS of 21 jobs and Alt 12 will result in a GAIN of 194 jobs. These numbers are far too conservative Alt 12 provides far more multiple-use benefits in virtually every category (except wilderness/preservation) Yet the projected annual budget for Alt 12 is $2,749,000 LESS than that for Alt. 8

Letter 1253	The Draft Plan reduces Total Employment by 21 jobs I believe this figure underestimates the actual effect.
Letter 2160	I feel that your employment assumptions are incorrect.
Letter 2181	I also feel that your employment assumptions are incorrect When the forest industry is the biggest employer in the region and you are the biggest landowner reducing your harvest level 30%, how can only 67 jobs be affected?
Letter 2624	When the forest industry is the biggest employer in the region and you are the biggest landowner reducing your harvest level 30%, how can only 67 jobs be affected?
Letter 2906	If you reduce the timber supply, loggers, sawmills, papermills, equipment dealers, truck dealers, tire dealers, garages and eventually factory workers will be affected
Letter 3963	The Advocate, April, 1992, pg. 10 As for the predicted job losses, most are in the Forest Service itself
Letter 3981	EIS· 3-82-83 - The effects of the Alternatives on employment are very poorly developed. There is more to it than just timber jobs Alternative 3 emphasizes restoration and protection of the GW and also provides for jobs in education, research, and recreation - this needs to be documented and developed Also revise "changes in income" on pg. 3-84
Response	An input/output model called IMPLAN was used to estimate employment and income effects within the 19 county impact area for timber, recreation, wildlife, forest service expenditures and county returns produced by the Forest These estimates were made for each alternative and the change from current management reported in the FEIS The estimate includes both direct and indirect effects on jobs and income. The IMPLAN model is used nationally by the Forest Service to estimate these effects and is considered a reasonable model for doing this. The definition of the impact areas, the industry sectors affected, and the resource outputs produced by each alternative are the key assumptions that determine the number of jobs and income gained or lost from current management. The Forest Service therefore believes the number of jobs and income are reasonable estimates that provide a good basis of comparison among the alternatives.
Letter 744	The Pendleton County Economic and Community Development Authority would like to address, specifically, the policy presented in Alternate 8 of reducing the timbering volume from eight million board feet to 3.5 MBF We believe that the reduced level unnecessarily restricts the opportunity for commerce in Pendleton County, West Virginia The final approved plan should reflect the needs of the ambient communities and allow for the continued timbering at current volumes
Letter 744	The Dry River District straddles two states, Virginia and West Virginia, and is therefore unique in its impact The Virginia side is consistent with the opportunities of the Pedlar District. The West Virginia side is without similar opportunities Pendleton County has no large industry and is completely rural The per capita income in Pendleton County is one of the lowest in the nation and the unemployment rate has been accurately estimated as being approximately 10% While the impact of reduced timbering is sustainable to the communities in much of the forest area, the reduced volumes may result in a hardship for Pendleton County residents The Authority suggests that the current level of timbering be included in the final draft forest plan to promote real economic parity
Response	As displayed in Table A-7 of the Revised Plan, the estimated average annual offer on the Dry River Ranger District is 4 1 MMBF This reduction is consistent with the relatively weak market and the presence of special interest and special management areas containing unique biological and recreation values that are incompatible with regeneration harvesting and road construction
Letter 2335	I don't believe the Forest Service adequately assessed the impact Alternative 8 would have on the paper and wood products industries in the area
Letter 2938	There has been so many things left out to direct and indirect employment No 1 Loggers will suffer first, No 2 Paper mill workers, saw mill workers, furniture workers, box plant workers, transportation workers, and many more

Letter 2938 No. 3 You have to support people like equipment dealers, chain saw dealers, fire dealers, parts stores, service stations, Mom & Pop grocery stores.

Response The socio-economic analysis includes the effects of selling stumpage from the Forest on direct and indirect income and employment within sectors 160, 161 and 162 in the IMPLAN model These sectors include independent loggers and local sawmill operators. At present only 5 percent of the volume needed by the pulp & paper industry comes from the Forest. The Forest Service thus assumes that the selling of stumpage from the Forest has very small impact on jobs and income in the pulp and paper industry. However, to better respond to these comments, a sensitivity analysis was done using the IMPLAN model and including pulp and paper industry. Based on data supplied by Westvaco and assuming the pulp could not be obtained anywhere else, the following multipliers were developed for every 1 MMBF of hardwood roundwood sold by the Forest up to 15 MMBF· 31 73 jobs and $1.119 million would be generated throughout the impact area. This compares with 4 08 jobs and .07443 million not including this sector. See Appendix B of the FEIS for more information

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Letter 3610 Alt. 12 pays $139,000 more to counties than Alt 8. I realize that technically the counties receive the same amount of money regardless of which alternative is chosen. However, the difference between 25% of gross receipts and 75 cents per acre must be made up by Congress -- in other words, my tax dollars.

Response This argument doesn't seem to have much merit on a Forest with a below-cost timber sale program The funds required to produce the 25% of gross receipts are also provided by Congress. There doesn't appear to be any economic advantage to the government in replacing PILT funds with increased revenues from below-cost timber sales.

Letter 3972 The point has been made that lost timber jobs could be made up with jobs in recreation, however, there is nothing to indicate that this could be done And if so, these jobs would not pay the money that is earned on present timber jobs If the number of people could be brought into the area to provide this number of recreational jobs, which would take thousands, would not our national forests be trampled under foot and defaced?

Response Alternative 8A produces more hunting RVDs and less timber than current management This results in more recreation jobs being created and more timber jobs being lost than current management There is no data to support the last statement in this comment.

Letter 1847 In economic terms, Alternative #3 would have no effect on current payments to counties in lieu of taxes and will result in no net change in forestry related jobs. It also has the lowest budget and will eliminate below cost timber sales.

Response The assertion that Alternative 3 would "result in no net change in forestry related jobs" is only valid to the extent that timber volume normally offered on the George Washington National Forest could be substituted with a comparable volume off other lands. While there appears to be sufficient growing stock on other lands to accomplish this, it is uncertain if an adequate amount would be available for timber harvesting by persons currently harvesting timber from the George Washington National Forest

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Letter 2319 As far as jobs go, more people are needed to manage the George Washington National Forest to keep poachers out, to monitor the ecology of the forest, to maintain the present facilities and so on

Response Alternative 3 contains a modified budget that calls for increased funding in law enforcement, and in other traditionally underfunded programs

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Letter 143 The highly productive growing conditions and rapidly evolving timber management practices being developed in the southeastern United States may in time render the relatively low-site-index lands considered in the Management Plan extremely uncompetitive

Response Consideration of events outside the area of the Forest certainly are important in devising region wide direction. However, they are outside the scope of the current plan revision process

Letter 1850 In your paper "Timber Supply and Demand Analysis", it is stated that [the] Growth - Removal Ratio [is] 2 73/1 It does not make economic, silvicultural or common sense to let this renewable natural resource go to waste The people of western Virginia and eastern West Virginia depend on the forest industry The GWNF is currently supplying about 8.5% of the stumpage volume to satisfy local demand I believe that this is in direct violation of the original purpose of the forest services mandate (1897) to provide timber and water for public use

Response Although the authority to cut timber (the Organic Act of 1897)was in place when the Forest was chartered (1918), timber was not a driving force behind the creation of the Forest Lands for the Forest were acquired by the authority of the Weeks Act It was damage to the watersheds that led to the creation of this act as stated by *The Lands Nobody Wanted* by Shands and Healy This act solved two problems it allowed land which was under private ownership to be purchased by the government, it also gave the government the authority to acquire land specifically for the purpose of watershed protection In 1924, the Clarke McNary Act added "the production of timber" as a purpose for forest acquisition

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BELOW-COST TIMBER SALES: Role of Forest Timber in Local Market

Letter 3722 The GWNF currently represents, DIRECTLY, about 5 percent of the raw material used by the Westvaco Covington Mill Indirectly, from sawmills and lumber mills, Westvaco procures about 30 percent of the local raw material hauled to the Covington Mill from the GW Forest

Response Members of the ID Team have had discussions with and correspondence from representatives of Westvaco By their estimation, approximately 5% of ALL of the raw material used by Westvaco in their Covington facility comes from the Forest

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Letter 145 Westvaco has a long history of responsible environmental leadership, and maintains a keen interest in the activities of the National Forests The company's most recent investment in our Covington Mill will increase production and need for additional raw materials. The timber production from the George Washington National Forest represents an important portion of the Covington Mill's consumption The impact of not addressing this issue will prove significant to the nation's wood supply

Letter 280 You are well aware of our investment of $530 million to increase production by 40 percent The expansion will also increase our raw material need by 40 percent The GWNF represents a significant potential contribution to Westvaco's raw material supply, and in fact, production from the GWNF accounts for approximately 5 percent of Covington's raw material consumption.

Letter 3823 [We urge the adoption of Alternative 12 because it] will maintain a healthier forest industry infrastructure

Response The expanded processing facilities at the Covington mill will require an increased supply of raw material Although the Forest is hardly expected to serve as the sole source of this additional volume, it represents one of the most convenient and inexpensive source. To the extent that this volume is not available in proximity to the mill, Westvaco will be forced to acquire the raw material from other sources, possibly as far away as Kentucky

There is sufficient inventory of raw material in western Virginia and adjoining West Virginia to supply the mill's need if one considers the inventory on the non-industrial private forest lands Unfortunately, the *availability* of this material from the non-industrial private forest lands is uncertain This subject is discussed in more detail in the process paper *An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area* The conclusions in this paper are summarized in Appendix B of the FEIS

At the present time, there appears to be enough raw material available to meet Westvaco's current needs. There may not, however, be enough available to gainfully employ all the independent loggers who traditionally supply the Westvaco facility

Letter 7	*There are great economic ramifications to be considered when you run a risk of endangering any economic industry However, loggers might have to make some economic adjustments and change their focus*
Letter 59	*As an employer of contract loggers who depend on national forest timber for their livelihood and also a company which has invested a large sum of money into a cable yarder which depends 100% on national forest timber, we would be devastated if this plan is implemented*
Letters 63, 68, 69, 70, 75, 76	The Draft Plan that is proposed would severely hurt the forest products industry in West Virginia
Letter 71	*The Draft Plan reduces acres classified as suitable for timber production by more than 50% and reduces the annual harvest by more than 25%. This action would clearly aggravate an already intensely competitive market*
Letter 184	Further reductions in harvest levels are not necessary and would be catastrophic to the forest products industries of both Virginia and West Virginia It is time that human beings and the economy found their way into the forest use equation
Letter 490	Georgia-Pacific's pulp and paper mill at Big Island, Va , and hardwood sawmill at Buena Vista, Va , respectively employ approximately 330 and 40 people. Both mills depend upon the NF for some wood supply Reduction of harvest down to the 27 mmbf proposed in the draft of Alt 8 would have some negative impact on both mills
Letter 490	The draft plan suggests that any reduction [in volume of timber offered off the GWNF] would be offset by additional harvesting on private and corporate lands in the area. Our studies indicate that this will not happen because the volume is not available on these lands; therefore, area loggers would lose their livelihood
Letter 969	Alt. 8 is not acceptable by any measure My family is supported by timber dollars and I find Alt 8 to be objectionable in this time where our timber resource is needed by all of our citizens
Letter 1060	The Council is particularly concerned by the Timber Demand/Supply Analysis described in Appendix B of the DEIS Specifically, the agency states "A change in Forest Service timber harvests could be offset by a change in the amount harvested by the non-industrial private landowner A significant reduction in volume offered by the Forest Service should not have an adverse effect (for a mill in the form of higher prices) because its portion of the supply mix is relatively small " (DEIS, Appendix B-26) The statement demonstrates the agency has lost grip with reality
Letter 1060	The assumption that national forest reductions can be offset by suppliers from the non-industrial private lands is completely wrong. Under this assumption, according to data in the 1990 RPA Assessment, by the year 2040, on a nationwide basis, each and every acre of non-industrial private land would have to produce as much timber as industry lands do today This obviously is unrealistic on either a national or even state level.
Letter 1300	If alternative 8 is approved it will drastically reduce the timber resources available
Letter 1304	The proposed harvest level of 27 MMBF is only 60 percent of timber demand as determined by the Forest Service The Draft Plan states that other landowners will be able to make up this deficit VFA believes differently and uses a Forest Service document, "Forest Statistics for Virginia 1986," to support this position Of equal concern to VFA is that pressure put on other lands by the lack of harvesting on the GWNF will cause poor management and stewardship to occur
Letter 1448	Alt 8 would tend to save the timber industry from itself by helping to preserve the long-range resource of its livelihood
Letter 1609	Alt 8 threatens the livelihood of the thousands of Virginians and West Virginians who work in the forest products industry Alt 8 represents very poor mgt of natural resources that belong to the public It will place undue hardship on private lands in the Appalachians to supply needed wood and does little to protect the forest from gypsy moth infestation
Letter 1635	Many in this area including the Big Island mill depend to some degree on the long-term relationship established with the Forest Service.

Letter 1663	The Draft Management Plan will discourage the location of prospective forest related industries and expansion of existing industries due to the proposed limited timber supply from the George Washington National Forest, and,
Letter 1855	Alt. 8 will not enhance the economy of the area or create jobs.
Letter 1989	I strongly request that you adopt Alt. 12 as the new mgt plan for the GWNF. Economic contributions made by the furniture industry should not die due to lack of raw materials.
Letter 2196	Alt 8 wants to lower the ASQ to 27 million ft and only meet 59% of the future timber demand With a good majority of private landowners being absentee and not wishing to cut their timber, I do not see where the future timber supply is coming from. If you cut back and they hardly sell any timber, then somebody has to go out of business
Letter 2205	Alt. 8 is not a very good alt. I am a logger and even though I hardly ever cut any FS timber, I am afraid you're going to hurt my livelihood. Loggers who depend on USFS timber will be competing with me on Game Commission and private timber sales
Letter 2207	I am a logger and I am afraid your decision to choose alternative 8 is going to put us out of business If you cut back on the allowable timber sale quantity, I believe there will be so much competition that someone will have to go I don't believe there is that much private timber out there
Letter 2348	I have a problem with the ASQ dropping below the current ASQ or even the anticipated demand for wood products in the future The timber industry needs a steady supply of wood products to meet the demand with the ever-growing population Environmentalists cry that the timber supply can be shifted to private lands I feel they are wrong So many people are buying land to form their own little wilderness, without regard for timber harvest Where is the future timber supply coming from?
Letter 2506	I view the George Washington National Forest as an important source of lumber for my industry Therefore, I am asking you to adopt the proposal of Alternative 12 for management of the George Washington National Forest
Letter 2536	Timber needs can and should be met on private lands Letter 2658 Private land owners are selling a lot of their property to retired people who very seldom want to sell any timber, therefore I would like to ask you to strongly consider Alternative 12.
Letter 2672	Paraphrase - [Timber supply from private land will not meet demand] People are moving into this area from other states and buying up farms They are not in the timber business, they are buying this land to retire on
Letter 2809	I tried to sell some timber off my land and was told that due to the lack of a road going directly to it the value of the timber was not high enough to harvest When I realize that my tax money is spent to build roads into my NF to harvest the timber in direct competition to me I feel this NF socialism has gone too far. If that NF timber is so valuable let the highest bidder build the roads like my contract with the highest bidder goes Why should the sale of NF timber undersell me?
Letter 2880	With the continued loss of the productive forest land base for other uses, we cannot afford to pursue a course of locking up the remaining land we have available for productive timber management
Letter 2906	You say that the difference can be made up on private lands You're wrong With the USFS owning half or more of the commercial timber in each county, that leaves little for the timber industry to draw from
Letter 2938	There is a great demand for forest producers and it will even be greater in the future You will be making a big mistake by locking up the land for availability of timber
Letter 3660	Forest Statistics of Virginia, 1986 states that corporate lands are being overharvested by about 20% Forest Statistics for Northern Mountains, 1986 states that NIPL lands are being harvested at growth Each year more land is being taken out of production by development and subdivision Your statement that the lost volume will be picked up elsewhere is WRONG!
Letter 3672	I feel that the Alternate 8 issue in which I strongly disagree, would only put more hardships on the timber industry

Letter 3679 *I look at the demand of timber I see the "buy-up" of private timber land by outsiders who do not consider selling timber Therefore, I like Alternative 12*

Letter 3710 *Timber supplies from private sources can meet a larger share of demand, as they have in the past As the analysis performed by the planning team observes, "A review of the supply capabilities from all ownerships in the GWNF market area suggests that timber inventories are abundant and continue to grow.*

Letter 3775 *Many private logging contractors are having a hard time making ends meet right now. Your plan would only worsen this by decreasing the amount of timber available for timber management*

Letter 3799 *I am for Alternative 12 because I am in the timber business and the less timber there is to bid on to cut results in closing the business.*

Letter 3833 There is a very substantial timber related industry in the area of the National Forest that is and has been dependent on the forest as a source of raw material Every effort should be made to maximize the timber sales in keeping with a good rotation, as well as the recreation, wildlife, and environmental considerations.

Letter 3842 The preservationists' claim that the deficit created by reduced sales of NF timber can be offset by private landowner sales is simply untrue Private landowners are not likely to sell their timber in the volume necessary to make up the difference without some kind of tax incentive to do so.

Letter 3939 Recent investments made by Westvaco at their Covington mill increased production and [the] need for raw material This also means added jobs in the harvest of the needed raw material, if available In addition, several local sawmills have been upgraded and modernized in the last few years that increases their consumption of local raw material

Letter 3939 The timber from the George Washington National Forest is an important portion of the consumption at four paper mills, one veneer plant, and 98 sawmills within the zone of influence of the National Forest in Virginia and not counting the sawmills in West Virginia Export of Appalachian Hardwoods has become very important to the local, State, and National economies These facilities mean over 4000 jobs in the Virginia zone of the Forest not counting the jobs provided by the loggers who cut and haul the raw material to the processing facilities The area of the Forest in West Virginia adds additional jobs to the timber industry In addition, the timber industry creates and supports many spin-off jobs in the local communities. The raw material required to support the above processing facilities is not readily available from other sources as stated by the Forest Planner

Letter 3939 The Draft Plan states that it would be easy to make up the difference between timber sale volume and timber demand from the Forest by going to other sources There is no analysis to show how the planners made this determination or even if the additional volume is available No information is provided on the amount of forested acres these other sources contain or how much is available for harvest The Plan shows a loss in direct jobs and doesn't take into consideration the loss of indirect jobs due to the reduction in the sale of timber products or the resulting negative impact to the rural economy of the area of the National Forest. The Plan relies on Regional Economists projections which are based on assumptions they made with little to no local information or indepth analysis. Their projections are then adopted into the Plan even though they have no basis as shown in the "Plan Process Papers" Evidently no consideration was given to the effect the Monongahela Decision had on timber volume harvest from 1974 to 1980 or the fact that the Forest has been operating under an artificial ASQ (that was below demand), set by the Chief, in the determination of what has been supplied from the Forest, what could have been supplied from the Forest, or development of future demand trends Naturally if a Forest is not permitted to place timber volume on the market then the true demand for timber from the Forest cannot be determined under the process used in the development of this Plan Nor can future demand trends be determined with any reliability

Letter 3963 Roanoke Times, 25 Mar. 1992 What are the cost implications of reduced logging activity? If we are already seeing softwood costs rising at an alarming rate during a period when housing starts are at a low ebb, what will happen when housing starts return to normal levels? It doesn't take a great deal of imagination to predict shortages and much higher prices

Letter 3972 Alternative 8 only satisfies 59% of the present demands and this short fall cannot be made up from private land This short fall will increase as more private land is subdivided up and taken out of timber production

Letter 3978 Though this alternative [#12] still does not recommend adequate timber harvesting I feel it is the best alternative for the long term stability of the forest products industry in the area

Letter 3984 — Such a small percentage of the timber produced in Virginia comes from Federal land that sharp reductions in your timber output won't have any long-term negative effect on the economy of the region,

Letter 4001 — Timber production should be curtailed There are large areas of private timber holdings that are being underutilized The GWNF should not be in competition with such private lands An example of this is the recent decision of Westvaco to close its log yard in Highland County because it [Westvaco] does not need additional wood from this area

Letter 4011 — Alt 8 assumes that the future increase in demand for hardwood stumpage will be met on private land having worked in this area for the past 13 years as a lumber buyer, the last 5 of those years have been characterized by increasingly tight supplies of logs

Letter 4257 — Coastal Lumber Co. operates 8 manufacturing facilities and all of these could be adversely affected by implementation of Alt. 8

Response — Hard evidence that permits a conclusion as to the relative ability of the potential supply of forest products from the Forest to contribute to a stable regional economy has not been located There is reason to believe that the constraining factor on the number and size of manufacturing facilities in the Socio-Economic Impact Areas is the national and international demand for the goods and services produced from stumpage rather than the supply of stumpage This principle is discussed in detail in the process paper *The Concept of Demand*

The process paper *Economic Diversity and Dependency Assessment* concluded that the economy of northern Virginia is relatively diverse, albeit the timber industry is a major industrial component The economic stability of any region can best be achieved by diversifying the mixture of industries and employment opportunities so that the region is less susceptible to any changes in demand for wood products or any other product or service

Evaluation of the **likelihood** that any reduction in the volume of forest products from the Forest could be replaced by forest products from other lands within the Socio-Economic Impact Area has been done This analysis is documented in the process paper *An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area.* The conclusions in this process paper are summarized in Appendix B of the FEIS

In formulating Alternative 8A as the Forest Service preferred alternative, two modifications were incorporated which should mitigate any economic impact of a modest reduction in timber harvest

1 The allowable sale quantity has been increased to 330 million board feet (or an average annual offer of 33 million board feet)

2 Lands suitable for timber production are more concentrated on sites which are accessible and with higher productivity. This should permit a higher percentage of the offered volume to be high quality hardwood and pine sawtimber, thus more economically efficient

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Letter 1985 — Please support Alt 12 Any action other than the adoption of Alt 12 will negatively impact the furniture industry and its ability to compete with other durable goods manufacturers, both offshore and domestic

Letter 1986 — I would like for you to accept alt 12 If the amount of logging is curtailed in this area, this could very well have an impact on all of the manufacturing with the increase of buying lumber elsewhere We may even have to look at the importing of some of our lumber This would affect jobs

Letter 1997 — Please adopt Alt 12 as the new mgt plan for the GWNF. The domestic furniture business is in enough trouble now without having one of our most important sources of lumber choked off

Letter 2030 — Even if the national forests put timber on the market at no lower than the "going local market price," that local market price would be heavily influenced to begin with by the prospect of a large amount of available national forest timber This means that loggers will be less interested in harvesting smaller tracts on private land and, with their relative lack of bargaining power, private landowners will be unable to require desirable standards of thinning and cleanup

Letter 2047 — The George Washington National Forest is important to the veneer mills of Virginia and North Carolina as a source of logs I urge you to adopt Alternative #12

Letter 2062	The GWNF is an important source of lumber for sawmills, veneer mills and all furniture industries The forest supplies many jobs of all descriptions. Please adopt Alt. 12 as the new plan for the NF
Letter 2274	*As a Cost Control Manager at a wood working furniture plant, I cannot stress strongly enough the importance of the continued flow of lumber from the George Washington National Forest. These domestic and local raw materials are crucial in providing the competitive edge* Adopt Alternative #12.
Letter 2284	The George Washington National Forest is a very important source of lumber for the furniture industry, not only in your state, but in North Carolina as well It is very necessary for it to remain a strong source of logs for the sawmills that supply our company out of Western and Northern Virginia.
Letter 2286	It is necessary that this forest remain a constant source of logs for us and for the furniture industry in general in VA and NC.
Letter 2305	The George Washington National Forest is an important source of raw materials for the furniture industry
Letter 2318	It is important that the George Washington National Forest remain open to logging for saw mills that furnish lumber to the furniture industry
Letter 2545	*Consideration must be given to the people and communities dependent upon the forest industry in the area for their survival The Deacon's sawmill at Lexington is not as visible as the Holiday Inn, the Maples, or the HoJo* If a strict accounting were taken of the number of residents working at the mill, in the woods providing logs to the mill, trucking logs to and lumber and chips from the mill, I suspect you would find that one mill supports more people than the three "tourist-based" firms combined. A larger share of the proceeds from the mill stay in the local economy.
Letter 2549	The uninterrupted supply of American hardwoods is vital to the furniture industry and to the American effort It would certainly be a tragedy for American Wood Manufacturers to go off shore for this wood supply
Letter 2658	With a group of sawmills (seven within a radius of thirty miles) that produce close to a million feet of lumber per work week, I do not believe Alternative 8 will be sufficient to handle this demand
Letter 2661	There is not enough stumpage available locally to meet the demand for logs To further restrict harvesting activities on the GWNF *will be devastating to the wood industries in and around the GW. One or more of the sawmills in the GW area will be forced to close*
Letter 3514	Since the George Washington National Forest is an important source of lumber for the furniture industry in Virginia and North Carolina, I feel it should remain a viable source for logs for the sawmills Therefore, I support Alternative #12
Letter 3664	The George Washington National Forest is an important source of lumber for the furniture industry in Virginia and also North Carolina It is of utmost importance that it remain the most important source of logs that are now supplied to the sawmills in Western and in Northern Virginia In this regard, I urge the adoption of Alternative #12.
Letter 3747	Oak is the foundation of the timber industry in West Virginia Many small loggers and sawmill owners rely on timber from the National Forest. Protecting our hardwood resources and the public perception of those resources is vital to the economic survival of our state.
Letter 3790	I like Alt 12. The GWNF is an important source of lumber for the furniture industry in VA and NC It is important that it remain a viable source of logs for the sawmills that supply us out of Western and Northern Virginia
Letter 3995	*The company that I work for produces a high-quality product with little or no defect We purchase many logs in the George Washington National Forest area* If you decide to designate close to 800,000 acres to "non-timbering areas," it will have a wide-ranging effect.
Letter 4236	It is of most importance that [the GWNF] remain a viable source of logs for the sawmills that supply us out of Western and Northern Virginia Without our raw materials we would not be able to continue our operation, thus its loss of employing workers, its tax base, etc

Response	Based on information displayed in Table 2-5, the estimated volume of sawtimber offered annually would be reduced by 1.5 MMBF As discussed in the process paper *An Analysis of Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area*, it appears likely that this volume could be replaced from non-industrial private lands
Letter 46	If a reduction in harvest on the national timber forces Georgia-Pacific to close, it will severely affect timber prices for Central Virginia
Letter 71	At the Georgia Pacific Corporation hardwood sawmill in Buena Vista, Virginia, more than 30% of our raw material originates from Forest Service lands
Letter 71	If the current plan is adopted it is conceivable that our sawmill will experience a reduced work week due to a reduced log supply. It will almost certainly increase our log prices and diminish an already bare bones profit margin.
Response	The ID Team Leader discussed this concern with a representative of the hardwood sawmill at Buena Vista, Virginia. It seems unlikely that the mill would close as a result of the changes envisioned in Alternative 8A There is a possibility of insufficient logs to keep the mill operating full time. There is, however, no way to predict the probability of such an action
Letter 490	Alt 12 allows for the use of a greater amount of wood, which the forest will yield, whether managed professionally or not As a respective citizen of the area, G-P supports the use of this wood rather than allowing it to be wasted as dictated by other Alt. choices Using this wood to provide wood and paper products for the citizens of the nation, will result in a monetary return to the NF's. This will result in savings for all taxpayers of the nation
Response	Alternative 12 has been reformulated to have an allowable sale quantity of 450 million board feet (or an average annual offer of 45 MMBF) This volume of stumpage equates to the anticipated demand for stumpage from the Forest As displayed in Graph 2-25, this volume of harvested timber is substantially below-cost and would not "result in savings for all taxpayers of the nation "
Letter 1615	The economic analysis, which indicates lost jobs in timber, does not seem to take into account the fact that most of these jobs will just move to private lands This should be factored in
Letter 3705	The forest plan predicts there will be a loss of jobs because of the reduction in timber harvesting, this does not take into account the increase in harvesting on private lands, which is likely to occur
Response	As discussed in the process paper *An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area*, it cannot be substantiated that most of the timber jobs lost as a result of any reduction in timber harvesting will move to private lands While there is at least some opportunities for substitution, it is unlikely that all national forest timber can be replaced with no economic effects
Letter 1645	The Recorder (Monterey, Virginia) 27 March 1992, pg 19 FORKS OF WATER - The log collection yard operated here by Westvaco closed this week but company officials and industry analysts stressed the closing is only temporary.
Letter 1645	In announcing the closing, Westvaco public relations manager Robert Crockett said, "The temporary closings are necessary to reduce wood inventories which have been building steadily because of the mild winter and market conditions within the paper industry "
Letter 1645	Local loggers who sell wood to Westvaco in Highland on a quota basis that allows them to bring in a given amount of wood a month, will bear the brunt of the operation's closing
Letter 1645	Two mild winters in a row have enabled loggers to get machinery into the woods to harvest timber on an almost year round basis, causing the company's stockpile of pulpwood to rise

Letter 1645 "Many companies have been operating at less than full capacity or selling their product for less," Lewis continued "Westvaco is one of them." .

Letter 1645 At the same time, the economic down turn that is impacting much of the economy has decreased the demand for the paper products made from the pulpwood when it gets to the Covington mill..

Letter 1645 Lewis agreed saying, "Westvaco is not the only company that has had to lower production The whole industry has suffered terribly during this two year recession "...

Response The points raised in this newspaper article seem to substantiate that the national and international demand for goods and services produced from the stumpage supplied from the Forest plays at least a strong a factor in the need for raw materials as the relative supply of raw materials.

Letter 2030 The effect of below-cost timber sales on private landowners who plant trees· For many years, landowners have been urged to plant trees as a conservation measure. We have planted about 60 acres of our farmland to pine trees Our trees are now reaching maturity and badly need a thinning but, as you know, there is little market for the trees. The reason, of course, is the potential buyers can get timber so cheaply from the national forests

Letter 2572 Taxpayer-subsidized below cost logging from the George Washington National Forest, depresses local economies by keeping privately produced timber and timberlands undervalued. It also turns 3/4 of the trees into cheap paper products and air and water pollutants, thereby increasing environmental costs while suppressing local recycling efforts

Letter 3544 Alternative 3 would eliminate taxpayer subsidy. Response Alternative 3 would still require funding from taxpayers that would exceed any revenues that might be generated by user fees from the public Either way citizens are paying for using the national forest's resources.

Response The Timber Sale Program on the Forest operates at a cost greater than the expense of running that program. However, the timber is appraised at fair market value and usually receives a significant bid premium when conditions of the sale are in demand by purchasers. Some timber sale offerings are not as desirable as others and are appraise at lower prices and bring little or no bid premium. Pine pulpwood thinning sales are costly to log and have smaller profit margins for purchasers Purchasers of Forest timber depend on a mix of private, national forest and industry land to harvest timber. Many other loggers only cut on private timber land All ownership components of our nation's timber land base are needed to meet our needs for timber products

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Letter 1973 I support Alt. 8 Closing timber harvesting on public lands will benefit private landowners Private timber sales will be more attractive to buyers, thus improving prices for private landowners' crops while keeping timber industry workers employed.

Letter 2242 Don't compete unfairly with private landowners by artificially keeping the price of timber down by selling timber below cost. The pulpwood industry should develop its own private tree farms or pay fair prices to private landowners.

Letter 2665 "A change in Forest Service timber harvests could be offset by a change in the amount harvested by the non-industrial private landowner A significant reduction in volume offered by the Forest Service should not have an adverse effect because its portion of the supply mix is relatively small. .a review of supply capacities suggests that timber inventories are abundant and continue to grow. no serious depletion of the timber inventory is foreseen in the short run the Forest's role could be decreased during this period " (EIS, B-26) This information makes it clear that the supply of timber from the GW floods the market and reduces the price and value of timber and timber lands for private landowners and local economies Timber harvesting in the GW is a disservice to local communities and should, therefore, be eliminated

Letter 3710 During the 1980's, the forest substantially increased its market share of local timber supply, from 5% in 1977 to 8 5% in 1990. Thus, while GWNF timber removal volume has increased 6 3%, total timber harvest in the market area has increased only 1% in recent years DEIS, B-25 This demonstrates that increases in federal timber sales have come at the expense of private suppliers

Letter 3916 I am a forest owner in my own right, and every time you sell a piece of timber, it hurts my ability to sell my timber It also artificially holds down the price of my timber

Letter 4034

The claim on p 2-51 of the DEIS that adoption of Alternative 3, the Conservation Biology alternative, would result in joblessness is unfounded and an outright lie In fact on p. 3-81 of the DEIS it is stated that "the (sic) role of national forest system land to the total forest resource base changes in national forest resource outputs are not expected to cause heavy impacts on the local economy " Thus it is likely that jobs lost through cessation of all logging on national forest land would be quickly compensated by job creation on private forest. Furthermore the lifting of competition from federally subsidized timber would likely benefit private growers Unfortunately, this aspect of employment is not even mentioned in the plan documents.

Response

As discussed in detail in the process paper *The Concept of Demand*, the demand for wood (stumpage) by the producers of wood-based products and services is relatively "elastic" It is questionable if changes in the amount of stumpage offered on the Forest would cause more than a small, short-term increase in the price of stumpage The key point is that stumpage offered on the Forest is a small percentage (8 5%) of the total amount of stumpage sold in northern Virginia and adjoining West Virginia

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Letter 3654

We strongly oppose the harvesting of timber from the George Washington National Forest at taxpayer expense. We believe this practice results in unfair competition with private landowners who might otherwise be able to profitably market tree crops

Response

Purchasers of Forest timber depend on a mix of private, national forest and industry land to harvest timber Many other loggers only cut on private timber land All ownership components of our nation's timber land base are needed to meet our needs for timber products

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Letter 369

The FS has seriously underestimated the demand for GWNF timber and the capacity of private land to make up for any supply deficit. The demand for Appalachian hardwood timber is growing worldwide, and the GWNF has some of the finest

Response

Historically the Forest has provided a small share of the timber demand in the market area, applicable to this Forest (between 5 to 9 percent from 1977-1989) We estimate the Forest's contribution to this demand as being between 15 MMBF and 31 MMBF Our projections in the demand analysis are predicated upon the historical trend of timber stumpage delivered by the Forest

FIA data indicates growth to removal rates are at a 2.7 to I ratio for all species, and therefore an adequate supply of timber exists in this area FIA data for our market area indicates that forest industry and non-industrial private land comprise 72 percent of the land within this area, while the National Forest comprises 26 percent But the productive capability of the Forest and management objectives on public lands has influenced historic production levels It is inappropriate to infer that the National Forest should produce 26 percent of the market area volume With these statistics in mind, we believe that there is an adequate supply of timber available from non-NF sources that could take up any shortfall if the annual offer from the George Washington National Forest was marginally reduced from its 39 MMBF current level Stumpage price adjustments may be needed to induce other owners to increase supply of timber, but we feel these adjustments would be minimal

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Letter 2318

We should continue to use the George Washington National Forest as a lumber source

Response

This comment is consistent with the Revised Plan

Letter 2346

Adding even more to my rage is the fact that much of the timber harvested from our public lands is destined for foreign markets!

Response

The Forest has no data on exactly how much of our quality sawtimber is exported However, the number is estimated as being less than 5 percent

BELOW-COST TIMBER SALE PROGRAM. Multiple Use Benefits from a Timber Sale Program

Letter 67	*The consideration of reducing the amount of timber harvest by almost one half is of not only grave concern to* wildlife but to the economic long range factors
Response	The reduction in timber harvest will result in timber jobs and income decreasing and big game wildlife that require young age classes (i e deer) also decreasing when compared to current management.
Letter 2232	I believe it is important that some standard of economic reason be applied for harvesting for wildlife habitat improvement.
Response	Regeneration harvest methods will be used to achieve wildlife objectives when they are the most cost effective method of achieving these objectives.
Letter 981	*The Plan should budget for 1,000 acres per year for vegetative manipulation to benefit non-game wildlife. The* Plan should not encourage additional deer habitat
Response	*The Revised Plan will provide vegetative manipulation to benefit both game and non-game wildlife The exact* amount will depend on habitat needs identified in site specific projects, rather than an arbitrary amount While deer will benefit indirectly from vegetative manipulation targeted at other species, there is no direct effort to develop additional deer habitat
Letter 3962	Timber cutting should be done to provide habitat for fauna and flora in the GWNF, not to supply man's need
Response	The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to the environment, to issues raised by the public, and to agency policies and priorities. Alternative 8A was developed to respond to a wider array of uses, values, products and conditions including amenity values and environmental concerns Alternative 8A is also responsive to the emerging policy on *ecosystem management.*
Letter 3840	*There should be one kind of timber sales timber for wildlife.*
Response	The concept of management areas, upon which the plan is based, considers vegetative manipulation through *timber harvest as a means to achieve the desired future condition Some lands, such as those in Management* Area 17 are intensively managed for timber production as opposed to those lands in Management Areas 14, 15, 16 which are intensively managed for wildlife habitat development.
Letter 4241	According to the EIS (p 205), the present value of the additional hunting benefits achieved through the preferred alternative timber program is a mere $205,000 or $650,000 less than the losses incurred to produce them These benefits are in addition to the millions of dollars worth of hunting available with no logging at all.
Response	Most huntable wildlife species can be maintained at viable population levels. This still provides a reasonable chance for hunter success when vegetation is manipulated through a timber management program Worthwhile hunting is available on unsuitable lands in part because of logging activities on suitable land All aspects of the ecosystem are interconnected
Letter 3710	Around half of the proposed below-cost program is said to benefit wildlife DRLRMP, 2-2. The planning team attributes some $205,000 in annual economic value from logging-related wildlife benefits, which it claims to offset partially the forest's below-cost timber deficit. *DEIS*, 2-35 No part of the planning documents attributes an economic cost to the potential harm to wildlife that logging might cause.

Letter 3710 This simplistic approach overlooks important factors, especially the lack of need for additional early successional habitat and the adverse impacts of logging on bear and other species requiring undisturbed, late successional growth These points are not discussed in the planning documents. Nor do they address in any detail the possible effects of proposed logging on songbirds and other important forest species See, e.g , DEIS 3-132 - 3-144.

Letter 3710 The claim that the proposed logging program would benefit wildlife is dubious at best This claim should be deleted from the planning documents until exposed to much more thorough scientific and economic scrutiny.

Letter 4241 Losses [from below cost timber sales] are justified by the Forest Service on the benefits that logging is said to provide to other forest resources. In fact, the only nontimber benefits from logging identified were increased carrying capacity and hunting for deer and, to a lesser extent, turkey. Carrying capacity and hunting benefits for bear were found to decrease with increased logging In no case, however, were these added hunting benefits large enough to offset losses from logging (EIS, p. 2-35). We do not feel that the public good is served by spending more taxpayer dollars to provide hunting opportunities than the added hunting is worth, particularly in view of the significant environmental costs imposed by logging.

Response The ID Team found that the value of benefits derived from a timber sale program could not be analyzed adequately in the revision. Many of the benefits do not posses a monetary value whiles others can only be assessed a monetary value in site-specific situations

Existing policies require the exploration of management practices other than timber sales to produce comparable non-timber benefits Alternative 6 was reformulated to determine the relative advantage of producing wildlife habitat conditions similar to those in Alternative 8A without the use of a timber sale program Based on the information in Table 2-14, the present net benefits of timber and wildlife minus the present net costs of timber and wildlife for Alternative 8A exceed the present net benefits of wildlife minus the present net costs of wildlife for Alternative 6. This means that the Forest can produce a comparable level of wildlife benefits more cost efficiently using a timber sale program than relying solely on non-timber benefits

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Letter 367 The maintenance of a bioecological system for our forests is imperative, and the maintenance of a sound timber management program is essential to its continuation.

Letter 369 The diverse habitat provided by a balanced timber age-class distribution is essential for a diverse and healthy wildlife population Herbaceous forage makes up to 40% of wildlife food sources Maintenance of biological diversity requires scientific forest mgt.; vegetative manipulation (including timber harvesting) is fundamental to scientific forest management The interests of the forest products community are neither superior nor subordinate to those of other forest users. But since timber cutting is a necessary tool used to achieve biological diversity, the interests of the forest products community must be considered

Letter 182 I am writing to urge you to continue the management philosophy that you have had in the past by allowing logging to be done on National Forest properties. I do not think that I need to tell you that this creates exceptionally good habitat for much of our wildlife and is essential if we are to continue to have good, healthy numbers of wildlife in the future.

Response Biological diversity is a complex subject that cannot simply be equated with a well-balanced age-class distribution of timber stands In particular, biological diversity cannot be equated with maximizing habitat for game species Biological diversity includes the variety of species in the Forest Not all of these species benefit from timber or wildlife management practices

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Letter 369 Alt 8 is preservationist mgt that will degrade biological diversity The resulting overmature forest monoculture will be a biological desert that is less vigorous and more vulnerable to insects and disease Under Alt 12, the necessary vegetative manipulation tools are available to provide for far more biological diversity

Response A mature forest is hardly a "monoculture" or a "biological desert" There are a variety of plant and animal species that require and thrive in older vegetation, including old growth.

Letter 2664 The Forest's budget (either in wildlife or timber) in the Final Plan must contain funds to cover wildlife timber sales in unsuitable habitat

Response — As displayed in Table A-7 of the Revised Plan, the Forest Service preferred alternative anticipates a small amount of volume being harvested off lands unsuitable for timber production (500 MBF per annum).

Some of the 3,400 acres of "wildlife habitat non-structural improvements" funded in Appendix F of the Revised Plan would consist of timber sales on lands unsuitable for timber production to provide wildlife habitat

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Letter 502 — Profits from sales should be used to develop other forest uses, i.e.: hiking trails, stand improvement, etc.

Response — Receipts from timber sales are distributed by law to the U.S. Treasury. Several accounts are credited with a *distribution of these receipts. These accounts are National Forest Fund, K-V, Sale Salvage Fund from which numerous activities are funded as directed by regulations governing each account Funded activities must* occur within the sale area boundary.

Letter 88 — In Alternative 8, there has been no economic impact [analysis done] on the surrounding communities resulting in the decrease in wildlife habitat that will come as climax species take over the 800,000 acres set aside.

Response — *The change in employment and income displayed for each alternative includes the changes engendered by* increasing or decreasing hunting opportunities. It is a mistake to assume that lands unsuitable for timber production have no value for wildlife species. At least for the 10 to 15 years that the Revised Plan is in effect, these lands will offer quality habitat for black bear, gray squirrel, wild turkey and other species.

Letter 1435 — I want to see more land managed for timber production, including clearcutting. Not only will it provide *timber-related jobs for the local economies, it would also benefit wildlife species such as grouse.*

Response — Alternatives 2, 4, 5, 7 and 12 contain more land suitable for timber production and a higher percentage of clearcutting than the Forest Service preferred alternative. These alternatives are considered in detail in the FEIS.

Letter 281 — I urge you not to abandon forest management practices that have been developed and proven successful over the last 90 years. Since we no longer allow natural fire to occur, logging is probably the only practical way, *giving due concern to protection of watershed and riparian areas, to provide setback in succession.*

Letter 282 — Many wildlife species benefit from well-regulated timber harvests On the other hand, inactive or greatly reduced forest management is irresponsible on our part and of greatly reduced benefit to wildlife.

Letter 292 — The only economically feasible tool available to provide a diversity of habitat is the well-regulated timber harvest I strongly recommend that you adopt this management policy for the George Washington National Forest.

Letter 530 — Cutting would help the wildlife population and give them a place to hide and they would also eat leaves off the under brush.

Letter 730 — The development of these habitats is a direct and a positive benefit of a timber management program designed with multi-disciplinary involvement

Letter 757 — *Commercial timber harvesting is an effective and cost efficient means of maintaining forest wildlife habitat* I sincerely hope that the Forest Service will not adhere to those who would propose to exclude it to the detriment of a balanced ecosystem.

Letter 857 — This new program [reduced timbering] is not good for hunting.

Letter 1306 — In my hunting of ruffed grouse for thirty years in Virginia, I have seen their numbers steadily decrease and one of the main reasons, I think, is because we do not harvest enough mature timber The ruffed grouse and all *wildlife benefit from frequent cutting I don't see why we can't have more frequent cutting to enhance wildlife* but at the same time use prudence in the cutting to protect our Native Brook Trout

Letter 2200 Cutting trees is good for the forest. It balances age class and is good for wildlife

Letter 2635 Maintaining a broad diversity of plant and animal species across the forest is an objective shared by all but the most radical preservationists To maintain the full spectrum of diversity, from early successional to climax species, significant and regular manipulation of the vegetative complex is necessary. Commercial timber production, guided by the overall objectives of management, is the common sense approach to that manipulation and it has spin-off economic benefits The other key to managing for diversity is to protect the forest from the catastrophic effects of fire, gypsy moth and the like Thus, I urge you to consider the broader, long term effects of these aspects of the plan.

Letter 2823 Timber harvesting is the primary tool used to create a diversity of wildlife habitats on the Forest, therefore it is critical to maintain an active timber sale program which takes into account the intangible as well as tangible benefits of timber harvesting

Response The preferred alternative does not maximize the potential value for either early successional or late successional unfragmented habitats It recognizes the value of both somewhat conflicting needs and within a large forested area provide for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

The Revised Plan recognizes the values of forest management and vegetation manipulation within the context of multiple use management Much of the timber harvesting will be conducted specifically to regenerate portions of an aging forest to provide early successional habitats The amount of regeneration provided varies among the twelve alternatives considered in detail in the FEIS Several factors come into play including the values that unfragmented habitats and roadless areas provide, value of and need for forest products that can be provided, and the costs versus benefits derived from this action

Estimated white-tailed deer carrying capacity is maintained at present levels Currently, in some areas of the forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some rare plant species are preferred as deer foods Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters Based on past sales declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas However, there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate Grouse hunting accounts for approximately five percent of the hunting days afield on this Forest In light of a below cost timber program, it is economically difficult to justify an increased timber program to increase ruffed grouse hunting success rates

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2 under "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife.

Letter 167 [T]he use of modern forest management practices will positively impact wildlife habitat, dispersed and developed recreation, biological diversity, and positively impact economic gains in the [Alleghany] County

Letter 2387 The George Washington National Forest owns 57,172 acres which is 24 3% of the total forest land in Rockbridge County The use of modern forest management practices will positively impact recreation, biological diversity and positively impact economic gain in the County

Response Timber harvesting is one of the most cost effective ways of creating early successional wildlife habitat Timber harvesting does not contribute **directly** to creating dispersed or developed recreation opportunities Timber

harvesting can be used to maintain species richness (one of the components of biological diversity), but it has limited application in maintaining other types of biodiversity.

There are serious questions about the appropriate role of the Forest in terms of its responsibilities to the citizens within or adjacent to the National Forest boundary compared to its responsibilities to other interested citizens of the American public in general The Revised Plan could include maintenance of community stability if it was consistent with other multiple use objectives. The decision to supply a given amount of forest products for this purpose depends on the relative ability of the Forest to appreciably contribute to a stable regional economy as well as the environmental effects and multiple use values foregone as a result of this action

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Letter 1257

Commercial timber cutting is an economical means of manipulating forest growth and providing an ongoing base of good habitat for all kinds of wildlife Comparing timber harvesting costs (i e. road building) with the revenue from that activity is an unfair way of determining the total value of timbering to mgt. of the forest, particularly for wildlife and wildlife's long-term welfare.

Response

The question of the multiple use values attributable to a timber sale program is addressed through the use of "marginal timber and wildlife benefits" This number represents the value of timber and wildlife benefits derived from timber harvesting minus the timber costs

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Letter 3710

Analyze much more thoroughly whether the benefits of purported "multiple-use" logging offset the costs and state unequivocally that any such logging will not cause overall harvest volume to exceed 27 4 MMBF per year.

Response

There is no Federal regulation which requires the Forest Service to receive a profit on the sale of timber Sales are awarded competitively from sealed bids to the highest bidder most often significantly above the advertised price ASQ is interpreted as a maximum timber production from suitable lands for 10 years that the Forest cannot exceed Any year, because of funding, may be higher or lower than the ASQ.

Letter 190

The idea that wildlife, water quality, recreation, and other desirable features can be maintained and thrive under a system which virtually eliminates the sound practices of timber and vegetation manipulation, using proven forestry practices, is ludicrous.

Letter 2385

I hope that the new restrictions which will greatly reduce the timber cutting and game mgt potential for the forest will NOT be put into effect. The clearcut areas and roads created by timber sales are vital to the continuation of much recreational activity by a substantial number of taxpayers

Response

The Forest Service preferred alternative is designed to provide a variety of multiple use benefits consistent with the needs and desires of the Forest's public

1/3 of the forested acres are suitable for timber production A greater portion of the Forest was not designated as suitable for a number of reasons High roading costs to access remote areas, low quality of timber, and low value on site with poor site indices, and weak markets in certain areas of the Forest contribute to below cost sales Generally, such areas were removed from the suitable timber base to increase economic efficiency of the Forest's timber program

Timber management is "concentrated" on the lands suitable for timber production, but it is not intensified Long rotation ages and numerous standards ensure that these lands serve other multiple use purposes, such as for wildlife that prefer early seral forest stages, and species preferring early seral forest stages intermixed with older age classes More than 3/4 of these suitable lands are within Management Areas 14, 15, and 16 in which timber harvesting is specifically designated to improve wildlife habitat management

In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area Instead, the Revised Plan identifies modified shelterwood as the primary regeneration harvest method As discussed in Appendix H of the Revised Plan, modified shelterwood and other even-aged regeneration harvest methods can adequately provide sufficient oak regeneration to meet timber and wildlife objectives

There is no research or experience that supports the contention that timber harvesting promotes improved water quality Instead, mitigation measures in the form of riparian area standards and best management practices are employed to minimize any adverse environmental effects from timber harvesting methods

Hunting, which will be monitored through the sales of National Forest stamps, is not predicted to drop as a result of implementing the Plan. Hunting has declined, and this Forest appears to be closely approximating national trends. A slight annual decrease in hunting is predicted for the next decade

Less road construction does not mean less areas are available for hunting Forest engineers estimate that there are approximately 1760 miles of Forest Service administered roads. They also estimate that 60% of these roads are open all year or open seasonally for hunter access. This does not include the numerous county and state roads that traverse the Forest This open road mileage facilitates easy access to the majority of the Forest.

Some areas remain roadless The majority have perimeter roads, so even these areas are relatively accessible. There is a demand for hunting areas away from roads, as well as demand for hunting areas that are easy to access by motorized vehicles

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BELOW-COST TIMBER SALES: Compliance with USDA Policy on Below-Cost Timber Sale Programs

Letter 3710

Plan further reductions in below-cost timber sales. Response Plan for further reduction in below cost timber sales The issue of Below-Cost deals with below cost timber sale program expenses and revenues, not individual timber sales. The DEIS analyzed a wide variety of alternatives, and in particular alternative 10, to evaluate the below-cost issue While a positive cash flow could not be achieved in any alternative, the timber sale program under the present plan does provide positive net benefits in the TSPIRS Economic Account. This trend is expected to continue under the Revised Forest Plan and the Forest will continue trying to improve the cash flow for the timber sale program

Letter 3710

The planning team has no sound scientific or economic rationale for the extensive program of below-cost sales that it proposed to maintain The forest should construct an addendum to the new plan that phases out [below cost] sales altogether.

Response

The Forest Service preferred alternative has been prepared to be in compliance with existing laws and regulations. The Forest Service is not required to make a profit on the timber sale program The legal requirements are limited to those outlined in the *USDA Decision on Revise of Administrative Decision by Chief of the Forest Service Related to Administrative Appeals of the Forest Plans and EISs for the San Juan National Forest and the Grand Mesa, Uncompahgre, and Gunnison National Forests* The FEIS and Revised Plan comply with the administrative requirements of this decision.

As discussed in Chapter 2 of the Revised Plan, a national policy on below-cost sales may be forthcoming in the future At that time, the Revised Plan will need to be amended or revised to comply with such a policy

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Letter 3728

Current timber sale cost accounting methods do not include the intangible benefits derived from timber sales such as fire protection, foot travelways, wildlife habitat developments and forest-wide vegetation diversity needed by the various species of wildlife. It is most critical to maintain flexibility in the mgmt. of the Forest through a timber sale program which takes into account the intangible benefits of a timber program, rather than consider only funds produced from the sale of timber

Response

The discussion on the economics of the timber sale program has been developed in light of the accepted accounting principles used in TSPIRS. The analysis also takes into account the requirements imposed by the Department of Agriculture in the "USDA Decision on Review of Administrative Decision by Chief of the Forest Service Related to the Administrative Appeals of the Forest Plans and EISs for the San Juan National Forest and the Grand Mesa, Uncompahgre, and Gunnison National Forests" of July 31, 1985 Where the timber sale program is the most cost effective manner to produce benefits, timber harvesting is considered an appropriate management practice It is highly questionable, however, if a timber sale program is the most cost effective method to provide fire protection or foot travelways

Letter 4044 The Forest Service contravenes Section 6(k) of the National Forest Management Act by setting and estimating future cutting levels by calculating sustained timber yield relying on biological criteria rather than by using profit and loss equations In other words, the Forest Service sets its annual allowable sale quantities on how much it can biologically produce rather than on whether it can be done profitably.

Letter 4044 Although a strict profitability test for timber sales is not required by Section 6(k), the legislative history of the section demonstrates that the economic factor Congress intended the Forest Service to consider in determining suitability is the profitability of timber production.

Response As discussed in detail in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest*, the ID Team followed the procedures outlined in the NFMA Regulations (36 CFR 219 14) and in Chapter 20 of the *Timber Resource Planning Handbook* in determining the lands suitable for timber production It is beyond the scope of the revision to interpret the legislative intent of Section 6(k) of NFMA

Letter 4044 The Forest Service failed to explain why the plan will provide greater overall net public benefits than other alternatives

Letter 4044 The Forest Service must explain why the preferred alternative will provide the greater overall net public benefit than the other alternatives.

Response In the record of decision for the FEIS, the Regional Forester will select the alternative that maximizes net public benefits. The rationale for this decision is included in that document

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Letter 4044 *The Forest Service must examine whether the profitability of the plan's timber sales program is the most cost effective way to achieve the non-timber multiple-use objectives of the plan*

Response The ID Team has rigorously explored this question in addressing the issue on the Forest's below-cost timber sale program As discussed in detail in the process record "Addressing Issues and Concerns in the Revision of the Land and Resource Management Plan for the George Washington National Forest" and summarized in Appendix A of the FEIS, the use of timber sales to achieve timber and wildlife habitat objectives is explored. Timber sales are used to achieve wildlife habitat objectives where such practices are the most cost effective.

Letter 4044 A chosen timber sale program need not be the most cost-effective so long as it achieves the forest's non-timber multiple-use objectives However, the Forest Service's below-cost timber sales program also does not achieve the non-timber multiple-use objectives of the forest as required Public comments made during the initial comment period indicated a strong preference for more retention of the natural amenities Because the legislative history of 6(k) indicates that 'other pertinent factors' to be considered include public comments, the Forest Service once again seems to have inadequately responded to the statute's requirements by not responding to the public's demands. In any event, the Forest Service should propose to further reduce below-cost timber production because it is fiscally sound and because of the public's desire for more non-timber multiple-use activities Because the local economies are not vitally dependent upon the forest's timber supplies a proposed decrease in net timber production can occur without having a significant adverse impact on the neighboring communities

Response It is beyond the scope of the revision to interpret the legislative intent of Section 6(k) of NFMA The contention that the public express a "strong preference for more retention of natural amenities" is valid for many people who commented initially on the scoping notice and later on the draft documents There is, however, a large segment of the population that desires other products and uses from the Forest

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Letter 4044 Historically, recreation accounts for nearly 90% of the George Washington National Forest's economic value The commercial timber extraction from the forest has averaged only 24 million board feet per year from 1973-82. There has been popular public support for preserving the forest for the increasingly popular non-timber recreational activities However, in spite of these facts, the Forest Service's 1989 favored alternative still proposes nearly 260,000 acres (24% of the Forest), a 13% increase in below-cost timber harvesting from the 1973-82 average timber harvests, as being suitable for timber production

Response	The period of 1973-1982 contains the years when the Forest was under a timber moratorium because of the Monongahela decision Alternative 2 represents a continuation of "interim management direction" and is identified as the "no action" or "current management" alternative

BELOW-COST TIMBER SALES: Lands Suitable for Timber Production

Letter 16	Some of the areas designated as suitable for timber harvesting are almost certainly located in areas which are too isolated to access, and other areas which are accessed easily have not been selected Some adjustments in subclasses are certain to result upon inspection of maps which show where the subclasses are actually located
Letter 3742	In addition to mapping the unsuitable portions of MA 16 and 17 with subclasses of MA 16 and 17 rather than MA 1, we request that the acreage in these subclasses be displayed in the EIS and Plan We also request that the reduced acreage in MA 1 be displayed
Response	Lands suitable for timber production are displayed on a map accompanying the Revised Plan The Revised Plan will be implemented through a series of project-level decisions based on site-specific environmental analysis and disclosure. At that time, the suitability of the stand for timber production will be determined using the criteria in Revised Plan Appendix A
Letter 87	The amount of timber harvesting in MA 10 appears excessive considering the expressed ecological purpose of the plan
Response	In the Revised Plan, Management Area 10 contains no lands suitable for timber production
Letter 4001	Timber production should be limited to peripheral areas of the forest that are accessible by existing roads so as not to impact wilderness areas Timbering should be prohibited on steep slopes, on areas with thin, low-fertility, or highly erodible soils, on floodplains, in wetlands, or within 200 ft of streams Timber should be cut only on highly productive sites where quality sawtimber can be produced.
Response	The ID Team is uncertain if there would be any National Forest land available for timber production if it had to meet all of these criteria Certainly there wouldn't be enough to maintain a feasible timber sale program
Letter 146	The draft plan reduces the portion of the forest devoted to timber harvesting to 25% This is a great improvement over the discredited 1986 plan, which proposed to harvest timber on more than 64% of the G W. The low site indices, steep slopes, erodable soils, and high cost of timber management makes the 92 plan much more realistic
Response	Alternative 8A is identified as the Forest Service preferred alternative in the FEIS and is the alternative used to produce the Revised Plan The Revised Plan identifies 1/3 of the forested acreage as suitable for timber production
Letter 150	I would like to see more of the GW National Forest being used for timber production This would provide more income for the local economy and the National Forest, while improving the timber stands and quality of the forest
Letter 3660	Suitable lands should be just that. You have a lot of suitable land classed as unsuitable This is unacceptable
Response	Alternative 8A has been formulated so that 350,000 acres are suitable for timber production Appendix A of the Revised Plan contains a more detailed explanation of the process used to identify those lands suitable for timber production

Letter 181 Improve revenue from timber sales by increasing acreage available for timber harvest

Letter 985 The most tangible way that the communities I serve benefit from the National Forest is through the harvesting of timber. Alternative 8 reduces the number of acres available for timber production Since the National Forest constitutes the majority of timber land in this area, the reduction in acreage would necessarily remove from the marketplace some of the best timber land In my view, that reduction in available acreage amounts to an unreasonable restriction on use of the National Forest.

Response Increasing the amount of lands suitable for timber production does not necessarily improve revenue from timber sales Revenues can be improved by adding more lands with high value timber products and/or site indices There are usually no additional opportunities for such an action within any alternative considered in detail in the FEIS Each alternative uses the most productive sites to the maximum extent that is consistent with other resource objectives and the practicality of a timber sale program.

Letter 188 No site index 50 lands should be part of the timber base for commercial timber sales or wildlife management

Response As displayed in Table A-5 of the Revised Plan, there are some lands suitable for timber production with a site index of 50 These lands are included because of the intermingled nature of stands with site indices of 50 and more productive sites on the 1/3 of the forested lands suitable for timber production The Forest Service intends to be very selective in deciding to regenerate any stands with a site index of 50 during the period of the Revised Plan The relative economic advantages of harvesting such stands will depend on site-specific factors beyond the capability of a programmatic analysis like the revision process to consider

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Letter 444 It would be my preference to keep the total forest available for timber production For many years the conflict between others using the National Forest and the Forest Industry has been minimal and timber production did not interfere with other activities

Response Section 4 of the MUSYA provides the following definition

> "Multiple use" means the management of all the various resources on the national forest so that they are utilized in the combination that best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources, and harmonious and coordinated management of the various resources, each with the other, without the impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output."

Thus, the concept of multiple use recognizes that not every multiple use can necessarily be accommodated on the same tract of national forest land

In working with various individuals, groups, organizations and agencies, the ID Team has developed 22 management areas which emphasize different mixtures of management practices that complement or enhance compatible resource uses Rather than carving up the Forest based on a simple political solution, these management areas contain mixtures of compatible resource practices They are integrated in the sense that all of the compatible management practices (with associated standards) in any management area prescription are designed to achieve the objectives of that management area In some of the management areas, regulated timber harvesting, system road construction and/or motorized recreation use may not be useful in achieving the "desired future condition" of the given management area This does not mean that such management areas should be labeled as "single use management"

Letter 989 The areas not recommended for Wilderness Designation should be clearly released to full multiple-use management including motorized recreation Since most of the areas called "roadless" are not roadless or even close, these areas should not be referred to as roadless henceforth

Letter 1060 The council is very concerned with the identification of 176,166 acres of "Remote Highlands" as unsuitable for timber production Why were these lands considered "unsuitable" for timber production? These acres are to be managed to "provide older vegetation in remote and isolated areas where recreationists can obtain a degree of solitude and the environment can be maintained in a near-natural state with little intervention " This sounds more like a "de-facto" wilderness withdrawal The agency needs to reconsider the amount of acreage in this category

Letter 1369 "Remote Highlands" includes 176,166 acres, but why were all these acres considered "unsuitable" for timber production? This sounds like a "de-facto" wilderness proposal. The planners need to reconsider the amount of acreage in this category There is not enough information to show whether or not all these acres should be considered as "unsuitable" for timber production Retain these lands in the suitable base or provide more information to justify their withdrawal

Letters 2194, 2199, 2729
Alternative 8 sets aside another 251,978 acres for wilderness Call it remote highlands or whatever you wish, but we presently have wilderness areas that aren't needed or desired by most American citizens.

Letter 2218 I am opposed to any more set-aside acres from multiple use for Remote Highlands

Letter 2727 Alternative 8 sets aside another 251,978 acres for Remote Highlands. I am opposed to any more set aside acres from multiple use

Letter 2823 Those roadless areas considered for wilderness study but not selected for wilderness study designation in the plan must be clearly released for multiple use management in the final plan

Letter 3595 Alternative 8 sets aside another 251,978 acres for Remote Highlands This is the next closest thing to wilderness, a biological desert for our wildlife I am opposed to any more set aside acres from multiple-use

Response The Forest Service is finding that people need and want a wider array of uses, values, products, and conditions from the Forest than in the past These additional multiple uses include environmental and social values not traditionally identified as multiple uses

143,000 acres of the Forest have been allocated to Management Area 9 ("Remote Highlands") in the Forest Service preferred alternative This management area has been designed to recognize and manage areas that contain special biological and recreational values stemming from the fact that they contain few, if any, roads and have largely recovered from past disturbances Remote Highlands offer opportunities for solitude, primitive recreation and habitat for area-sensitive species These are values, uses and conditions which are rare in the mid-Atlantic States.

Remote Highlands are not "de facto" wilderness areas They permit management practices and uses that are incompatible with wilderness At the same time, they are not lands suitable for timber production where early successional wildlife habitat and timber objectives will be achieved Instead, Remote Highlands offer a core area where habitat for late successional, remote and area-sensitive species can be provided. There will be some habitat manipulation in the form of prescribed burning. In portions of these areas in proximity to existing roads, maintenance of existing openings and even creation of new openings and other improvements is appropriate. Remote Highlands can be managed to supplement the higher degree of habitat manipulation in adjoining management areas

Remote Highlands *generally* contain the poorer and more remote sites in which it is more expensive to build roads and harvest timber With the high degree of concern about below-cost timber sales by the public and Congress, the Forest would be submitting a much worse annual TSPIRS report if we committed much of our timber sale program to Remote Highlands

The desired future condition for Remote Highlands does not lend them to being managed as land suitable for timber production Such management increases early successional vegetation which is disadvantageous to area-sensitive wildlife species requiring expanses of late successional vegetation Such management also requires roading which is disadvantageous to remote and area-sensitive wildlife species and to primitive, non-motorized recreation opportunities

Letter 88 — Alternative 8 sets aside 76% of the forest for an elite group of users providing what adds up to defacto wilderness areas On this 800,000 acres there is little consideration given to wildlife habitat, the need for access for our aging population, timber harvesting, recreational facilities for the average family users and satisfactory control measure for Gypsy Moth

Letter 382 — *Under Alternative 8, 80% of the GWNF will be managed as an isolated, decadent forest, 27% will be wilderness/* remote even though this far exceeds current demand.

Letter 1858 — Alternative 8 puts aside over 284,000 acres as wilderness/remote highlands and reduces acreage for timber harvest to 259,000 acres from 640,000 acres in 1986. This is forest preservation, not forest management and there is a major difference

Letter 2254 — *Alternative 8 consigns over 80 percent of the forest to limbo and is not a viable forest management plan*

Letters 2664, 2823

The Draft Plan shows that management areas (MA) 1, 4, 6, 7, 8, and 9, have essentially designated approximately 50% of the entire GWNF as existing or de-facto wilderness Our Chapter recognizes the values and benefits of undisturbed areas, unique ecosystems, and rare and endangered species of plants and animals. However, we do not believe that the extreme large acreages allocated for "hands off management" meets the *intent of the Forest Service mission, multiple use or professional resource stewardship*

Letter 2629 — We feel that heavily restricting timbering, as outlined in #8, is a serious mistake, both economically and environmentally. #8 would make for more 'Wilderness' While we are in favor of preserving the forest, we are not in favor of locking most users out in the name of preservation Increased Wilderness will simply put more pressure on the other areas

Letter 3660 — *Need to add flexibility to other Management Areas by adding suitable acres Especially MA's 1, 4, 10, 11, & 13*

Letter 3730 — The large reduction of acres suitable of timber production is inappropriate Massive withdrawals of potentially productive land should not take the place of diligent planning and management that maintains the desire biological values while producing some level of goods and services Integration of activities should be pursued

Letter 3951 — This alternative [#8] sets too much of the Forest in a de-facto wilderness mode of management.

Response — *It is incorrect to refer to lands unsuitable for timber production as "de facto wilderness". These lands are* unsuitable for a number of reasons There are a variety of management practices that can still be employed on most of these lands

As displayed in Table 2-6 of the Revised Plan, more than 1/3 of the lands unsuitable for timber production lie within management areas that employ a variety of management practices to enhance habitat for wildlife species (Management Areas 14, 15, 16 and 22) and 4% of the unsuitable acres lie within a management area that emphasizes timber (Management Area 17) Most of these unsuitable lands are relatively unproductive and *inaccessible sites that are intermingled with stands that are suitable for timber production*

11% of the unsuitable acres lie within Management Areas 7, 11 and 13 These management areas also contain lands suitable for timber production Those acres designated as unsuitable for timber production where either relatively unproductive areas or stands which couldn't practically (or economically) be managed for sustained yield of wood products in a manner that was consistent with the objectives of these management areas.

17% of the unsuitable acres lie within management areas possessing unique recreational, biological, historical or geological values (Management Areas 4, 5, 6, 10 and 18).

1/3 of the unsuitable acres consist of wilderness, roadless areas recommended for wilderness study, Special Management Areas and Remote Highlands These areas are managed to provide biological and social values not common to private lands These lands are also managed to provide values which are incompatible with the construction of roads and the sustained yield of wood products

The remaining unsuitable acres consist of isolated tracts, developed recreation areas, administrative sites, communication sites, and utility corridors

Letter 730 — A balanced approach to the future of resource mgt on the GW demands that a substantial acreage be identified as suitable for timber mgt. and the resulting development of quality habitat for those wildlife species that require young forest stands Acreage totals for lands identified as suitable for timber managemnet similar to those proposed in Alts 7 and 12 (471,000 ac and 447,000 ac , respectively) are essential if the GW is to become something other than small, isolated fragments of young forest surrounded by a vast expanse of mature forest, a scenario equally as unacceptable as would be the converse

Letters 2815, 2818, 2819, 2820, 2821
I am very concerned that we are making a major mistake in reducing clearcutting and timbering from roughly 65% of the forest to a basic suitable land base of only 24% To effectively manage for wildlife more acreage needs to be added to the suitable land base for all types of timbering

Letter 3633 — Do not prohibit logging in any area

Letter 3728 — This reduction (to 24% of the Forest's acreage) in suitable land base forces timber mgmt to the best growing sites and highest quality timber-producing areas on the Forest Concentrating timber mgmt on the best sites will adversely affect many wildlife populations and will not distribute habitat diversity throughout the Forest At least half of the Forest should be designated as suitable for timber and wildlife mgmt.

Letter 3934 — Concentrating timber management on the highest quality sites will adversely affect many wildlife populations and reduce habitat diversity throughout the Forest Expand the suitable land base to considerably more than 1/4 of the total Forest area

Response — The Forest Service preferred alternative designates approximately 1/3 of the Forest as suitable for timber production A greater portion of the Forest was not designated as suitable for a number of reasons High roading costs to access remote areas, low quality of timber, and low value on site with poor site indices, and weak markets in certain areas of the Forest contribute to below cost sales Generally, such areas were removed from the suitable timber base to increase economic efficiency of the Forest's timber program

Timber management is "concentrated" on the suitable lands, but it is not intensified Long rotation ages and numerous standards ensure that these lands serve other multiple use purposes, such as for wildlife that prefer early seral forest stages, and species preferring early seral forest stages intermixed with older age classes More than 3/4 of these suitable lands are within Management Areas 14, 15, and 16 in which timber harvesting is specifically designated to improve wildlife habitat management

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Letter 2608 — We are concerned with Alternative, #8 with its low acreage dedicated to timber production and its extremely high acreage of land to be "preserved" without any regard to use for any other activities. We believe that the managed harvesting of timber, including clearcutting, is essential to wildlife populations and other multiple uses as well as contributing significantly to the economy of communities near the forest

Response — The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions This fact results in major disagreements over which alternative should be selected as the Revised Plan

Alternative 8A was developed to respond to a wider array of uses, values, products and conditions including amenity values and environmental services The ID Team has also formulated Alternative 8A to be responsive to the emerging policy on ecosystem management

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Letter 3613 — The DEIS and Revised Plan do not comply with 36 CFR 219 14(c) requiring that land shall be tentatively identified as not appropriate for timber production if certain criteria apply These lands were not identified or locations given in the DEIS or Revised Plan Nor was there a justification or rationale given for including specific lands in the category of tentatively not suitable for timber production

Response — Appendix A of the Revised Plan contains an expanded discussion of the suitability analysis including the procedure for stage 3 suitability This procedure is also discussed in more detail in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest*

Letter 3660 — Stage 3 suitability analysis, suitable acres can and should be increased via withdrawals from Remote Highlands and Lands Not Available For Timber Production

Response — As displayed in Graph 2-9 of the FEIS, the amount of lands allocated to "Remote Highlands" has been decreased from 186,000 acres to 141,000 acres As display in Graph 2-26, the amount of lands suitable for timber production has been increased from 260,000 acres to 350,000 acres

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Letter 3728 — On lands unsuitable for timber production, the use of silvicultural systems should be the primary means of achieving wildlife habitat objectives on the Forest.

Response — By law, lands unsuitable for timber production are not managed under even-aged or uneven-aged regeneration harvest methods to ensure sustained yield or forest regulation.

Letter 3946 — The Plan should show the distribution of site indices for the suitable acres The selection of these acres should be fully discussed with special reference to the stage two economic analysis

Response — Table A-3 in Appendix A of the Revised Plan displays a breakdown of the lands suitable for timber production by site index A discussion on the use of the financial analysis (stage 2) is included in Appendix A A more detailed discussion is included in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest.*

Letter 1060 — The land suitability analysis outcome is troubling considering that in the 1986 forest plan, the amount of acreage "suitable for timber production" was more than double at 640,166 acres. It is almost inconceivable that circumstances could have changed that drastically to suddenly reduce the suitable land base by more than 50 percent to only 259,036 acres Under Alternative 12, 447,133 acres would be suitable for timber production, providing a greatly reduced, but more reasonable, landbase to meet many multiple use needs.

Letter 1060 — As noted earlier, the Council has numerous concerns with the agency's Land Suitability Analysis Under Alternative 8, the agency has reduced the land suitable for timber production to 259,036 acres–well below the 1986 forest plan level of 640,166 acres This represents more than a 50 percent reduction Alternative 12, with only 447,133 acres of suitable land for timber production (45% of the forest), provide a better balance while still reducing the forest's true potential by restricting activities on many tentatively suitable acres

Letter 1300 — Alternative 12 broadens your land base by 188,133 acres as Land suitable for timber production

Letter 1686 — Increase the areas suitable for timber production

Letters 1798, 2162, 2908, 3588, 3589
Alternative 8 only considers 24% suitable for timber production The other 76%'s fate is to fall down and rot.

Letter 2281 — Restricting timber management to only 24 percent of the George Washington National Forest is not consistent with the objectives of multiple use or the science of forestry management.

Letter 2566 — Designating 79 percent of the forest as unsuitable (Alternative 8) for timber production is an abrogation of the Forest Service mission

Letter 2684 — Alt 8 only considers 25% of the forest suitable for timber production This is a tremendous reduction from the present plan

Letter 2938 — Suitable areas should be raised higher at least half should be left for timbering, "500,000 acres."

Letter 3610 — Under Alt. 8, only 24 percent of the forest is classified as suitable for timber production It is simply not acceptable to say that 76 percent of the forest will not be managed at all. What a waste of valuable resources Under Alt 12, 42 percent of the forest is suitable for timber production. While this figure is still relatively low, it does allow for more multiple-use management than Alt. 8

Response — The many individuals, organizations and agencies who commented on the Draft Revised Plan and DEIS have philosophical differences on the management of the Forest. Naturally, there are disagreements over the degree that any alternative is equitable to the interests and concerns of these individuals, organizations and agencies

National and regional Forest Service policy during the 90's has evolved to include a greater sensitivity for environmental concerns and a willingness to adjust priorities to ensure that National Forests are managed to provide values beyond the traditional goods and services offered in the past

Alternative 8A has been formulated to find the appropriate mixture of uses, values, products and conditions that will be provided for the next ten to fifteen years in light of the realization that people want and need a wider array of uses, values, products and conditions from the Forest than in the past

Alternative 12 provides a mixture of goods and services that approximates those provided in the 1986 Forest Plan under revision This alternative is generally viewed as more favorable by persons who are employed in the timber industry, by hunters concerned with early successional game species (especially white-tailed deer and ruffed grouse) and by persons who wish to enjoy off-highway vehicles on the Forest

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Letter 1060 — There is not sufficient information to address whether or not all the 34,978 acres within "Special Biological Areas" in Management Area 4 should be considered as "unsuitable" for timber production The agency should consider opportunities to retain these lands in the suitable base or provide more justification for their withdrawal

Letter 3997 — We commend GWNF for proposing administrative designations designed to ensure the protection of biodiversity, particularly mgt prescriptions 4A, 4C, 4D (SIA's and RNA's), generically known as SBA's These designations are vital to the DFC of biodiversity conservation on the Forest as described in Alt 8 We also recommend honorary designations for these areas through the VA Natural Areas Registry Program

Response — The "Special Biological Areas" discussed in the Draft Revised Plan are assigned to three types of "Special Interest Areas" (SIAs) in Management area 4 in the Revised Plan

"SIA — Biological" consists of 38 biological areas containing 26,000 acres These areas contain unique natural communities which require restrictions on management practices to maintain or enhance their habitats These areas contain most of the threatened, endangered, and sensitive species on the Forest Based on consultation with appropriate state and federal agencies, it was deemed inappropriate to manage these lands for the sustained yield of wood products. For this reason, it is inappropriate to classify them as suitable for timber production This designation, however, does not preclude the manipulation of vegetation for the management of TES species and their habitat when it can be accomplished without damaging the special values of these areas

"SIA — Research Natural Areas" contain the 2,000-acre Little Laurel Run Research Natural Area This RNA was established by the Chief. Based on the Chief's establishment report, no timber harvesting is permitted in the Research Natural Area

"SIA — Shenandoah Mountain Crest" contains 43,000 acres of known habitat for the Cow Knob Salamander on Shenandoah Mountain. An additional 7,000 acres of known habitat is allocated to Management Area 21 as part of the Little River Special Management Area Cow Knob Salamander is a Category II species (proposed for listing as a federally endangered or threatened species) The Forest is cooperating with the U S Fish & Wildlife Service, the Virginia & West Virginia agencies and the Natural Heritage Programs for the Commonwealth of Virginia and the State of West Virginia in preparing a "pre-listing recovery plan" for this species The limited range of suitable habitat for Cow Knob Salamander can be easily fragmented by timber harvesting or road construction For this reason, this area has been designated as unsuitable for timber production

Letters 1060, 1369

The Draft Plan identifies 41,794 acres of dispersed recreation areas as "unsuitable" for timber production. Dispersed recreation is not incompatible with timber production opportunities and recommends returning these lands to the suitable land base wherever possible.

Response

Many forms of dispersed recreation are compatible with timber harvesting, but this is not true for all forms of dispersed recreation. In particular, timber harvesting is compatible with the objectives and desired future condition for Management Areas 7, 11 and 13. Portions of these management areas are suitable for timber production Timber practices are either restricted to uneven-aged management or the use of modified versions of even-aged regeneration harvest methods that are consistent with achieving aesthetic or recreation objectives Those acres that are unsuitable for timber production in these three management areas cannot be economically managed using these regeneration harvest methods.

Letter 3710

At the very minimum, the forest plan should stipulate that any sales of timber from unsuited land will substitute for, not add to, the total volume contemplated for the forest's regular timber sales program

Response

Agency direction (FSH 2409.13 CH 30) clearly states that volume from timber sales on unsuitable land are not included in the ASQ because this volume was not used in the timber yield calculation projection This volume will be part of the Timber Sale Program Quantity as shown in the Revised Plan and will be in addition to the ASQ.

Letter 3710

Additional "multiple-use" timber sales give the logging industry an incentive to "help" the forest find additional reasons to sell timber from sites that otherwise would be free from harvest

Response

Vegetation manipulation from suitable land to provides for achieving the desired future condition for wildlife habitat or other resource benefits This can often be most cost effectively done with a timber sale contract. The impetus for such action comes from the benefiting resource, not the timber industry

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Letter 1250

There should be a specific annual allowable cut quantity for land considered "unsuitable for commercial timber cutting"

Letter 3840

All lands identified as unsuitable should actually be managed as unsuitable and not timbered for "any" purpose.

Response

The Forest Service preferred alternative anticipates a small amount of timber volume being harvested off lands unsuitable for timber production (500 MBF per annum)

Timber harvesting on lands unsuitable for timber production will normally be part of such actions as removing hazard trees along rights-of-way, creating vistas, and expanding or creating recreation sites It can also be used, under limited circumstances, to create additional wildlife habitat

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Letter 4219

In addition to the suitability criteria stated in the Plan, project level analysis must also consider the following. Marketable--There is a market and demand for the products from a stand. The stand is saleable Logging systems appropriate for the harvest should be available and practical. Accessible--Based on physical barriers, soil type, slope, ROW needs, etc., the stand can be accessed at reasonable cost If anticipated road costs exceed the G W average by more than 50 %, an analysis of cost-effectiveness must be included as part of the environmental assessment

Response

The criteria for locating lands suitable for timber production are listed in Appendix A of the Revised Plan The decision to schedule any timber sale involves a number of site-specific factors, many of which are listed in this comment

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Letter 57

The biggest element of being unsuitable for timber production (in the long run) should be permanent soil-site conditions With correct ecological harvesting many forests with low volumes and poor stocking may be made productive for interrelated values including timber.

Response	Soil site conditions are an important factor in determining land suitable for timber production Low site lands are not included in the suitable land base. Good sites with low volume or poor stocking can be harvested and will provide better yields in the future
Letter 2664	The Draft Plan does not have the specific areas of suitable and unsuitable acres identified or mapped The GWNF staff must map these acres as soon as possible to insure that management work proceed on a timely basis
Letter 2824	On January 11, 1992 we wrote to you asking for circulation of maps showing suitable and unsuitable areas of management areas 16 and 17. We requested that these be made available for public comment during the draft stage. We have not received a map for review. After these maps are distributed, we request a reasonable time to review and comment.
Response	At the time that the Draft Revised Plan was released for public comment, the ID Team had not devised a method for electronically mapping the lands suitable and unsuitable for timber production Technology problems have been resolved in the intervening months and the Revised Plan now has an accompanying map that displays the lands suitable for timber production
Letter 188	No existing Semiprimitive NonMotorized area should be included in the suitable base for timber harvesting if road construction is included or if Retention VQO standards cannot be met
Letter 3840	All SPNM lands are unsuitable
Response	The Revised Plan uses "adopted recreation opportunity spectrum" to insure that the ROS class and VQO are consistent with management area direction A small amount of land inventoried as semi-primitive non-motorized will have a different adopted ROS class Conversely, some lands presently inventoried as semi-primitive motorized will be managed as semi-primitive non-motorized with an appropriate adopted ROS class
Letter 3489	It is fully recognized that there are glades, steep slopes, and occasional unique areas to which this does not apply
Response	Most of the alternatives considered in detail in the FEIS include steep slopes and unique biological areas in the lands unsuitable for timber production
Letter 1061	My major objection concerns Alternative 8 which reduces forest area suitable for timber production
Letter 1446	Acreage suitable for timber production from 640,000 ac in 1986 to 259,000 ac in 1992, is a reduction of 60% in 6 years. This raises serious concern about the ground rules now in effect and the rationale behind the imposition of those ground rules
Letter 2542	Limiting the suitable timber land to only 24% of the Forest (259,036 acres) is saying that our valuable timber resource will be neglected on 76% of the Forest We find this totally unacceptable
Letter 2566	It is inconceivable that circumstances could have changed so drastically from the 1986 forest plan to suddenly reduce the suitable land base by more than 50 percent to only 259,036 acres
Letter 2664	The criteria used by the GWNF staff for determining suitable and unsuitable acres for timber cutting is not directed by the resource The Draft Plan has arbitrarily declared 79% of the Forest as unsuitable for timber harvesting The VWTF strongly urges the GWNF to change its guidelines for determining suitability It should be made on a site-by-site basis with specific stand and site conditions, economics and regeneration capability used to evaluate suitability
Letter 2886	It is not clear to us how your criteria for defining lands suitable for timber production has changed so since 1986 In 1986, lands deemed "suitable" stood at 640,166 acres Alternative #8 list only 259,036 suitable acres The physical facts do not support such a reduction, and though there is a significant reduction in suitable acres in Alternative #12, we believe a sustainable timber harvest of 50 million feet can be achieved on these suitable acres

Letter 3729 — Much of the GWNF was cut-over and high-graded many times, the loss of chestnut, and the impending potential loss of the oak component by gypsy moth place a heavy burden on your silvicultural activities to salvage and restore your forest stands to vigor with proper species composition for each site. To achieve a vigorous forest will require the silvicultural mgt of all of your stands, excepting Wilderness and some of your poorest ridge sites

Letter 3890 — Acreage that has been classified as suitable for timber production should be designated as such To not do so would waste a potential national asset We would lose a source of community income as well as the opportunity to improve product and stand quality through improved, scientific silvicultural methods including timber stand improvement cuts, crop tree release and properly designed clearcuts.

Letter 4241 — *We support the nearly 60% reduction in the acreage earmarked as suitable for timber*

Response — A discussion of the determination of lands suitable for timber production is contained in Appendix A of the Revised Plan A more detailed discussion is contained in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest*

Generally, the change in amount of lands suitable for timber production consisted of the removal of lands (1) with values incompatible for timber production, (2) that contained poor sites (particularly in combination with lack of access and steepness), and (3) where resource development would be prohibitively expensive (usually because of lack of access) Many lands that are unsuitable for timber production share two or even three of these characteristics.

Letter 146 — In Alternative 12, the suitable acreage (447,133) is too high The current suitable acreage necessary to harvest 38 MMBF is 288,021; Alternative 12 would increase this by more than 55%

Response — *Alternative 12 now has 595,000 acres suitable for timber production. This is an 1/3 more acres suitable for timber* production than in the DEIS. This amount of acreage is needed to provide the ASQ using the mixture of regeneration harvest methods and standards applied to much of the suitable lands

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Letter 3683 — We believe the large reduction of acres suitable for timber production is inappropriate The greatly reduced allowable sale quantity will not adequately meet the existing timber demand and will also cause a loss of jobs Massive withdrawals of potentially productive land should not take the place of planning and management that maintains the desired biological values while producing some level of goods and services All uses are not exclusive with regard to acreage

Response — A discussion of the determination of lands suitable for timber production is contained in Appendix A of the Revised Plan A more detailed discussion is contained in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest*

Generally, the change in amount of lands suitable for timber production consisted of the removal of lands (1) with values incompatible for timber production, (2) that contained poor sites (particularly in combination with lack of access and steepness), and (3) where resource development would be prohibitively expensive (usually because of lack of access). Many lands that are unsuitable for timber production share two or even three of these characteristics

Appendix B of the FEIS has been rewritten to explain the assumptions inherent in the estimation of changes in employment and income displayed in Figure 2-34 and Table 3-23 in the DEIS The ID Team wishes to stress that these are relative numbers and cannot be viewed as absolute changes in employment and income The decrease in employment and income predicted for the Forest Service preferred alternative should be viewed as potential for decreases in employment and income The Regional Forester will weigh this potential for loss of employment and income as one of the factors considered in selecting the alternative to serve as the Revised Plan

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Letter 2838 — Alternative 8 calls for approximately 24% of the total forest land to be managed for timber What percentage of the National Forest land in Bath County will be managed for timber

Response — The Revised Plan represents a Forestwide management philosophy . The information requested is not available at this time However, the suitable timberland within Bath County is shown on a map accompanying the Revised Plan

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Letter 1163 — Timbering activities appear to be too narrowly focused in smaller, confined areas in comparison to the existing plan.

Response — Almost 1/3 of the Forest is suitable for timber production in the Forest Service preferred alternative. These lands are located in those management areas where regeneration harvesting is consistent with the desired future condition of the management area and where regeneration of timber stands can be accomplished in an economic manner without excessive costs

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BELOW-COST TIMBER SALES: Allowable Sale Quantity (ASQ)

Letter 139 — "How much logging is 54 million board feet?" I was shocked to find out that this seemingly large amount of cutting would actually occur on less than one-half of 1 percent of the forest's 1 million-plus acres In other words, 99 5 percent of the forest will be left untouched each year of hunting, recreation, sightseeing, etc.

Letters 145, 374, 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1428, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2379, 2443, 2610, 2679, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4006, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

The alternative [#12] is clearly sensitive to the "below cost" sales issue and only contemplates annual harvest on slightly less than 0.6% of the forest.

Letter 3904 — [We support Alternative 12 because it] would have harvest activities occurring on a little more than 0 5 percent of the Forest annually.

Response — Like the other thirteen alternatives considered in detail in the FEIS, Alternative 12 was formulated to accomplish stated goals and objectives in the most economically efficient manner. It is as sensitive to the below-cost timber sale issue as any alternative can be with an average annual harvest of 45 million board feet.

To state that only 0.6% of the Forest is harvested in any given year presents an underestimation of the effects of this level of timber harvesting The effects of any timber harvesting lasts longer than one year Also, the road construction/reconstruction necessary to support this level of timber harvesting is not limited to the stands being regenerated.

Letter 3660 — One way to help the below-cost issue is to up the ASQ

Response — As displayed in Graph 2-25 of the FEIS, the ID Team determined that Alternative 10, with an allowable sale quantity of 150 MMBF (or an average annual offer of 15 MMBF), offered the best solution to the below-cost timber sale issue while still retaining a timber sale program There are many factors which affect the "cash flow" related to any timber sale program A higher allowable sale quantity can provide this benefit as long as it is located on highly productive sites, utilizes even-aged regeneration harvest methods (particularly clearcutting) and minimizes investment in silvicultural practices and road construction

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Letter 151 — I am greatly concerned about the large amount of timber sales that the Draft Management Plan has scheduled for the Pedlar District (501 MMBF annually, Appendix A -- Timber Sales Schedule)

Letter 744 — A specific example of the location of a District and timbering levels being of little related value is the Dry River District and Pedlar District An acreage was established for both Districts of 501 as being valued for timbering. By formula, both Districts were allotted 3.5 MBF of timber products extraction

Response — The 501 in Table A-1 of the Draft Revised Plan is thousands of cubic feet of timber, not lands suitable for timber production

Appendix A of the Revised Plan displays an annual timber volume of 4.1 MMBF (917 MCF) for both the Dry River and Pedlar Ranger Districts To achieve the goals, objectives and desired future condition of the Revised Plan, a small reduction in average annual timber volume offered on these two districts will be necessary. The Forest Service realizes that this may cause some inconvenience to the local timber industry.

Letter 744

The draft plan does not itself fulfill its role of providing adequate habitat protection for bear and turkey The habitat set aside is intersected by the most traveled traffic artery in the county, Rt. 33. Rt. 33 is disruptive to the migratory habits of the species under protection As the location of the habitat sanctuary is ill placed and ineffective for the purpose, Pendleton County residents should be allowed to utilize the land for timbering and other pursuits consistent with wise forest management applications. With habitat protection not an issue of significance, the health of the forest must be considered. Research has indicated that the G.W can easily sustain timbering on previously established levels and could increase the level of extraction of timber products In a conversation with Ronald Lindenboom, coauthor of the draft plan, he indicated that the forest could sustain timbering at much higher levels, sixty million board feet. Current plan levels for timbering are projected at 27 MBF. The Dry River District, affecting Pendleton County, allows for only 3.5 MBF. By using the ratio suggested by the possible timbering volume over the proposed timbering volume, and applying that ratio to the Dry River District, the result is a volume for the Dry River District near 8 MBF. The objection that the forest cannot sustain timbering at 8 MBF is spurious Authoritative sources suggest the volume desired by the Authority is reasonable Past practices have demonstrated no threat to the environment, and no study, to our knowledge, indicates a long term detriment to the forest should timbering levels remain as they have traditionally been established

Response

The Forest Service is finding that people need and want a wider array of uses, values, products and conditions from the George Washington National Forest than in the past. Not everyone agrees that the agency should provide for all these needs and wants. The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

What the land is capable of providing in terms of timber production is only one factor in deciding allowable sale quantity Timber offered for sale must be sold and cut to achieve the vegetation manipulation needed to meet the objectives of the Revised Plan Based on experience and market demand as evidenced by "no bid" sales, offering a high level of timber volume from the Dry River Ranger District would result in much of this volume not being sold.

Letter 369

The drastic reduction in ASQ to 27 MMBF as proposed by Alt. 8 does not come close to meeting demand for NATIONAL FOREST TIMBER, let alone the demand for timber from all sources The ASQ of 50 MMBF as proposed in Alt 12 will meet present demand

Letter 1058

My industry can live with a 50 mmbf ASQ, although 60 mmbf would be ideal.

Letter 1060

The analysis goes on to state that "the product mix has changed over the last 20 years, very significantly, because sawtimber demand has greatly increased in this area With growth exceeding removals by a factor of three.. " Clearly the potential is there on the forest to sustain the timber demand However, the agency's preferred alternative (#8) fulfills only 59 percent of the projected demand for the next 10 years Under the more balanced alternative (#12), 109 9 percent of the demand would be met (See DEIS, Table 3-23, page 3-92)

Letter 1060

Under Alternative 12, the average annual allowable sale quantity (ASQ) is 50 million board feet This ASQ is not extreme and it does not exceed the forest's long term sustained yield It is well below the forest's biological potential, if the benchmark analysis in the 1986 plan is still relevant

Letter 1253

The Draft Plan fails to meet current demand for timber

Letter 3711

The million board feet in Alternative 8 is too low

Letter 3963

The Advocate, April, 1992, pg 10 Danny Goodbar said at the public hearing that 78 million board feet a year is the forest's "fair share" wood for sawmills surrounding the forest (There are 14 of those mills in Rockbridge County alone).

Response

The Forest Service is moving away from the concept that the National Forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization

that National Forest must be managed scientifically to best achieves the goals, objectives and future conditions desired by the American people

The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past. Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development.

Alternative 12 provides a mixture of goods and services based on the traditional concept of multiple use management In particular, timber management, motorized recreation use and providing habitat for early successional wildlife species are emphasized more than in the Forest Service preferred alternative

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan

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Letter 3840

Forest ecologists and biologists should be determining habitat type needs and what timbering will be done to provide this need and where and how Not the advance selection of a quota for ASQ and clearcut acreages without regard for the theme of Alternative #8. Forest biologist originally selected 21 MBF for ability of forest to healthily generate Politics have continued to raise this figure - this is contrary to concept of Alternative #8

Letter 3962

In the original Alternative 8, a timber harvest of 21 MM board feet satisfies the wildlife needs of the forest. This number needs to be reconsidered for the final Plan.

Response

Several FORPLAN runs were done on Alternative 8, and they yielded ASQ's ranging from 21-27 5 million board feet, depending upon various economic factors analyzed Alternative 8 was formulated, as is the Forest Plan, with no predesignated ASQ That is, the ASQ is an end result of the desired future condition as described in the Forest Plan.

Letter 3951

Select Alternative 12 with some modifications ASQ - Set at between 44 and 48 mmbf/year from suitable acres Set the suitable acres between 475,000 and 550,000 acres Include the better timber producing sites and roaded areas in the suitable land base To this add between 2 and 3 mmbf/year of wildlife habitat sales Also add another 3 to 4 mmbf/ft of salvage material Spell it out in the plan, don't lump together For the wildlife and salvage sales either show volume or acres and make this possible in all management areas except wilderness and wilderness study areas

Response

The public submitted a number of suggestions for modifying Alternative 12. Many of these suggestions were either contrary to the overall theme of Alternative 12 or were contradictory with one another. Adjustments were made in Alternative 12 where the suggestions seemed consistent with the overall theme of providing a full range of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat and where it allowed the Alternative to provide a more positive response to the issues

Lowering the allowable sale quantity for Alternative 12 to 450 MMBF (or an average annual offer of 45 MMBF) provided a substantially better response to the "Projected Net Revenue" displayed in Figure 2-4 of the DEIS Therefore, Alternative 12 was reformulated with an allowable sale quantity of 450 MMBF

No attempt was made to calculate the non-chargeable timber volume for each alternative This information is germane to the timber sale schedule in the Revised Plan and is not a pertinent factor is selecting the alternative to serve as the Revised Plan A non-chargeable component of 5 million board feet per year, however, is not inconsistent with the management philosophy of Alternative 12

The mixture of regeneration harvest methods for Alternative 12 has been changed so that the **estimated** annual program of harvest would consist of the following mixture of regeneration harvest methods· clearcut on 1,250 acres, modified shelterwood on 1,400 acres and two-staged shelterwood on 700 acres Alternative 12 does not employ uneven-aged regeneration harvest methods

The request for "an increase in acres where true multiple use in effect" correlated to lands suitable for timber production was assumed Alternative 12 now has 595,000 acres suitable for timber production This is an 1/3 more acres suitable for timber production than in the DEIS This amount of acreage is needed to provide the

ASQ using the mixture of regeneration harvest methods described in the previous paragraph and the standards applied to much of the suitable lands

The inventoried sensitivity level of any trail does not change However, this does not affect the adopted visual quality objective assigned to any management area prescription used in Alternative 12

Alternative 12 has been reformulated in the FEIS to include the same developed recreation program as the Forest Service preferred alternative.

Despite comments to either increase or decrease ATV opportunities, the number of ATV routes remains nine The mixture of motorized recreation in Alternative 12 is consistent with its overall theme

Alternative 12 does not recommend any roadless areas for wilderness study. Recommending areas seems to be contrary to the overall direction of the alternative

Alternative 12 is considered in detail in the FEIS. The Regional Forester will select it as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 168 — I do not like the apparent loophole which refers to additional cutting in the name of wildlife habitat. This and any references to "salvage" or "pre-emptive" cuts due to gypsy moth or other excuses should be tightened so the total amount of allowable harvest is understood by everyone and complied with

Letter 1557 — The timber cutting provisions are very lax and indeed faulty in respect to land considered "unsuitable" for commercial timber cutting No specific maximum average cutting level is specified for these lands

Response — Appendix A of the Revised Plan contains information on the "Total Timber Sale Program" which includes the allowable sale quantity as well as an estimation of the "non-chargeable component" of 5 MMBF (or an average annual volume of 500 MBF) FROM lands unsuitable for timber production. This "non-chargeable component" includes volume derived from salvage sales. It also includes volume from lands unsuitable for timber production if a timber sale is the least cost method to carry out the vegetation manipulation needed to achieve the desired future condition in a management area The level of this production will be monitored

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Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 3478, 4068, 4073, 4074, 4075

The total annual timber cut should not exceed 27 million board feet The alternative allows cutting in the name of wildlife mgt , etc. There is apparently no ceiling on that

Letter 982 — Included in the harvest total of 27 mbf should be those gypsy moth-related kills. Steep slopes and "unsuitable" land should not be timbered at all

Letter 988 — We need to consider the ASQ of 27 MBF as a reasonable number I have no problem with the ASQ, and I support local sawmills regularly. Any increase in this ASQ, however, I would object to

Letter 1081 — The total allowable sale quantity should be 27 mbf including all logging done in the name of wildlife habitat management

Letters 1094, 1169, 1982, 3827

The total annual timber cut should not exceed 27 million BF The alt allows cutting in the name of WL mgt , etc There is apparently no ceiling on that

Letter 1314	Reduce total annual timber cut to 27 MBF.
Letter 1439	Under no circumstance increase the timber harvest to more than 27 mmbf annually.
Letters 1634, 1671, 2925,	There should be a cap on timber harvesting of no more than 27 million bd ft annually.
Letter 1684	The total annual timber harvest should not exceed 27 MMBF This figure should encompass the ASQ as well as (not in addition to) the amount of non-commercial cutting permitted for wildlife mgt., salvage, and gypmo damage
Letter 2308	The figure of 27 mmbf does not include much harvesting to be done primarily in the name of wildlife management. Likewise salvage cuts are excluded Ditto cutting in the name of the gypsy moth on lands classified as "unsuitable". Nor is timber which may be harvested in riparian areas included. The draft plan even provides that "unsuitable" lands may be harvested for timber. The figure of 27 mmbf ASQ should be declared to set the maximum cut, i e., 270 mmbf, for a ten year life of the plan.
Letter 2327	Limit timber harvest to less than 27 million board feet annually if that yield can prove to be sustainable without affecting detrimently the health of the forest ecosystem
Letter 2666	27 million board feet should include all of the timber harvested, regardless of the reason for harvesting [including] cutting in the name of wildlife habitat manipulation and salvage
Letter 2732	The total timber harvest from all sources - timber program, wildlife mgt. and gypmo salvage and presalvage sales should fall within the 27 mbf ceiling.
Letter 2755	4. The recommended timber harvest of 27 million board feet with 259,000 acres suitable for timber is too high We are concerned that an unspecified amount of cutting can be done in the name of wildlife habitat manipulation on lands unsuitable for timber. We believe that the 27 mbf should include all timber harvest, no matter what the purpose
Letter 3527	I am opposed to increasing the amount of logging allowed
Letter 3546	The total annual timber cut should not exceed 27m board feet including cutting in the name of wildlife management
Letter 3568	The twenty-seven million board feet of proposed harvest is very fraudulent and misleading It does not take into account the timber taken from salvage sales, gypsy moth, and wildlife openings.
Letter 3606	Very restricted timber harvest.
Letter 3608	Congressman Olin's recommendation of allowing 40 mmbf per year is clearly unacceptable. Timber sales should be limited to no more than 27 million bd ft per year.
Letter 3710	A major flaw is the contemplated allowance of a substantial volume -- as much as five MMBF per year -- to be harvested from "timber unsuited" acres While the apparent rationale for such logging would be to enhance wildlife habitat and to prevent gypsy moth damage, little analytic justification is provided.
Letter 3710	The very minimum, the forest plan should stipulate that any sales of timber from unsuited land will substitute for, not add to, the total volume contemplated for the forest's regular timber sales program.
Letter 3710	[To] raise programmed timber harvest levels to accommodate additional sales is bad policy. No matter how the sales are counted, they will inflate the actual amount of volume offered above the 27 4 MMBF level, thus exacerbating the below-cost timber sales deficit
Letter 3710	Allowing sales beyond the announced volume drastically reduces the usefulness of the annual allowable sale quantity as an indicator of overall logging activity on the forest, thus undermining the usefulness of the DEIS as an indicator of the impact of logging

Letter 3710 The final plan should unequivocally limit all logging on the George Washington to 27.4 MMBF or less per year.

Letter 3710 Any logging allowed on unsuited acres should count toward the 27 4 MMBF annual allowable sale quantity.

Letters 3720, 3766, 3782
The total annual timber cut should not exceed 27 million board feet.

Letter 3847 - Restrict the timber harvest to a minimum -- no more than 27 MMBF per year as stated in Alt. 8

Letter 3849 The plan cites 27 million bd ft as its annual ASQ, yet several "loopholes" appear to permit much more cutting--such as gypsy moth salvage and wilderness mgt. cutting.

Letter 3861 Timber cutting, directly and indirectly, still seems to be the principal purpose of the GWNF even under Alt 8. Timber cutting should be held to a sustainable yield, which I would consider 20 million board feet annually at the maximum, including the cutting incidental to wildlife habitat management, and salvage sales Clearcutting *should not be permitted*

Letter 3942 The Draft Plan states that about a quarter of the Forest is suitable for timber production and that the Allowable Sale Quantity should be 27 million board feet. To members of the general public who are uninformed about how the Forest Service counts timber harvest, these figures are misleading An unspecified amount of timber harvest is done in the name of wildlife habitat management. Regardless of the purpose, to most people cutting trees and selling them is timber harvest. Please consider counting all timber harvest, including that done in the name *of wildlife habitat improvement, in the 27 mbf I would like to see 27 mbf be a ceiling for any timber harvest,* whether it be a regular timber sale, salvage, or habitat improvement.

Letters 3965, 3892
The proposal designates 27 million board feet as the annual allowable sale quantity. While allowing for timber cutting as needed for game management, salvage, and gypsy moth damage, no maximum average cutting level is specified for these areas in the proposal

Letter 3938 Timber. The ASQ of 27 million board feet should be the absolute total of all timber cut on the forest for any reason Timber removal for game management, salvage and gypsy moth damage treatment on lands listed as unsuitable for timber harvest should be included in the total ASQ of 27 MMBF. More emphasis should be put on large, quality sawtimber with longer rotation ages, and less emphasis placed on pulpwood sales which are wasting the taxpayer's money. If all logging is done within 1/2 mile of existing roads, without having to build new roads, you should be able to greatly increase the percentage of bove cost timber sales Eliminate the word 'salvage' from timber sale jargon The maximum size clearcut in any type of role should be 20 acres

Response Alternative 8 has been reformulated in the FEIS so that the allowable sale quantity of 270 MMBF is the Total Timber Sale Program. Therefore, there will be no harvesting of timber on lands unsuitable for timber production.

Letter 1360 In determining the number of bd ft of lumber that should be produced from the forest, the following points should be considered -the level of cutting should not be equal to or above the level of sustained yield. -there is no justification short of Congressional action to allow "below cost" sales. -timber production should be confined to areas where the soil is adequate to allow rapid growth of trees

Response The Revised Plan meets the requirement of the Sustained Yield Act in achieving and maintaining in perpetuity a high level of annual or periodic output of timber without impairing the productivity of the land.

Letter 1980 *- I support maintaining the current level of timber harvest at 35 mmbf annually. This provides needed stability* and security for those involved in timber harvesting and related occupations It also benefits the NF through harvesting the mature timber, allowing the smaller timber to prosper and providing food and cover for wildlife

Response The Revised Plan has an ASQ of 330 MMBF (or an average annual offer of 33 MMBF). Alternative 14 has an ASQ of 350 MMBF and Alternative 2 has an ASQ of 380 MMBF

Letters 2161, 2163, 2542

We need a 50 mmbf or higher annual harvest

Letter 3831 — Your final Land Management Plan must include ASQ of 50 MMBF or more

Response — Alternatives 5 and 7 were considered in detail in the FEIS They provided 50 MMBF or more of annual harvest One of them will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2633 — A figure of 40 million board feet seems to be a reasonable and acceptable compromise that will have little impact on the Forest's recreational, economic, and employment contributions and will meet the present demand for timber in the area

Response — Alternative 4 is considered in detail in the FEIS It contains a 40 MMBF harvest. It will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2664 — Rotation age is a factor in determining the amount of suitable acres and the Allowable Sale Quantity (ASQ) The low end of the rotation age range should be reduced to allow more opportunities for timber sales, wildlife habitat management and vegetative diversity

Response — The mid-point of the rotation age is used in determining the ASQ The present ranges of rotation ages provide the best help in attaining the desired future conditions

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Letter 2712 — The allowable sale quantity of 27 million board feet of timber is sufficient If GWNF has a hard time selling 27 million board feet at a profit, it will be harder with 40 million More supply means less demand, less demand means lower prices

Response — Analysis does not indicate a reduction in prices until about 50% of demand is offered. With demand at 45 MMBF there is room for increasing the quantity of timber The Forest is having to cover many fixed costs with proposed 27 MMBF A larger quantity could be more profitable (less costly on a per unit basis)

Letter 2823 — We feel that timber harvesting should be more evenly distributed over the entire Forest than what is shown in Alternative 8 The ASQ should be set between 40-50 mmbf/year of commercial timber sales with an additional 4-5 mmbf/year of salvage and wildlife habitat improvement sales

Response — Market conditions and land productivity are not evenly distributed over the Forest Management areas contain lands with similar prescriptions and characteristics. Timber is emphasized where site productivity is high and market demand is greatest on suitable land

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Letter 2899 — I ask the FS to set an ASQ based on biological, rather than political, considerations That is, the ASQ should be determined by the amount of timber the land is capable of producing on a sustained yield basis. I have not seen figures for sustained-yield timber volume in the draft plan, and would call on the FS to develop them.

Response — The long term sustained yield capacity has been calculated but it is not shown in the Revised Plan. It is the level of sustainable volume once the suitable forest land is fully vegetated. It does not occur until many decades from now It cannot the ASQ for this planning period

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Letter 1166 — Growth on the GWNF far exceeds mortality and harvest now Under Alternative 8, millions of board feet would be wasted as trees die and rot. With proper management, more of these trees could be harvested, providing jobs for people in the area, and raw material for mills

Letter 1420 — Almost twice as much timber dies on the GWNF as is cut each year This is an unacceptable waste of a precious national resources I ask you to choose an alt that harvests more timber (Alt 12)

Letter 3964 News-Gazette [Lexington, VA] 22 Jan 1992 Harvesting in the forest each year should be moved up to 48 mmbf The mortality rate in the forest each year is 90 mmbf "When more is going to waste than what you're cutting, it makes sense to cut 48 million bd ft."

Response *The Forest Service is moving away from the concept that the National Forests need to be managed based primarily on maximizing certain natural resource products. This concept is being replaced with the realization* that National Forest must be managed scientifically to best achieves the goals, objectives and future conditions desired by the American people.

The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past. Not everyone agrees that the agency should provide for all of these needs and wants. The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development.

Wise use of forest resources is a mandate of the Forest Service that is considered and provided for in the Revised Plan The Forest Service recognizes that dead, dying and down trees are important components of forest ecosystems and can't be removed from the Forest in large numbers without causing some negative environmental impacts.

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan.

Letter 2938 There should be 75 to 80 million feet per year harvested This would be about equal to mortality rate. This mortality rate is a big waste, it should be used If you cut to 27 million feet this will put more of a demand on private land than it will stand, plus there are so many acres of private land that are disappearing because of building and preservationists

Response This level exceeds the projected demand for timber from National Forest lands Dead, dying or down trees have a value in the ecosystem and their removal can not occur without some negative consequences However, timely salvage can utilize high value products for the economic and social well being of local communities, provide for public safety, provide scenic rehabilitation and provide fuelwood Standards provide for some salvage to occur

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Letter 3545 *The ceiling figure for number of board feet to be harvested per year should be held at 27 MBF for the combined* total of suitable and unsuitable acreages No disruptive timber harvest under the guise of "habitat improvement"

Letter 3710 Forest planners intend to allow as much as 5 MMBF of harvest [from unsuited land] to take place each year, increasing the potential annual volume by 18% from 27 4 MMBF to 32 4 MMBF The apparent rationale for such logging is that it could be needed to prevent gypsy moth damage, to salvage trees lost to gypsy moth infestation, or for wildlife habitat improvement This rationale does not hold up to scrutiny and, in any event, the allowed volume is far too much.

Response The Revised Plan shows the anticipated amount of harvest from unsuitable land in the Timber Sale Program Quantity There are legitimate wildlife and salvage reasons for harvesting on unsuitable land, but the level of this work will be limited by budgets and manpower.

Letter 3744 Cutting done in the name of wildlife management should be part of the total annual cut

Response *In Management Areas 14, 15, 16 harvesting is done to manipulate vegetation to meet certain wildlife habitat needs When this is done on suitable land, the timber volume produced is part of the ASQ.*

Letter 3812 Timber harvesting 27 MBF is far more sensible than the harvest in years past, however future timber harvests should be restricted to the periphery of the Forest

Response Alternative 9 considered harvesting in peripheral areas only It could be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

Letter 981	[Salvage cutting] harvests should be included as part of the annual allowable timber yield
Letter 1064	The proposed sale quantity of 27 MMBF per year is reasonable with the following restrictions: (1) that salvage and vegetative mgt. timbering is INCLUDED in the total The quantity of salvage alone can currently increase timbering totals well beyond the 27 MMNF limit
Letter 1329	The timber harvest guidelines are extremely misleading. The actual estimated harvest (ie when salvage and wildlife harvests are included) could greatly exceed the current levels of timber harvest.
Letter 1615	ASQ should include all timber cuttings, including those for wildlife openings, salvage, gypsy moth damage, etc This is the only way we can get a true picture of what's being done.
Letter 2215	The preferred alternative is [deceptive]. It appears at first that there is a significant reduction in allowable timber sales, but there is much unaccounted timbering under the excuses of creation of wildlife openings and salvage of actual and potential gypsy moth damage that are not part of this logging ceiling In actuality more timber can be cut under this alternative then under the old plan or present management
Letter 2868	There must be a limit on the amount of timber harvesting for wildlife management and salvage purposes so that these harvests do not serve as an "end run" to the allowable sale quantity
Letter 3553	Place a ceiling on annual timber cutting for any reason
Letter 3687	Timber which is harvested in the name of wildlife management and gypsy moth control should be included in the total board-ft/yr figure
Letter 3710	[..] some 57,000 additional acres of forest land have been added surreptitiously to the draft plan's timber-suited acreage, "to eliminate confusion " Mr Kelley's letter of March 9 [ ] suggests, similarly, that an "additional sales volume" will be added to annual programmed harvest levels. Such changes smack of bad faith, and can be expected to be met with strong opposition from the conservation community.
Letter 3821	While I understand that gypmo killed timber is to be salvaged as best as possible, I am concerned that the suggested board feet to be sold is far too high, especially if the net effect on the treasury is negative, and if it results in more roads being cut into more areas
Letter 3840	All salvage sales are timber sales Same conditions apply, same requirements, applies toward ASQ All timber harvesting for any purpose wildlife, salvage, waterhole development on either suitable or unsuitable lands goes toward ASQ
Letter 3884	All timber sales "to benefit wildlife" must be charged against the total ASQ. All salvage sales must be charged against the total ASQ. Costs of "wildlife sales" need to be chargeable to timber.
Letter 3962	Salvage sales should be called timber sales, count on ASQ, and only occur in areas suitable for timbering
Letter 3984	Two glaring loopholes in states ASQ are the gypsy moth salvage program and the use of timber management to create so-called wildlife benefits
Response	Salvage is the expeditious removal of timber damaged through natural, unplanned events such as fire, insects, disease, and wind or ice/snow storms Gypsy moth mortality will occur over a wide area of the Forest on lands both suitable and unsuitable for timber production during the next 10 to 15 years The allowable sale quantity normally includes timber volume from scheduled timber sales off lands suitable for timber production When salvage occurs on lands suitable for timber production, the salvage volume replaces scheduled timber sales volume and is considered part of the allowable sale quantity Salvage of mortality from gypsy moth infestation as well as other natural events, on lands unsuitable for timber production is not part of the allowable sale quantity Instead, it is non-chargeable volume The "Non-Chargeable Volume" and the Allowable Sale Quantity comprise the "Total Timber Sale Program" as discussed in Appendix A of the Revised Plan The Revised Plan anticipates a very small amount of "non-chargeable volume (500 MBF per year)

In Management Areas 14, 15 and 16, timber may be harvested from lands unsuitable for timber production to achieve vegetation manipulation needed to meet the desired future condition described in Chapter 3 of the Revised Plan. Such practices are employed when they are the most cost effective means to achieve the vegetation manipulation. Additionally, several logging techniques such as skyline cable and helicopter logging may be used on steep slopes with very minimal soil disturbance.

Letter 4243 — I am opposed to any forest management plan that recommends an increase in the harvest and clearcutting of our National Forest

Response — Timber is one of the multiple uses provided on the Forest. Alternative 8A was formulated to provide a wider array of uses, values, products and conditions on the Forest than in the past Timber management is employed to provide some of those benefits where timber management practices are the most cost effective practices and where they can be applied in such a way that the diversity and sustainability of ecosystems are maintained

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Letter 2882 — I request that the suitability acres be raised to 640,000 acres and that the resultant ASQ be no less than 50 MMBF.

Response — Alternative 5 was considered in detail in the FEIS It has high levels of ASQ and suitable acres It could be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2665 — No limits are placed on resource extraction by volume or by location The salvage sale program and wildlife program open up all places in the forest (with the exception of existing wilderness) to timbering, limited only by access. An effective forest plan must set these types of limits

Response — The Revised Plan clearly identifies in which management areas timber harvest, including salvage and wildlife management may occur

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Letter 2628 — Timber harvested for firewood, wildlife habitat improvement, salvage, or other purposes from lands which are "unsuitable" should not total more than 1 5 MMBF per year. The EIS should show the effects of this harvesting for each alternative, and the Plan should show an amount to be harvested from each management area

Response — This level of detailed information is more appropriately addressed at the project level analysis phase.

Letter 2366 — I feel an ASQ of 20 mbf or less, with a HIGH sawtimber component, will be the only strategy for solving the problem of below-cost sales.

Response — Alternative 10 was considered in detail in the FEIS It considered a timber program of least net cost, but was not able to achieve an above cost timber sale program It could be selected as the Revised Plan if it is the alternative that maximizes net public benefits.

Letter 2542 — Most tree species begin to suffer injury and die after the age of 60 to 140 years. On the land suitable for timber production (915,053 acres according to page B-33 of the draft EIS, or a more accurate number according to Mr. Ron Lindenboom is 750,000 acres) realistic rotation ages should be used to help determine the allowable cut.

Response — The 916,000 acres is land tentatively suitable for timber production. This amount of land was used in analysis of all alternatives as a starting point from which further analysis was done in FORPLAN to arrive at different levels of suitable land in each alternative Rotation ages ranged from 50-200 years.

Letter 2066 — I believe the annual timber Allowable Sale Quantity (ASQ) should be raised to 40 million board feet or more This should be brought about by making the acreage suitable for timbering larger, possibly up to 450,000 acres You should consider how much land has high quality trees that could be harvested at break even or better. Some of the other benefits of this revision would be. increased jobs for those in the timber industry and increased payments to the counties from the higher timber sales

Letter 4020 — A high level of timber production based on sound, scientific forest mgmt is in the best interest of all the people

Response — The Revised Plan has an allowable sale quantity of 330 MMBF (or an average annual offer of 33 MMBF) that would be harvested on approximately 1/3 of the Forest that is suitable for timber production. As displayed in Table 3-25 of the FEIS, Alternative 2 has an ASQ of 380 MMBF and has 300,000 acres suitable for timber production Alternative 12 has an ASQ of 450 MMBF and has 595,000 acres suitable for timber production The combination of an ASQ of 400 MMBF and 450,000 acres of lands suitable for timber production is a highly economically inefficient formulation

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Letter 4011 — Instead of reducing the ASQ, the FS should look toward increasing it where appropriate

Response — Several alternatives with higher ASQ and suitable land base are considered in detail in the FEIS Anyone of them could be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 1446 — A timber reduction of from 49 million bd ft to 27 million bd ft would be acceptable to me ONLY if (1) the sales were really economically operable and merchantable and (2) about half of the proposed 27 million bd ft was not to come from wildlife enhancement cuts

Response — All timber sale offerings are designed to be economically operable and contain merchantable timber Since more than 3/4 of the lands suitable for timber production is contained in Management Areas 14, 15 and 16 in the Revised Plan, it is reasonable to assume that more than half of the volume harvested during the first decade of the Revised Plan will come from these management areas

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Letter 87 — The EIS should clearly show how much of the timber volume will be harvested in the first plan period in each Management Area This should be shown for each alternative.

Response — There is no requirement for such disclosure The Timber Sale Schedule for the Forest Service preferred alternative is contained in Appendix A of the Revised Plan

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Letter 3883 — Timber sales should be limited to the proposed 27,000,000 board feet per year maximum and be still further phased down as may accelerate net forest growth. Timber practices should not obscure trails or endanger hikers I am opposed to all clearcutting

Response — Agency direction (FSH 2409 33 CH 30) clearly states that volume from timber sales on unsuitable land are not included in the ASQ because this volume was not used in the timber yield calculation projection This volume will be part of the Timber Sale Program Quantity as shown in the Revised Plan and will be in addition to the ASQ

The Revised Plan shows the anticipated amount of harvest from unsuitable land in the Timber Sale Program Quantity There are legitimate wildlife and salvage reasons for harvesting on unsuitable land, but the level of this work will be limited by budgets and manpower

In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

Alternatives 9, 11 and 13 explore the use of timber harvest cutting methods other than clearcutting to manage the Forest timber sale program These alternatives are considered in detail in the FEIS One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

FOREST ACCESS· Motorized Access

Letter 6	I feel the public needs more, not less opportunities to explore your beautiful forest on the primitive roads that currently exist I think we have enough wilderness area already and what we really need to do is stay with the multiple use management policy
Response	Wilderness is part of multiple use management very much as is harvesting timber, grazing cattle, protecting watersheds, and camping Driving for pleasure and viewing scenery is indeed one of the most popular uses of national forest lands and the ID Team recognizes this Certainly there will be opportunities to enjoy the forest on open primitive roads. In addition, Executive Order 11644, as amended by Executive Order 11989, recognizes off-road use as a legitimate use on federal lands To the extend that resources are protected and need is demonstrated through support and maintenance, opportunities to enjoy the Forest will be provided
Letter 14	Remember public land is for the public It's uses should be for anyway you choose to use it whether it be by jeep, ATV, horseback, bike or by foot
Letter 4256	We don't want anymore areas closed to motorized recreation for special management areas, wilderness, etc.
Response	There is no wording in the many federal laws that apply to the Forest that indicate that members of the public have a right to use the Forest in any manner that they chose While the Forest Service strives to meet the needs and wants of all citizens, there are situations under which portions of the Forest cannot be accessed by motorized vehicles or even mechanical transport In these cases, uses may be limited
Letter 504	I would urge that no new roads or ATV trails be planned All unnecessary roads should be closed and reclaimed by forest
Letter 932	There are enough roads and ATV's already
Letter 2869	Alternative 8 is a fair compromise Include no new roads To do otherwise would encourage illegal off-road riders whose goal in life is to obtain traction, rather than enjoying the forest around them
Response	Management of system roads under the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS" Management of all-terrain vehicle use is discussed under "ISSUE 4 — ALL-TERRAIN VEHICLE (ATV) USE" Alternatives 3, 9, 11 and 13 provide a more positive response to these concerns by limiting or prohibiting system road construction, eliminating ATV routes and having a more aggressive road closure policy than Alternative 8A These four alternatives are considered in detail in the FEIS Any one of these alternatives will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits
Letter 49	Do not permit loggers and recreational vehicles access to the George Washington National Forest
Response	Logging and motorized recreation are considered appropriate components of the multiple-use strategy for the Forest.
Letter 171	#14, "The District Rangers' Alternative", is also disturbing. The "protection" afforded Big Levels -- does it close FDR 162 to "motorized" wreck-reation
Letter 891	No motorized recreation only should be acceptable
Letter 948	No off-road motor vehicle use should be allowed at all Let's have some areas where we can go without auto noise.

Letter 979	Limit RVs Limit their obnoxious intrusion as much as you can.
Letter 3797	Get the noise and pollution of the vehicles out of our treasured natural resources.
Letter 3894	The higher the level of access, the greater the damage and degradation Any form of motorized access results in the greatest damage. Any road or trail that can be used by an ATV (gated included) will be used by an ATV
Response	The management of licensed off-highway vehicles for the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 – FOREST ACCESS". The management of all-terrain vehicles is described in the Revised Plan in Chapter 2 under "ISSUE 4 – ALL-TERRAIN VEHICLE (ATV) USE" and in Chapter 3 under Management Area 11 Alternatives 3, 7, 9, 11 and 13 eliminate all existing ATV trails and preclude construction of any new trails. These alternatives also limit licensed off-highway vehicles to differing amounts of open system roads These five alternatives are considered in detail in the FEIS One of these alternatives will be selected by the Regional Forester as the Revised Plan if it is identified as the alternative that maximizes net public benefits.
Letter 973	This park needs no mechanized invasion.
Response	The George Washington National Forest is not a National Park. Motor vehicle use is consistent with the legal mandates governing its management
Letter 2	Please keep the primitive roads open to four-wheel drive use. We need primitive road access to go four-wheeling, hunting, fishing, camping, exploring, etc
Letter 6	Don't close any more roads to motorized recreation.
Letter 14	Some of the places I hunt and fish are too far or too difficult to walk Some of the members of our hunting party are older men So access to these spots by 4-wheel drive is a matter of safety and health concerns.
Letter 35	Insure that no additional areas of the forest be closed to motorized recreation access, this alternative should include more miles of primitive roads (not trails) which are open to responsible four-wheel drive vehicle access for family hunting, fishing, camping and exploring
Letter 83	I also don't understand the wording of the next paragraph that there should be no increase in density of open roads over current levels I feel that there should be an increase in the amount of open roads in the forest since this is definitely an increase in 4x4 vehicle use
Letter 164	Our family wants to be able to access our National Forests, not just read about our great country I want to see more primitive roads open to four wheel drive use. Give us primitive road access to the forests for four wheeling, hunting, fishing, camping, exploring, and having a good time
Letter 324	It is my desire to share the forest experience with my children. But, closing the lands completely to wilderness areas will severely limit, if not totally preclude, my ability to do that
Letter 989	The management of timber sales has consistently closed all primitive roads close to the sale This practice is totally unacceptable and unjustifiable. Require all timber sales to assess opportunities for 4WD recreation and leave all primitive roads existing before the sale open.
Letter 2204	Access to the forest is reduced when our population is aging
Letter 2586	We would urge you to open more primitive roads and close no more to these people. Primitive roads afford access for hunting, fishing, camping, and exploring as well as Four Wheeling
Letter 2590	Areas of concern include. 1) continued access to sites we use for rock climbing, caving, camping, canoeing, and other activities

Letter 4013 Do not close more primitive roads for special management areas.

Letter 4042 I would prefer all trails accessible to vehicles be opened for hunting, fishing and wood cutting as much as possible I feel more access is needed in order to spread out the growing population of sportsmen and to provide more access to dead and down wood.

Letter 4042 Please allow usage of the small side trails instead of pushing them shut. This makes much more of the dead wood available instead of allowing it to go to waste.

Letter 4244 Primitive road access to the forest is needed for four wheeling, hunting, fishing, camping and exploring. Forest planners have refused to acknowledge the demand and needs of the recreational four wheeler

Letter 4256 We feel it is important to have primitive road access to the forest for four-wheeling, hunting, fishing, camping, exploring, etc.

Response With over a million acres in Virginia and West Virginia, the Forest offers an abundance of hunting, fishing, camping, and other dispersed recreation opportunities. Much of the Forest is readily accessible by open road to persons preferring to use 4WD vehicles Seasonally, many roads are closed to protect soil, water, wildlife, and the road investment Of the existing 1760 miles of Forest Development Roads (FDR), 610 miles are open to the public year-round, 440 miles are open seasonally, and 710 miles are closed year-round. Forest Development Roads throughout the Forest are available for licensed 4WD use and provide access for hunting and fishing.

While there is an obvious need for a degree of motorized access to the Forest, this need must be balanced against conflicting goals for wildlife management, non-motorized recreation use, and fragmentation of habitat for area-sensitive species. Under the Revised Plan, 80% of the Forest would be available for differing degrees of motorized access Overall, there are ample opportunities for motorized access

Based on discussions with 4-wheel drive organizations, there is a concern over the number of open, primitive roads that offer OHV opportunities. Likewise, ATV organizations have expressed concern over the number of trail routes available for unlicensed vehicles.

Under Alternatives 2, 5, 8, 8A, 10 and 12, minimal change is expected in the maintenance and management of the existing roads and access for hunting and fishing would remain pretty much as is

Alternatives 5 and 12 would leave many new roads open to public use and, thereby, increase motorized access somewhat The relatively small amount of road construction, however, would not significantly increase motorized access

Alternative 4 would maximize 4WD access by causing some of the closed system roads to be opened, allowing up to 1650 miles of road to be opened at least seasonally.

These alternatives are considered in the FEIS The Regional Forester will select the alternative that best maximizes net public benefits with access being one of the considerations in that selection.

Letter 974 It is absurd to spend more taxpayers money in building roads to harvest timber than will be returned by the value of that harvest. The opening of previously roadless areas does not improve the quality of life, and only hastens the destruction of primitive areas.

Response If the Forest Service is to manage timber and provide for wildlife species requiring early successional habitat, access is necessary. New roads are often needed to provide this access.

A national policy on below-cost timber sale programs is being developed, but the Revised Plan will not be able to resolve this issue until the policy is enacted.

As displayed in Table 3-17 of the FEIS, 89% of the roadless area acreage has been allocated to management areas where road construction is not permitted

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Letter 952 I'd like to ask that no more areas be closed to motorized recreation as special management areas. We need primitive road access to the forest for camping; hunting, fishing and just plain getting away.

Response	The need for motorized recreation must be balanced against conflicting goals for wildlife management, non-motorized recreation use, and fragmentation of habitat for area-sensitive species Under the Revised Plan, there should be ample opportunities for motorized recreation and associated dispersed recreation activities
Letters 936, 963	Finally, please do not allow motorized vehicles in any new areas in the Forest
Letter 3703	Do not build anymore roads and trails for off road four wheelers
Letter 3915	I am very much opposed to any actions that would tend to promote off-road vehicle use.
Response	The ID Team recognizes the need for motorized recreation as expressed by many comments. Allowing motorized access in any new areas on the Forest must be balanced against goals for wildlife management, non-motorized recreation use, and fragmentation of habitat for area-sensitive species The Forest Service preferred alternative is designed to retain a portion of the Forest in a roadless condition, or to at least not construct any new roads in many areas Road construction is not permitted in Management Areas 4, 5, 8 and 9.
Letter 1644	The GW should be closed to all motorized vehicle use except on roads or trails designated for such use. No cross country use should be allowed. No motorized use of roads or trails unless specifically designated as such.
Response	Under the preferred alternative, the Forest is closed to cross country travel by motorized vehicles. Licensed vehicles may use open Forest roads Unlicensed vehicles, including ATV's, are restricted to trails specifically designated by Forest Supervisor's Orders for their use
Letter 1843	I want to see as little motorized use of the Forest as possible
Letter 3633	Restrict the use of motorized vehicles to the maximum extent possible
Response	Executive Order 116644, as amended by Executive Order 11989, recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands Alternatives 3, 7, 9, 11 and 13, which contain a standard that limits the use of motorized vehicles to open system roads, are considered in detail in the FEIS One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits
Letter 3894	Areas of the GWNF that have little or no law enforcement presence due to their distance from law enforcement stations should have their own management classification to address this law enforcement problem Perhaps it can be modeled on management area 1A with additional specification that all access other than semi-primitive non-motorized would be prohibited The area north of WV secondary route 311 (Camp Run Road) between the Hardy County line and Camp Run Road is a good example of an area that should be managed as described above
Response	The Forest Service does not preclude public use of the National Forest simply because their might be law enforcement problems from some misuse.
Letter 2895	The fewer vehicles near the trails or wilderness, the better -- as the ease of access to people who don't respect the wilderness causes damage to the wilderness through irresponsible and senseless acts of vandalism
Response	Wildernesses are managed in accordance with several public laws As discussed in Chapter 3 of the Revised Plan under Management Area 8, no motorized vehicles are permitted in wildernesses

Letter 2710 All motorized use should be confined to roads which could be handled by a normal passenger car.

Response *Use by vehicles other than passenger cars is necessary or allowable in several situations*

1 Forest roads frequently must be travelled for administrative use when weather conditions and road surface conditions preclude normal passenger car travel.

2 It may not be economically feasible to construct or maintain all access to a grade and condition for passenger vehicles

3 Use of the Forest by OHV vehicles is considered an allowable component of multiple use management

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Letter 3728 All public vehicular access should be prohibited after habitat mgmt. activities, including timber sales and road construction, are completed Therefore, we see no need for a reduction in the SPNM classification in the Plan.

Response *As described in Appendix G of the FEIS and Appendix I of the Revised Plan, the semi-primitive non-motorized* recreation opportunity spectrum requires the presence of no system roads and is inconsistent with classifying lands suitable for timber production The semi-primitive motorized (subclass 2) recreation opportunity spectrum *class has been designed to describe the situation where timber harvesting and road construction occur in a* semi-primitive setting, but the roads are closed to public use

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Letter 94 Concerning the language associated with "Remote Highlands", "Desired Future Condition" "Roads may" could mean that these roads will in fact by closed and I am strongly opposed to this I would like to see this sentence read, "Human travel is principally on system trails, although existing roads will remain open or be opened seasonally."

Response Which roads to open or close or how many roads to open or close are not decisions to be made at the Forest Plan level These decisions are site-specific and are made at the project level.

FOREST ACCESS: Road Management

Letter 87 The amount of road construction in the preferred alternative appears excessive considering the ecological values which are to guide the Plan

Letter 1292 The new plan calls for building an additional 200 miles of roads, despite public concerns about native biodiversity and big wilderness

Letter 2380 [We are in favor of the] substantial reduction in the 200 miles of new roads

Letter 3481 While I agree with the selection of Alternative #8 as a sensible, reasonable compromise with many diverse interests, it would be my hope that, if further modifications are made, the recommended total mileage of proposed road-building could be substantially reduced It appears to be very difficult to justify this amount of earth-disturbing mileage in relation to the total acreage of timber management

Letter 3543 Limit new road construction

Letter 3643 Further, Alternative 10 requires the fewest miles (two) of yearly road construction of any of the timber harvesting alternatives This would represent an annual cost savings that is unspecified within the document We recommend that the annual road construction costs for each alternative be listed in the Final Environmental Impact Statement Road maintenance costs would also be reduced because fewer miles of roads would be constructed

Letter 3940 Plan Page 2-13, Paragraph 7. The amount of new road construction (20 miles/year) may be high In a truly biological alternative, the amount and type of new roads constructed should be determined by desired future condition

Letter 3945 — The 200 miles of road construction during the decade seems too high and unnecessary if timber harvesting could be located near existing roads rather than building new ones through bear and turkey habitat

Letter 3711 — Road construction in Alternative 8 is too high.

Letter 3962 — The proposal to build 20 miles/year of new roads does not conform to the concept of biological values To protect migration corridors and fauna habitat, the total road mileage needs to decrease They are 855,000 acres in Management Area's that either don't require roads or that have wildlife habitat that needs freedom from disturbance (MA 1, 4, 6, 8, 9, 1, 3, 14, & 15). The 20 miles/year of roads would go on the remaining 206,000 acres of the forest

Letter 4249 — The amount of new road construction (200 miles over the first decade) is excessive and unacceptable More information needs to be available re projected building, areas to be accessed, and costs A chart similar to the one provided on trail construction would be helpful. (Appendix B of Plan) I especially deplore the projected use (or the strong hint of that possibility) of these roads, once the timber harvest is completed, for expanding the mileage available for ATV use (See 2-9).

Response — The road construction/reconstruction costs and estimated miles of road construction needed to support the timber sale program associated with each alternative have been reexamined

It is important to note that the estimated miles of road construction is based on the average existing road density and the average road density needed to access stands to be harvested These estimates are not precise since the actual number of miles needed for any given year depends on factors which cannot be modeled in FORPLAN Therefore the estimated miles of road construction are displayed as a range rather than a single number The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year.

The cost of road construction modeled in FORPLAN is an average cost that is directly proportional to the number of miles of roads constructed. Given the imprecision of the road construction estimates, there is no advantage in displaying the annual road construction costs other than increasing the complexity of the FEIS.

Letter 2298 — Alternative 8 cuts more acres and builds more roads than Alternative 12. Yet Alternative 12 actually harvests more timber It seems to me that Alternative 8 is more costly and will do more harm to the environment.

Letter 3743 — Alternative 12 provides 5 miles per year less roadbuilding.

Response — The miles of road construction has been reanalyzed for each alternative in the FEIS Alternative 8A constructs fewer roads than Alternative 12

Letter 3479 — Please, please, please work towards keeping the clearcuts and roads to remove timber at a minimum.

Response — In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year. The actual miles of roads constructed every year will depend upon site-specific factors such as the relationship of timber stands to be harvested to existing roads and the nature of the terrain.

Letter 2580 — I am definitely not in favor of prohibiting vehicular travel and access on the Old Hunter Shanty Trail.

Letter 2650 — Please don't let the Old Hunters Shanty road be closed to vehicular access

Letters 2688, 2698, 2699, 2706, 2719, 2910, 2916, 2936, 3671, 3768, 3806, 3807, 3818, 3879, 3944
I hope the Forest Service will continue to allow vehicular access to the Old Hunter's Shanty Trail

Letter 2756 I would very much like to see the [Old Hunters Shanty Trail] road remain open.

Letter 2843 Plans to close the Old Hunters Shanty Trail in western Shenandoah County would be a grievous move to the citizens of Shenandoah County as well as the citizens of VA who use this trail as an access to the NF.

Letter 2851 Several environmental interest groups want the Old Hunters Shanty Trail changed to a classification which would prohibit vehicular access. I am definitely not in favor of this

Letter 2852 I am very much opposed to prohibiting vehicle use of the "Old Hunters Shanty Trail"

Letter 2932 I understand that you are considering closing the road that goes back past where Hunter Shanty used to be on back to the Beacon on Patty Mountain to vehicular traffic. I would like to let you know I think this is unfair. The hunters and Sportsmen are the only ones who pays to use the NF

Letter 3878 Please allow your people to keep this entire environment (Old Hunters Shanty Trail) open to vehicular traffic to both enjoy and maintain its integrity.

Response The Forest Service preferred alternative allocates the Big Schloss Roadless Area to Management Area 21. The intent of this management area is to provide seasonal access to hunters on the Little Sluice road/trail

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Letter 55 Roads should not be cut through the forest because we already have plenty of roads throughout the forest which already require too much maintenance

Letter 279 [Suggest] a large reduction in road building and road construction, and the identification of sensitive biological areas and fragmented ecosystems in which road closures could occur

Letters 491, 492, 496, 759, 762, 891, 933, 934, 938, 963, 972, 976, 1059, 1069, 1070, 1076, 1086, 1087, 1090, 1099, 1139, 1158, 1160, 1167, 1168, 1250, 1260, 1320, 1330, 1346, 1354, 1365, 1429, 1439, 1443, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1551, 1557, 1608, 1611, 1621, 1634, 1651, 1652, 1656, 1661, 1671, 1730, 1731, 1732, 1822, 1943, 1944, 1976, 1978, 1981, 2022, 2040, 2049, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2242, 2276, 2280, 2283, 2325, 2355, 2364, 2376, 2400, 2401, 2471, 2498, 2505, 2512, 2515, 2536, 2557, 2609, 2613, 2670, 2674, 2705, 2764, 2765, 2766, 2767, 2809, 2839, 2925, 2942, 3087, 3088, 3147, 3148, 3149, 3150, 3471, 3498, 3529, 3594, 3616, 3635, 3655, 3701, 3705, 3735, 3744, 3809, 3846, 3849, 4029, 4093, 4217, 4253, 4255
No new roads should be built on the Forest.

Letter 503 Assure us that no new roads will be built in the Forest

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2666, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 3478, 3763, 3846, 4068, 4073, 4074, 4075
No new roads Also, close all unnecessary roads.

Letter 743 I do hate to see expensive roads built into the forest that you later call "Hunter Access Roads"

Letter 748 Please stop ANY new roads from being built I feel we should reclaim some of the roads already built

Letter 877 No new roads should be allowed, and as much as possible all except essential roads should be closed and reclaimed.

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2063, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 3606, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4157, 4158, 4172, 4183

No new roads should be built

Letter 948 — I'm concerned about putting in any more roads

Letter 965 — The use of off-road vehicles needs to [be] more limited by not adding more roads to the already existing ones.

Letter 970 — No new roads should be built in the forest. There are already too many unnecessary roads which need to be closed

Letter 979 — Since GWNF is "wild" and should remain undeveloped, you should limit access to large areas by curtailing road development

Letter 982 — No new roads should be built, and many of the existing ones should be closed and reclaimed

Letters 987, 2806

Road building should be minimized

Letter 1062 — The greatest fault in the plan is the construction of 200 miles of roads per year We urge that no new roads be built

Letter 1072 — Absolutely no new roads should be built. You should consider starting to close existing ones

Letter 1077 — Cut down on new roads in the forest

Letter 1078 — NO NEW ROADS should be built and all unnecessary roads should be closed and reclaimed There is definitely no need to go to the great expense of building 200 miles of new roads in the next decade

Letter 1081 — Alternative 8 has altogether too much new roadage, this should be substantially reduced

Letter 1083 — It also discourages me, when I read that increased new roads are planned in this natural area

Letter 1152 — We have enough roads in the Geo Wash. Forest. No new roads!

Letter 1157 — I want to stress my disapproval of plans to build new roads.

Letter 1161 — I also urge you to consider eliminating the building of new roads and the closure of as many existing roads as is practical.

Letters 1094, 1149, 1169, 1258, 1314, 1317, 1982, 3553, 3827

No new roads should be built in the Forest Any unnecessary roads should be closed

Letter 1277 — I am also concerned about the construction of unnecessary roads in the GWNF

Letter 1290 — I feel strongly about not building any new roads

Letter 1297 — There should be no new roads! The existing roads are more than sufficient, and additional roads create air, water and soil pollution and mgt problems

Letter 1329 — The building of 200 miles of new roads should not be considered Reclaim unnecessary roads for the purpose of removing the isolation of small clumps of wilderness areas

Letter 1349 Unnecessary roads in the forest need to be closed

Letters 1370, 1971, 2902
Eliminate all roadbuilding and reconstruction.

Letter 1378 No new roads should be built in the GWNF Unused roads should be allowed to return to their natural condition

Letter 1443 Additional roads will only take away from the wilderness, any unnecessary roads should be closed

Letter 1445 No more new roads They are too expensive

Letter 1454 No new roads

Letter 1552 [Flaws to draft plan include] miles of unnecessary new roads

Letter 1569 NO roads

Letter 1615 There should be no net increase in roads on the Forest Existing roads should be evaluated for closing Closed roads should be closed permanently

Letter 1642 Road construction in the National Forest should be terminated, other than for forest fire protection

Letter 1684 No new roads should be built, and those which are little used should be closed and seeded

Letter 1809 The use of off-road vehicles, motorized traffic and timber harvest are detrimental to the forest. Please see that we DO NOT expand roadways

Letter 1816 New road construction needs to be stopped Efforts need to be made to close off travel on some roads to reduce the incursions of people into sensitive wildlife habitat

Letters 1823, 1886, 2010, 2230, 2237, 2272, 2292, 2510, 2674, 2749, 3797
No new roads should be built in the Forest Unnecessary roads should be closed and reclaimed

Letter 1843 I oppose the proliferation of logging roads

Letter 1864 Cut back on roads

Letter 1879 I believe the current road system in the forest is entirely adequate and I would oppose the expansion of the roads for loggers, ATV, and 4-wheel drive enthusiasts

Letter 2053 I am against more roads being cut into the wilderness.

Letter 2060 No new roads should be constructed, and all existing roads should be inventoried to determine their need All non-critical roads should be closed

Letter 2189 No additional roads are necessary GWNF should maintain the minimum necessary roads, thus protecting the maximum space for hiking, walking, and other minimally intrusive activities

Letter 2285 We don't feel that any new roads should be cut into the forest, particularly if the roads are being built for the timber businesses.

Letter 2319 There are already enough logging roads! We don't need anymore roads Roads cause erosion of soils.

Letter 2327 I urge you to adopt Alternative 8 as the preferred plan for the GW Forest I also ask that in that plan· No new roads be built

Letters 2337, 2606
Elimination of new road building and new construction

Letter 2346 As long as we are subsidizing the timber industry by building road to increase access to our precious wild public lands I will be infuriated with such a policy

Letter 2347	The 200 miles of new roads envisioned by the Plan would only worsen the fragmentation and destruction of the GW's most sensitive habitat.
Letter 2513	If any action is taken regarding roads, it should be in the form of removing and regrading and seeding the majority of existing roads throughout the forest.
Letter 2529	No new roads, close any unused roads and restore the land for natural growth
Letter 2603	We should not build any new roads and in fact, we should remove the side roads we now have
Letter 2628	There should be no increase in the total Forest system road mileage. Timber harvesting should take place off existing system roads and temporary roads
Letter 2665	Eliminate all new roadbuilding and reconstruction
Letter 2710	GWNF does not need any more roads Biological diversity needs to be preserved, most of these roads are involved in below-cost logging sales.
Letter 2836	Build no new roads - the GW is covered with old logging & FS roads
Letter 2868	New roads are generally unnecessary There are currently 1,800 miles of Forest Service roads and 2,400 miles of state and federal roads in the Forest These roads are more than adequate to handle the recreation demands on the Forest Building roads has an overall negative impact on forest resources as they lead to soil erosion and fragmentation of undisturbed wildlife habitat Furthermore, building roads into currently unroaded areas destroys the wilderness character of these lands Finally, timber harvests requiring new roads are often below cost and generally there are no actual non-timber benefits that justify the road and harvesting expense.
Letter 2892	No new roads should be built, both because of the severe environmental impact and the expense
Letter 2892	The enormous cost, both in dollars, and in habitat destruction, is not at all justified in this Forest
Letter 2922	Road building should be kept at a minimum where ever possible.
Letter 3537	There should be no new roads on the Forest Roads that allow licensed OHV use should be reviewed and restricted where illegal off-road use is prevalent. This analysis should also be included in the EIS.
Letter 3545	The Plan should reflect a net reduction in total road mileage There are already too many roads
Letter 3558	New roads should be reduced
Letter 3567	I would like no increase in the mileage of roads in the forest. If there must be some new roads built, there should be an equal amount of road closed, ripped and seeded Non-system roads or "troads" must be closed to vehicles
Letter 3527	Roadbuilding in the forest should be kept at a minimum - the projected 20 mi per is too much
Letter 3625	It is understood that roads are needed to conduct timber harvest Use of old roads should be maximized and use of cable increased in order to reduce need for new roads A new road should not be built to accommodate a harvest if the timber cutting operation does not make a profit
Letter 3633	Construct no new permanent roads
Letter 3647	Do not build new roads It is absurd and destructive to put new roads into a natural area
Letter 3661	No new roads in the GW! Alternative 8 includes too many new roads

Letters 3680, 3796

No new roads should be built All timber harvest should be done along existing roads

Letter 3699 Too many unnecessary new roads

Letter 3700 It is a travesty to continue building new roads through wild, forested areas. The few forest areas that remain must be protected from this which causes tremendous damage to the ecology of the forest

Letters 3720, 3766, 3782

No new roads should be built Close all unnecessary roads.

Letter 3750 *No new roads should be built for below-cost timber sales.*

Letter 3756 Two hundred miles of new roads are unnecessary and will only lead to increased misuse of the forest and its resources. Work toward reducing the number of roads in the region.

Letter 3812 The rate of road building is far too rapid. Building roads to every corner of the Forest will not lead to unfragmented habitat, an objective of Alt. 8. The FS should not be a road building agency

Letter 3834 There is no need for new roads Too much road building has been done in the name of recreational access to wilderness when in fact it was lobbied for by the timber industry and in effect has been a great subsidy to this industry.

Letter 3840 *Don't run new roads into "Bear" and "Turkey" habitat areas for uneven-aged management - poor economics.* Reduce road mileages and move uneven-age timber areas to the existing road network

Letter 3847 - Limit the development of new roads

Letter 3850 No new roads should be constructed; reclaim unused roads.

Letter 3892 *No new roads are necessary. I recognize the need for road maintenance and resurfacing and believe that these* activities should continue if not be stepped up to maximize the utility of the existing timber management infrastructure of the GWNF.

Letter 3938 Roads. There are already 1800 miles of Forest Service system roads. This is more than enough! No new roads should be built The 20 miles of new roads per year proposed in Alternative 8 is unacceptable! Road work should be limited to improvements of a few existing roads such as needed widening for safety or drainage *improvements Non-system roads which are passable should be gated and closed*

Letter 3962 MA 11: 2-82 & [Standard] 401 - Lands suitable for timber Roads constructed for timber harvest should be closed and seeded after use. We do not need additional roads in the forest.

Letter 3962 MA 17. [Standard] 594 Roads constructed should be temporary roads that are closed upon completion of the project Timbering should be done on skid trails

Letter 3962 Standard 9, "No roads are constructed" should be in every Management Area of the Plan except for MAs 12 & 20

Letter 3996 [Maintain] roads but [build] no new roads

Letter 4001 No new public roads should be constructed and existing roads should be maintained to the lowest standard Some existing roads that encroach on critical habitat areas may need to be closed Some very short segments may be constructed for timber mgt in the limited areas where that is permitted These must be built to the minimum standards for the job at hand and used only for that purpose

Letter 4009 There should be fewer, not more, roads

Letter 4053 Do not build any new roads, rather close some

Letter 4182 [I] support a protective Forest Management Plan To be protective the plan must not allow new roads to be built

Letter 4184 We have millions of miles of roads in the U S - enough to pave all of New England We don't need anymore!

Letter 4262 There is no reason to increase the road system as this will disrupt the fragile wildlife habitat as it exists presently, and will invite more polluting cars and people to sensitive areas

Response Management of system roads under the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS".

There are currently approximately 1760 miles of Forest System Roads and an estimated 250 miles more of roads under other jurisdictions that directly border national forest lands

The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year Additional roads may be needed for a variety of reasons including access to new developed recreation sites and access to wildlife improvements

The FEIS contains a description of fourteen alternatives which contain differing amounts of road construction designed to achieve the desired future condition for each alternative. Only Alternative 3 would involve no road construction Alternatives 11 and 13 would permit no system road construction Alternatives 3, 6, 9, 10, 11 and 13 contain management areas that foster a more aggressive policy towards closing, and where appropriate, removing roads from the transportation system

All of these alternatives are considered in detail in the FEIS One of these alternatives will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits

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Letter 181 Reducing the standards to which roads are constructed or the level to which they are restored after use, can significantly increase the cost differential between the fair market price of product at the stump and to the end user Allowing OHV and other motorized and non-motorized use of the roads and haulways rather than forcing restoration of these areas further improves the economic viability of timber sales We recommend that the road and haulways be used for 5 to 10 years, to permit natural forest reclamation After that period they could be assessed to determine if assisted reclamation was required

Response There are a number of factors which affect the standard and design of any system road including safety and mitigation for adverse environmental impacts Generally, a road that is open to public use requires a higher standard for safety and minimization of erosion Open roads are also more expensive to maintain.

Letter 2664 The Draft Plan predicts an average of 20 miles of new road to be built annually This is a large decrease from the 1986 Plan that had an average of 52 miles per year However, the Draft Plan fails to identify the amount of reconstruction and the management of reconstructed roads This omission should be corrected and added to the Final Plan and EIS

Letter 3840 Proposing 20 new miles of road each year in a forest of over 4,000 mi of roads is not in keeping with the theme of Alternative #8

Letter 3942 Under no circumstances should the recommendation for 20 new miles of road per year remain in the plan An increase in uneven age management has been used as a justification for this proposed increase in roads Please restrict timber harvest to areas along existing roads Decreasing the proposed mileage will have the added benefit of reducing the budget required to implement Alternative 8

Response The Revised Plan estimates 5 to 8 miles of new road construction per year Reconstruction needs are estimated in the Revised Plan budget Typically management of a road does not change after reconstruction

Letters 986, 1153, 2227

Eliminate all new roadbuilding, including reconstruction

Letter 1071 — There should be a minimum number of roads Roads are not necessary, they disturb the very nature of the area. Please keep the Forest a wilderness

Letter 1884 — No more roads OF ANY KIND should be constructed Roads fragment the habitat, create edge, facilitate the entry of pest and non-native plants, cause erosion and stream damage, change drainage patterns, and provide barriers to movement Existing roads should be carefully surveyed and those not absolutely necessary should *be closed and revegetated with native local species.*

Letters 2035, 2534, 3662

No new roads built on the GWNF - and many existing roads should be obliterated

Letter 1992 — No new roads should be built and existing roads should be obliterated.

Letter 2026 — *Aside from the cost and intrusion, new roads inevitably lead to new activities such as logging and vehicle use which further harm the biological integrity of our fine mountains Please, no new roads.*

Letter 2045 — Prohibit the building of new roads and the reconstruction of old ones Roads cutting through the forest drastically degrade the quality of the area as a wildlife habitat

Letter 2602 — I am against any and all new forest roads and I whole-heartedly support the closing of roads, especially if it would serve to create larger wilderness areas

Letter 3929 — I am opposed to road construction in the NFs because road construction is an item of public expense that benefits the for-profit timber industry

Letter 3691 — No new roads should be built in the forest, and many of the existing roads should be removed

Letter 3963 — Daily News-Record (Harrisonburg), 23 Jan 1992, pg 6 Roads are the most costly item, ecologically and *economically It results in the further fragmentation of forested ecosystems, increased erosion and siltation of* streams, added stresses to threatened species and more money-squandering projects at taxpayer's expense It will allow and promote the murder of trees in riparian areas [and] forest-wide using deer/grouse as the excuse to trash thousands of species It will molly-coddle OHV interests (ATV, 4x4, dirt bikes) over nature

Letters 3985, 3986

No new roads should be constructed and roads which are not now open to the public should be reseeded and *allowed to return to the forest*

Letter 3695 — Limit or close all roads and (do not) build new ones

Response — Alternative 3 eliminates all road construction and reconstruction. This alternative is considered in detail in the FEIS and will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits

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Letter 1064 — 20 miles of road per year are needed to initially access new areas for timbering for about the next ten years Two specific restrictions should be included. (1) that the limit of 10 years be specified in the Plan with a significantly reduced amount of roads after that (2) that a very high % (90%) of the new roads are specified as the lowest level, closed and seeded for the years between uses Timber operators should not be allowed to build higher-grade roads.

Letters 1139, 1621, 2283, 2512

Unnecessary roads should be closed and reclaimed

Letter 1310 — 200 miles over the next decade is 200 miles too many You should look at closing some of the roads in the forest.

Letter 1652 — Roads not currently being used should be closed and reclaimed

Letter 2003 — Roads already considered unnecessary should be closed and reintegrated with the surrounding forest.

Letter 2347 — Rather than opening new areas to roads and motorized traffic, why not concentrate on closing the roads that endanger many areas?

Letter 2498 — Unnecessary roads should be closed.

Letter 3931 — No new roads should be built and unnecessary roads should be closed and reclaimed.

Response — Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS" describes the management of the transportation system including the policy on road closures

Alternatives 3, 9, 11 and 13 allocate many parts of the Forest to management areas with a more aggressive road closure policy than those in Alternative 8A. All of these alternatives are considered in detail in the FEIS One of these alternatives will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits.

Letter 1472 — The road construction is much better for Alt 12; it consists of only 15 miles

Response — Alternatives 8 and 12 have been reformulated in the FEIS The estimated miles of road constructed is respectively 5 to 8 miles per annum and 7 to 11 miles per annum

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Letter 2732 — No new roads should be built unless the loggers pay for them. One of the best ways to cut the federal budget deficit is to terminate below-cost timber sales

Response — Many roads that are constructed will be used for more than just logging Those left open for public use will be used for many different recreational pursuits Those closed to the public will be used for administrative access and are available for fire suppression

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Letter 3490 — Logging road construction [is] a poor option at the expense of generally accepted conservation principles.

Response — Timber harvesting and road construction will be accomplished in a manner that sustains the diversity and productivity of ecosystems

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Letter 3637 — We support a low standard closed or seasonally opened road system on the forest. Access to national forest land is needed but large graveled roads that are open year long are expensive to construct, maintain, and are a detriment to wildlife

Letter 3660 — Lower road specs if going to rip, seed, and close Saves money.

Letter 3911 — Road maintenance and resurfacing should continue if not be stepped up to maximize the utility of the existing timber mgt infrastructure

Response — The management of system roads under the Forest Service preferred alternative is described in Chapter 2 under "ISSUE 3 — FOREST ACCESS" and under the desired future condition for each management area in Chapter 3 of the Revised Plan

Roads are designed, constructed and maintained according to the specific management objectives for any management area and at a standard that affords safe passage and protection of resources in a cost-effective manner

Letter 83	Another area in the plan that worries me is page 2-13 under "roads". It states that at least 90 percent of the roads in this area will be closed year round. I do not understand why this is necessary and hope that this will be changed
Letter 2823	We feel that the miles of open roads should be kept to the minimum needed to maintain good wildlife and timber management practices.
Response	The Revised Plan calls for closing 90% of new road constructed to support the timber sale program

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Letter 87	The Plan should outline the amount of road construction, restoration, relocation, and pre-use maintenance.
Response	The actual miles of road construction, reconstruction, restoration, relocation, and maintenance of system roads will be determined by site-specific analysis during implementation

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Letter 146	In Alternative 12, the new road construction mileage (15 mi /yr) is too high It more than doubles the current rate of new road construction (7 mi).
Response	The estimated road construction has been revised to 7 to 11 miles per year in the FEIS

Letters 766, 767	*With 4,200 miles of road already in existence, no new roads need to be built; unnecessary roads should be* closed and reclaimed
Letter 1075	*Spending more taxpayer money on roads when there are already 4,200 miles of roads, sounds unnecessary.*
Letter 1847	With over 4,000 miles of roads in the G W it makes little sense to increase it now for any reason, including economics.
Letter 2007	NO NEW ROADS! Currently, the forest is served by 4200 miles of existing roads This amount should be reduced by closing unnecessary roads and allowing this land to be reclaimed
Letter 2012	Why is there a need for 200 miles of new roads? Already there exists 4,200 miles in the G W National Forest
Letter 2308	200 miles of new roads is too large 4,200 miles of roads on the GWNF should permit harvesting a 27mmbf average annual ASQ and even a larger ASQ entirely by temporary roads and skid trails extending from existing roads Road construction costs are a prime factor in causing below-cost timber sales It is recommended that no new roads be built in the revised planning decade
Letter 2615	New roads should be limited to roads cut for timber harvest and ideally these roads should be cut and paid for by the timber industry under Forest Service supervision. Balanced management for everyone's needs is *required to maintain the Forest's resources and value for future generations*
Letter 3529	Roads - unnecessary roads should be closed & reclaimed Existing roads (1800 mi Forest Service roads & 2400 *mi of State and Fed. roads) total 4200 miles. Enough is enough!*
Letter 3544	The GW now has 4200 miles of roads -- no more are needed.
Letter 3892	There are currently 4,200 miles of roads in the GWNF which are more than adequate to allow for the necessary timber harvesting and general forest management
Response	There are currently approximately 1760 miles of Forest System Roads and an estimated 250 miles more of roads under other jurisdictions that directly border national forest lands The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year. Additional roads may be needed for a variety of reasons including access to new developed recreation sites and access to wildlife improvements

Letter 3676 — If roads are made in the G W Forest, it will bring in people who will then trespass on private property adjoining the National Forest.

Response — At least ninety percent of new roads constructed to support the timber sale program will be closed to public use

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Letter 3739 — No new road building until the [wilderness and biodiversity potentiality] studies have been decided upon

Response — When the Regional Forester selects the alternative to serve as the Revised Plan, road construction will be permitted under the conditions and in the areas described in the Revised Plan There would be no road construction in any roadless area recommended for wilderness study

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Letter 3676 — We want to see the area of the G W Forest which lies between Camp Run and the Hardy County line in Pendleton County left as it is We are opposed to making roads into the area for any reason

Response — That area is part of Management Area 15, where an open road density of less than two miles per 1000 acres is called for

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Letter 17 — The standard for open roads in MAs 14 and 15 would allow for many more miles of open road than the current standard. We strongly support the current standard

Response — The road densities (1 mi/1000 ac for Management Area 14, and 2 mi/1000 ac for Management Area 15) are the same as in the previous plan for some species and higher for other species The allowable densities are considered appropriate, based on the emphasis for Management Areas 14 and 15

Letter 2664 — The VWTF strongly supports the philosophy that all new or reconstructed roads be ripped, seeded to grasses and legumes and closed to motorized vehicles except USFS and VDGIF for personnel on work projects and law enforcement The open road density in MA 15 in the Draft Plan (standard 557) of two miles of open road per 1,000 acres is excessive The VWTF strongly recommends only one mile of open road per 1,000 acres.

Letter 3951 — Road Density - Only count Forest Service system roads that are within the interior of a Management Area Do not count boundary roads, state roads, or private roads For some areas the density should be set at one (1) mile of open roads per 2000 acres (bear and turkey areas) Other areas do not need a road density established (deer) The roads that the Forest Service constructs and the majority of the existing roads are of such low standards that they have little to no negative impact on any wildlife species. The Forest Service cannot control state and private roads and therefore should not consider them in the computation of road density Traffic Service Level "D" roads that are closed or will be closed should not be counted

Response — There are a variety of ways to determine road densities in a particular management area, each having its own merit. Measures for determining densities are contained in Chapter 3 of the Revised Plan Actual road densities for each area with a road density guideline will be determined and monitored

It is estimated that less 5 to 8 miles of new roads will be constructed annually to support the timber sale program Of this, it is estimated that 90% will be closed and seeded New "Common Standards" have been developed to improve the benefits to wildlife that seeding closed roads provide Seeding of exotic or invasive species is not allowed, and fescue is to be used only site specifically when it is determined that other cover species will not be able to control an erosion problem

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Letter 2931 — Be careful about where roads are built in the forest Some people run their mountain bikes, ATV's, or motorcycles on the [Appalachian] trail The only practical way to slow this down in remote areas is to limit access by limiting road building

Response — All alternatives prohibit motorized use of the Appalachian Trail, yet the ID Team recognizes that illegal use by mountain bikes, ATV's, and motorcycles may be fostered by road construction as the comment indicates Alternatives 2, 5, 6, 7, 8A, 10, 11 and 13 propose minimal change from current road management Alternative 9 has some road construction proposed, but would close many roads in SPM areas Presumably some of these roads would be adjacent to the AT Alternative 3 would remove approximately half of the Forest Development

Roads and allow for no new construction and would provide the most protection for the AT The Regional Forester will select the alternative that maximizes net public benefits Road access in the Forest is one of the considerations in making the selection

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Letter 1555 — I do not believe that we need any new roads in the forest, but should one have to be built, we should have a public comment period before such proposals could be carried out

Response — A discussion of road construction is included in project environmental documents Under the National Environmental Policy Act, the public does have an opportunity to comment on a project before a decision is made

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Letter 2665 — The inventory of roadless areas upon which the plan is based is meaningless without an accurate inventory of existing roads. To date, none exists as many roads are admittedly unmapped, undocumented and unrepresented in the information of the Plan and EIS.

Response — The Forest maintains a detailed record of system roads on the Forest This inventory is updated annually

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Letter 2929 — As part of the preparation of the FEIS, the ID Team has worked with District representatives to update the road inventory and to map the inventory in the Geographic Information System The Special Features Map that accompanies the Revised Plan displays the location and status of system roads

Response — Construction of system roads under the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS"

Letter 3728 — WVDNR recommends that roads be constructed to the lowest possible standard to meet mgmt objectives

Response — Roads are designed to the standard needed to implement the specific resource management objective associated with each project The projects must be designed to achieve the goals, objectives and desired future condition of any management area

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Letter 3728 — The desired future condition of the MA should determine road mgmt - not project level decisions We desire most FS specified roads in Mgmt Areas 9, 14, and 15 be managed as closed The Plan should state current open road density.

Response — The desired future condition and standards associated with each management area provide general direction for the management of roads Site-specific analysis and decisions are needed, however, on the management of individual roads within a management area The Revised Plan is a programmatic document that establishes the general policies for management, it cannot establish specific direction on each particular management decision needed to implement the Revised Plan

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Letter 3840 — All non-system roads should be closed Problems remain on the ground with the open roads versus closed roads versus non-system roads that are open Either non-system open roads should be counted relative to habitat mileage or they should be systematically closed

Response — The Forest maintains a detailed record of roads on the Forest where vehicular traffic is sanctioned This inventory is updated annually

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Letter 3951 — Road Construction - Keep as in Alternative 12

Response — The road construction program in Alternative 12 is the amount of new roads needed to access the suitable land base to provide an allowable sale quantity of 450 MMBF Since the Forest Service preferred alternative harvests a smaller allowable sale quantity, a smaller amount of road construction is required

Letter 2755 — The term "roads" is not clearly defined in every Management Area prescription, if OHV use is allowed, the wording should be "Motorized public travel is restricted to open system roads". For example, Standard 279 under Management Area 9 and Standard 519 in Management Area 13 both say "Existing roads may continue to be used". This wording is too loose and seems to condone travel on non-system roads

Letter 3938 — The definition of what is a road should be more clearly stated in the Plan Wherever the word "road" is used in the Plan, it should be clarified whether system or non-system roads are being addressed

Letter 3942 — Regarding roads, the language in the Draft Plan is too loose Each time the word "road" is mentioned, specific language should be used to identify what type of road is intended. For example, any reference to "open road" should be changed to "open system road" if that is intended Use of nonsystem illegal roads is a widespread problem. I hope the new plan will address this problem. Roads receiving illegal usage should be closed. While I recognize that this is a time-consuming and expensive project, it needs to be done to protect the forest resources.

Response — Unless stated otherwise, when Forest roads are discussed in the Plan, the reference is to roads that are part of the Forest Transportation Inventory System

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Letter 3538 — I suggest the area from Rough Run Road to the Hardy Co Line not have any new access roads as in plan 8 We already have people on ATV's in there and there aren't any roads or trails It is a big law enforcement problem

Response — The decision to build new access roads north of Rough Run Road in West Virginia will be determined during site-specific project analysis. Management Area 11 depicts the only areas of the Forest where ATV's are permitted on designated trails The remainder of the Forest is closed to vehicles which are not licensed by the appropriate state. Law enforcement is an integral part of the Forest's management

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Letter 3538 — There, are bald eagles on the South Fork River If more access to this area is made I feel they will be shot

Response — The Revised Plan requires that any management activities must conform with the Recovery Plan for any federally threatened or endangered species The question of the presence of bald eagles on the South Fork of the Shenandoah River and the effect that any management practices would have on this species would need to be addressed in the biological assessment for any project.

Letter 3962 — [Standard] 555 "Motorized use is allowed" only on system roads "when it doesn't conflict "

Letter 4038 — Replace the sixth paragraph on page 2-13 of the Draft Revised Forest Plan with the following: "The desired future condition is a road system that serves the public, meets management needs, and protects resources in a cost-efficient manner. Only roads in the Forest Development Road system are available for motorized use Open road mileage may be reduced or seasonally adjusted to address biological objectives Roads that cannot be maintained at a level that prevents resource degradation will be closed to public use "

Response — Off-system roads being used by full sized vehicular traffic are discouraged by the use of natural barriers ATV use is governed by Forest Supervisor orders

The Revised Plan does not make a site-specific decision on the opening or closing of system roads Instead, management area direction provides the road management policy The specific decision on the opening or closing of any road must be consistent with the road management policy of a given management area, or else the Revised Plan must be amended to eliminate the inconsistency.

Letter 4038 — Replace the seventh paragraph on page 2-13 with the following "The Revised Forest Plan involves construction of estimated _____ miles per year of new roads for the first decade, not including reconstruction or maintenance of existing roads Approximately 90 percent of these new roads are closed year-round."

Letter 4038 Replace the eighth paragraph on page 2-13 of the Draft Revised Forest Plan with the following. "Decisions that determine whether roads are open or closed to public use are made at project-level. However, the open road density does not increase above the specified road density for each management area."

Response The road construction/reconstruction costs and estimated miles of road construction needed to support the timber sale program associated with each alternative has been reexamined.

It is important to note that the estimated miles of road construction is based on the average existing road density and the average road density needed to access stands to be harvested. These estimates are not precise since the actual number of miles needed for any given year depends on factors which cannot be modeled in FORPLAN. The ID Team has, therefore, displayed the estimated miles of road construction as a range rather than a single number. The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year.

The cost of road construction modeled in FORPLAN is an average cost that is directly proportional to the number of miles of roads constructed. Given the imprecision of the road construction estimates, there is no advantage in displaying the annual road construction costs other than increasing the complexity of the FEIS.

FOREST ACCESS. 4-wheel Drive OHV use

Letter 57 Licensed off-highway vehicles should be kept to the very minimum.

Letter 279 [Suggest] OHV use be restricted to open roads

Letter 283 NO to off-highway vehicle travel in the National Forest

Letter 738 Minimize damage by off-road and ATVs by severely restricting areas they can be used

Letter 759 Off road vehicles have NO business in such as lovely place as the GWNF.

Letter 885 No loud ORV's

Letter 1072 ORVs have no place in National Forests. Get them out of GWNF. They destroy, pollute, litter and ruin the forest for everyone else.

Letter 1073 I oppose increased access for off-road vehicles and ATV's. Off-road vehicles cause erosion and are a hazard to those on foot. Off-road recreational vehicles have no place on public lands.

Letter 1153 All off-road vehicles should be eliminated from the GWNF.

Letters 986, 1370, 2045, 2227, 2337, 2515, 2606, 2902, 3981, 4050
Eliminate all off-road and unlicensed vehicle usage within the forest

Letter 1642 The use of the forest for vehicles, and especially the 3-wheelers and 4-wheelers should be curtailed as much as possible. Noise and damage done by those vehicles is intolerable.

Letter 1816 It is my opinion that ATVs and ORVs have no place in the GWNF and should be barred totally and without exception

Letter 1884 The GWNF is no place for ATVs and ORVs which do significant environmental damage when used "legally". The use of the forest by ATVs is preemptive of other uses which are more in tune with natural values.

Letter 1987 - Regulation of ORVs: One use we would strongly urge that you ban is the activities of ORVs, ATVs and other similar types of motorized equipment. No citizen has the right to inflict the kind of damage to public lands that these vehicles can and often do inflict. The GWNF has a large road system which allows access to many remote areas. To allow these types of vehicles to leave this road system and roam at will through the forest invites an unacceptable amount of destruction of a public resource. It seems to us that it is very unlikely that either the FS or the local law enforcement agencies are in a position to protect the public's interest in the GWNF unless all motor vehicles are confined to the existing road system

Letter 2048	Eliminate all off-road and unlicensed vehicle uses within the forest in order to eliminate that disturbance to wildlife and the corresponding destruction of habitat and trails
Letter 2308	NO ATVS, OHVS, NO MECHANIZED BUCKING BRONCOS These machines rudely intrude on the peace and quiet beauty of the forest and directly deprecate its human, floral and faunal values With 2,400 miles of public roads and 1,800 miles for forest development roads, anyone who wishes to ride about in the forest has abundant opportunity to do so.
Letter 2665	Eliminate all off-road and unlicensed vehicle use
Letter 2665	There is no right to off-road ORV/ATV motorized recreation in the GW Other National Forests (Monongahela, Ouachita, and others) have found motorized recreation incompatible with other resource values in the forest and have outlawed their use in those forests Similar action is appropriate and necessary in the GW
Letter 2685	Of special note I believe is the use of our National Forests for the disruptive recreational use of Off the Road/All Terrain Vehicles. Surely we can think of better places to pollute and disrupt
Letter 2709	Keep the OHVs out All they and their drivers can do is wreck the place
Letter 2891	I am completely against motorized uses of the forest such as four-wheel recreational vehicles.
Letter 3461	Off Road Vehicle damage is never repairable WE DO NOT NEED THESE INFLUENCES IN OUR FOREST
Letter 3471	Noisy off-highway vehicle use are not compatible and are not necessary in the George Washington National Forest
Letter 3566	The use of destructive off-road vehicles should be very limited, preferably banned altogether.
Letter 3634	I have yet failed, completely, to come up with any excuse for ORVs using hiking trails and forest service roads
Letter 3696	Off-road recreational vehicle use is totally incompatible with peaceful, undestructive pursuits ORVs also contribute to the pollution of air and water and the destruction of wildlife
Letter 3713	I am totally opposed to off highway vehicles on any part of our National Forest
Letter 3714	I am generally opposed to opening up the forests to off the road vehicles.
Letter 3717	I am opposed to ORV use in Forests The vehicles are noisy, promote erosion, and seem to encourage forest use by people least likely to respect the Forest
Letter 3726	We would prefer the elimination of all engine powered vehicles from the GWNF, except on maintained roads.
Letter 3728	WVDNR does not support the use of ATV/ORV's on public lands due to the many conflicts with other forest users
Letter 3739	No off-road vehicle use other than to conduct studies.
Letter 3840	ORV (licensed) may use any open system road on the forest No closed system road or trail may be used by any ATV or ORV.
Letter 3921	This alternative [#8] limits to some extent, the use of off-highway vehicles I believe the national forests should be closed to off-road vehicles OHVs and ORVs should be severely restricted to those areas where adverse effects on soil and water can be eliminated
Letter 4008	ORV use in NFs should be minimal
Letter 4009	ORV/ATV presence and trails in the Forest is an abomination and should be banned and excluded from the forests

Letter 4021 We don't need more playlands for ORVs.

Letter 4249 I object to the additional mileage being 'maintained for PHVs'! This is the one forest use that is not compatible with any other use

Letter 4262 All ORV use should be eliminated

Response Executive Order 116644, as amended by Executive Order 11989, recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands

Alternatives 3, 7, 9, 11 and 13 contain a standard that limits the use of motorized vehicles to open system roads. *These alternatives do not designate any motorized trails, effectively eliminating opportunities for the legal use* of unlicensed vehicles and restricting the use of licensed vehicles on the George Washington National Forest

Alternatives 3, 7, 9, 11,and 13 are considered in detail in the FEIS One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 93 Utility Corridors and Maintenance Roads and Forest Service Roads, would it not be feasible to open these roads and areas (to OHVs) through special permit or request A small fee could be generated as well as being able to limit use of the areas It might also allow the areas to be kept open for limited recreational use while at the same time allowing maintenance updates from responsible users as to road conditions, area conditions, and such as that

Letter 181 Allow OHV use of current and future utility right of ways These could provide both a good linear trail system plus could provide readily available connectors between trails systems

Response Utility corridors and maintenance roads are under permit to the user The permittee is responsible for the *maintenance of both the corridors and the roads. OHV use is detrimental to these corridors and cannot be* allowed

As far as Forest Development Roads, various authorizations can be used to allow uses that are not incompatible with the existing use The Forest Service cannot charge a 'use fee' to individual users, but it can issue use *authorizations to individuals or organizations who would be responsible for the maintenance of the road under* special use permit Each application for use is judged on its own merits before use is granted, or denied

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Letter 2628 From the map dated 3/27/92 furnished to CTF, the OHV route designated for the Skyline road on the James River District appears to exceed the open road segment All routes shown on the map should be checked to assure that no designation is made of a road which is not open currently

Response *Skyline Road #125D and Trail #471 coexist. Both go to the top of Big Knob in the area of Dolly Ann Hollow* The Skyline Road is currently open year-round to public motorized use to the 3,700-foot elevational level

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Letter 6 A benefit for four wheelers provide that would disappear if more roads are closed is the support they provide to the local economy

Response The ID team recognizes that there are both direct and indirect benefits to local economies resulting from four wheelers use in the Forest These benefit values must be balanced against those for other resources, monetarily and otherwise The Regional Forester will select the alternative that maximizes net public benefits

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Letter 3742 Your mailing of April 3, 1992 included a GIS map showing the location of roads which would be open for *Off-Highway Vehicle travel. This map should be distributed for public comment The map shows OHV routes on* what appear to be trails on the base map Because of the intrusive nature of OHV use, no OHV route should be designated on a route also used as a trail Not only is there potential danger of mixing users, but the impacts of 4-wheel drive vehicles on the route is of a magnitude that it severely degrades the experience of hikers or horse riders The OHV designation should be removed from any route which is also a trail The map should be part of the final plan mapping

Response — Many of the maps requested were available for review at the Supervisor's Office. Maps with information such as OHV routes and ROS classes were displayed for public review at public meetings before the DEIS was issued and at open houses held during the comment period on the DEIS The type and amount of maps to publicly display depends on the nature of the action, public issues, and the scope of anticipated actions affected by the decision to be made. NEPA (40 CFR 1500 4) states that agencies should emphasize portions of an EIS that are useful to decision makers and the public and reduce emphasis on background material The ID team believes that most inventory maps fall into the category of the background material The maps did not need to be distributed for public comment because they were not essential in helping the public identify a reasoned choice among the alternatives presented in the DEIS. What was important were the management area allocations by alternative and these were provided on maps for public comment. Trails and roads can coexist on the Forest. This allowance is determined through site-specific project analysis.

Letter 14 — I would like to see more primitive roads open to 4-wheel drive use, not necessarily new trails

Letter 35 — It is my sincere hope that access to the George Washington National Forest by four-wheel drive vehicles will be maintained to maximize the recreational experiences available to the public, including the physically handicapped

Letter 58 — Please keep the best 4WD trails of the George Washington National Forest open so the prime recreational opportunities are not lost.

Letter 86 — After reviewing the Plan with my limited knowledge of land use plan wording, I feel that it's not all bad but definitely need to take 4x4 use more seriously then it does.

Letter 171 — Why are so many "suitable" OHV-routes located outside of MA 11?

Letters 950, 952, 960, 1100, 4244, 4256
More primitive roads should be opened for four-wheel drive use.

Letter 953 — I would like to see more areas opened for use by four wheel drive vehicles

Letter 955 — I wish there were more open roads for 4-wheel drives to use

Letter 956 — I think there needs to be more roads open to all 4-wheel drive vehicles

Letter 958 — I hope that the primitive roads are not closed to motorized recreation

Letter 1164 — The need for OHV recreation is well stated in the Plan The need for an alternative that would meet a reasonable demand for this opportunity was improperly overlooked when the suggested alternative was developed

Letter 1883 — Please consider keeping primitive roads open for 4-wheel drive use, (even if you limit the number and size of vehicle).

Letter 2711 — Open more primitive roads to 4-wheel drive use, no more areas closed to motorized recreation

Letter 3590 — I would like more primitive roads opened for four wheel drive vehicle use I strongly oppose the closing of existing primitive roads

Response — Roads suitable for 4WD vehicle use have been identified in Chapter 3 of the Revised Plan under the description of Management Area 11 This has been done considering the traffic service level of the road, the maintenance level of the road, and open or closed status of the road. Designated 4WD routes are included in the Revised Plan map A refinement of the inventory of 4WD opportunities may be completed in cooperation with Ranger Districts with a project-level determination made as to whether a particular route should be open or closed to 4WD use

Alternative 4 would maximize motorized access to the Forest by including some of the closed roads in the Forest System Roads inventory An estimated 710 miles of system roads presently closed year-round would be opened at least seasonally to the public with consideration given to concurrent management activities Persons with disabilities and others who desire to use 4WD vehicles for access could use these roads

Alternative 4 will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 60 — I feel that a lot of the problems with getting this area properly designated, is that OHV and ATV keep getting lumped together, which MA#11 does. There is a need to handle them as two different user groups w/o cutting OHV expansion opportunities.

Response — Although both licensed OHV routes and unlicensed OHV trail systems are included in Management Area 11, they share the same route only in a few, specific cases such as Peters Mill Run.

Letter 93 — I also appreciate the accommodations you have proposed for those of us who use off-highway vehicles

Response — NO RESPONSE REQUIRED

Letter 83 — I also think that Management Area nine is vague with the use of the words, "can" and "may" I am afraid that this is a set-up to close these areas to 4x4 use.

Response — The intent of Management Area 9 language is to give Forest managers the flexibility to open or close roads as circumstances dictate Which roads to open or close or how many roads to open or close are not decisions that are made at the forest plan level Those decisions are site-specific and are made at the project level.

Letter 138 — As an off road motorcycle enthusiast of many years, I feel that the draft plan is far too restrictive providing too little area for potential ORV trail development.

Response — Executive Order 11644 as modified by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands The ID team recognizes off road motorcycle use as part of this Any licensed motorcycles will be allowed on open Forest Development Roads and will be allowed on trails developed for motorized use in Management Area 11 with specific Supervisor's Orders permitting use by unlicensed vehicles

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Letter 181 — Provide OHV trail heads near established public campgrounds and private businesses

Response — OHV trail heads may be developed on a site specific basis after analysis as to need and impacts on various resources.

Letter 892 — I want to state my categorical opposition to the opening of any of the following roads on the GWNF to ORV use

Letter 892 — #399 Jerkemtight Rd. - This accesses Southern Shenandoah Mountain near Wallace Peak A stream, the Jerkemtight Run, flows parallel to this road The Shenandoah Mountain ridge here is a fragile meadow of the xeric oak-chestnut type which would be rapidly churned up by destructive ORV use Also, the Jerkemtight Run is one of the very few viable water sources for those hiking the Shenandoah Mountain Trail in this area

Letter 892 — #85, #85A Flagpole - This is a magnificent high meadow environment which would be rapidly destroyed by ORV use As far as I am concerned FDR 85 and 95 should be permanently closed for habitat recovery and to maintain biodiversity

Letter 892 — #539 Hone Quarry Ridge - Again, this ridge accesses Shenandoah Mountain and provides a link between the Hone Quarry area and the main Shenandoah Mountain Ridge just north of Reddish Knob.

Response — Table 3-5 of the Revised Plan lists the Featured OHV routes in Management Area 111 FDR #85, #399, and #539 are not included in this list FDR #85A is an open system road

Letter 971	I do not want to see expanded .4-wheel drive use
Response	Licensed 4-wheel drive vehicles may use open roads in the Forest

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Letter 989	The preferred alternative sets up the framework for a significant loss of 4WD off-highway opportunity in a deceptive manner
Response	The ID Team has carefully considered the possible 4-wheel drive routes that are consistent with the over-all theme of Alternative 8A Known routes are displayed on a map that accompanies the Revised Plan. The question of motorized recreation supply and demand has been revisited in preparing the FEIS. An improved discussion on the supply and demand for Off-Highway Vehicles (OHVs) is included in Chapter 3 of the FEIS under "Dispersed Recreation"

Letter 4241	The following is a list of ten pernicious exotic plant introductions found along OHV/ORV tracks Damage to the forest is unknown, however, it is clear that these plants effectively destroy large amounts of native species Arthraxon hispidus, Polygonum perfoliatum, Myosoton aquaticum, Celastrus orbiculatus (Oriental Bittersweet), Lonicera japonica (Japanese Honeysuckle), Spireaea japonica (Japanese Spiraea), Perilla frutescens (Beefsteak-mint); Microstegium vimineum, Ailanthus altissima (Tree-of-Heaven), Alliaria petiolata (Garlic Mustard)
Response	These species were not necessarily brought in by OHV/ORV vehicles Many species of plants produce seed that can remain dormant in the seed bank for many years before germinating, and may originally have found their way into the forest in many different ways The Forest Service is aware of invasive exotic species and the problems caused when they become established The Forest is working with the state Natural Heritage Programs and the Virginia Native Plant Society to try to cope with the problems of exotic plants invading native ecosystems

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Letter 181	Provide seasonal OHV use of areas designated for habitat management.
Response	The Forest Transportation System includes 440 miles of system roads that are opened seasonally

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Letter 181	Recognize that visual impact areas can be used for OHV use without degradation of the scenic vistas provided to the public The forest cover is sufficiently dense
Response	The commenter has made a general statement which may or may not hold true depending upon the specific application There are a wide variety of management activities which may occur within visually sensitive areas The activities are carefully planned so that they remain subordinate to the characteristic landscape, thereby maintaining a natural or near natural appearance Project level analyses may indicate that the landforms and vegetation are not conducive to adequate screening or absorption of the management activity

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Letter 1430	I am aware you are considering opening up various areas for ORV's and motorcycles I feel this is a destructive idea
Response	Licensed OHV's and motorcycles will be allowed to use open Forest Service roads just as any other licensed vehicle might Unlicensed vehicles, including ATV's, will be restricted to specifically designated trails in Management Area 11 With these restrictions, there will be negligible impacts to the natural resources of the Forest

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Letter 1869	I am opposed to a high level of motorized recreation
Letter 3543	Provide no expansion of OHV/ATV use
Response	Motorized recreation is but one of the resource areas that the Regional Forester will consider in selecting the alternative to serve as the Revised Plan

Letter 2543 WVOHVA is adamantly opposed to Alternative 8 Alternative 8 is extremely deficient in the amount of opportunities available to motorized recreation, allocating only 17,000 acres as available for that use The small areas will concentrate the use, increasing the potential for resource damage based on excessively intensive use along Such a situation will tend to foster immoderate trail densities. If a quality recreational experience isn't provided to any public, the result is often inappropriate use that causes user conflicts and/or resource damage

Response Roads suitable for 4WD vehicle use have been identified in Chapter 3 of the Revised Plan under the description of Management Area 11 This has been done considering the traffic service level of the road, the maintenance level of the road, and open or closed status of the road Designated 4WD routes are included in the Revised Plan map A refinement of the inventory of 4WD opportunities may be completed in cooperation with Ranger Districts with a project-level determination made as to whether a particular route should be open or closed to 4WD use

Alternative 4 would maximize motorized access to the Forest by including some of the closed roads in the Forest System Roads inventory An estimated 710 miles of system roads presently closed year-round would be opened at least seasonally to the public with consideration given to concurrent management activities Persons with disabilities and others who desire to use 4WD vehicles for access could use these roads

Alternative 4 will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letters 3537, 4241

A clear distinction must be made between licensed and unlicensed OHV/ORVs throughout the revised plan and the DEIS The current language used "OHV" in both instances, sometimes adding "/ATV" to distinguish the trail systems from the road system However, this terminology is confusing One word should be used for licensed vehicles and a separate word to represent unlicensed vehicles (perhaps OHV and ORV respectively) ATV is commonly associated specifically with "three-wheelers" and therefore should not be used.

Response The following definitions are now in the Glossary

> **all-terrain vehicle (ATV)** — a type of off-highway vehicle (OHV). It includes vehicles 50 inches or less in width that have a dry weight of 600 pounds or less, that travel on three or more low-pressure tires and have a seat designed to be straddled by the operator. Because all-terrain vehicles cannot be licensed or registered under state vehicle laws, they are not allowed on Forest Development Roads unless a road is specifically designated by Supervisor's Order for OHV use that includes ATVs.
>
> **off-highway vehicle (OHV)** — broad category of motorized vehicles capable of off-highway travel This broad category includes ATVs, motorcycles, trailbikes, and four-wheel drive vehicles ATVs and most trailbikes are not licensed under state motor vehicle laws Licensed OHVs are allowed on any Forest Development Road that is open for public travel provided the vehicle and the operator are in compliance with motor vehicle laws of the state. This definition encompasses and replaces the term off-road vehicle (ORV)
>
> **off-road vehicle (ORV)** — the term off-road vehicle is encompassed by and replaced by the term off-highway vehicle (OHV).

Letter 1883 [We] request that you keep parts of the George Washington National Forest open for 4-wheel drive use

Letter 1883 The quality of life for [4-wheel drive users] will be negatively impacted in a very big way if you simply shut them out

Letter 2032 Provide more off-road vehicle (ORV) and motorcycle recreation areas

Letter 2735 I oppose the enlargement of area for use by off-highway vehicles. Such vehicular use contributes to a serious erosion problem

Response Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of the land

Licensed off-highway vehicles are permitted to use any open Forest road. Certain roads have been determined to be suitable for use by highclearance vehicles only and are identified on a special features map These roads should provide a more satisfactory recreation experience than driving on a road that is suitable for sedan use. Additionally, motorcycles may use ATV trails designated in Management Area 11 By limiting vehicles to roads and trails specifically designed for them, impacts on natural resources are negligible

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Letter 2476 — I strongly oppose any changes that would bring ORV's close to the Appalachian Trail.

Letter 3479 — Keep areas for use by off-road vehicles as far away from the Appalachian Trail as possible so they won't wreck.

Response — The Appalachian Trail is in Management Area 6 This Management Area is the same in all alternatives with the exception of lands recommended for wilderness study area designation A remote non-motorized experience is provided Standards were developed in cooperation with the Appalachian Trail Conference, other Southern Appalachian National Forests, and the Forest Service Southern Regional Office This provides protection to maintain the non-motorized experience of the trail for foot traffic only.

Letter 2615 — Additional ORV road construction will not benefit the Forest in any manner It will increase poaching, litter/dumping, and side-trail destruction. With today's limited/declining budgets, I doubt the Forest Service can meet the additional burden these roads create

Letter 2615 — Additional ORV roads must be extremely curtailed.

Response — The preferred alternative does not propose OHV road construction Licensed OHV vehicles may use any open Forest Road as can any licensed vehicle Certain of these existing roads have been identified on a special features map as suitable for high clearance/4WD vehicles only. Cross country travel is prohibited. Poaching and littering are law enforcement problems more appropriately handled outside of the land management planning process

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Letter 2626 — As a mode of transportation for hunters and fisherman, OHV's should not be tolerated, they should be prohibited by law.

Response — If a road is an open public road and the OHV is licensed by the state, it is permitted like any other licensed vehicles that hunters and anglers might use Cross country travel by all vehicles is prohibited in the preferred alternative Proposing a law to prohibit OHVs is outside of the scope of the land management planning process.

Letter 2628 — In order to qualify for designation as an OHV route, segments of roads should have sufficient length or be interconnected in such a way that users have a meaningful experience Short segments should be dropped from designation because of the risk that users will be tempted to use illegal routes to complete their riding experience in the Forest

Response — Certain existing Forest roads that are suitable only for high clearance/4WD vehicles have been identified on a special features map There are no short segments indicated There are segments of roads that are suitable for sedan travel that have been included in order to interconnect OHV routes to provide a route of desirable length

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Letter 2629 — As far as the Baltimore 4 Wheelers are concerned, one of the finest driving experiences anywhere would be right in the GWNF

Response — NO RESPONSE REQUIRED

Letter 2657 — Motorized OHVs are noisy and even mountain bicycles are a hazard since the bikers barrel along without even a warning and their tires cause serious erosion

Response — Motorized OHV's (large 4WD trucks, ATV's, motorcycles) are not mixed with non-motorized traffic Licensed vehicles may travel any open Forest Roads Unlicensed vehicles such as ATV's are restricted to trails that are

specifically designed for them and designated by Forest Supervisor's Order Specific noise limit criteria are contained in the Supervisor's Orders for ATV trails.

Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized use Generally, *though not always, this works well, but it is realized that there may be some conflicts The Forest has experi*enced excellent relationships with individuals and organizations interested in mountain bicycles.

Letter 2665

The demand for wilderness opportunities far outweighs the demand for off-road motorized opportunities. Yet the increase in off-road opportunities far out-distance increases in wilderness opportunities This continued emphasis on this destructive "decreation" is outrageous. Additional opportunities should not be explored (Plan, 2-9, 2-10).

Response

Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as a legitimate use of federal lands to be controlled and directed so as to protect the natural resources of these lands The GWNF will control such use so as to protect the natural resources This motorized outdoor recreation is fully a part of multiple use management very much as is wilderness, logging, watershed protection, and grazing. The Revised Plan seeks to balance the uses so as to maximize net public benefits, with the realization that not all activities can or will occur on the same piece of land. There is a demand for both wilderness and OHV use that the Forest can meet.

Letter 2677

The use of large forest areas by off-highway vehicles would lead to total elimination of these lands for primitive *recreation We cannot permit this*

Response

Motorized recreation use is not compatible with primitive recreation Management Areas 6, 8, 9, and 21 specifically emphasize remote, non-motorized recreation. Although some motorized recreation is permitted in Management Areas 6, 9, and 11, unlicensed motorized recreation is appropriate in Management Area 11 Relatively, there is a far greater amount of land allocated for non-motorized use than for motorized use. The Multiple Use Sustained Yield Act of 1960 recognizes that not every use can occur on every piece of land

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Letter 2823

We recognize OHV and ATV as a legitimate form of desirable dispersed recreation for many citizens. However, such areas should only be developed and maintained by such user groups under the guidance and approval of the Forest Service All OHV and ATV primitive roads and trails should be closed during the spring breeding and nesting period for all ground nesting birds. This use must only be permitted on Forest Service designated routes.

Response

The Forest has developed relations with organizations and individuals that are interested in motorized recreation ATV trails, specifically designated by Forest Supervisor's Orders, are "adopted" by these folks for maintenance and construction ATV's are allowed in Management Area 11 only Other Management Areas call for closure during the spring breeding and nesting season

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Letter 2911

ORV use in the forest has a very negative impact It interferes with the natural state of wildlife and, also, increases the danger of fires in certain areas

Response

Executive Order 11644 as amended by Executive Order 11989 recognize ORV use as a legitimate use of federal lands to be controlled and directed so as to protect the natural resources of these lands. ORV use is an *appropriate use of National Forest Use will be managed so as to minimize negative impacts to wildlife There* is no evidence of increased incidence of fires on this Forest

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Letter 3485

Keep the wilderness areas in the George Washington National Forest The opening of the forest for off-highway vehicles would ruin the character and value of the land for hikers and primitive camping and encourage trouble I support Alternative 8

Response

Existing wilderness areas are preserved in all alternatives Management Areas 6, 8, 9, and 21 in the Revised Plan specifically emphasize remote, non-motorized recreation Additionally, several other Management Areas offer similar opportunities to the extent that they are compatible with the emphasis of the individual management areas.

Letters 3537, 4241

The Plan lists several standards which are used to determine adequate OHV/ORV sites (2-76 through 2-81) These standards look good on paper but there is no evidence that such standards were followed in the proposed sites Standards of particular curiosity are #'s 376 and 377 How much research goes into minimizing OHV/ORV effects on the land? How is public safety promoted? These questions should be addressed Standard 388 states that OHV vehicle use, its effects, and enforcement of restrictions and closures are closely monitored and evaluated Evaluations and measures used for monitoring OHV/ORV use should be included in the EIS

Response

Standards are included for management of the areas. Qualified professionals--soil scientists, hydrologists, biologists, botanists, archaeologists, etc –will monitor the status of resources based on monitoring standards included in the FEIS If unacceptable damage occurs the route or trail will be closed permanently or until the situation is corrected

State and local law enforcement agencies do have jurisdiction on National Forest lands These agencies along with Forest Service law enforcement officers are charged with law enforcement in the areas

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Letters 3537, 4241

The Plan states (2-81) that illegal OHV/ORV use is not prevalent and that both law enforcement and peer pressure are effective methods of control A full report of illegal citings should be included in the EIS before the Final Plan is released

Response

It is inappropriate to include law enforcement citations in the FEIS

Letter 3537, 4241

The Plan states (2-9) that the desired future condition of motorized recreation is to continue to meet public demand This language should be changed to fully recognize the desired future condition which is to meet public demand without increasing user conflict (motorized vs non-motorized) and minimize environmental damages This new language would be consistent with Executive Order 11644

Response

Standards for Management Area 11 incorporate the meaning of Executive Order 11644 as amended by Executive Order 11989

Letter 3537, 4241

A separate section should be reserved in the annual reports for the OHV/ORV issue The two existing trail systems should be the focus of these reports. A provision should be included which allows this issue to remain open on an annual or biannual cycle so user conflicts may be addressed and closely monitored

Response

If appropriate at the time that such an annual report is prepared, the OHV/ORV issue may be discussed. Standards incorporated in Management Area 11 address user conflicts and will remain in effect until removed by a plan revision

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Letter 3537

Enforcement should be an integral part of the plan's budget.

Letter 4241

Enforcement should be an integral part of the plan's budget Preventative measures such as licensed permits to use OHV/ORVs on the forest should be considered

Response

Law enforcement is an integral part of the budget process

Letters 3537, 4241

The Plan states (2-81) that impacts from OHV/ORV use are confined to the immediate trail environment It is evident that the noise factor is not being considered nor is it being identified as a significant impact both to the environment and to other users The noise factor should be addressed and any language suggesting that impacts are confined to any immediate area should be removed

Response — *Impacts on the natural resources, excepting noise, are confined to the trail Vehicle noise levels are restricted* by limitations in the Forest Supervisor's Orders that designate trails. If noise becomes unacceptable then the route will be closed until the situation is corrected

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Letter 3603 — *If OHVs are allowed, put them on the side of the mountains away from view of the Appalachian Trail.*

Response — The Appalachian Trail is managed for remote, non-motorized recreation Any sitings of OHV's will be outside of the foreground viewshed of the AT

Letter 3605 — The realization that the ORV groups want more space in which to ride does not warrant destroying more of the forest.

Letter 3709 — New roads are destructive to the natural selection process as are ATV trails, which should be kept to a minimum

Response — Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of the lands. Natural resources of the *Forest will not be destroyed*

Letter 3614 — What were the results of the analysis pursuant to 36 CFR 295 2(a) by which the GWNF was required to analyze the specified objective impacts of ORV use in each management area under the Draft Plan?

Letter 3614 — What methodology was used by the GWNF to classify each management area under each Alternative Draft Plan to authorize, restrict or prohibit ORV use pursuant to the requirements of 36 CFR 219 21(g) and what were the results of this analysis?

Response — The analysis pursuant to 36 CFR 219.21(g) and 36 CFR 295 2(a) is contained in the process paper *Incorporation of the NFMA Requirements for Off-Road Vehicle Use into the Revision of the Land and Resource Management Plan for the George Washington National Forest* This process paper is on file in the planning records in the *Forest Supervisor's Office*

Letter 3614 — Under the Preferred Alternative Plan 8, ORV recreational use is severely restricted in a very subjective manner The objective and legally appropriate process would be to properly designate all management areas as open, *restricted or prohibited to ORV use pursuant to the above referenced legal authority After the Plan's implementation*, the Forest Service, ORV users and other interested parties can address the development of specific ORV recreational trails on a site specific basis pursuant to the provisions of 36 CFR 295 2(b) and FSM 2355 14

Letter 3614 — Regarding the Draft Plan. 1 By what methodology has the GWNF determined the demand for ORV recreational opportunities pursuant to Section 2355.03 (policy) of the Forest Service Manual (hereinafter "FSM") and what were the results of this analysis?

Letter 3614 — *What coordination activities have been, or will be, implemented* by the GWNF pursuant to FSM 2355 15 to coordinate ORV use with both governmental and ORV interest group organizations?

Letter 4241 — Tables 3-20 and 3-21 in the EIS display the demand and supply which justify the building of the three new OHV/ORV complexes It has been explained by the Forest I D Team Leader, Ron Lindenboom, that the *semi-primitive motorized recreation demand figures in table 3-20 are actually "expected" demand if the new* complexes were available These figures are misleading and have little substance Therefore they should be removed from the EIS unless an actual current demand can be calculated

Letter 4256 — Why do planners refuse to acknowledge the demand and need of four-wheeling?

Response — The Forest Service Manual 2355 03 provides for motorized recreation opportunities when, among other conditions, there is a demonstrated demand

The demand estimates in Table 3-20 of the DEIS were developed under a procedure described in detail in the process paper *Dispersed Recreation Demand Analysis* dated May 17, 1989 This information essentially compared the demand for recreation opportunities in different settings (ROS classes) with the capacity of the

land to provide those settings This estimate is a recreation-visitor day per acre comparison that does not take into account the infra-structure needed to support ATV opportunities.

Since the draft environmental impact statement was issued, the Forest has received numerous letters, calls and visits from interested parties indicating that there is an unmet demand for both licensed and unlicensed OHV opportunities In response to this concern, the Forest evaluated the estimated demand for both licensed and unlicensed off-highway vehicle recreational use from the current Statewide Comprehensive Outdoor Recreation Plans (SCORP) for Virginia and West Virginia The details of this evaluation are discussed in Appendix B Table 3-3 displays the estimated demand in miles for four wheel and motorcycle off-road use for the Forest.

The FEIS uses the comparison of the estimated miles of roads or trails available for licensed and unlicensed OHVs with the anticipated demand for these roads or trails as the best indication of an unmet demand for licensed or unlicensed OHV opportunities Table 3-4 displays the result of this comparison for each of the alternatives.

Letter 3614 — I express concern that the GWNF has not properly interpreted and applied the referenced legal provisions and in particular the requirements of 36 CFR 219 21 (g) and 295 2(a). Clearly, these provisions require that the GWNF authorize, restrict or prohibit the potential for establishment of ORV recreational opportunities in each management area based on the objective criteria of 36 CFR 295 2(a) and FSM 2355 14. The subsequent designation of specific ORV trails is guided by the provisions of 36 CFR 295 2(b) and FSM 2355 14 in a site specific process Yet, the different alternative plans have radically varying ORV use designations for each management area which suggest a subjective judgment as opposed to the objective analysis required per the above cited legal authority

Response — The cited references have been interpreted correctly

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Letter 3623 — I disagree with the decision about ORV use in the 10 year plan.

Letter 3623 — The draft plan is overly restrictive regarding primitive roads shared by four wheel drive, ORV, ATV, and trail bikes I feel there should be an increase of these roads

Letter 3675 — I would like to see strict rules for off road vehicles I have seen them do much damage plus disturbing nature

Response — Standards applied to off-road-vehicles are to ensure natural resourses are protected.

Letter 3883 — Motorized vehicles emit carbon dioxide and other pollutants and intrude on the silence and small sounds of the forest. The use of motorized vehicles off the established forest roads should be discouraged.

Response — Motorized vehicles emit noise and pollutants These must be considered in the known demand for motorized recreation Licensed motorized vehicles are restricted to open roads. Unlicensed vehicles are restricted to trails that are specifically designated by Forest Supervisor's Order for unlicensed vehicle use.

Letter 3883 — No vehicles of any kind should be allowed on foot trails except for designated specially hardened trail segments in cases where a trail relocation is not feasible.

Response — The conflicts between motorized and non-motorized uses are known and such uses are separate in the Revised Plan

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Letter 3951 — Provide for approximately 50% of the demand for OHV and ATV users as long as they assist in construction and maintenance. This can be worked in conjunction with the location of "D" level roads for the timber program to provide loops Some of these routes can be closed during turkey nesting season In addition, some can be designated for use by handicapped hunters (under special regulations) during hunting season

Response — Certain roads have been identified as suitable for high clearance vehicles that will offer the experience desired by licensed vehicle users Additionally, licensed vehicles may use any other open road, many of which are opened and closed seasonally based on wildlife management direction applicable to specific management

areas. 160 6 miles of "Featured OHV Routes" are included in Table 3-5 of the Revised Plan Appendix J of the Revised Plan also includes an additional 63.4 miles of roads suitable for licensed OHV use Several districts have or will have provisions for persons with disabilities to use specific roads.

Letter 3962 — EIS I am interpreting Table 3-1 to mean that of the 1050 road miles open year round and seasonally, 877 miles are maintained so that a late model car can easily traverse them. Am I correct?

Response — *Of the 1760 miles of Forest Development Roads, 630 are maintained such that a car can traverse them.*

Letter 3962 — The roads (Table 3-1, EIS) you list as suitable for OHV use: We interpret this to mean that these are the only D level roads open to OHV use and that all other trails and D roads are closed to OHV use

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Response — Licensed vehicles may use any open Forest Road regardless of its class. Certain of these are suitable for high clearance vehicles only and are identified on a special features map. If the road is closed, it can not legally be used. Only trails specifically designated by Forest Supervisor's Orders may be used by unlicensed vehicles.

Letter 3962 — *The roads that go into any of the 26 roadless areas should not be considered available for OHV use*

Response — Of the lands in the 27 areas evaluated in the FEIS, 89% is unavailable for development in the Revised Forest Plan.

Letter 3969 — I support substantial isolation of ORV managed areas from wilderness areas, and especially from the specific facility of the Appalachian Trail.

Response — Wildernesses and the Appalachian Trail are managed for remote, non-motorized uses

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Letter 3981 — EIS· 3-16-17 - The environmental impacts of OHV and ATV use are not even discussed - full disclosure of the effects on biodiversity and esthetics (noise pollution, etc) is necessary in the EIS.

Response — In the FEIS impacts of activities are analyzed cumulatively, not activity by activity. Thus impacts of OHV and ATV use are reflected in effects discussed in Chapter 3. For example, wildlife values are lower in alternatives with high OHV and ATV use.

Letter 3984 — Building trails specifically for their use begs the question of what the forest plans to do when the next technological innovation comes along that demands more of the land still? Popular Mechanics, article "Drive the Aircar Red-Hot Hovercraft Skims Over Anything at 50 mph Describes the personal sports machine of the future, which is in production already. These machines are coming to your forest soon, and the precedent of accommodation *that you are setting with your treatment of OHV "needs" will ill serve you*

Response — When hovercraft become an issue, they will be discussed.

Letter 4035 — *Mgt Area prescrips fail to adequately provide for motorized rec.* - MAs 1, 4 and 14 allow OHV *use on roads only*, which limits use to 4-wheel drive vehicles and dual purpose motorcycles MAs 6,7,8 are totally closed and 9,10,13,15,16 are likely closed - MA11 allows motorized rec As conceived in the Draft Plan, it fails to provide adequate dispersion, and concentrates use in "complexes". - The objectives of loop travel are to provide variety of experience and disperse use. The tone of the Plan description implies bias and the designation of sacrifice *areas. The many qualifiers regarding designation may result in few on-the-ground trails in spite of the objectives* of the MA. - There is little recognition of the impacts of other kinds of rec in this section and throughout the FEIS and Draft Plan. There is little attempt to promote cooperation among motorized and non-motorized groups. There is little attempt to reconcile other resource activities (like timber harvesting) with motorized rec. - MA17 also allows motorized rec, with more emphasis on road-based as opposed to OHV use The prescription should, *but fails to provide for the compatibility of timber harvest activities with trail-based rec. Harvests can be* designed to avoid existing trails, and new trails can be integrated into harvest plans - The statement, "Costs for wildlife habitat improvements, rec needs, or a special case for the visual resource should ordinarily be paid for

by their respective areas" ignores availability of KV funds to integrate harvest activities w/the improve't of other facilities.

Response

Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands It is recognized that motorized recreation is fully a part of outdoor recreation under the Multiple Use Sustained Yield Act of 1960 (MUSYA) The Revised Forest Plan has been formulated so as to maximize net public benefits, with motorized recreation considered in the balance of resources The MUSYA does say that not all uses must occur on every acre of the Forest

Not all Management Areas can philosophically accept motorized recreation For instance, Management Areas 6, 8, 9, and 21 are specifically managed for remote, non-motorized recreation Other management areas are likewise managed with a specific emphasis which precludes OHV use In the Revised Plan, OHV use is allowed in Management Areas 7, 11, and 17, with 11 having specific emphasis on motorized recreation

In the Revised Plan, licensed OHV's may travel any open road Certain of these roads in Management Area 11 have been identified a suitable for high clearance vehicles only and have been indicated on a special features map These roads are likely to provide the experience that is desired in motorized recreation Some higher standard roads are included in this mapping so loops are formed

Unlicensed vehicles such as ATV's are restricted to trails specifically designed and constructed for ATV use and are designated as open for use by Forest Supervisor's Orders These are the complexes referred to in the comment and are contained in Management Area 11 They are under no terms to be considered "sacrifice" areas If unacceptable resource damage occurs the route will be closed permanently or until the situation is corrected

Cross country travel is forbidden for any type of motorized vehicle, large or small, licensed or unlicensed

Experience has demonstrated that motorized and non-motorized uses do not mix on trails The Forest has excellent relationships on the Ranger District level in working with individuals and organized groups from both areas To the extent possible, the planning process has attempted to get the two groups together and, all things considered, this has been successful Nevertheless, it is realized that there are conflicts

Management Area 17 does allow for consideration of OHV use To the extent that natural resources are protected, timber harvesting and motorized recreation will be considered together Likewise, Management Area 11 allows for some timber management if necessary

At the project level, KV funding is integrated into harvest activities with the improvement of other facilities to the extent possible and appropriate for the project

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Letter 4035

All Alts fail to plan for the full spectrum of motorized rec or motorized dispersed rec. Issue No 4 of the DEIS discusses ATV use but fails to mention licensed 4-wheel drive use, off-road motorcycles, dual purpose motorcycles, or other types of wheeled ORVs which share similar concerns with ATVs - Motorized rec is best managed as dispersed The figures demonstrate a DECREASE in SPM from current inventory for ten out of 14 alts, including inexplicably Alt 4 which purportedly favors motorized rec This clearly demonstrates the failure to plan for dispersed motorized rec in most alts - Alt. 12 actually allocates more resources to SPM use and shows an increase in available acres in Fig 2-41 and Table 3-3 That Alt 4 allocates most OHV use to roads demonstrates a misunderstanding of the needs and diversity of motorized rec

Response

The alternatives have been developed, each with a particular theme and emphasis Motorized recreation is not compatible with the emphasis of all alternatives Therefore, it is not appropriate to plan a full spectrum of motorized recreation in every alternative

Licensed OHV use (meaning to include all licensed vehicles, 4WD, motorcycles, dual purpose, etc) is discussed under "ISSUE 3 – FOREST ACCESS" in chapter 2 of the Revised Plan ATV's are discussed under "ISSUE 4 – ALL-TERRAIN VEHICLE USE" Issue numbers are categorizations and are irrelevant to the discussion

Motorized recreation is considered as dispersed recreation, a legitimate form of outdoor recreation as recognized by the Multiple Use Sustained Yield Act of 1960

The acreage indicated for semi-primitive motorized ROS by alternatives reflects the resource emphasis of the *alternatives and the affects that this has on the ROS classification This is not meant to reflect the amount of* motorized recreation opportunities that are available In fact, there are likely to be far more interesting motorized recreation opportunities in the roaded natural category It must be realized that the classification takes into account many considerations other than roads

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Letter 4235

I am writing to express my SUPPORT FOR Off-Highway Vehicle (OHV) clubs and their use of both Federal and State lands for recreational uses I have friends who are very active in these clubs and their 'Tread Lightly Program' The club dug drainage, planted grass, and policed trash. I SUPPORT this exchange of services and believe more trails and should be made available to them as long as this exchange exists

Response

The Forest has excellent relationships with organized clubs and individuals in designing, constructing and maintaining motorized recreation trails. This is a must for continued management of such opportunities

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Letter 4241

There should be no new roads on the Forest. Roads that allow licensed OHV use should be reviewed and restricted where illegal off-road use is prevalent This analysis should also be included in the EIS

Response

The FEIS contains a description of the various alternatives which contain differing amounts of road construction designed to achieve the desired future condition for each alternative Only Alternative 3 would involve no road construction Other Alternatives call for no new system road construction and/or foster a more aggressive policy towards closing, and where appropriate, removing roads from the transportation system. Licensed OHV's may travel any open road Illegal use, such as traveling on a closed road or traveling cross country, will be addressed by District law enforcement personnel

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Letter 4241

In the Effectiveness Monitoring summary on pp 4-14 through 4-17 there are two references made to OHV/ORV use. The Plan uses applicable traffic laws as a standard for monitoring illegal OHV/ORV use. This seems to be an inadequate methodology, especially when trying to monitor unlicensed ORV users The second reference deals with monitoring soil impacts of OHV/ORV use. More standards are needed to analyze the adverse effects of OHV use Wildlife fragmentation due to the noise caused by OHV/ORV use should be monitored User conflicts should be monitored

Response

The presentation of the monitoring program has been reformated for the Revised Plan Still, this is meant as a summary and not a detailed explanation of methodology This is to be developed by resource specialists on a project level basis Indeed, traffic laws are not applicable to unlicensed vehicles, but they are applicable to licensed vehicles which are permitted on open forest roads The Forest Supervisor's Orders which designate *trails for unlicensed vehicles contain appropriate restrictions and limitations*

Letter 989

Immediately analyze the demand for 4WD opportunities and plan for an increase over five years to provide opportunities adequate to meet the above identified demand uniformly over all districts

Response

It is anticipated that demand for 4WD opportunities will become evident through organizations and individuals volunteering to work with Ranger Districts in the identification and upkeep of 4WD routes It is not expected that this demand will be distributed throughout the Forest uniformly among the Ranger Districts

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Letter 989

The plan contains no framework for the classification of a primitive road or an accurate inventory of the existing primitive roads on the forest The classification of "4WD way" is a meaningless and unused category, and only *is included to obscure the issues. Modify the TSL D category to include all high clearance primitive roads which* will be managed open unless posted closed Plan for a slow careful inventory of primitive roads over five years to be done in partnership with user groups Use the definition of a roads as any travelway over 50" nominal width to classify a primitive road and correct all maps to read this Many primitive roads are incorrectly labeled hiking trails Publish a map and guide to these after the completion of the inventory

Response

An accurate inventory of roads suitable for 4WD use has been made for the Revised Forest Plan. The "4WD way" designation has been dropped Modifying the TSL D classification would be in error since several such roads are, in fact, better than primitive and are suitable for sedan travel Most of the old woods roads or primitive roads to which the comment refers were not constructed to consider protection of the natural resources in the area.

For this reason, they are not included on the Forest road system and have been closed to public use They make great hiking trails, but are not good for motorized vehicles The Revised Forest Plan will have a map with roads suitable for 4WD use identified.

FOREST ACCESS: Access for Disabled People

Letter 80	I recognize the need for multi-purpose recreation and I was glad to see that your plan included access for disabled hunters and anglers.
Letter 1456	I support Alt. 8, except it goes against traditional uses in this area It reduces access for handicapped persons and I happen to be one of the handicapped that use the NF as much as possible
Letter 2235	I find myself disabled after a work injury. I cannot walk to places where I like to hunt anymore. Please help with Plan #12.
Letter 2590	Maximize forest access for persons with disabilities.
Letter 3927	The National Forests need to be made more accessible for our handicapped and elderly persons
Response	Chapter 2 of the Revised Plan discusses access for persons with disabilities under "ISSUE 3 – FOREST ACCESS." Most Ranger Districts have a program to provide hunting access to physically disabled hunters

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Letter 3789	Trusting I will be able to let my ATV carry my aged bones into the forest hills during hunting season
Response	ATV's may be used on routes specifically designated as open for their use by Forest Supervisor's Orders Cross country use of ATV's is prohibited Otherwise, licensed 4WD vehicles may use any open Forest road Specific project level decisions will be made regarding hunting access for persons with disabilities

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Letter 93	I am extremely happy that you made accommodations for the handicapped in wilderness areas as well as in more conventional and modern camping areas
Response	Other than allowing wheelchairs, there are no specific modifications, trails or facilities for persons with disabilities in wildernesses All developed recreation areas will be made fully accessible for persons with disabilities

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Letter 2235	I find myself disabled after a work injury I cannot walk to places where I like to hunt anymore. Please help with Plan #12.
Response	With over a million acres in Virginia and West Virginia, the Forest offers an abundance of hunting, fishing, camping, and other dispersed recreation opportunities Much of the Forest is readily accessible by open road to persons preferring to use 4WD vehicles Seasonally, many roads are closed to protect soil, water, wildlife, and the road investment Of the existing 1760 miles of Forest Development Roads (FDR), 610 miles are open to the public year-round, 440 miles are open seasonally, and 710 miles are closed year-round Forest Development Roads throughout the Forest are available for licensed 4WD use and provide access for hunting and fishing. Under Alternatives 2, 5, 8, 8A, 10 and 12, minimal change is expected in the maintenance and management of the existing roads and access for hunting and fishing would remain pretty much as is. Alternatives 5 and 12 would leave many new roads open to public use and, thereby, increase motorized access somewhat The relatively small amount of road construction, however, would not significantly increase motorized access Alternative 4 would maximize 4WD access by causing some of the closed system roads to be opened, allowing up to 1650 miles of road to be opened at least seasonally.

These alternatives are considered in the FEIS and provide access for licensed 4WD vehicles to some extent and therefore provide access for visitors who prefer to use 4WD vehicles The Regional Forester will select the alternative that best maximizes net public benefits with access being one of the considerations in that selection.

Letter 2513 — The addition of four-foot wide, hard-packed trails with easy grades for wheelchairs would be appreciated by all of us.

Response — Access for persons with disabilities plays an important role in all alternatives There are four existing trails for persons with disabilities. Three have recently been repaved and the fourth will be resurfaced for wheelchair access when funding allows

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Letter 2590 — *Maximize forest access for persons with disabilities.*

Letter 3927 — *The National Forests need to be made more accessible for our handicapped and elderly persons.*

Response — Each alternative seeks to maximize access for persons with disabilities within the emphasis of the individual alternative All developed recreation areas and administrative facilities that are open to the public will be made fully accessible.

Letter 3613 — In MA 9 it states "opportunities for the physically impaired are provided without special provision or improvement. Wheelchairs are permitted." This is a cruel and nonsensical standard What "opportunities" are being provided that are different than the opportunities the general, non-impaired public will have?

Response — This sentence has been deleted from the Revised Forest Plan

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FOREST ACCESS: Hiking Trails

Letter 57 — Put small parking areas on such roads and then build foot trails from these. Walking is the key to dispersed recreation. Make them do it.

Response — The existing 950 miles of trails on the Forest provide primary foot access to the dispersed areas of the Forest. Additionally, Appendix B of the Revised Plan lists proposed trail construction and reconstruction projects, many of which will add mileage to the system This list does not change by alternative. The trails to be constructed will be selected each year once funding is received and priorities are determined Many of the existing trails have developed trailhead parking and more such parking will be constructed as funding allows

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Letter 2273 — The proposed development of several miles of new trail in the Southern Massanuttens is of some concern. Although the specific locations are not listed, the trails include new construction in the vicinities of Boone's Run, Massanutten West, and Kaylor Knob. The Boone's Run and Kaylor Knob trails would both be in Management Area 9 (Under Alternative 8), which is managed to provide older vegetation in remote and isolated areas With the increased traffic that such trails would bring, how remote and isolated would the area remain? Currently the area contains some of the best bear habitat in the Forest, this is so because of its remoteness The flat high elevation wetlands, east of Grubbs and Lairds Knob and west of Kaylors Knob should be left isolated as possible This unique area is a small valley built on a Martinsburg Shale foundation

Response — Appendix B lists planned trail construction and reconstruction projects and includes several projects in the Southern Massanutten area of the Forest Priorities for construction of the trails will be set on a yearly basis as funding becomes available. At such time that a trail is planned for work, project level analysis will be completed to evaluate the effects on the resources of the area

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Letter 2273 — *The Existing Pitt Spring Trail (Massanutten South between Pitt Spring and Fridleys Gap) follows what at one time* was a roadbed passable by Jeep The same trail was used during the Civil War, in fact it is reported to be an *old Indian Trail. This long use is primarily because of the comfortable grade it traverses This trail could use*

some renovations, there are some areas that would benefit from waterbars and ditching, and one wet area just north of Fridley Gap that needs a puncheon across it.

Response — This comment recommends maintenance work needed on the Massanutten Mountain South Trail (FDT 416) This work should be part of the Ranger District's program of work for trail maintenance The Revised Plan appropriately has no discussion of project level maintenance of trails

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Letter 2273 — I would also favor eventual construction of a portion of the proposed ridgetop trail from Bird Knob to Pitt Spring, as the existing trek on the Road to the Big Mountain Electronic Site is not pleasing This trail could connect with the old trail which crosses the Massanutten from Endless Caverns to the Pitt Spring Lookout As most of this area is in Management Area 14, and it is not far from a road, the disturbance to the ridgetop habitat seems more acceptable The inclusion of this portion of ridge trail should please the ridge-runners, and the continued use of the existing Pitt Spring trail would appear to be a reasonable compromise to those favoring a complete west ridge trail system

Response — The trail construction project(s) favored by the comment will be included for consideration at such time as funding and priorities make it appropriate to do such

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Letter 2273 — The Massanuttens truly are unique within the Forest The long parallel ridges offer hiking opportunities not found in many places Much of the southern portion is truly roadless Any management plan should seek a balance between enhancing the hiking opportunities and preserving the isolated conditions now present

Response — The Regional Forester will select the alternative that maximizes net public benefits The hiking opportunities and isolated, remote conditions mentioned in the comment are considered in making this selection.

Letter 2319 — Recreational trails, primitive trails unopen to motorized vehicles should be emphasized and there are already plenty of these Trails for horses need to have a suitable grade and a hard surface

Response — The Forest currently has over 900 miles of trail available for non-motorized use with more planned for construction as user demand dictates and funding allows Several of these are planned for horse use The grade and surfacing necessary for horses is understood

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Letter 2664 — The Draft Plan Appendix page B-1 - B-6 shows over 100 miles of reconstructed trail work and 280 miles of new trail construction in the next ten years Providing increased and improved access by these trails will cause conflicts between trail user groups and timber and wildlife management practices Where is the demand for 280 miles of new trails

Response — Dispersed recreation demand is discussed in the Draft Working Paper "Dispersed Recreation Demand Analysis - George Washington National Forest" dated May 17, 1989 This paper discusses demand by Recreation Opportunity Spectrum classification Specifics on demand for trails are discussed in the Statewide Comprehensive Outdoor Recreation Plans (SCORP) for Virginia and West Virginia. These two documents, "The 1989 Virginia Outdoors Plan" and the West Virginia "SCORP 1988-1992", are specific about types of trails needed in the parts of the states that the GWNF affects Trail construction/reconstruction projects in Appendix B are not prioritized Funding for these is on an annual basis and thus determination of what trails will be constructed will be on an annual basis

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Letter 3633 — Ensure that existing trails are not destroyed, ie, permanently cut or blocked

Response — The Forest has over 900 miles of existing trails Some are heavily used and others are not used at all Any existing trail that receives at least a moderate amount of use will be maintained

Letter 3647 Emphasize hiking and walking which are compatible with a wildlife habitat

Response Non-motorized, dispersed recreation has traditionally made up a large part of the use on the Forest and this trend is expected to continue There are over 900 miles of trail for day hikes, backpacking, and walking on the Forest This is fully compatible with wildlife habitat management.

Letter 3640 [The] tremendous backlog of maintenance and construction needs for trails should be taken into account in the plan For example, trail corridors should be left alone and not logged for timber or cleared for game management clearings. If trails are not destroyed for such activities, they will not have to be rebuilt. I support the inclusion of the Big Blue and Big Schloss trails system under Management Area 6 for protecting critical trails

Response The priorities of the trails construction/reconstruction projects listed in the Revised Plan will be worked out on an annual basis as funding allows Visually sensitive trails will be protected to the extent that is allowed under the management emphasis of the Management Areas that they go through Management Area 6 is specific to the Appalachian National Scenic Trail While the Big Blue and Big Schloss trails are worthy of protection, it will be done within the management areas through which they traverse

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Letter 3640 I support the Potomac Appalachian Trail Club's position on designating certain trails as foot use only Mountain bikes are not appropriate for use on all trails, and this should be taken into account in the plan

Letter 3942 On page 2-11, the Plan says "The Share-the-Trail' program is promoted" Some of the activities listed, such as hiking, hunting, fishing, backpacking and camping, are compatible uses Others, such as horseback riding and mountain biking, are not Some trails are too sensitive to be used by horses and bikes and should be restricted to uses that have a lower impact

Letter 3946 We disagree with the adoption of "Share the Trail" as a general concept for recreation mgt Many trail uses are incompatible or compatible under only some circumstances We support separation of uses where even a moderate degree of conflict exists Even if some uses are compatible, the design of a specific trail may make it inappropriate to allow a specific use because of environmental degradation. We advocate a policy of allowing use only where the environmental impacts are minimal If mixed uses are allowed, a monitoring system should be designed to allow evaluation of unacceptable conflicts or environmental impacts Trail users should be informed about the permitted uses on specific trails

Letter 3883 As long as trail use is light and infrequent, the same trail may reasonably be shared by foot hikers, bicycle riders and horseback riders, which is now GWNF procedure as "non-motorized trails" As use becomes more frequent, it will be advisable to designate some trails solely as foot paths, some others only as horse trails, and to prohibit all vehicles (including bicycles) from some hiking trails and from some horse trails Such practices can be worked out in consultation with hiking clubs and riding clubs and accomplished by volunteer effort

Letters 3998, 4012

PATC strongly urges the Forest Service to designate certain trails as foot trails only PATC opposes the multiple recreational use of trails where such use endangers the safety of the users and seriously threatens the viability of the treadway Some trails do not lend themselves to the safe compatible use by different groups

Response Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized trails While it is understood that there are conflicts between different non-motorized uses, restrictions on use, such as designation of trails for foot travel only, are appropriately considered on a project-level basis

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Letter 3660 New trails should be built as needs arise. Not as opportunities arise We can't take care of what we've got now.

Response The Revised Plan proposes trail construction/reconstruction projects that will be prioritized on an annual basis as funding allows Maintenance of existing trails is important in setting priorities for work

Letter 3884 — Plan must stipulate that, with each timber sale, ALL hiking trails in the sale Compartment(s) will be investigated for followability; those not clearly marked will be reblazed ("maintained") very soon Such effort should be pledged in the Plan, otherwise, it will fall by the wayside.

Response — This process is more appropriately considered under the project level analysis and planning completed for each timber sale

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Letter 3894 — Leave hiking trails at present level

Response — Based on analysis presented in the Statewide Comprehensive Outdoor Recreation Plans (SCORP) for Virginia and West Virginia, there is a demand for increased trail mileage for various uses Priorities for trail construction will be set on an annual basis as funding allows.

Letter 3951 — Do not construct any additional long distance hiking trails except the Allegheny Trail. The demand does not justify such additional trails Freeze the location of the Big Blue Trail in its present location. Keep the Sensitivity Level at "3" for the Allegheny Trail Consider a level "2" or "3" for the Big Blue as originally set when the trail was established Construct short hiking loop trails at the major recreation areas and the National Forest Scenic Byway

Response — Trail construction priorities have not been determined. This will be done annually as funding allows. It is anticipated that priorities will go to reconstruction and fill in or connector trails. Demand for hiking trails is indicated in the Virginia and West Virginia Statewide Comprehensive Outdoor Recreation Plans (SCORP) Visual sensitivity of trails will be determined on a case by case basis. Visual quality objectives are assigned by Management Area taking into account the management emphasis of each Where it counts, the scenic resources of the Forest will be protected and enhanced. However, this does not mean preservation or retention VQO's everywhere

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Letter 3984 — I am appalled that the draft plan reduces hiking opportunities to the extent that it does

Response — The Revised Forest Plan does not reduce hiking opportunities

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Letters 3998, 4012

PATC encourages the Forest Service to designate corridors for trails that will be left alone and not logged or otherwise "managed," save as trails. Trail corridors would also support migratory paths for plant and animal species

Response — Many Forest Trails traverse management areas that are unsuitable for timber production Management Areas 6, 8, 9, and 21 specifically emphasize and several other management areas offer non-motorized recreation opportunities All Forest lands are managed, whether for wilderness, remote recreation, developed recreation, wildlife habitat, timber, electronic transmission, or hiking

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Letter 3998 — PATC opposes any cutting that obliterates trails used by the hiking public

Response — Heavily used trails are not likely to be obliterated in any alternative

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Letter 4262 — Increase the trail system which maintains respect to the environment and encourages people to meet nature on nature's terms

Response — Appendix B of the Revised Plan contains trail construction and reconstruction projects These will be prioritized annually as funding allows Cross country backpacking, day hiking, and loop trails will be constructed

Letters 766, 767

The Plan should emphasize use of the park for hiking and other non-motorized recreation.

Letter 3861 — Place more emphasis on areas and trails which hikers and back-packers can use, but where no vehicles are allowed

Response — The Revised Plan recognizes the importance of non-motorized dispersed recreation Management Areas 6, 9 and 21 specifically emphasize such opportunities with other management areas likewise offering many nonmotorized opportunities. Management Area 8 contains wilderness and areas recommended for wilderness study, the most primitive dispersed recreation opportunities on the Forest With over a million acres on the forest, there are plenty of opportunities to get away from vehicles on the Forest in all alternatives. The Regional Forester will select the alternative that maximizes net public benefits to serve as the Revised Plan.

Letter 957 — Instead of closing trails on the forest, lets keep them open for enjoyment and open new ones

Response — Appendix B of the Revised Plan contains a listing of trail construction projects This list does not change by alternative Trails to be constructed each year will be determined on an annual basis once funding is received and priorities are determined. As long as trials are being used and there is funding to maintain them, they will remain open

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ALL-TERRAIN VEHICLE (ATV) USE: Opposition to ATV Use

Letters 3, 503, 760, 4015

ATV use in the GWNF is inappropriate.

Letter 49 — I strongly disagree with ATV use in the GWNF - a wealthy few gain at the expense of the many.

Letter 57 — Off-highway vehicle use should be minimized or prohibited on the trail systems

Letter 168 — Keep the number of miles of ATV trails to the bare minimum and locate them in areas that are already 'motorized'

Letters 279, 491, 763, 976, 1069, 1075, 1090, 1152, 1154, 2039, 2049, 2063, 2242, 2355, 2835, 2836, 2505, 2529, 2839, 2942, 3546, 3635, 3847, 3797, 4158, 4231

No ATVs should be allowed in the GWNF.

Letter 284 — Limit damaging ATVs

Letter 371 — It is clear that trails opened to ATVs are going to have to be closed when it is determined, as it surely will be, that significant environmental damage has occurred It, therefore, seems to me to be much more desirable to close the forest completely to ATV use before that damage occurs.

Letters 492, 762, 972, 1320, 1330, 1346, 2376, 2512, 2705, 2839, 3980, 4255

ATV use on the GWNF is inappropriate and should be eliminated.

Letters 496, 891, 1158, 1250, 1258, 2012, 2510, 2749

ATVs should not be allowed on any forest trail. No new ATV trails should be allowed, even the existing ones should be closed.

Letter 504 — ATVs are incompatible and destructive of natural resources, and any existing ATV trails should be closed and prohibition of ATVs enforced

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 4068, 4073, 4074, 4075

Prohibit ATV trails in the national forest This type of recreation is incompatible with forest values and other recreational uses.

Letters 766, 767

ATVs are unacceptable on any NF trail There should be no new ATV trails built in the GW NF, and all existing ATV trails should be closed The plan should emphasize use of the park for hiking and other non-motorized recreation

Letters 867, 934, 1059,1087, 1162, 1290, 1313, 1611, 1621, 2280, 2375, 3616, 3655, 3863, 3870, 4182

ATV use should be eliminated

Letter 877 ATV's are NOT compatible with the goals of NF preservation and should be banned

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4172, 4183

ATVs, which are destructive in many ways, should not be allowed on the forest

Letter 933 The use of all-terrain vehicles (ATVs) on the George Washington National Forest should be eliminated They are incompatible and unacceptable on any national forest trail THIS REGULATION MUST BE ENFORCED

Letter 970 All Terrain Vehicles (ATVs) should not be permitted in the forest. They are incompatible and unacceptable, and any existing ATV trails should be closed

Letter 971 I do not want to see expanded ATV use

Letter 978 We are against ATVs and other so-called "recreational vehicles"

Letter 979 Banish all ATVs.

Letter 981 No new ATV trails should be permitted Existing ones should be closed. ATV use is not appropriate for our national forests.

Letter 982 The Plan should not add to the ATV trail system On the contrary, it should remove the two existing areas open to ATVs and ban them from the GWNF That kind of motorized traffic causes air, noise, and water pollution, damages fauna and flora, causes severe erosion and siltation, and invades the general environment hikers and forest dwellers seek ATVs have no place on Federal forest lands

Letter 987 ATVs presently are out of control Enforcement of regulations is inadequate Outlaw them completely

Letter 1067 Members of the Northern Shenandoah Valley Chapter of Audubon oppose any authorization in the proposed George Washington National Forest long-range plan which would permit recreational use of ATVs

Letter 1067 All-terrain vehicles cause serious environmental damage, such as vegetation destruction, soil erosion and stream pollution ATV use is incompatible with the remote non-motorized recreation activities in the George Washington National Forest due to noise and visual impacts, resource damage and safety concerns These negative environmental impacts are inappropriate with the goals of natural resource protection and compatible multiple uses in the George Washington National Forest and that experience has shown that these uses cannot be adequately controlled

Letter 1070 Ban all ATV use in the GWNF once and for all

Letter 1071 There should be no ATVs permitted in the Forest They are dangerous to the riders and a disturbance to everyone else in the forest - both people and animals

Letter 1076 All terrain vehicles are unacceptable on forest trails

Letter 1077 Allow no ATVs Vehicles are incompatible with beneficial forest usage.

Letter 1078 ATV's are incompatible with nature and should be banned from all national forest trails No new ATV trails should be built and all existing trails should be closed

Letter 1081 ATV's are too destructive of too many resources to be permitted at all If Hoosier National Forest can eliminate ATV's, why can't we?

Letter 1083 I have been aware of the immense damage that all-terrain vehicles place upon natural areas, increasing erosion, and once again, reducing water quality Also, I am greatly concerned about the intense noise that such vehicles make, as they rip through the wilderness

Letter 1086 No ATV trails! I can't imagine this even being considered in a forest area

Letters 1094, 1439, 1167, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1671, 1730, 1731, 1732, 1943, 1944, 1982, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 2925, 3087, 3088, 3147, 3148, 3149, 3150, 3827, 4093
There should be no ATV trails permitted in the national forest. This type of recreation is incompatible with other forest users and values

Letter 1099 Eliminate ATV use - it's destructive and destroys the peaceful purpose most people seek

Letter 1139 All-terrain vehicles are incompatible with protection of trails and the wilderness enjoyment of hikers or those with non-motorized means of transport The Forest Service should not designate any additional trails for ATV use

Letter 1149 All-terrain vehicles are incompatible with maintaining the biological and ecological unity of the forest and should be completely prohibited

Letter 1260 ATVs are totally unnecessary for the enjoyment of a wilderness area, and should be banned The only use of an ATV is military and/or FS people who must quickly access an area, no others should even have them

Letter 1277 ATVs and basic forest characteristics are thoroughly incompatible. I request therefore that all ATV trails be closed--and that this closure be strongly enforced.

Letter 1281 I think that ATV use in GWNF is inappropriate and should be curtailed

Letter 1283 I would also like to state my opposition to allowing ATVs in the GWNF This style of recreation is abusive to the forest and extremely obnoxious for anyone who is hiking or cross-country skiing with the hope of observing wildlife

Letter 1297 There should not be any new ATV trails, and I would suggest that all existing ATV trails be closed ATVs present air, noise, and other pollution problems, as well as safety risks, and they are simply incompatible with proper mgt of any NF

Letter 1310 No ATV use should be allowed in the GWNF ATV use in a National Forest is detrimental to all other forest uses.

Letters 1314, 1445, 1634, 1981, 2040, 2327, 2670, 3478, 3744, 3809, 3834, 4028
Prohibit ATV trails in the NF.

Letter 1318 A ban on the use of ATVs must be enacted and made applicable to the whole forest

Letter 1323 I am concerned about access for ATVs, as ATVs disturb those seeking peace

Letter 1329 The designation of current roads and trails for usage by ATVs also should not be allowed ATVs are incompatible with other non-destructive usage of the forest (ie hiking, fishing, bird watching) No existing ATV trails should be maintained No new ATV trails should be opened

Letter 1354	ATVs should be banned from the forest due to their noise and potential for habitat destruction
Letter 1365	Don't need people beating up the trails on those ATVs Shouldn't build any new trails for them and ought to close ones they use now. Trails should be for walkers mainly, and some horseback riders.
Letter 1368	Dispersed Recreation - Motorized: We support appropriate passive recreational uses of the forest and believe that ATVs and snowmobiles are incompatible with these uses. We encourage the substitution of the policy statement described in Alt 9.
Letter 1378	Use of ATVs in the GWNF is inappropriate and should be eliminated or tightly controlled at current levels
Letter 1429	ATVs are incompatible and unacceptable on any forest trail. No new ATV trails should be built, and all existing ATV trails should be closed. ATV use should be confined to developed areas
Letter 1434	Protect the ecology and beauty of the forest by banning ATV use within the forest.
Letter 1443	The use of ATVs should not be allowed in the forest at all. ATVs are incompatible and unacceptable on any NF trail.
Letter 1551	Ban ATV use in the Forest. The destruction such vehicles wreak on the forest is irreparable. Their use on these lands is an inexcusable misuse of public property and abuse of majority interests by a minority stake holder.
Letter 1555	I do not believe that we need any ATV recreation in our National Forest, and I wonder how it would conflict with the requirements of Virginia Law stating that anyone operating an ATV not on their own property obtain written permission.
Letter 1557	Build no new ATV trails, close the existing ones, and enforce these regulations.
Letter 1569	NO motorcycles NO ATVs.
Letter 1608	ATV's are incompatible with and unacceptable on any NF trail. Build no new ATV trails, close all existing ATV trails, and rigorously enforce whatever regulations there are in the final plan regarding use of ATVs
Letter 1651	I am VERY opposed to more ATV trails.
Letters 1652, 1823	ATVs and mountain bikes are incompatible with and unacceptable on any NF trail Build no new ATV trails, close all existing ATV trails and enforce these regulations
Letters 1661, 2675	ATVs are not acceptable and should be banned from our NFs.
Letters 1656, 1822	ATV riders shouldn't have the run of our national treasures... ATV use should be prohibited It's inappropriate and ruinous
Letter 1684	ATVS are destructive and disruptive and should not be allowed within the NF. Existing ATV trails should be closed and no new ones built
Letter 1861	ATVs are destructive to trails and roads, causing more damage than any comparable use They infringe upon others' enjoyment
Letter 1978	The use of ATVs should be curtailed if not banned completely from most areas
Letter 1992	ATV traffic should be eliminated from the wilderness Enforcement of existing regulation is needed to prevent further damage to the forest
Letter 2003	ATVs are inconsistent with a wilderness environment and are the most damaging single user of forest trails Increasing the operating areas of these "trail killers" is incomprehensible ATVs do not belong in NFs or parks

Letter 2005	The use of ATVs anywhere in the GWNF is inappropriate and their use would defeat the purpose of a NF.
Letter 2007	ATV use of any kind is incompatible to a NF trail. Existing ATV use should be closely monitored and analyzed to determine its effect on the environment. All existing regulations should be strictly enforced. NO NEW ATV TRAILS should be built.
Letter 2010	All Terrain Vehicles are incompatible and unacceptable on any national forest trail.
Letter 2022	Expansion of trails or areas for All Terrain Vehicles will create disturbance of delicate natural balance. ATVs should be prohibited altogether.
Letter 2027	ATV's should not be allowed on the forest due to their destructive nature
Letter 2029	I find it troubling that the Management Area 11 for creating OHV trails is a consideration for the Forest. It's discouraging that Management Area 11 includes acreage equal to more than 210 80-acre farms.
Letter 2035	Expending ATV use on the GWNF is inappropriate and should be eliminated Enforcement of existing regulations to prevent forest damage is needed.
Letter 2026	Eliminate, if not severely restrict, ATV use in the forest. While the organized ATV groups may be responsible, there are many other ATV users who simply do not hold to responsible standards of forest protection. Erosion, noise, muddied ponds and streams, and off-trail destruction would result
Letter 2052	Keep ATVs out of the forest They are inappropriate in such a setting
Letter 2053	Nor should roads for ATV use be permitted. ATVs are a gross travesty on the wilderness and an insult to both animals and the people who hike there.
Letter 2061	I am in complete disagreement with opening any new ATV trails This is completely inappropriate in any National Forest I strongly feel that the existing two trails be permanently closed
Letter 2189	There should not be any areas dedicated to "ATVs". ATVs destroy the natural processes that are the principal attraction of most visitors.
Letter 2230	ATV use on the GWNF is inappropriate and should be eliminated Certainly no new areas should be designated; existing areas should be closed.
Letter 2237	ATV use of any kind is incompatible to a national forest trail. Existing ATV use should be closely monitored and analyzed to determine its effect on the environment All existing regulations should be strictly enforced. NO NEW ATV TRAILS should be built.
Letter 2276	All terrain vehicles should be prohibited. These vehicles are simply too destructive to be permitted in a national forest Existing ATV trails should be closed, and no new ones built
Letter 2283	Phase out ATVs. All terrain vehicles are incompatible and unacceptable on any national forest trail Build no new ATV trails, enforce the existing regulations, and analyze the impacts of the current ATV trail use on the forest.
Letter 2285	Ban all-terrain vehicles (ATV's) from the National Forests They have no place in the wilderness and are very destructive.
Letter 2292	ATV's should be banned; they are incompatible with a forest ecosystem
Letter 2319	ATVs should be out of the question when incorporating plans for a forest They do nothing but harm The Forest Service should close all existing trails and open no more to ATVs
Letter 2347	The damage would be magnified by the proposal to open new areas for ATVs Having witnessed first-hand the scars these machines have already left on the GW, I urge you to ban all ORVs from the Forest.

Letter 2471	ATVs do not belong in a wilderness area
Letter 2534	Expansion of all-terrain (ATV) use on the GWNF is inappropriate and should be eliminated
Letter 2602	I am totally against ATVs and would like to see them banned from all national forests They simply have no place and are entirely inappropriate on public land
Letter 2603	Ban all motorcycles and all-terrain vehicles from our national forest and we should enforce our existing regulations to prevent any further damage to the forest.
Letter 2612	Regarding ORV's and the devastation caused by them due to the erosion, litter, and noise pollution they create, they should be banned from all public lands period
Letter 2648	I disagree with the addition of any new ATV trails on forest service lands I don't like the fact we have trails now much less adding new ones
Letter 2666	All existing ATV trails should be closed and no new trails should be built The Peters Mill-Taskers Gap trail is a disgrace and it is painful to even contemplate how this beautiful area has been ruined I am concerned that Peter's Mill and Tasker's Gap are now considered one trail.
Letter 2674	ATVs are incompatible and unacceptable on any NF trail No new trails should be built
Letter 2712	The proposed areas for All Terrain Vehicles in Alternative 8 are quite adequate If any increases in dedicated ATV areas are considered, they should be offset by a minimum equal increase in Wilderness Areas
Letter 2755	ATVs are destructive and have many negative impacts on wildlife, fragile plants, soil, and streams. ATV use precludes many other legitimate human uses of the forest, such as hiking, birdwatching, fishing, hunting, and enjoying solitude Please remove all existing and proposed ATV trails from the plan The proposed trail in the Deerfield is particularly objectionable It is adjacent to the Elliott Knob roadless area, which is a sensitive biological area The proposed ATV area has not been thoroughly inventoried to determine if sensitive plants and animals are found there ATV use of this area could easily spill over into the Elliott Knob area
Letter 2809	Enforce keeping the ATVs to the roads they are entitled to and not let them off the roads to tear up the remainder of the forest
Letter 2732	The plan takes a significant step backward with respect to ATV trails ATVs in no way relate to forest values but instead detract from the forest with their noise and increased erosion, disturbance to wildlife and litter
Letter 2892	ATVs are not suitable for wild, backcountry areas They disturb hikers and wildlife and should not be part of a national forest plan
Letter 2922	ATV type vehicles are very destructive and should not be permitted within the Forest at any time
Letter 3498	ATV users should find private lands for their loud and destructive recreation and the Forest Service should not support them
Letter 3527	The use of ATVs should be severely restricted
Letter 3538	Living next to the forest we see people on ATV's illegally hunting all the time ATV's just don't belong in our national forest They destroy the environment.
Letter 3544	ATV's are noisy, polluting, and disruptive to wildlife -- they have no place in the national forests in my opinion
Letter 3553	Prohibit ATV trails as this type of recreation is incompatible with forest values and disturbs others seeking recreation within the area
Letter 3558	ATV use should be minimized
Letter 3563	The amount of acreage set aside for ATV, OHV trails, is still much too high This activity is not compatible with needs of other Forest recreationists! No other activity interferes with the enjoyment of non-participators

Letter 3606	We especially urge ATV restriction
Letter 3619	All-Terrain-Vehicles are an environmental CATASTROPHE!! No new ATV trails should be built and all existing ATV trails should be closed
Letter 3629	ATVs destroy forest Multiple use should only apply to uses which are sustainable
Letter 3647	ATV's are so destructive! They have no place in national forests Close the existing ATV trails
Letter 3656	ATV trails should be weaned from the area
Letter 3662	Expansion of all-terrain vehicle (ATV) use on the GWNF is inappropriate and should be eliminated Enforcement of existing regulation to prevent damage to the forest is needed.
Letters 3720, 3766, 3782	Build no new ATV trails, close all existing ATV trails, and enforce these regulations
Letter 3750	No new ATV trails, which are destructive in many ways, should be allowed in the forest
Letter 3678	The use of all-terrain vehicles is defeating the purpose of what a wilderness experience should be.
Letter 3680	Cease all ATV activity in the Forest I feel ATV use is very disrupting and damaging to the Forest
Letter 3687	I would like to see the acreage allowed for ATV use further reduced These vehicles have no place in the public's forest The pollution, erosion, and high levels of noise these machines cause greatly exceed that of any other special interest group using the Forest, excluding timbering Keep their access to the Forest to a minimum
Letter 3691	Expansion of all-terrain vehicle use in the forest is inappropriate and should be eliminated in order to prevent further damage to the forest
Letter 3695	ATV's are simply too damaging to the earth and spoil the tranquility of the outdoor experience.
Letter 3724	I urge that OHVs not be allowed at all in the NF. Their effect on the trails and on the sonic environment can be devastating.
Letter 3732	OHV/ATV vehicles have a number of negative impacts on the Forest including disturbing and destroying wildlife habitats, creating a safety hazard for other users of the Forest, and contributing to erosion problems. We recommend that no new trails be built for their use and the existing trails be closed
Letter 3735	Expansion of ATV use on the GWNF is inappropriate and should be eliminated Enforcement of existing regulations to prevent damage to the forest is sorely needed.
Letter 3736	I am opposed to the use of ATVs in the GWNF. They can be heard over a great distance and disturb those wanting to enjoy nature peacefully.
Letter 3756	ATVs are damaging to the forest, and if allowed at all, they should be limited to existing logging roads only.
Letter 3796	ATVs should not be allowed in the forest. Their use is extremely destructive and is incompatible with preservation attempts
Letter 3821	ATVs should be banned from almost all areas of the GWNF
Letter 3840	No ATV use on forest Biological value theme does not justify this type of limited user sport Unmanageable in Long Run. Very damaging to adjacent forest areas. They can and do go anywhere they want. Most other forest users wish to avoid ATVs, their noise and agitations Requires regular monitoring. F S assumes burden of policing action which they are severely understaffed Peter Mill Run ATV-ORV Trail Lee District should be closed down to this type of use Massanutten West Hiking Trail should be run through Peters Mill Valley instead of along ridge to west

Letter 3846 ATV use in the GWNF is extremely harmful to the public's enjoyment of the area and should be prohibited

Letter 3850 ATVs should not be allowed in the forest.

Letter 3929 I oppose the proposal to open new areas to ATV use. ATV activities tears up plant and tree roots, disrupts wildlife and greatly increases erosion along the trails and paths cut by ATVs or built for ATV use The chance for increased personal injury appears high also In this respect, it does not serve the public's interests to increase the opportunities for risky motorized adventures in open vehicles If there is a pressing recreational need to be met in these areas, wheeled access could be gained by all-terrain bicycles

Letter 3931 ATV's are unacceptable on any national forest trail The National Forest should eliminate ATV use on the forest trails.

Letter 3938 ATVs: No new ATV trails should be built! Use of the 2 existing trails by all-terrain vehicles should be closely monitored. Strict standards should be set for erosion and misuse such as riding off the trails or damaging wildlife ponds, etc Users must understand clearly that any misuse which degrades resources adjacent to the trail will cause closure of the trail.

Letter 3962 All-Terrain Vehicles should be banned from the forest In the Peters Mill Run area, ATV users have shown an unwillingness to stay on the trails ATVs have destroyed sensitive species of plants on both dry lands and in bogs

Letters 3985, 3986

ATV use should be prohibited on GWNF and existing ATV trails should be closed Better efforts should be made to end illegal ATV use.

Letter 3996 [Do not] build new ATV trails, eliminate current ATV trails

Letter 4053 ATV areas all existing trails should be closed, and monitoring instituted so that they don't operate away from public roads

Letter 4253 Urge the removal of ATV use from the forest Close all existing ATV trails Emphasize non-motorized recreation.

Response Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands.

Since most ATV's are unlicensed vehicles, they can only be driven on trails which are designated for ATV use by Forest Supervisor's Orders. Alternatives 3, 7, 9, 11 and 13 do not designate any motorized trails, effectively eliminating opportunities for the legal use of ATV's on the Forest Alternatives 6, 8, and 8A designate a minimum of trail routes to be constructed in Management Area 11.

Each of these alternatives is considered in detail in the FEIS. One will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2513 I encourage you to reduce (and preferably eliminate) the access to the forest areas by ATV and other motorized vehicles and instead, promote the upgrade of the trails for walking or cross country skiing

Response Alternatives 3, 7, 9, 11 and 13 do not designate any motorized trails, effectively eliminating opportunities for the legal use of unlicensed vehicles on the GWNF These alternatives are considered in detail in the FEIS One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits Appendix B lists numerous trail construction and reconstruction projects that will upgrade the Forest Trail System The projects will be prioritized on a yearly basis as funding becomes available The Forest does not receive enough snowfall to make cross country skiing a viable use

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Letter 134 An incredible fact of the preferred alternative is the devotion of more attention to off road vehicles (ORVs) on the Forest than to the welfare of endangered species There is no regard for either the threat to Forest ecosystems or the waste of precious resources and pollution associated with these machines and the "dangerous babies" who operate them

Response	Threatened, endangered, or sensitive species are protected in all alternatives.
Letter 146	In Alternative 12, the acreage for ATV trails is 204,075. This constitutes nearly 20% of the total forest This is far too much The current ATV trail network under construction or in operation totals 13,732. Alternative 12 would increase this by 1486%.
Letter 1157	I want to stress my disapproval of plans .to expand the area for use of all-terrain vehicles.
Response	The acreage contained in Management Areas where ATV trail construction is allowed varies from none in Alternatives 3, 7, 9, 11 and 13 to 925,162 acres in Alternative 4 with varying amounts between allowed by other Alternatives Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of the land. These natural resources will be protected under any alternative that is selected. The Regional Forester will select the Alternative that best maximizes net public benefits with needs for motorized recreation opportunities being just one of many resource considerations.
Letter 1268	ATVs and mountain bicycles should be prohibited on FS trails
Response	ATVs are prohibited on all Forest trails except those that are specifically designated for their use by Forest Supervisor's Orders Non-motorized mountain bicycles are permitted on all Forest trails except those in wilderness and the Appalachian Trail Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized users. With over 900 miles of trail, there is plenty of opportunities for all, with minimal conflicts
Letter 1161	The fact is that ATVs are incompatible with all the other recreational users.
Letter 1349	ATVs tear up trails and add noise pollution that is quite a bit worse than what the NF already suffers from cars and airplanes
Letter 1546	Why should the govt promote the energy-wasteful, dangerous and extremely obnoxious use of ATVs which disturb and destroy alongside of the goals of hikers, campers, to appreciate, educate themselves, and preserve a pristine nature? The two are not equally legitimate goals They should not be given equal footing in a mgt. scheme Furthermore, hikers and motor vehicles are completely incompatible Hikers don't like noise and exhaust fumes
Letter 1552	(Flaws to draft plan include) expansion of off-road motor vehicle use (mainly ATVs)
Letters 1976, 2498	No new ATV trails should be built.
Letter 2215	ATV use is not a traditional use of the forest and it tends to exclude all other recreational uses It also is very damaging to the land A study done in Michigan found out that it would cost a billion dollars to repair the damage done by these vehicles so far The preferred plan states that peer pressure will be the main way of limiting abuse. ORVers peer pressure will more likely encourage users to travel off trails Without a clear effective plan to police this very intrusive use of the forest, it should not be allowed at all What funds are available to police the ORVs and maintain trails and protect the environment?
Letter 2325	Please do not expand the range of ATVs They pollute, destroy habitat and scare wildlife and people.
Letter 2710	ATV use should not be expanded.
Letter 3998	PATC urges the Forest Service to greatly restrict ATV use.
Letter 4266	I recommend that ATV use be limited to those ATV trails now established or that ATV use be abolished in the Forest along with OHV use

Response

Executive Order 11644 as amended by Executive Order 11989 recognizes OHV (including ATV) use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of those lands Motorized recreation is a legitimate part of multiple use management very much as is hiking, hunting and camping, but trails must be designed and controlled so as to avoid negative impacts to the natural resources

The impacts of the three existing ATV trails and the one proposed are considered to be quite minimal Other than noise, which is generally no greater than that of a sedan driving along an open road, the impacts will be limited only to the trail tread itself. However, if significant resource damage is found, the route will be closed permanently or until the situation is corrected

The conflicts between motorized and non-motorized use are recognized. ATV's are restricted to trails in Management Area 11 which are designated for their use by Forest Supervisor's Orders ATV's are not permitted to go cross country and are prohibited in wilderness With over a million acres on the Forest, there are vast areas where the non-motorized, experience may be had. Management Areas 6, 8, 9, 13 and 21 specifically emphasize non-motorized, remote recreation.

Letter 3665

No increase in ATV/OHV vehicle use Rerouting existing routes away from areas such as Peters Mill Road near the Cypripedium reginae family

Response

Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands Any adverse effect on the resources of an area will result in closure of the road or trail permanently or until the situation is corrected Rerouting a specific trail is appropriately discussed at the project level basis

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Letter 3861

ATVs damage the Forest and its ecosystems, as well as make the Forest less attractive to other human users I would prefer that no areas be designated for their use However, if they are to be permitted, require them to stay in designated areas and designate only the least sensitive biological areas for such use The number of designated areas (miles) should be no more than those currently so designated, and nowhere near as much (many) as proposed!

Response

ATV's are restricted to three existing trails on the Forest Site specific environmental analysis must be completed on one proposed trail on the Deerfield District This analysis considers the trade-offs among the various resources of an area In all cases, cross country travel is prohibited Impacts, except for noise, will be limited to the trail tread Noise is expected to be no greater than that of a sedan traveling an open road in the Forest

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Letter 1546

I found no discussion of the adverse aesthetic impacts of off-road vehicle use. They create noise, pollution, ruts, destruction, and no doubt will increase the incidents of littering along their trails

Letter 2497

There is no way to control ATVs and their detriment to the NF is well known. As the population in VA and surrounding states grows and as ATV popularity increases, the problem will get worse in exponential proportions.

Letter 2530

The increased use of ATV's in what should be QUIET forest land should be stopped We know that they do great damage–disturbing wildlife and habitat for wildlife, and cause erosion and NOISE

Letter 2572

Unlicensed vehicle use and the destruction to the forest floor that accompanies this use in the forest would also increase dramatically [with Alternative 8]

Letter 2050

I am pleased that you have limited the use of ATVs in the forest They are noisy, destructive, polluting machines

Letter 4224

I would like to express my concerns with all terrain vehicles (ATVs) It is important to restrict their activities. My personal experience with ATVs has been to witness unnecessary destruction, trespassing, and lack of respect by throwing trash

Response

The Revised Plan does not commit to the construction or designation of any specific ATV trail routes It merely acknowledges that the construction of such routes in Management Area 11 is appropriate under the standards in Chapter 3

Specific concerns about noise, erosion, littering, etc. are site-specific issues that must be addressed in any proposal to construct or designate a new ATV trail system Such a proposal would require site-specific analysis and disclosure of environmental impacts

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Letter 3688 Preserve the wilderness areas, serene, peaceful, devoid of the echoes of roaring off-road vehicles, so we can hear the birds for the future & our children!

Response Existing wildernesses are preserved in all alternatives.

Letter 2627 [Management according to Alternative 8 would result in further decreases in the biological diversity of the area by] continuing encouragement of off-road and unlicensed vehicle use.

Response Unlicensed OHV's (ATV's) will be restricted to four trails designated by Forest Supervisors Orders specifically for their use Three of these exist and one is proposed. Impacts of these trails are limited to the trail itself Noise should be no greater than that of a sedan driving on an open forest road The amount of land involved is so small that biological diversity will not be impacted Licensed ORV's may use any open Forest road very much as any licensed vehicle Cross country travel by any type of motorized vehicle is prohibited.

Letter 2693 ATV use is a form of recreation to a great many people, but I feel that the harm greatly outweighs the advantages of their use in most instances Examples of this harm are noise pollution, erosion, taking away from the "nature experience," etc I have no problem with exceptions made for people with disabilities

Letter 3568 I would like to see ATV and ORV and hang gliders removed from the GWNF These trails and users, as has been proven, are not a multiple-use, but a multiple-abuse of the GW It is costing taxpayers and federal government millions of dollars to make, maintained these abusive uses with no return in economics for any one

Response ATV's are restricted to four trails in the Forest, three of which have been built and are maintained in cooperation with volunteer groups ORV's and large licensed 4WD vehicles are restricted to open Forest roads very much as are other licensed vehicles Certain roads have been identified that are suitable for high clearance vehicles and offer the desired experience Executive Order 11644 as amended by Executive Order 11989 recognizes off-highway-vehicle use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands Hang gliders are using two existing sites and have two proposed sites in the Revised Plan These sites are constructed and maintained in cooperation with organized clubs

Each of these activities is a recognized, legitimate part of multiple use management Such management does not mean that every acre of land will be used for every activity. Expenses are minimized by using volunteers

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Letter 3716 Any increase in Off-Road-Vehicle (ORV) usage would jeopardize the health of the forest ecosystem and spoil most back-country recreational opportunities (back-packing, camping, native trout fishing, etc)

Response *Management Areas 6, 8, 9, and 21 specifically offer non-motorized, remote recreation opportunities, those types mentioned in the comment These Management Areas cover vast areas and are spread throughout the Forest. Cross country travel by any type of vehicle is prohibited. Licensed 4WD vehicles are restricted to open roads Certain roads have been identified as suitable for high clearance vehicles only The health of the Forest will not be jeopardized by these vehicles*

Letter 3893 *The idea that these loggers and four wheelers can use the park to benefit the rest of us is idiotic. These machines cause pollution, accidents, erosion and frighten the game.*

Letter 3911 *All non-rescue ATVs (e g , ambulance or vehicles used for the distinct purposes of transporting injured persons) are incompatible with the role of a national park The two existing areas open to ATVs are more than sufficient NO new ATV trails should be built in the GWNF*

Response The GWNF is a National Forest, not a National Park, managed for multiple uses in accordance with the Multiple Use Sustained Yield Act of 1960 which directs that National Forests shall be managed for outdoor recreation, range, timber, watershed, and wildlife and fish purposes This doesn't mean that every acre is managed for

every use however. Licensed vehicles are restricted to open roads and unlicensed vehicles are restricted to trails that are designed and designated by their use.

Erosion is minimized by proper road and trail design and construction.

Letter 3893 — These machines give people who are too lazy to walk and observe nature a weapons platform like a tank to assault probably the last hardwood forest worth looking at on the whole Eastern seaboard.

Response — Vast acreages in Management Areas 6, 8, 9, and 21 are managed with an emphasis on non-motorized remote recreation. Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate use on federal lands to be controlled and directed so as to protect the natural resources of those lands Motorized recreation is a recognized part of outdoor recreation under the Multiple Use Sustained Yield Act of 1960.

Letter 4034 — An extremely undesirable fact of the preferred alternative is the devotion of more attention to ORV's on the Forest than to the welfare of endangered species. On p 3-16 of the DEIS we read that 16,999 acres of the Forest are devoted to these wasteful destructive toys. There is no regard for either the threat to forest ecosystems or the waste of resources and pollution associated with these machines

Response — Vehicular impacts in Management Area 11 are restricted to the roads and trails. Cross country travel is not permitted. There are no listed endangered species in Management Area 11. If any are found and would be impacted, they would be protected Impacts on the ecosystems of the Forest have been and will be analyzed on a project level basis.

ALL-TERRAIN VEHICLE (ATV) USE: Advocacy of Use

Letter 1143 — Alternative 8 only allows 5 riding areas and prohibits multiple-use This is wholly inadequate More areas and multiple-use are needed

Letter 1164 — The Draft as presented does not meet the needs of our members or the other users of these vehicles It is inadequate, ignores the projections of use and need for opportunity on the forest and is overly restrictive for future uses.

Letters 1866, 1871, 2001
Alt 8 is terribly deficient in the amount of opportunities it would make available to me and the 135,000 or so others who also enjoy nature while riding ATVs I strongly oppose Alt 8

Letters 2236, 3519
I am opposed to Alt 8 It is terribly deficient in the amount of opportunities available to me and others who enjoy riding an ATV

Letter 2244 — I oppose the proposed Plan Alt 8 It does not make available opportunities for me and other ATV riders

Letter 2311 — I am strongly opposed to the Proposed Plan Alternative 8 It is terrible in the amount of opportunities available to enjoy nature while riding on ATV.

Letter 2528 — I am strongly opposed to the proposed plan Alt 8 It is terribly deficient in the amount of opportunities available to me and other disabled people who like to enjoy nature on an ATV

Letter 4263 — We are opposed to Alternative #8. It is terribly deficient in the amount of opportunities available to my family and the 135,000 or so others who like to enjoy nature while riding an ATV.

Response — Acknowledgement has been made that one of the trade-offs associated with selecting Alternative 8A as the Revised Plan is a limitation on all-terrain vehicle opportunities

Based on comments received on the Draft Revised Plan and DEIS, has reevaluated the opportunities for providing all-terrain vehicle use in these nineteen areas has been reevaluated in light of the goals, objectives and desired future condition of the Forest Service preferred alternative This reevaluation is documented in the

process paper *Incorporation of the NFMA Requirements for Off-Road Vehicle Use into the Revision of the Land and Resource Management Plan for the George Washington National Forest*

Letter 2032 — Forest Plan Alternative 12 is much better than Alternative 8. A total of 17 riding areas would be available for ORV use, multiple-use areas need to be considered to tie those 17 areas together

Response — Alternative 12 only commits to nine ATV routes although additional routes might be located in Management Areas 16 or 17. Alternative 12 includes the parallel trail concept which could be used to connect ATV routes

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Letter 3982 — *The figures demonstrate a decrease in semi-primitive motorized from current inventory for ten out of 14* alternatives, including inexplicably Alternative 4 which purportedly favors motorized recreation. This clearly demonstrates the failure to plan for dispersed motorized recreation in most alternatives

Response — A close review of the ROS definitions is advised. Semi-primitive motorized is not the only place where motorized recreation occurs In fact, most will occur in roaded natural. ROS is classified by more than roads or motorized access. Also included are such considerations as managerial setting and other evidence of humans It stands *to reason that the more people we have out there, the less primitive the environment.*

Letter 3982 — There is little recognition of the impacts of other kinds recreation other than motorized in this section and throughout the DEIS and Draft Plan There is little attempt to promote cooperation among motorized and non-motorized groups There is little attempt to reconcile other resource activities (like timber harvesting) with motorized recreation

Response — The Forest has had *excellent relationships and cooperation with groups and individuals from many, many* differing interests. In fact, the entire planning process, with the many public meetings and cooperating working groups has been evidence of the Forest's attempt to get folks to work together. Issues that have been brought up during the process have been used to direct the development of the Revised Plan. Each Management Area discussion is broken down with subheadings on the relationship of the resources within the Management Area

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Letter 4239 — *I'm a trail biker. I've heard your department thinks that we won't care if our legal riding areas in the George* Washington National Forest are taken away from us I would certainly care I would like to know how we have appeared not interested in the trails we do currently enjoy So, I and fellow trail bikers could avoid another situation like this, I would like you to write back to me with your teams reasons why your department thought we would not miss the loss of the trail bike riding areas

Response — The Forest has never maintained that ATV riders weren't interested in using and maintaining the existing ATV *trail system. All existing ATV trails have clubs that have constructed and maintain these trails*

Letter 138 — As an off road motorcycle enthusiast of many years, I feel that the draft plan is far too restrictive providing too little area for potential ORV trail development

Response — Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands The Forest recognizes *off road motorcycle use as part of this Any licensed motorcycle will be allowed on open Forest Development* Roads and will be allowed on trails developed for motorized use in Management Area 11 with specific Supervisor's Orders permitting use by unlicensed vehicles

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Letter 873 — The plan does not adequately provide for the recreational use of off-road vehicles does not provide sufficient area or trail mileage to meet the needs of the riding public The "Parallel Trail" concept placing trails adjacent to existing open roads should be put into the plan The Draft Plan is overly restrictive regarding primitive roads *shared by 4-wheel drive, OHV/ATV's and trail bikes. The plan fails to consider the recently passed legislation* calling for development of motorized trails on public lands.

Letter 1144 — The quality of the trails is excellent, but the quantity of ORV trails is marginal Additional trails would be a big plus, and attract more users Multiple use trails and woods roads work very successfully.

Response — Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of the land The alternatives in the FEIS present a broad range of opportunities for OHV's including ATV's. The Regional Forester will select the alternative that maximizes net public benefits balancing consideration for OHV use and the needs for other resource management

All licensed OHV's including 4-wheel-drive trucks and motorcycles may use any open Forest Road Several of these are accessible only by high clearance vehicles ATV's as unlicensed vehicles are restricted to trails in Management Area 11 that are specifically designated for ATV use In some cases, these trails may be shared by licensed vehicles

The Forest is unaware of any recently passed legislation calling for development of trails for motorized use

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Letter 1143 — Motorcyclists and ATVs bring economic bonuses to your area.

Letter 2032 — Motorcycle and ORV riders are, and will continue to be, a positive economic factor for local merchants

Response — The Forest recognizes that there are both direct and indirect benefits to the local economies resulting from use by motorcyclists and ATV riders

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Letter 1580 — If other people can't ride, they're going to sneak on the trail and ride

Response — It is assumed that this comment refers to illegal use of OHV's in the Forest Just because people knowingly and willingly ride illegally in the Forest, doesn't make it all right or acceptable to do so This is and will be a law enforcement problem

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Letters 147, 148, 149, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163
The George Washington National Forest ten-year plan has been drafted and it is very restrictive for ATVs, OHV and trail bike users I think the plan should be rewritten to include more accessible areas for these vehicles

Letter 1660 — I'm writing to request your consideration of expanding the trail system in the GWNF. The existing trails are great, but more miles of trails that can be linked together for a 50 to 100-mile loop are needed to generate more interest for people travelling several hours for a day of riding. This would also lessen the impact of repeated riding on a shorter trail system Most of the people involved in off-roading are middle-income families and generate sizable amounts of dollars to local economies Motorcyclists prefer backcountry, rugged terrain, rough access and logging roads, and other undesirable areas that are not of much interest to other recreational groups using the forest

Letter 1876 — I am sure you are aware of the increase in area ATV users. We need more areas with a wider range of skill levels designed into the trails We need your support of Alternative 12. This will help ensure the continued availability of Environmentally sound recreation facilities for ATV use

Letter 2015 — I am asking your support of considering more ATV trails

Letter 2015 — There are not many places to ride where it is safe and legal We feel that there would be even more riders if more trails were available This area is beautiful and we spend a lot of money in Virginia just to enjoy our sport

Letter 2250 — Increase the number of off-road motorsport riding trails in the forest

Letter 3623 — The draft does not provide sufficient area or trail mileage to meet the needs of the riding public

Response — Table 3-2 displays the number of unlicensed OHV trail routes by alternative Alternatives 4, 5, and 12 call for substantial increase in the number of trail routes

The Revised Plan calls for maintaining the three existing trails and for the construction of one new trail specifically designated for ATV use Designation by Forest Supervisor's Order make the trails legal for use by unlicensed vehicles In addition to safety for riders, protection of the natural resources is a must Evaluation of

the impacts to natural resources for the proposed trail will be completed on a project level basis The money spent by ATV riders is recognized as an economic benefit to local communities

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Letter 2299 While I agree that ATV's should not have free run of the forests, ATV trails are perfectly reasonable and appropriate especially considering the ever declining areas available elsewhere in which to ride these vehicles

Letter 2354 I fully support your efforts to make ATV/motorcycle trails available

Response ATV trails are reasonable and appropriate as a legitimate part of multiple use management Four areas in the Forest are designated for ATV trails Three trails have been constructed and one is proposed

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ALL-TERRAIN VEHICLE (ATV) USE: Management of Use

Letter 1268 ORVs such as ATVs should be prohibited in the GWNF ATVs are incompatible with the purposes of the park they create unnecessary noise and air pollution, they cause injuries (both to ATV users and to others), and they lead to serious erosion problems The use of mountain bicycles creates problems similar to those caused by off-road motorized vehicles, i e , injuries to bicyclists and others and erosion problems.

Letter 1082 It seems to me like there are plenty of trails for them (ATVs) as it is now anyhow - why create new roads? It just costs money and aids erosion

Letter 1360 ORV use should be confined to selected areas where they are less likely to do damage to the land by increasing erosion and where the noise they create will not impact on those who prefer quiet Unfortunately the noise of some of these vehicles travels great distances in the forest Perhaps trails should be provided for them in portions of the forest that are dedicated to clearcutting

Letter 1615 All-terrain vehicles are destructive to the forest, to human lives as well, especially children I oppose their existence, period If we are stuck with them, against all common sense, they must be closely regulated and kept to existing roads There needs to be a strong emphasis on law enforcement with on-site enforcement officers to inspect these machines for safety devices (helmets must be required) and noise suppression devices. Any evidence of abuse of these areas (such as persistent and excessive littering or failure to abide by regulations) should lead to closing the trails for future use

Letter 2345 I am particularly concerned about the 5 proposed ATV trails I am categorically opposed to setting aside areas of our public lands for use by [ATV users]. ATVs are destructive They disturb wildlife and ruin habitat They cause erosion and siltation in our streams They are noisy. When an area is set aside for ATV use, other uses, such as hiking, birdwatching, camping, hunting, and fishing are excluded Of the five multiple uses, wildlife, protection of water quality, grazing, and other forms of recreation are not compatible with ATV use

Letter 2590 Curtail illegal ATV use

Letter 3529 ATVs - A sensible approach is needed for vehicles that are incompatible on any National Forest trail This revised plan may be the best opportunity to protect the environment

Letter 3604 ORV travel must be carefully restricted now or they will become a major threat to the GW Forest

Letter 3785 The use of off-road vehicles should be permitted only to the extent mandated by multi-use guidelines, and these guidelines should be reduced if the evidence of ATV destruction continues to mount.

Letter 3899 Use of all-terrain vehicles (ATVs) is inappropriate for public land use, especially national forest lands No new ATV trails should be built Impacts of current ATV trail use on the forest and wildlife must be studied and appropriate remedial action taken if necessary to preserve the integrity of the GWNF.

Response Executive Order 11644 as amended by Executive Order 11989 recognizes OHV (including ATV) use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of those lands Motorized recreation is a legitimate part of multiple use management very much as is hiking, hunting and camping, but trails must be designed and controlled so as to avoid negative impacts to the natural resources

The impacts of the three existing ATV trails and the one proposed are considered to be quite minimal. However if significant resource damage is found, the route will be closed permanently or until the situation is corrected

The conflicts between motorized and non-motorized use are recognized ATV's are restricted to trails in Management Area 11 which are designated for their use by Forest Supervisor's Orders. ATV's are not permitted to go cross country and are prohibited in wilderness. With over a million acres on the Forest, there are vast areas where the non-motorized, experience occur. Management Areas 6, 8, 9, 13 and 21 specifically emphasize non-motorized, remote recreation.

Letter 181 — Provide multi-use trail systems for scheduled group activities including hikers, mountain bikes, horses and OHV. These trails should be located adjacent to existing or proposed group camps.

Response — The Forest Service has found that motorized and non-motorized trails are not totally compatible. ATV trails are limited to those lying in Management Area 11. OHV use is not permitted on other system trails, except for the Neal Run trail developed to provide access for persons with disabilities.

Letters 147, 148, 149, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163
I think the parallel trail concept is a very good idea.

Letters 181, 376, 1164
Adopt the Parallel Trail concept, which permits OHV trails to be developed within an average of 400 yards on each side of the existing road systems This permits wide user dispersion and improves the safety of trail users. This also provides a wide variety of riding opportunities.

Letter 2903 — There was a concept of trail corridors parallel to existing roads that was endorsed by all parties in the one and a half years of public meetings It has great merit and was one of the few areas where all parties agreed, and yet the Draft Plan completely ignores it!

Letter 2523 — I feel that the 10 year plan does not provide sufficient area of trail mileage to meet the needs of the motorcycle riding public The "Parallel Trail" concept of placing trails adjacent to existing open roads should be put into the plan since this concept was endorsed at the public meetings by all parties The plan is overly restrictive regarding primitive roads shared by four-wheel-drive, OHV/ATVs, and trail bikes

Letter 3623 — The "Parallel Trail" system was endorsed by all parties at public meetings, yet ignored in the 10 year plan.

Response — The parallel trail concept has been incorporated into reformulated versions of Alternatives 4, 5 and 12 in the FEIS. If one of these is identified as the alternative which maximizes net public benefits, it will be selected by the Regional Forester to serve as the Revised Plan.

Letter 2041 — Several sites have been suggested for the proposed ATV trails. The Deerfield District site is particularly unsuitable This area is prime bear habitat and is adjacent to the Elliott Knob roadless area, which is known to have a number of sensitive plant species The area proposed for ATV use has not been thoroughly inventoried The same plants may be found in this area In addition, this areas is extremely steep and therefore unsuitable for ATV use Generally speaking, placing an ATV trail beside a roadless area is not a good idea. There is a high risk of illegal spillover use in the roadless area Elliott Knob is one of the wildest and most unique areas of the forest We need to protect it

Letters 3537, 4241
The suggestion of opening a trail complex on the Deerfield Ranger District is absolutely unacceptable Not only is this a pristine environment bordering the Elliott Knob Roadless Area, but it contains areas with sensitive species and a large black bear population

Response — The Archer area is identified for proposed construction of an ATV trail system Before this trail is constructed, an environmental assessment must be completed on a project level basis to determine impacts on natural resources of the area Any sensitive plant and animal species that must be protected will be noted in the assessment The public will be provided an opportunity to comment on any such proposal before a decision is made

Letter 1453 ATV development should be cut back on Alt. 12.

Response The ID Team has worked with individuals, organizations and agencies to formulate alternatives that respond to issues in a manner that is consistent with the ideologies of the different user groups involved and concerned about the management of the Forest. A moderate to high number of ATV trails are consistent with the ideology represented by Alternative 12

Letter 80 I'm not crazy about off road vehicles but I agree that they deserve places to ride. I hope you are also considering mountain bike trails.

Response The Forest encourages multiple use of non-motorized trails by mountain bikes, horses, and hikers. The vast majority of the Forest's 950 miles of trail are available for mountain bicycle use The notable exceptions are the 62 miles of the Appalachian Trail on the Pedlar District and trails in Wildernesses. As demand dictates, informational brochures may be developed and individual trails may be adopted by mountain bicycle users

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Letter 735 According to the DEIS (p. c-101), an ORV/ATV group has identified part of the Mt. Pleasant Area for OHV trails. Although I understand the need to accommodate their needs, surely there is an abundance of acreage on the district suitable for this type of use in areas not likely to be considered for future Wilderness designation. The establishment of OHV trails in the area would not only conflict with and limit primitive recreation opportunities, but would also establish a use incompatible with the designation of Wilderness.

Response The Forest Service preferred alternative recognizes that segments of FDR 51 enter the Mt. Pleasant Area from the north and the south. The north segment extends into the area for 1 mile and the south segment extends into the area for 3/4 mile. The road is opened on the first day of trout season and closed at the end of bear hunting season. Because the road no longer goes all the way through the area, use is low. The road is not designated for ATV use. Those hunters and anglers that use the road rely on it to provide access to the interior of that portion of the Mt. Pleasant area.

Letter 2664 The VWTF recommends that all ATV trails be closed from March 15 to July 31 to allow an undisturbed period for nesting and poult imprinting with the broods and hens. This is also an important reproduction period for many other species that require undisturbed areas.

Response ATV use is confined to trail systems within Management Area #11. The Plan provides for four ATV trail systems Within this small portion of the Forest, it is predicted that there will be a year-round demand for use.

Letter 1089 Motorized vehicle use on forest trails should be extremely limited.

Letter 1806 I hope to encourage you to limit the access of ATVs. Response In the Revised Forest Plan, ATV's are restricted to four trails, three existing and one proposed

Letter 4012 PATC urges the Forest Service to greatly restrict ATV use within the George Washington National Forest

Response In the preferred alternative, motorized use of Forest Trails is limited to specific trails in Management Area 11 that are designated as open to their use by Forest Supervisor's Orders This includes three existing trails and one proposed trail.

Letter 3643 The Department is concerned about development of all-terrain vehicle/off-highway vehicle (ATV/OHV) and developed recreation plans for Alternative 10 We recommend that the Alternative 8 option, which limits ATV/OHV use to 16,999 acres of forest, be incorporated into the Alternative 10 forest plan

Response The FEIS explores a range of alternatives that contain differing responses to issues. There is no advantage in modifying Alternative 10 so that it provides the same response as another alternative

Letter 1345 — I would like to see the NF opened up for four-wheeler use on remote backwoods trails for hunting purposes only The NF could also designate specific trails for people who want to ride four-wheelers for recreational purposes only.

Response — The Forest will have designated trails for recreational use of ATV's Additionally, certain trails may be open to ATV's during hunting season specifically for use by persons with disabilities Experience has shown that motorized and non-motorized uses do not work on trails, and therefore, due to these unacceptable conflicts among users, unacceptable damage to natural resources on trails not designed and managed for motorized use, and law enforcement difficulties, the rest of the Forest's trails are closed to motorized use

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Letter 1546 — Isn't it possible that if you allow extensive off-terrain vehicle use in the Forest at all that this will increase the demand and pressure on the Forest to expand this use? Why encourage off-terrain vehicle use at all? Isn't this use inconsistent with the Forest's role as a harbor for rare and endangered species, for solitude, and natural beauty that cannot be found elsewhere?

Response — Providing opportunities for motorized recreation is part of multiple use management and is consistent with the role that the Forest Service plays in providing outdoor recreation All threatened, rare and endangered species will be protected in all alternatives The Forest will provide ample opportunities for solitude, especially within Management Areas 4, 6, 8, 9, 13, 14, 15, 16 and 21 in the preferred alternative

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Letter 1644 — The ATV trail network (MA 11) proposed in the preferred alternative for the Jerrys Run/Brushy Mountain area appears to involve unacceptably high environmental impacts The area contains a number of system hiking trails, including Jerry's Run Trail, which is signed on Interstate 64 An ATV network would be incompatible with a hiking trail network in the same area because of noise, it would also be difficult to prevent ATV use of the non-motorized trail system Jerry's Run is a trout stream, which could be impacted by ATV use of the area Hunting use in this area would also be affected negatively Moreover, an ATV trail has been approved on the nearby Patterson Creek area on the Jefferson National Forest This complex should provide for any ATV demand in this vicinity

Letter 3840 — The ATV trail proposed for Brushy Mtn Area appears to have a number of conflicting aspects· 1 Jerry Run Hiking Trail - user conflict, noise levels for the hiking trail, potential illegal use of this hiking trail 2 Jerry's Run Trout Stream - Potential Conflict

Response — This proposal for construction of the Jerry's Run ATV trail system has been removed from the Revised Forest Plan

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Letter 1644 — The Peters Mill Run ATV trail and OHV road should be dropped because of the conflict with the Special Biological Area impacts The trail/road design is inadequate to prevent vehicles from leaving the route and causing damage in adjoining forest areas ATV use should be restricted to trails specially designed for such use, and OHV use should take place only on routes which are open to the general public

Response — The special biological area will be protected The Ranger District is working closely with organized groups to prevent negative impacts while still providing for motorized recreation opportunities ATV's are limited to specifically designated routes Cross country travel by ATVs is not permitted OHV's may use only routes that are open to the general public

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Letter 3962 — EIS The Peters Mill Run (ATV Trail) system needs to be closed until the destroyed plant life returns

Response — If unacceptable damage occurs on the Peters Mill run ATV trail it will be closed until the situation is corrected This will be done on a project level basis, outside the scope of the Revised Plan

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Letter 1644 — The ATV trail network (MA 11) proposed in the preferred alternative for the Archer area appears to involve unacceptably high environmental impacts This portion of Great North Mountain provides habitat for bear, which would be impacted by the ATV use The nature of the terrain is not conducive to limiting ATVs to an isolated area The North Mountain Trail would be impacted by noise, and it is doubtful if illegal ATV use of the hiking trail could be prevented

Response	The Archer ATV area is included in the Revised Plan A project level environmental assessment has not been completed for this trail Possible impacts mentioned in the comment will be examined during the project level evaluation
Letter 1655	The noise from ATVs takes away from the seclusion and peace of the woods. Keep them restricted to one small area of the forest so that the horrific noise these things make is not soon heard wherever one hikes. The same holds true for ATV trails Please keep them limited Can they use some recent logging trails in just one area of the forest?
Letter 1835	Lands available for ATV use - 16,999 acres If that's not enough, let them go elsewhere to another State to be argued over
Response	*ATV's are restricted to four areas on the Forest in the Revised Plan--three existing and one proposed*
Letter 1886	*Enforce existing regulations on ATVs, build no new ATV trails, and analyze the impacts of ATVs on the Forest*
Letter 2272	Existing ATV use should be closely monitored and analyzed to determine its effect on the environment All existing regulations should be strictly enforced No new ATV trails should be built
Letter 3660	ATV/OHV use should be limited and monitored closely for abuse
Response	ATV's will be limited to the three existing and one proposed trail Before construction of the proposed trail, a project specific analysis will be completed on the impacts of ATV's Similar analysis has been completed for the three existing trails
Letter 2066	Areas suitable for ATV trails should be designated by number and length of trails rather than overall acreage. It should be clear that trails will be permitted only if there is success in achieving responsible management by the user groups This project will continue to be on trial I believe the whole treatment of ATV areas in the draft plan does not have the right tone to it
Response	The wording in the Revised Plan has been modified to more clearly indicate that ATV's are permitted only on trails that are specifically designated for their use and that no cross country use is permitted The entire acreage listed in Management Area 11 where ATV trails are developed is not available for ATV use
Letter 2232	Provisions in the Plan to set up monitoring of ATV trails, if standards are violated, it should be clearly stated that the trails should be closed down
Response	The Revised Plan clearly indicates that if significant resource damage is found, routes will be closed permanently or until the unacceptable situation is corrected
Letter 2345	If there is a need for reconstruction of trails or restoration of damaged resources, please ask users groups to pay, not the taxpayers
Response	The Forest has excellent relations and cooperation with ATV user groups who have volunteered time, materials, and effort in construction and maintenance of ATV trails.
Letter 2345	Establish standards for ATV trails If there is degradation, close the trails.
Response	This is done in Management Area 11 and is applicable in all alternatives that offer motorized recreation opportunities.

Letter 2345 — Close ATV trails during wet seasons when the soil and vegetation are more susceptible to damage.

Response — When damage occurs or an area is susceptible to damage, ATV trails will be closed and will remain so until the situation is corrected

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Letter 2366 — I feel ATV use on FS land should proceed only when local groups will sponsor trails ATV use holds a real threat to other multiple uses, especially wildlife, water quality.

Response — The Revised plan proposes one ATV trail system in addition to the three that exist This will be developed only after expressed public interest is noted with an organizational commitment to adopt the trail for maintenance and protection. Project level analysis will consider impacts of this proposed trail on other resources

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Letter 2492 — Alternative 8 will still meet 213% of projected demand for OHV use in remote areas and 2,522% of the demand in less remote ares.

Response — The Forest Service Manual 2355 03 provides for motorized recreation opportunities when, among other conditions, there is a demonstrated demand

The demand estimates in Table 3-20 of the DEIS were developed under a procedure described in detail in the process paper *Dispersed Recreation Demand Analysis* dated May 17, 1989 This information essentially compared the demand for recreation opportunities in different settings (ROS classes) with the capacity of the land to provide those settings. This estimate is a recreation-visitor day per acre comparison that does not take into account the infra-structure needed to support ATV opportunities

Since the draft environmental impact statement was issued, the Forest has received numerous letters, calls and visits from interested parties indicating that there is an unmet demand for both licensed and unlicensed OHV opportunities In response to this concern, the Forest evaluated the estimated demand for both licensed and unlicensed off-highway vehicle recreational use from the current Statewide Comprehensive Outdoor Recreation Plans (SCORP) for Virginia and West Virginia The details of this evaluation are discussed in Appendix B Table 3-3 displays the estimated demand in miles for four wheel and motorcycle off-road use for the Forest.

The FEIS uses the comparison of the estimated miles of roads or trails available for licensed and unlicensed OHVs with the anticipated demand for these roads or trails as the best indication of an unmet demand for licensed or unlicensed OHV opportunities Table 3-4 displays the result of this comparison for each of the alternatives.

Letter 2536 — No new ATV roads should be built - the use of these vehicles in the forest needs much more analysis of impacts before the forest service recommends increasing areas dedicated to their use.

Response — Project level analysis considering impacts of ATV use will be completed for any new trails There is an on-going review of the impacts of existing trails.

Letter 2557 — Trails in the GWNF should be maintained in their current condition They should not be improved to allow additional all-terrain vehicle use. ATV's should be limited to their current areas of operation

Response — To the extent funding allows, trails will be maintained on the Forest There are plans for one additional motorized trail which will be constructed only after project level evaluation of the impacts of such a trail

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Letter 2664 — The VWTF is opposed to ATV use on the National Forests in Virginia However, even though we do not agree with ATV use, we are aware of the mandate to allow some controlled access Trail mileage should be determined by the ability to avoid conflicts with wildlife, natural resources and other recreational uses, rather than striving to meet pre-established mileage goals

Response — Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands ATV trails in the Revised Plan will be managed to minimize impacts on other resources.

Letter 2664 — Trails should only be opened when a responsible user club comes forward and agrees in writing to help construct and maintain the route on a cooperative basis All ATV use on the Forest should be confined to these designated trails MA 17 which has been designated for intensive timber management should be considered as sites for expansion of the ATV trail system if demand requires it. The public will be used to seeing more activity in MA 17 and may not object to ATV use in those areas Use of ATV trails after dark is not acceptable to the VWTF The VWTF encourages the GWNF to incorporate wildlife habitat enhancement projects into the cooperative agreements with the ATV user groups as mitigation in MA 11.

Response — The Forest has excellent relationships with cooperating groups and individuals in constructing and maintaining ATV trail systems ATV's are restricted to trails designated by Forest Supervisor's Orders in Management Area 11. Cross country travel is prohibited Wildlife management activities are permitted in Management Area 11

Letter 2903 — The Draft Plan just does not provide sufficient trail mileage to meet the well documented use demand and this violates one of your basic principles of forest planning It is overly restrictive regarding primitive roads which can be shared by four wheel drive vehicles, ATVs/ORVs/ and mountain bikes (as well as by hikers) Many such roads already exist in the G W. and should be utilized as such a recreation resource

Response — Experience has shown that motorized and non-motorized use of trails is not safe. Alternative 4 would maximize 4WD access by causing some of the old, restored roads (not on the Transportation System) to be included in the Forest Systems Roads Inventory. This would allow up to 1650 miles of road to be open at least seasonally The Regional Forester will select Alternative 4 as the preferred alternative if it is determined to be the one that best maximizes net public benefits

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Letters 147, 148, 149, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163
The plan fails to consider recently passed government legislation calling for development of motorized trails and public lands

Letter 2903 — The Draft Plan, in its restrictive approach to motorized trail uses, fails to address recent congressional legislation to provide gasoline tax funding for motorized and non-motorized trail development and maintenance The draft plan falls out of step with congressional and senate mandates and jeopardizes capturing significant funds to help alleviate your constant budget squeeze, since these funds would only become available for combined development of motorized and non motorized trails and would need a land management plan that allowed realistic development of motorized trail recreation opportunities

Response — We are unaware of any recent Congressional legislation that provides gasoline tax funding for motorized and non-motorized trail development and maintenance Word of such legislation and associated funds would come down through The Secretary of Agriculture, the Forest Service Washington Office and the Southern Regional Office. At such time as any funds are available, be assured that the Forest will work to get its fair share

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Letters 3537, 4241
We oppose the construction of any new ORV trail systems. Use of OHV/ORVs should be restricted to the two existing trail systems, Taskers Gap and Peters Mill Run located on the Lee Ranger District. A full report should be included in the EIS which analyzes current environmental damage caused by the trail systems and addresses the problem of illegal OHV/ORV use in the region as well as other regions of the forest.

Response — The Forest presently has three existing ATV trail systems Rocky Run, Taskers Gap-Peter Mill Run, and South Pedlar Graph 2-31 displays the number of unlicensed trail systems No alternative explores the option of only retaining the Taskers Gap-Peter Mill Run Trail system

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Letter 3567 — ATVs should not be allowed on forest service land if you find that this is not possible, then their use must be severely curtailed No new ATV trails should be constructed and the Peters Mill trail should be closed due to its proximity to sensitive areas and the inability to keep the vehicles from getting off of the trail. There need to

be specific guidelines for the determination of any degradation of the trails used and a clear policy that when this degradation reaches a certain threshold, that closure and rehabilitation will occur

Response — One new trail is proposed under the Revised Plan Project level analysis must be completed with regard to impacts on natural resources before this trail is constructed. The Peters Mill trail and, in fact, all trails will be monitored for adverse impacts If unacceptable damage occurs, the trail will be closed and will remain so until the situation is corrected

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Letter 3640 — I oppose expanding the areas open to all-terrain vehicles While ATVs are an enthusiastic recreational pursuit for some segments of the population, ATVs are destructive to the environment and must be strictly regulated

Letter 3646 — Limit rather than expand access for off-highway vehicles (OHV). The beauty and tranquility of nature should not be compromised by the destructive and disquieting effect of OHV

Response — ATVs will be restricted to four trails in Management Area 11 that are designated as available for use by Forest Supervisor's Orders Any unacceptable damage to the resources will result in closure of the trail until the situation is corrected.

Letter 3685 — I encourage you to locate OHV trails as far from sensitive areas of the forest as possible, so that any drivers tempted to wander off the trail will at least be wandering where they will cause minimal damage

Response — In all cases, cross country travel is prohibited Unlicensed vehicles are restricted to four trails, three existing and one proposed. In the event that any evidence of unacceptable resource damage occurs, the trail will be closed until the situation is corrected

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Letter 3705 — Motorized use is inconsistent with a biologically driven alternative If trails are currently provided, they should be carefully managed No new motorized trails should be developed Licensed, Four Wheel Drive, off highway vehicles should be restricted to the open road system Poor quality roads with erosion problems and stream crossings should be closed or upgraded.

Response — The Revised Plan is a plan to manage all resources of the Forest, biological, geological, historic, scientific, recreational, and otherwise ATV trails will be managed so as to minimize impacts to the other resources of the area Licensed 4WD vehicles may use any open Forest Road Certain of these existing roads have been identified as suitable for high clearance vehicles and should offer the opportunities sought for recreational riders In all cases there will be no roads open with erosion problems and stream crossings subject to unacceptable damage

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Letter 3717 — The opening of large areas of the forest to use by OHVs would have a dramatic effect on the character and value of lands for primitive recreation In areas of the AT where adjacent lands are open to OHV use, it will be nearly impossible for forest personnel to protect the AT from illegal use of OHVs on the AT

Response — It is incorrect to say that large areas of the Forest are opened to OHV's Licensed 4WD vehicles may use any open Forest Road very much as can any other licensed vehicle ATV's are restricted to three existing trails and one proposed trail in the Revised Plan Vast acreages in Management Areas 6, 8, 9, 13, and 21 are managed specifically for remote, non-motorized recreation Motorized traffic is prohibited on the AT

Letter 3840 — Monitoring language needs to be very definable - trails should be monitored at frequent intervals by F S personnel Significant abuses should call for trail closure No trail should be worked on, opened or planned without a responsible maintaining organization overseeing its use The F S should not solicit interest in ATV trails or their construction Any interest should be a product of public demand Location of any ATV trails should be exceptionally well thought out as to ecological impacts, user group impacts, habitat type conflicts, etc Deerfield proposed ATV trail lies adjacent to "Bear" habitat lands Peters Mill ATV trail has a track record of problems which in my opinion are not solvable Draft pg 2-77 #380 and 384.

Response — Effects on the resources in the area of ATV trails are monitored. The Forest has been working with cooperating individuals and organizations in the construction of these trails The environmental effects of the Archer trail system on the Deerfield will be examined on a project level basis before a decision is made to establish it

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Letter 3848 — MA 18. Line 633 Add "New OHV/ATV trails should not be constructed where they will need to cross a riparian zone" Change existing line to " designated crossings which are bridged or graveled ." Motor powered vehicles which are intended to be used off roads have resulted in considerable resource damage due to irresponsible human use We are particularly concerned that these vehicles are not permitted to be operated in a place such that the opportunity for abuse in riparian zone arises We would further add "New OHV/ATV trails should not be opened or constructed within 100 yards of a wild trout stream " By providing buffer zone of a football fields length between a trout stream and an ATV/OHV trail, the possibility of abuse is reduced and conflicts between user groups are controlled (see line 377)

Response — Protection of riparian areas and fisheries is a priority consideration in the assessment of all new trail routes Standards require that fords will not be used without site specific analysis, that trails will be closed if unacceptable resource damage occurs or is likely to occur, and that unauthorized OHV use will not be tolerated

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Letter 3892 — I believe that all non-rescue ATVs are incompatible with the role of a national park In addition to the noise and air pollution caused by these vehicles, they often cause irreversible erosion and damage to the areas in which they are allowed. The two existing areas open to ATVs are more than sufficient and that no new ATV trails should be built in the GWNF

Response — The George Washington is a National Forest, not a National Park Motorized Recreation is fully compatible with management for a National Forest under the Multiple Use Sustained Yield Act of 1960 Executive Order 11644 as amended by Executive Order 11989 recognizes OHV use on federal lands to be controlled and directed so as to protect the natural resources of these lands

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Letter 3909 — ATV use impinges on other recreational uses of the forest In addition to the noise, fumes, dust, and safety considerations, there is the issue of habitat destruction. While I'm sure there are those who responsibly ride on designated trails, I am equally sure there are individuals that select the steepest or muddiest terrain to scour Their results are clearly evident in the forest I urge no new trails be built and use on existing trails require licensing That way individuals who disregard the rules can be identified and removed

Response — The Multiple Use Sustained Yield Act of 1960 recognizes outdoor recreation, which includes motorized recreation, as a full part of National Forest management This does not mean that every acre must be managed for every resource, however The Forest offers extensive opportunities in all areas of recreation, primitive to fully developed. Licensing requirements for ATV's are beyond the scope of the Forest Land Management Planning process

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Letter 3940 — ATV trails should be provided only if there is a documented demand and if they are compatible with biological objectives If significant demand is documented, only the existing trail and the 2 under development should be designated as ATV trails Trails should be closed if abuse or site degradation occurs

Response — The Forest has worked with cooperating organizations and individuals in the design, construction and maintenance of the three existing trails Their willingness to participate is a good indicator of their interest Trails will be closed if resource degradation occurs and will remain so until the situation is corrected

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Letter 3962 — There are no standards for ATV noise I would propose a maximum 70 db rating at a certain distance from vehicle with the engine at a speed that produces maximum noise The location would be where the noise is at a maximum

Response — Noise levels are spelled out in the Forest Supervisor's Orders designating individual trails These are generally in accord with national guidelines as defined by specialty vehicle manufacturers

Letter 3973

I suggest at least Alternative Plan #12 This alternative would provide more [motorcycle/ATV] riding areas and lessen the daily impact on those areas by spreading the use A secondary effect would be, additional volunteer assistance in maintaining the areas, (i.e erosion control, trail repair, rubbish removal), and the general economic benefits of increased traffic through these parks and adjoining small towns.

Response

The Regional Forester will select an alternative to serve as the Revised Plan that maximizes net public benefits The Forest has excellent relationships with volunteer organizations and individuals in design, construction, and maintenance of both motorized and non-motorized trail systems The economic benefits are recognized but must be considered in balance with the benefits for all resources.

Letter 3982

Management Area 17 should, but fails to provide for the compatibility of timber harvest activities with trail based recreation Harvests can be designed to avoid existing trails, and new trails can be integrated into harvest plans. Ths statement "Costs for wildlife habitat improvements, recreation needs, or a special case for the visual resource should ordinarily be paid for by their respective areas", ignores the availability of K-V funds to integrate harvest activities with the improvement of other facilities.

Response

The Revised Plan section on Management Area 17 has been reformulated to address motorized recreation

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Letter 3982

The standards need revising to more flexible accommodate the needs of motorized recreation Impacts of all recreation must be addressed. Better information is needed to project the demand for and economic benefits of motorized recreation Planing should focus on how facilities and interpretation can encourage shared use

Response

Standards in the Revised Plan have been written to better address motorized recreation. Impacts of recreation activities that are clearly at issue have been discussed. Where no issue has been raised, there may not be a discussion. This is not to say that, on a project level, there will be no issues raised that haven't been addressed in the Revised Plan It is agreed that better information is needed as to demand for and economic benefits of motorized recreation. The draft working paper "Dispersed Recreation Demand Analysis" dated May 17, 1989, contains quantitative analysis that was completed using the information available. This is sufficient to present demands and trends in dispersed recreation for the current planning process. Nationwide, the Forest Service is committed to the share-the-trail concept. However, experience has clearly shown that motorized and non-motorized uses are not compatible due primarily to safety. Therefore, the Forest has separated uses in the Revised Forest Plan.

Letter 4001

ORV/ATV use in the GWNF should be strictly controlled and limited to designated trails in small areas on the periphery of the forest Care should be used to assure that these nuisance vehicles not impact the wilderness areas, special biological areas, streams, wetlands, or other critical habitat areas We would much prefer that ORV/ATV use be prohibited in the GWNF but we can accept their closely controlled use in small sacrifice areas. We understand that 17,000 ac are proposed for ORV use, this is excessive by at least an order of magnitude; 2000 ac (3 sq miles) should be more than adequate for this disruptive use.

Response

Licensed vehicles may use any open roads. Certain of these roads have been identified as suitable for high clearance vehicles only and have been identified on a special features map. Unlicensed vehicles are restricted to trails specifically designated by Forest Supervisor's Orders The impacts, excepting noise, will be limited to the trails Cross country travel in Management Area 11 is not permitted Sensitive areas and wilderness areas are protected in the Revised Plan

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Letter 4268

Plan - For Management Area 11, EPA recommends that ATV/OHV trails be limited to those areas already fragmented by timber access roads, etc EPA encourages the Forest Service to limit the number of acres available for trail development and to reduce the number of new trails proposed The combined effects of noise and air pollution, soil erosion, loss or degradation of terrestrial habitat are of concern to us

Response

Executive Order 11644 as amended by Executive Order 11989 recognize OHV use as legitimate on federal lands to be controlled and directed so as to protect the natural resources of these lands The Revised Plan allows for the protection of the natural resources by restricting ATV's to the three existing ATV trails and one proposed trail The proposed trail must be evaluated as to impacts on the resources before it is constructed.

ROADLESS AREA MANAGEMENT: *Unique Values Not Found on Private*

Letter 135 — *With a large amount of regional forests in private hands and available for timber harvesting, the wilderness* designation on public lands is increasingly critical

Response — The ID Team concluded that wilderness designation on a large percentage of the Forest was not the optimum *solution to attaining the mixture of uses, values, products and conditions wanted by the public.*

Letter 4040 — I am opposed to the "preferred alt." The preferred alt. does not provide for the highest VALUES re land use. In the East primitive recreational opportunities, protection of biodiversity, watershed protection, and primitive/ semiprimitive recreation are in higher demand Timber from the GW is in such low demand that it can only be sold well below cost of taxpayer expense. Most of the timber from the GW goes to producing pulp and pallets. Why should the taxpayer be subsidizing NF harvests for pulp when the Forest Products Lab of the FS admits that recycling is exceeding projections? The preferred alt. would add 200 miles of road The GW builds roads to higher standards than the private sector would for the same amount of timber This means there are larger cuts and fills and more intrusion in remote areas than necessary. Logging under the preferred alt is still 100% even-aged logging Any form of even-aged logging is undesirable. Logging along rivers and creeks is an outrage The preferred alt. allows pre-salvage sales where there are gypmo outbreaks predicted Because attacks cannot be predicted, a larger area of the Forest is likely to be disturbed through logging. Logging tends to weaken forest ecosystems and make forests more susceptible. The preferred alt would greatly expand ATV use in the NF. When the Forest cannot control ATVs now, how will it control them after they are "sanctioned"?

Response — Alternatives 3, 6, 9, 11 and 13 provide a more positive response to these concerns than the Forest Service preferred alternative One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 2845 — Stay your course with regard to Alternative 8 There are so many areas open to ORV and to logging in the Mid-Atlantic states already, and with steadily encroaching populations, it becomes even more important to maintain some part of our forest heritage in its pristine state

Letter 3493 — Scenic views & wilderness need to be preserved for our children, their children & generations to come

Response — The Forest Service is moving away from the concept that the National Forests need to be managed based primarily on maximizing certain natural resource products. This concept is being replaced with the realization that National Forests must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people.

Letter 3665 — [We request] an increase in Roadless Areas which would lead to increase of Wilderness Areas

Response — The procedure for identifying the 27 roadless areas is described in the process paper *Incorporation of the NFMA Requirements for Wilderness" and into the Revision of the Revision of the Land and Resource Management Plan for the George Washington National Forest*

ROADLESS AREA MANAGEMENT: Wilderness Designation

Letter 2 — Big Schloss roadless area should be designated as Wilderness

Response — Alternatives 3, 6, 9, 11 and 13 contain the assumption that the Big Schloss Roadless Area would be recommended for wilderness study Accordingly, the Big Schloss Roadless Area has been allocated to Management Area 8 in each of these alternatives Any of these alternatives could be selected by the Regional Forester in the record of decision for the FEIS if one of them are identified as the alternative that maximizes net public benefits

The Forest Service preferred alternative does not allocate the Big Schloss Roadless Area to Management Area 8. Instead, the Forest Service preferred alternative allocates the Big Schloss Roadless Area to Management Area

21 One of the objectives of this management area is to retain the remote character of Big Schloss so that it might qualify for future consideration for wilderness study

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Letter 2 — I have become aware that much of the George Washington National Forest is going to be designated as "Wilderness" area I cannot agree with the closing of land

Letter 164 — We do not like to see or hear of any of our nations lands being closed and designated for wilderness

Letter 709 — Shenandoah National Park is certainly a remote unmanaged area of huge proportions Why do we need another?

Letter 1653 — There is no room for additional wilderness designation. Our forests need to be open to multiple use

Letters 1798, 2162, 2908, 3588, 3589
We have too much wilderness already.

Response — The Revised Plan includes the existing 32,000 acres of wilderness in four areas administered by the George Washington National Forest and two small portions of two wildernesses administered by the Jefferson National Forest. The Revised Plan recommends three roadless areas, containing 12,000 acres, for wilderness study This total acreage, 44,000, represents only 4 percent of the George Washington National Forest The land is not closed. Rather it is managed as wilderness, a recognized part of multiple use management.

Letter 3 — Designate a lot more wilderness area than 12,000 acres

Letter 10 — I am in support of the study for possibly increasing the wilderness area

Letter 80 — There is a growing need for more preserved open space as our population grows I hope you'll be sensitive to this and consider enlarging the areas you've considered as Wilderness Areas or add more areas to the plan

Letter 84 — I was very pleased that the three areas in the Blue Ridge are recommended for wilderness study If accepted, this would add approximately 1% to the existing 3% wilderness in the George Washington Looking to the west, there are no recommendations May I ask why not? One of the prime objectives of Alternative 8 is to preserve biological diversity in the George Washington There is no better area in the forest than the Little River Area and the Ramsey's Draft Addition to preserve a large unfragmented area for this purpose These two areas should definitely be included in your final plan

Letter 135 — The forest currently has 26 inventoried areas In alternative 9, all of these areas are recommended for wilderness study I could find no justification in the EIS for not including more

Letter 146 — Wilderness study recommendation is appropriate for Three Ridges, the Priest, and St Marys Addition It may be desirable to add other roadless areas to this list to meet the projected RPA demand increases

Letter 284 — More wilderness areas must be designated to protect our disappearing resources

Letter 869 — Currently only 12,000 acres are being considered for [wilderness] designation when the national average is 17%, this (1% or less) than the available land This is not adequate and should be increased to the recommended 59,000 acres

Letter 892 — Full protection of the Shenandoah Mountain is imperative Also, additional wilderness areas are needed, as only 3% of the GWNF is included in the National Wilderness Preservation System as opposed to an average of 17% nationally Virtually all Wilderness Areas in Virginia are situated on the steepest and most rugged terrain They fall short of representing ecosystem types found throughout the GNWF and are extremely small

Letter 932 — Since Virginia ranks 50th in the U S for parkland acreage, let's see that as many wilderness areas as possible are created in the GWNF

Letter 948 I'm concerned about inadequate wilderness protection

Letter 974 We support preserving much of our national forests for future generations as Wilderness Areas

Letters 137, 1086, 1099, 1160, 2355, 2925, 2675, 3640, 3701, 3707, 3969, 4015
More wilderness areas should be designated

Letter 1089 Develop a plan that places strong emphasis on preserving those deserving wilderness areas

Letter 1157 The protection and preservation of what is left of our rapidly shrinking wilderness should be given the highest priority in the Forest Service's management plan.

Letters 1167, 1439, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1634, 1671, 1730, 1731, 1732, 1943, 1944, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 3087, 3088, 3147, 3148, 3149, 3150, 4093
There should be more areas than three designated for wilderness.

Letter 1168 At least 50% of the quarter million acres of roadless ares in GWNF should be designated as WILDERNESS.

Letter 1290 Set aside as many wilderness areas as possible Examples are Little River and Ramseys Draft Addition

Letter 1296 3 out of 26 roadless areas are given wilderness designation There is very little biological diversity within the 3 selected since the choice was politically not biologically motivated

Letter 1323 I hope you will designate new and enlarged wilderness areas

Letter 1343 Designate "Wilderness" status to as many areas as possible, preserving the land to protect water resources, controlling further denuding of the land for roads and the eventual opening of the land to the cutting of timber, and restricting ATV vehicles that promote eventual destruction of the environment

Letter 1440 Its time we started saving wilderness areas and we can start by eliminating timber cutting This will have a number of beneficial effects, including (1) eliminating the need for costly roads to be built, (2) having trees in place reduces soil erosion and helps to keep streams clear of sediment, (3) having trees in place also gives native animals their natural habitat

Letter 1552 [Flaws to draft plan include] inadequate wilderness recommendations

Letter 1615 The plan only recommends three new wilderness areas. While these are welcome, they are inadequate

Letter 1809 I approve of wilderness designation

Letter 1980 I am opposed to wilderness designation Since St Marys area has been designated wilderness, it has absorbed more usage now than before it was declared wilderness. Wilderness designation (WD) is too restrictive, reduces handicap access, prevents the harvest of mature timber, dead/down wood and reduces mgt options especially for controlling gypsy moths.

Letter 2022 Areas recommended for wilderness designation are too limited.

Letter 2049 Allow as much wilderness as possible Once gone, it is almost impossible to regain

Letter 2273 It appears that the inclusion of the St Mary's Addition into Management Area 8 is based on no valid reasons whatsoever, except perhaps as a response to perceived public demand for land so designated

Letter 2513 I firmly believe that a larger percentage of the forest should be set aside as wilderness area, especially since the forest serves such a large population

Letter 2665 Wilderness study areas are chosen for purely political reasons and not biological (note unanimous Board of Supervisors' approval and these areas in Nelson County) A diversity of areas, a diversity of habitats, representing the entire forest and all ecosystems present is more appropriate All roadless areas should be afforded wilderness study.

Letter 2768	I am opposed to wilderness designation when looking at the Saint Mary's area. It has absorbed more usage now than before it was declared wilderness W.D. is too restrictive, reduces handicapped access, prevents the harvest of mature timber, dead/down wood and reduces management options especially for controlling gypsy moths. I would like to recommend that the "Priest" and "Three Ridges" continue to be managed at current status By leaving it off the W D list, at least the N.F. has access into the area and options available in the event of fire, plane crashes, gypsy moth control, etc
Letter 2929	The Draft EIS (Appendix C, C-163) fails to record that Belle Cove Branch in the Three Sisters Roadless area is an excellent, although small, native trout fishery. The area is one to which some of the heavy use of the Saint Marys River corridor could be diverted. The Draft Forest Plan fails to recognize the significant wilderness and recreational value of the Belle Cove drainage. The new Forest Plan should classify the entire Belle Cove watershed as a Wilderness Study Area
Letter 3529	Inadequate wilderness recommendations - less than 5% of forest would be permanently protected as wilderness. This is inadequate for recreation needs and biological diversity.
Letter 3556	There is little to justify further classification of productive forestlands in this most severely restrictive, no management category [wilderness]
Letter 3568	We most definitely need more and larger Wilderness in the GW At least twenty-five to thirty-five percent of the GW should be in roadless-wilderness areas This would enhance biodiversity and enhance the almost extinct natural predators needed for natural control and health of the GW
Letter 3662	The Forest Service recommendations would leave less than 5% of the forest as permanently protected wilderness. This is totally inadequate to provide for recreation needs and biological diversity for a popular and scenic forest within close reach of millions of people
Letter 3680	Designate more wilderness areas The future of our Forests depends on setting aside large blocks of old growth forests now so they can be preserved for future generations
Letter 3701	Support legislation that works, moderately, to preserve our wilderness. We must find compromises, not radical solutions.
Letter 3821	The opportunity for quality outdoor experience that roadless areas provide for the hunter, fisherman, camper, hiker, and scientist is so outstanding that areas such as the Little River, Ramseys Draft Add, Skidmore Fork, Southern Mass, Laurel Fork and the others must be saved for our future. I am disturbed that only 3 of 26 parcels have been recommended for wilderness designation.
Letter 3863	Do not accept the draft plan as submitted, revise it to add more acreage of the forest as permanently protected wilderness
Letter 3909	Although Alternative #8 proposed 91% of the forest be remanded to roadless areas, unavailable for development, it provides no safeguards against future pressures for development on these areas. Many of these areas should be put into wilderness status.
Letter 3929	The total number of roadless acres that are recommended for wilderness designation seems embarrassingly small. There being no wilderness areas designated yet, a much more ambitious plan for wilderness area designations should be adopted now it should not be postponed until the next planning cycle At a minimum, other significant areas should be reserved for protection until official determinations are made at a future time
Letter 3981	Recommend to Congress that large core roadless areas and corridors be designated as Wilderness or Wilderness Study Areas Manage most other lands as Wilderness Recovery Areas.
Letter 4262	Increase the amount of acreage designated as wilderness
Response	Appendix C of the FEIS contains an evaluation report on each of the 27 roadless areas A number of these areas contain biological and physical characteristics that would render them valuable additions to the National Wilderness Preservation System It is on the basis of these values that areas are recommended by the Regional Forester for designation as wilderness study areas

The Regional Forester will select the alternative that maximizes net public benefits The recommendation of areas for wilderness study area designation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States.

Letter 4 — I would like to express my full support for the proposal put forward by the Virginia Wilderness Committee for new or expanded Wilderness Areas for seven in the George Washington National Forest. This should be a prelude to larger wilderness preservations, including corridors of wilderness between preserved areas, and the natural reclamation of certain degraded areas.

Letter 51 — The list of roadless areas recommended for wilderness study is disproportionately small. I am distressed by the omission of four areas which were given high priority, Little River, Skidmore Fork, Ramsey's Draft Addition and Mount Pleasant The boundaries for these areas were drawn carefully, taking every consideration for possible difficulties, such as the elimination of the much-used access road on Little Bald Mountain. Little River is a very popular hunting area. Skidmore Fork includes much of the drainage for the Harrisonburg water supply, and a tremendous stand of Virgin Hemlock unique to the state. Ramsey's Draft current Wilderness Area is such a popular recreation place that it badly needs the proposed addition, and Mount Pleasant is an area of quite outstanding natural beauty

Letter 61 — Please strongly support and work to implement the designation of 26 areas, totaling 250,000 acres, for inclusion in the National Wilderness Preserves System.

Letter 81 — We believe that the plan is excellent in every respect except for wilderness areas, and we believe that the eight areas submitted to you by the Virginia Wilderness Committee deserve to be designated wilderness study areas. In particular we would urge you to include the following three areas as an absolute minimum -- Little River, Skidmore Fork, Ramsey's Draft Addition.

Letters 279, 986, 1370, 1847, 1971, 2048, 2227, 2337, 2515, 2602, 2606, 2809, 2902, 2942, 3438, 3439, 3440, 4050
I believe the plan should designate the 26 roadless areas as wilderness study areas.

Letter 371 — The preferred alternative is seriously deficient in the designation of new units for the National Wilderness Preservation System. The proposed new units are by no means the most significant candidates. The Little River unit is the top candidate for designation. Taken together with the Ramsey's Draft Addition and Skidmore, the entire complex would offer the most rewarding wilderness experience to be found anywhere in the East. I urge the adoption of at least three additional units. Little River, Ramsey's Draft Addition, and Skidmore.

Letter 491 — Increase areas designated as Wilderness, particularly Big Schloss, Kelly Mtn/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramseys Draft Addition, Skidmore Fork, Southern Massanutten, St. Marys Addition, The Priest, Three Ridges

Letters 492, 496, 748, 1320, 1346, 1378, 1551, 1656, 1822
I believe 11, not just 3, areas should be recommended for wilderness designation.

Letter 498 — The Little River area, Ramsey's Draft Addition and Laurel Fork areas MUST be preserved

Letter 503 — Recommend for wilderness designation Big Schloss, Kelly Mountain/Big Levels, Laurel Fork, Little River, Mt. Pleasant, Ramseys Draft Addition, The Priest, and Three Ridges

Letters 504, 1069, 2276, 3962, 4253
I support the wilderness designation of St. Mary's Addition, the Priest and Three Ridges, and ask that other areas be considered for wilderness designation also, especially Skidmore Fork, Mt. Pleasant, Laurel Fork, Ramseys Draft Addition, Little River, Big Schloss, Kelly Mountain/Big Levels, and Southern Massanutten.

Letter 735 — The constitution of the AT Conference and the ATC policy on Wilderness clearly support Wilderness designation in the areas encompassing or proximate to the AT

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 4068, 4073, 4074, 4075

Wilderness study areas should include the 8 wilderness proposals recommended by VA Wilderness Committee

Letters 760, 1281, 3647

Several areas should be recommended for wilderness designation, including· The Little River area, Ramseys Draft Addition, Mt Pleasant area, Skidmore Fork area and Laurel Fork area

Letters 762, 763, 891, 970, 1059, 1078, 1158, 1354, 1611, 1652, 1823, 2010, 2498, 2613, 3892, 3911, 3931, 3965

Eleven areas should be included for wilderness designation I believe that those 11 areas should include Big Schloss, Kelly Mountain/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramseys Draft Addition, Skidmore Fork, Southern Massanutten, St Marys Addition, The Priest, and Three Ridges

Letters 766, 767, 972, 1149, 1443, 3980, 4255

ALL of the following special areas should be studied for wilderness designation (MA8)· Big Schloss, Kelly Mtn/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramsey's Draft Addition, Skidmore Fork, Southern Mass , St Mary's Addition, The Priest, and Three Ridges All other roadless areas should be managed to maintain their roadless condition

Letters 867, 1162, 1365

Eleven areas should be set aside for wilderness designation, and roadless areas should remain as they are

Letter 877

Special areas need strong Wilderness Designation protection Among the 11 are Little River, Ramseys Draft Add., Mt Pleasant, Skidmore Fork, and Laurel Fork

Letters 884, 1139, 1154, 2280, 2512, 2705, 3744, 3756, 3796, 3849

I would like to see other areas studied for wilderness designation other than the three proposed Special areas I would like to see considered are. Laurel Fork (Highland Co.), Little River (Augusta Co), Ramsey Draft (Augusta & Highland Co's), Mt Pleasant (Amherst Co), and Skidmore Fork (Rockingham Co.)

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1454, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2027, 2063, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4172, 4183, 4231

The following areas should be recommended for wilderness study. Little River, Ramseys Draft Addition, Mt. Pleasant, Laurel Fork, Skidmore Fork, Kelley Mountain

Letter 933

Your wilderness recommendations are inadequate. Management Area 8 should be studied for wilderness designation This includes Big Schloss, Kelly Mountain/Big Levels, Laurel Fork, Southern Massanutten, St. Marys Addition, The Priest, and Three Ridges

Letter 934

I support the Sierra Club view for all areas of wilderness

Letter 938

We have enough roads not to disturb the roadless areas Please designate the roadless areas as wilderness study areas

Letter 939

It has been brought to my attention that you are studying 11 areas recommended for wilderness designation I do hope that you follow through and save those areas from construction of roads, timber cutting and other forms of exploitation We need protection particularly for our streams

Letter 944 I request that you designate a Wilderness Study Area in the northern section of the Forest There are over 5 million people (and growing) in the Washington-Baltimore metropolitan area who may desire to reach a true wilderness within a reasonable days drive

Letters 963, 1087, 1156
This letter is to urge you to consider designating as wilderness the following areas in addition to the three already planned. Big Schloss, Kelly Mountain, Laurel Fork, Little River, Mt. Pleasant, Ramsey's Draft Addition, Skidmore Fork, Southern Massanutten, St Mary's Addition, The Priest, and Three Ridges

Letter 976 One issue that brings strong disagreement is the number of areas that are being designated wilderness We feel that the recommended acreage is woefully inadequate The Forest Plan Revision Team should take a long, hard look at other areas that deserve the wilderness designation These areas are· the Little River area, the Ramseys Draft addition, the Mt Pleasant area in Amherst Co , the Skidmore and Laurel Fork areas

Letters 981, 982, 2929, 3733
Additional areas should be studied for wilderness designation. Laurel Fork, Little River, Ramsey's Draft Addition, Mount Pleasant, Skidmore Fork and Kelly/Big Levels

Letter 1070 Areas for protection as wilderness areas· Little River, Augusta County at 28,000 acres, Ramseys Draft Addition in Augusta and Highland Counties Bald Ridges and Ramseys Draft, Mt Pleasant, Amherst County at Three Ridges and The Priest, Skidmore Fork, Rockingham County and Laurel Fork

Letter 1072 Your plan needs much, much more wilderness A bare minimum would be the VA Wilderness Committee proposal.

Letter 1074 Additional areas should be designated as wilderness and all roadless areas should remain so.

Letter 1075 Consider adding WILDERNESS designation for Skidmore Forest (that hemlock old growth area is a rare irreplaceable forest - exciting to walk through) And for Mt. Pleasant, a magnificent area Ramseys Draft needs the addition of the slopes on either side of it Little River or Laurel Fork sound equally deserving So far the Wilderness designation has only been applied to 3% of the GWNF. It does seem fair and important to alott a bit more acreage to Wilderness designation

Letter 1076 Eleven areas should be recommended for wilderness designation and these should remain off limits to all vehicles

Letter 1081 All 8 wilderness areas proposed by citizen's groups should be included in the Plan as wilderness study areas.

Letter 1090 I support the maximum wilderness that may be set aside

Letter 1094 Wild. study areas should include the 8 wild proposals recommended by VA Wild Committee.

Letter 1139 I recommend that in addition to the three areas currently recommended for wilderness designation, the following areas should also be studied. Little River, Ramseys Draft Addition, Mount Pleasant, Skidmore Fork, and Laurel Fork

Letter 1149 Wilderness designation should be allotted to several more areas than currently proposed including Big Schloss, Kelly Mountain/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramsey's Draft Addition, Skidmore Fork, Southern Massanutten, St Mary's Addition, The Priest and Three Ridges. All other roadless areas should be managed to maintain their current roadless condition.

Letters 1152, 1317
The USFS would do well to follow the recommendations of the Virginia Sierra Club which designates eleven areas as needing wilderness designation

Letter 1153 Each of the existing 26 roadless areas should be designated study areas Biological inventories should be taken in these areas & all species populations carefully monitored

Letter 1155 Though we basically agree with the overall intent of Alt 8, not enough areas are recommended for wilderness study The areas we consider the best candidates for wilderness are the following in the order of priority· (1) Little River (2) Ramseys Draft Addition (3) Mt. Pleasant (4) Laurel Fork (5) Skidmore Fork (6) Kelley Mtn We

would like to see these areas receive the permanent protection ONLY wilderness designation affords The FS should make recommendations for wilderness study based on need and physical characteristics and not on political considerations

Letters 1169, 1982

Wilderness study areas should include the 8 wilderness proposals recommended by VA Wilderness Cmte We note that two of the best areas proposed, Little River and Mt. Pleasant, have been put in Mgt Area 13, a category which emphasizes recreational over biological values.

Letter 1249 Our family would like you to include more areas in wilderness study category, including Ramsey's Draft Addition, Skidmore Fork, and Little River

Letter 1250 Not enough areas are recommended for wilderness designation. 6 other sites should be so designated Laurel Fork, Little River, Mt Pleasant, Ramseys Draft Add , Skidmore Fk, and Southern Mass

Letters 1260, 1297, 3883

Please add Big Schloss, Kelly Mtn/Big Levels, Laurel Fk, Little River, Mt. Pleasant, Ramseys Draft Add, Skidmore Fk, and Southern Mass to your list of areas designated as wilderness AND maintain all other areas as roadless!

Letter 1268 Wilderness designations play a crucial part in the maintenance of the scenic beauty and wildlife of the GWNF The Plan currently recommends only 3 areas (St Marys Addition, the Priest, and 3 Ridges) for wilderness designation As someone who has hiked in and around those 3 areas, I agree wholeheartedly with such recommendations Additional designations are necessary, however The following 8 areas should also be studied for designation Little River, Ramseys Draft Addition, Mt Pleasant, Skidmore Fork, Laurel Fork, Big Schloss, Kelly Mtn/Big Levels, and Southern Mass In addition to extraordinary scenery, these areas contain old-growth forests, a wide variety of wildlife (including rare & endangered species) and crucial water supplies for nearby populations.

Letter 1310 I would like to see all 8 wilderness proposals included for wilderness The biological values of Little River and Mt Pleasant are too great for them to be designated as rec areas.

Letters 1329, 1429, 1557, 2061, 2189, 2230

In addition to the plan's proposed wilderness areas, the following areas also should be proposed for wilderness/ wilderness study designation· Big Schloss, Little River (Augusta County), Laurel Fork (Highland County), Mt. Pleasant (Amherst County), Skidmore Fork (Rockingham County), Kelly Mtn/Big Levels, Southern Massanutten, and Ramseys Draft Addition.

Letter 1330 11 areas should be recommended for wilderness designation, including Little River, Mt Pleasant, Laurel Fork, Skidmore Fork, and Ramseys Draft Add

Letters 1350, 2670

I would like to see eleven areas preserved as wilderness All other roadless areas should remain roadless with their biological and rec values protected

Letter 1360 Population growth on the East Coast combined with much more interest in outdoor experiences has put more pressure on the forest as a place people seek "wilderness experience" as well as the traditional hunting, fishing, hiking and other types of outdoor recreation Your plan should recognize the importance of this type of use and the probability that as more Americans live in urban areas, it will increase in the years ahead Unfortunately this type of use comes into conflict with efforts to maximize timber production. The use of some types of offroad motorized vehicles in the forest clearly creates conflicts with those who look to the forest for peace and quiet. For these reasons I favor setting aside additional Wilderness areas Mt Pleasant would be an excellent candidate as would the Belle Cove area in addition to those recommended by the Wilderness Committee.

Letter 1440 To protect wilderness for future generations, we need to designate more areas such as Big Schloss, Laurel Fork, Little River, and Mt Pleasant as Wilderness Areas

Letter 1655 I support Wilderness designation for Laurel Fork, Ramseys Draft addition, and Little River

Letter 1884 The designation of only 2 wilderness study areas (the Priest and 3 Ridges) falls way short of the reality of the need and demand for wilderness areas here in the eastern U S More wilderness areas are needed to lessen impact on the already heavily used designated areas. It is only in such areas where natural processes can

continue under minimal influence of human disturbance. We recommend that GWNF designate the following as WSAs (in addition to the Priest and 3 Ridges). St. Marys Add, Skidmore Fk, Southern Mass, Ramseys Dr Add, Mt. Pleasant, Big Schloss, Kelly Mtn/Big Levels, Little River, and Laurel Fork All other areas currently designated roadless should be kept in that condition.

Letter 1684 Recommend many or all of the 26 roadless areas for wilderness designation.

Letters 1886, 2272, 2453, 2454, 2455, 2534, 2625, 2795, 2796, 2797, 2798, 2799, 2800, 2801, 2802, 2803, 2804, 2805, 3091, 3092, 3248, 3249, 3250, 3251, 3252, 3253, 3254, 3255, 3256, 3257, 3258, 3259, 3260, 3261, 3262, 3263, 3264, 3265, 3266, 3267, 3268, 3269, 3270, 3825, 4152, 4153, 4154, 4155

The following areas should be given wilderness designation. Big Schloss, Kelly Mtn, Laurel Fork, Little River, Mt. Pleasant, Ramseys Draft Addition, Skidmore, Southern Mass, St Marys Addition, the Priest, Crawford Mt, Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mtn, Adams Peak, the Friar, 3 Sisters, Rough Mtn Addition, and 3 Ridges

Letters 1953, 1954, 1955, 1956, 1957, 1958, 1959, 2067, 2068, 2768, 3058, 3146

I am opposed to wilderness designation (WD) when looking at the Saint Marys area It has absorbed more usage now than before it was declared wilderness. WD is too restrictive, reduces handicap access, prevents the harvest of mature timber, dead/down wood and reduces management options especially for controlling gypsy moths

Letter 1987 Protection of roadless areas and wilderness areas: We would like to urge you to make this type of protected land available to more Virginians by designating all of the 27 roadless areas in the GWNF for consideration as wilderness areas by the US Congress Because of Virginia's long history of European settlement, the state is lacking in places which are undisturbed by the hand of modern man The average proportion of wilderness areas throughout the NF system is much higher than in the GW, and given the large number of people who live near or seek recreation in the GW, it seems to us that the expansion of wilderness areas would enhance the value of the GWNF & would not unduly restrict other user activities

Letters 1992, 2035, 2710, 3662, 3691, 3863

Twenty-two areas should be recommended for wilderness designation

Letters 2007, 2237, 2692

Consider the following areas for wilderness designation· Big Schloss, Kelly Mtn, Laurel Fk, Little River, Mt Pleasant, Ramseys Dr Add, Skidmore, Southern Mass, St Marys Add, the Priest, Crawford Mtn, Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mtn, Adams Peak, the Friar, 3 Sisters, Rough Mtn Add, and 3 Ridges The 4 other roadless areas should remain roadless

Letter 2012 Of the 26 roadless areas, I can't believe that only 3 were recommended for wilderness designation Skidmore Fork, Ramseys Draft, Laurel Fork, Big Schloss and Little River should be considered!

Letter 2026 Consider additional areas for wilderness designation Little River and Laurel Fork, Skidmore Fork, Mt Pleasant, Ramseys Draft Addition. These remote areas are not particularly suitable for timber harvesting and deserve protection as wilderness.

Letter 2038 Laurel Fork, Ramsey's Draft Addition and Big Schloss should be nominated for wilderness protection. The Service's ultra-careful proposals in this plan fail to demonstrate a commitment to preservation of these special areas that can not be managed by road building and timbering

Letters 2040, 3635

All eleven (11) areas recommended for wilderness areas by the Sierra Club should be so adopted

Letter 2045 All of the 26 roadless areas should be recommended for wilderness designation. It is time to start really protecting our forests - by preserving the wilderness that is so important to it.

Letters 2048, 2285, 2510

Designate all roadless areas as wilderness areas or wilderness study areas

Letter 2060 All 26 roadless areas should be converted to wilderness study areas in order to protect native biodiversity, evolutionary processes, and provide biological corridors From a human perspective, certain of the areas are of exceptional quality as wilderness experiences and for that reason alone must be protected under federal

wilderness designation These include at a minimum Kelly Mountain/Big Levels, Big Schloss, Laurel Fork, Little River, Mt Pleasant, Ramsey's Draft Addition, Skidmore Fork, The Priest, Three Ridges, St Mary's Addition, and Southern Massanutten

Letter 2215 All 27 roadless areas should be recommended for wilderness. The 3 areas the preferred alternative did recommend are but 1% of the forest, even with all the other wildernesses already designated in the forest, its still only 4%, less than 1/4 of the national average

Letter 2283 We should adopt the Wilderness Society's recommendation of 22 areas for wilderness designation (especially Ramsey's Draft addition and Little River) and manage the four other roadless areas to maintain their roadless condition

Letter 2289 Little River area is the largest roadless area in the whole GW. I support strong protection of this area. With a slight addition of areas of steep terrain the Ramseys Draft Wilderness could protect the whole little valley I support this action The Mt. Pleasant area has trees hundreds of years old I ask protection of these trees The Skidmore Fork area has ten rare, endangered or threatened species I support stronger protection for this area Protect the beauty of the Laurel Fork

Letter 2292 The following areas possess outstanding natural characteristics and merit wilderness protection They are· Laurel Fork, Skidmore Fork, Little River, Ramseys Draft Addition, Kelley Mountain, Three Ridges, The Priest, Mt Pleasant Several others merit further study.

Letter 2308 The Final Plan should additionally recommend for wilderness designation Little River, Ramseys Draft Addition, Mount Pleasant, Laurel Fork, Skidmore Fork, and Kelley Mountain–some 11% of the GWNF. Considering that all major multiple-uses except timber harvesting continue under the Wilderness Act, this is a modest percentage

Letter 2319 Some beautiful areas in my locality need special attention In management area #8, Kelly Mountain/Big Levels, Big Schloss, Little River, Mt Pleasant, Ramsey's Draft Addition, Southern Massanutten, St Mary's Addition, Laurel Fork, The Priest and Three Ridges should be studied for wilderness designation

Letter 2372 We would like very much for the Little River Roadless Area to be placed in wilderness study designation. The Little River area is the largest remaining roadless area on national forest land in Virginia. It has over 250 species of birds, an unusual stand of 300 white birch trees, several unspoiled watersheds, and superior opportunities for solitude and primitive recreation The Roadless Area Review and Evaluation for Little River shows strong evidence that it is a good candidate for wilderness

Letters 2375 2505, 2839, 3809
Eleven areas should be recommended for wilderness designation

Letter 2376 I feel that eleven areas should be recommended for wilderness designation. All roadless areas should remain roadless and be managed to protect biological and recreational values

Letter 2471 I urge you to consider wilderness designation for Little River, Ramsey Draft Addition, and Mt Pleasant

Letter 2515 Designate all 26 roadless areas as wilderness study areas

Letters 2529, 3567
Expand the number of roadless areas to be recommended for wilderness designation. Add the additional areas for study Little River, Ramseys Draft Addition, Mt Pleasant, Laurel Fork, Skidmore Fork, Kelly Mountain

Letter 2593 Three Ridges, Cold Mtn , Spy Rock, Bald Knob, Mt Pleasant and others MUST be preserved in a wilderness state

Letter 2627 [Management according to Alternative 8 would result in further decreases in the biological diversity of the area by] adding only 12,000 acres into wilderness management (which is presently a paltry 3% of the GNWF, while the national average for National Forest Wilderness is 17%)

Letter 2665 Eliminate all salvage sales and wildlife management in existing roadless areas and designate all 26 roadless areas as wilderness study areas

Letter 2666 Please include for wilderness recommendation those areas proposed by Virginia Wilderness Committee I am wondering why Little River and Mt Pleasant were placed in Management Area 13C which emphasizes recreation

Letter 2712 I support the studying of areas for wilderness designation in addition to the three recommended I regard Skidmore Fork a prime candidate At the very least all existing "roadless" areas should be maintained as roadless areas; true roadless areas

Letter 2732 All roadless areas should be maintained as wilderness, WSAs or SMAs At the very least the 8 roadless areas proposed as wilderness by the Va Wilderness Committee should be recommended as wilderness

Letter 2749 The areas recommended for wilderness designation should be expanded to include Big Schloss, Kelly Mtn, Laurel Fk, Little River, Mt Pleasant, Ramseys Draft Add, Skidmore Fk, Southern Mass, Crawford Mtn, Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mtn, Adams Peak, and the Friars (in addition to St. Mary's Addition, the Priest, 3 Ridges)

Letter 2755 Any forest plan emphasizing biological values must include a substantial component of wilderness We would like to see the following areas added to Management Area 8· Little River, Ramsey's Draft Addition, Mt Pleasant, Laurel Fork, Skidmore Fork, and Kelley Mountain We have carefully scouted these areas and find them to be as worthy as Three Ridges and The Priest, two of the areas that were recommended, and more suitable for wilderness in terms of physical characteristics than the St Mary's Addition

Letter 2835 Consider Little River, Mt Pleasant, Laurel Fork, Skidmore Fork, and Kelly Mountain for wilderness areas.

Letter 2836 Consider the following additional areas for Wilderness status· Little River, Ramseys Draft Addition, Mt Pleasant, Laurel Fork, Skidmore Fork, and Kelly Mountain

Letter 2868 Designate the following areas for wilderness study (in addition to the three recommended by the Plan) Big Schloss, Kelly Mtn - Big Levels, Laurel Fork, Little River, Mount Pleasant, Ramsey's Draft Addition, Skidmore Fork and Southern Massanutten Other roadless areas should be managed to maintain their roadless condition Preservation of these areas addresses the biological diversity requirements of the National Forest Management Act. Maintaining the wilderness character of these lands does not foreclose the option to undertake management activities at a later date However, subjecting these areas to roads and timber harvests now does foreclose their potential to be permanently protected as wilderness

Letter 2892 Proposed wilderness is insufficient More areas should be studies including Big Schloss, Little River, Ramseys Draft Addition, Laurel Fork, Skidmore Fork and Mt Pleasant

Letter 2900 As a minimum all eight wilderness proposals in Alternative 8 should be wilderness, the best way to manage national forest land and preserve biological diversity.

Letter 3478 Wilderness study areas should include the 8 wilderness proposals recommmended by Virginia Wilderness Comm. Two of the best areas proposed, Little River and Mt Pleasant, have been put in Management Area 13, a category which emphasizes recreational over biological values

Letter 3525 I support Alternative 8 What little remains in a primitive and undisturbed state should be protected I am especially hopeful that the areas surrounding The Priest and Three Ridges will become wilderness and that all other roadless areas will remain as such

Letter 3527 I favor the following areas as wilderness· Little River, Ramseys Draft Addition, Laurel Fork, Skidmore Fork, Kelley Mountain

Letter 3543 I would like some additional areas designated for wilderness study, in addition to the 3 recommended in the plan These include Laurel Fork, Mt Pleasant and Ramseys Draft I hope that the adopted plan contains all of the roadless areas unavailable for development shown in alternative 8

Letter 3544 I am in favor of studying all 26 roadless areas as possibilities for wilderness areas We need more wilderness to preserve genetic variation both in plants and animals

Letter 3546 I request that all eight wilderness proposals recommended by the Virginia Wilderness Committee are included

Letter 3558 Wilderness study areas should be expanded, and should more closely follow the recommendations of the Virginia Wilderness Committee.

Letter 3563 Additional areas should be considered for inclusion in the Wilderness System in view of the increasing demand for this type of recreation Mount Pleasant is highly worthy of being included .so are others initially suggested by the Forest Service. Other good candidates are Little River and the expansion of existing Ramsey's Draft.

Letter 3600 We cannot allow any of the 26 roadless areas to be disturbed at all!

Letter 3602 I would feel able to make a much stronger endorsement of Alt. 8 if it were to incorporate some of the features of Alt. 13: Additional areas designated (or at least reserved pending further study) as wilderness. I recommend the Ramsey's Draft Add. More attention to controls/guidelines to protect/ensure biological community diversity and continuity, forest restoration, and viewsheds.

Letter 3606 More designated Wilderness Areas: Little River, Ramseys Draft, Mt. Pleasant, Skidmore Fork, Laurel Fork.

Letters 3616, 3655, 3996
All 26 roadless areas should be recommended for wilderness designation. Most important among these areas are Little River, Ramseys Draft Addition, Mt. Pleasant, Skidmore Fork, and Laurel Fork

Letter 3656 The Plan should recommend all 26 roadless areas for wilderness study, esp , Big Schloss, Kelly Mountain/Big Levels, Laurel Fork, Little River, Mt. Pleasant, Ramseys Draft Addition, Skidmore Fork, Southern Massanutten, St. Marys Addition, The Priest, and Three Ridges.

Letter 3661 More wilderness areas Permanent protection for at least the 8 areas proposed by the VA Wilderness Committee.

Letter 3675 In the higher areas, I would rather see more wilderness areas such as St. Mary's & Mt. Pleasant

Letter 3687 Little River because it would protect a complete watershed and is of considerable size I think would be an excellent wilderness candidate.

Letters 3695, 3700
The Priest and Three Ridges deserve wilderness protection as you have planned. However, Southern Massanutten, Skidmore Fork, Ramseys Draft Addition, Mt. Pleasant, Little River, Laurel Fork, Kelly Mtn, Big Schloss also deserve this protection

Letters 3720, 3766, 3782
The following areas should be studied for wilderness designation (Management Area 8) Big Schloss, Kelley Mountain/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramseys Draft Addition, Skidmore Fork, Southern Massanutten, St. Marys Addition, The Priest and Three Ridges All other roadless areas should remain roadless and be managed to maintain their biological values.

Letter 3732 We recommend the following eight roadless areas for wilderness study (in addition to the three proposed in the Plan): Little River, Ramseys Draft Addition, Mt. Pleasant, Laurel Fork, Kelley Moutain, Skidmore, Big Schloss, and Southern Massanutten These eight areas include critical habitat for rare and endangered plants and animals, outstanding scenery, and excellent opportunities for primitive recreation due to their remoteness and ruggedness

Letter 3735 Leaving less than 5% of the forest as permanently protected wilderness is totally inadequate and unacceptable 22 areas should be recommended for wilderness designation.

Letter 3750 The following additional areas should be recommended for wilderness study· Little River, Ramseys Draft Addition, Mt. Pleasant, Laurel Fork, Skidmore Fork, Kelley Mountain, Big Schloss, and Southern Massanutten All other roadless areas should be managed to maintain their roadless condition

Letter 3797 YES to labeling the whole list of recommended areas for Wilderness Designation.

Letters 3846, 3870

The 11 areas chosen by the Sierra Club should be recommended for wilderness designation (including Little River, Ramseys Draft Add, Mt. Pleasant, Skidmore Fk, and Laurel Fk).

Letter 3847 - Increase the natural wilderness areas and emphasize primitive, non-motorized recreational use of the Forest.

Letter 3861 You do not have enough wilderness areas designated. There should be at least 7-8

Letter 3899 Twenty-two areas of the forest should be designated as wilderness areas. These include Big Schloss, Kelly Mtn., Laurel Fork, Little River, Mt. Pleasant, Ramseys Draft Addition, Skidmore, The Priest, Crawford Mtn., Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mtn., Adams Pk., The Friars, Three Sisters, Rough Mtn. Addition, and Three Ridges.

Letter 3938 Wilderness· I would like to see 6 other areas, which are equally unique and as much or more deserving of wilderness designation, added to Management Area 8. They are Little River, Ramseys Draft Addition, Mt. Pleasant, Skidmore Fork, Laurel Fork, and Kelley Mountain.

Letter 3945 Wilderness study areas could be enlarged to include Beard's Mtn. and Mill Mtn.

Letter 3984 Designate more wilderness areas to distribute the use All 26 roadless areas within the forest should become wilderness study areas.

Letters 3985, 3986

All GNWF land on Crawford Mountain including the 9,906 roadless area studied in the "Evaluation Report" on roadless areas and other contiguous GNWF lands around Crawford Mountain should be recommended for Wilderness designation and placed in Management Area 8

Letters 3985, 3986

All 26 roadless areas and adjacent GWNF lands should be studied for wilderness designation and managed to retain their roadless condition

Letters 3985, 3986

The flanks of Crawford Mountain, which were excluded from the remote highlands management area should be moved to remote highlands or recommended for wilderness designation and managed as wilderness with some personal firewood gathering

Letter 3999 The importance of having true wilderness accessible to one of the most densely populated regions in the country is critical, and much more wilderness should be designated I specifically support recommendations to include the following specific areas Big Schloss, Kelly Mtn, Laurel Fk, Little River, Mt Pleasant, Ramseys Draft Add, Skidmore, Southern Mass, St Marys Add, the Priest, Crawford Mtn, Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mtn, Adams Peak, the Friars, 3 Sisters, Rough Mtn Add, and 3 Ridges.

Letter 4053 Please study for possible wilderness designation the Big Schloss, Kelley Mountain/Big Levels, Laurel Fork, Little River, Mt Pleasant, Ramseys Draft Addition, Skidmore Fork, and South Massanutten areas

Letter 4241 We recommend that 22 of the 26 areas, encompassing approximately 217,000 acres, be recommended for wilderness study in the final plan.

Dry River Ranger District We recommend all five areas studied be proposed for wilderness The Forest Service has a rare opportunity with these areas to create a really expansive Eastern wilderness with this rare cluster of roadless areas in close proximity to one another.

James River Ranger District We strongly recommend the Mill Mountain area be proposed for wilderness This 11,770 acre area is generally steep and mountainous, and is not nearly as well suited to timber management as it is important to be protected for its natural values.

Warm Springs Ranger District We support both the small Rough Mountain Addition and the Laurel Fork area to be proposed as wilderness

Deerfield Ranger District In addition to the Ramsey's Draft Addition we recommend the other three areas as well The Jerkemtight area, a superb wildland and recreational resource, Elliott Knob and Crawford Mountain rugged, remote high elevation areas that have high recreation and wildlife values, especially for black bear habitat.

Pedlar Ranger District We recommend all eight areas studied be proposed for wilderness Four of these areas are traversed by the Appalachian Trail.

Lee Ranger District The inclusion of Big Schloss and Southern Massanutten in the National Wilderness Preservation System is very high priority given the relatively small amount of designated wilderness in the Baltimore, Washington and Richmond metropolitan areas

Letter 4266

The Draft Plan recommends three Wilderness study areas (Management Area 8) for study I recommend a number of additional areas be studied, and managed to maintain their roadless condition These areas are Big Schloss, Kelley Mountain, Laurel Fork, Little River, Mount Pleasant, Ramsey's Draft Addition, Skidmore Fork, Southern Massanutten, St Marys Addition, The Priest, Crawford Mountain, Elliott Knob, Jerkemtight, Dry River, Gum Run, Oak Knob, Mill Mountain, Adams Peak, The Friars, Three Sisters, Rough Mountain Addition and Three Ridges

Response

Federal legislation is needed to create a wilderness or wilderness study area The Regional Forester can recommend certain roadless areas for wilderness study in the record of decision for the FEIS This is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, Secretary of Agriculture, and the President of the United States.

Alternative 9 allocates all 27 roadless areas to Management Area 8 as recommended for wilderness study.

Alternative 13 has been formulated to explore the addition of 22 roadless areas to Management Area 8 as recommended for wilderness. Adams Peak, Big Schloss, Crawford Mountain, Dry River, Elliott Knob, Gum Run, Jerkemtight, Kelley Mountain, Laurel Fork, Little River, Mill Mountain, Mount Pleasant, Oak Knob, Ramseys Draft addition, Rough Mountain Addition, Skidmore, St. Marys Addition, Southern Massanutten, The Friars, The Priest, Three Ridges and Three Sisters.

Alternative 11 has been formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to include the Big Schloss, Kelley Mountain, Little River, Ramseys Draft Addition, Mount Pleasant, Laurel Fork, Skidmore, and Southern Massanutten Roadless Areas in Management Area 8 as recommended for wilderness study

Alternatives 9, 11, and 13 are three of the twelve alternatives considered in detail in the FEIS The Regional Forester will select one of these alternatives to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 135

6,000 recreation visitor days of use were recorded in the St Mary's Wilderness There is an obvious demand for recreation opportunities involving solitude and serenity As the Washington-Baltimore metropolitan area and other surrounding areas continue to grow, these qualities will not be available in the future without more wilderness

Response

There is and will continue to be a demand for primitive recreation areas involving serenity and solitude This need can be met in many of the roadless areas whether or not they are designated as wilderness Management Areas 4, 9, and 21 will maintain those areas that offer such an experience and opportunity

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Letter 135

6 roadless areas are to be modified under Alternative 8 I could find no justification for this action in the draft EIS

Response

Alternative 8A does not "modify" any of the roadless areas in Appendix C of the FEIS Instead, not every acre within the roadless area inventory is allocated to Management Areas 8, 9, or 21 in Alternative 8A

Letter 60

My first concern deals with the area falling under MA#9 that takes in Maple Spring, Gum Run, Dundore Mtn , Dry Run, Oak Knob, Union Springs, Meadow Knob and Hone Quarry Number one, calling this area remote highlands is as far from reality as would calling US 33 a goat path I see more use of this area, motorized by

OHV, RV's, hunters, fishermen and just people taking Sunday drives, as well as college students partying, and *non-motorized by a lot of campers, mountain bikers and on rare occasion hikers, than any other area I have* been to yet thus far on the forest, except for the developed sites Remote just does not fit the description of this *area*

Letter 60 — This area is favorite to hunters and OHV users alike, with most of the hunters using the same roads for their sport as OHV. In as far as illegal ATV use in this area, I have seen little, but not enough to class it as a major problem. Yet, regardless what this area is managed as, it will see this much or more of this activity, again due to its location and the type of terrain in this area.

Letter 60 — It is one of the most accessible parts of the DRRD. I still feel that most of the Gum Run roadless area is far from roadless, much less remote. The designation in Alt. 12 as well as its boundaries is closer to the fact.

Letter 94 — The first problem has to do with Management Area 9 on the Dry River District. This area included Meadow Knob, Dry Run Road (FR304), Union Springs (FR225), Stone Camp Quarry (FR225B and Baltimore 4-Wheelers Adopt-a-Road) parts of Dunkle Hollow Road (FR227) and Hone Quarry They are all accessable by 4-wheel drive *vehicles How can the aforementioned areas by considered "Remote Highlands" when your own conditions do* not really apply to what exists?

Response — This is the area of the Gum Run and Oak Knob Roadless Areas as discussed in the FEIS Roads mentioned in some of the comments form the boundaries of the areas and, for the most part, do not intrude into the areas Where system roads intrude into the area, they will be closed to public access. The Forest recognizes that these areas, though essentially roadless on the interior, do not provide much opportunity for solitude and serenity due to the surrounding roads and other outside influences

Under Alternatives 2, 4, 5, 7, 10 and 12, all or most of these areas are allocated to management areas that make them available for development and no longer held in a roadless area category To varying degrees, existing *and newly constructed roads could be open for OHV use to the extent that concurrent management for other* resources allow One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan *if it maximizes net public benefits*

Letter 94 — The second problem has to do with "Roadless" designation. The "Gum Run Roadless" area is not roadless I would not want to see it wrongly classified This precedent then could be used to close other areas of the forest to the 4-wheel drive enthusiast

Response — All Forest Development Roads, opened year round or seasonally, will be available for use by 4-wheel drive enthusiasts under all alternatives

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Letter 296 — *Based on its attributes and the broad variety of threatened species it contains, Laurel Fork presents a reasonably* persuasive case for inclusion for federal wilderness designation Opposition to wilderness status has been *based on the use opportunities foreclosed if such status is granted and not on Laurel Fork's ability to meet the* established criteria

Letter 3687 — Also, Laurel Fork because of its remoteness and unique terrain should be considered for wilderness

Letter 3812 — Laurel Fork in Highland County is biologically distinct from most of the GWNF and its spruce communities must be protected I believe Wilderness designation is the best way to produce the hands-off mgmt needed for this area Deer and beaver have certainly checked the recovery process, but human plantings of red pine, red spruce, and non-native Norway spruce have also done much damage.

Response — The Laurel Fork Roadless Area contains biological and mineral values, which outweigh its value as wilderness. *This area is being managed in a manner that is sensitive to roadless area values but also recognizes the need* to not foreclose options for the management of biological and mineral values and other compatible resource opportunities.

Letter 935 — In particular, the Board wishes you to know of its continued opposition to the establishment of wilderness areas within Rockingham The Board adopted a resolution in May of last year setting out the County's position on the wilderness issue.

Response	The Forest Service has recommended no land in Rockingham County for wilderness study
Letter 1456	I oppose designated wilderness because of being too restricted This also reduces handicapped access, reduces mgt. options, does not necessarily contribute to "wildness". Sometimes even causes more harm to the forest with increased usage. Wouldn't mind so much if the designated wilderness areas were more scattered, but Forestry Division is concentrating on our specific area We live in the "Hub of Augusta County" and we're building fast. There's a lot of concern in our area about the closing of this much area
Response	The three roadless areas recommended for wilderness study possess no open roads and have little likelihood of being roaded even if they were not designated as wilderness.
Letter 2014	Designating the Three Ridges area as a Wilderness management area is appropriate. There is a need for backcountry recreation that is expected to increase substantially according to the U S Forest Service 1989 RPA study. The Three Ridges area is rugged and remote Your forest surveys and projections indicate there is little economically recoverable timber that can be harvested from this area It is best left as is, with the best possible use being backcountry recreation.
Letter 2939	I support designating the Three Ridges area as Wilderness.
Letter 4258	The Three Ridges Area should be declared a wilderness area Commercial development in this area would be a tragedy
Response	The Three Ridges Roadless Area will be recommended for wilderness study if the Regional Forester selects Alternatives 3, 6, 8A, 9, 11 or 13 as the Revised Plan
Letter 2060	Appendix C (roadless areas), the claim is made that all wilderness areas in the Blue Ridge are the same, and that the 26 roadless areas also are the same as each other and as existing wilderness areas. The draft concludes that on this basis they do not deserve wilderness status I challenge such a claim when the pertinent existing wilderness areas are pitifully small. The sum total of existing wilderness in the Jefferson NF, the GW, and the Monongahela NF, is only about 250,000 acres Just because these units are small, they must be better protected, buffered and linked together with still additional yet undesignated areas To not do so would be to threaten their long term survival as wilderness and thus to violate the implied mandate of earlier commitments of Congress and the American people to protect them as wilderness under the Wilderness Act
Response	One of the concerns expressed during the second roadless area evaluation (RARE II) was that representative landforms and ecosystems were included in the National Wilderness Preservation System. The Forest Service directions for conducting roadless area evaluations require this point to be considered as part of any roadless area evaluation. Although there are existing wildernesses in the Appalachian Oak Forest ecosystem and the Ridge and Valley Physiographic Province, this fact was not used to disqualify any roadless areas from consideration nor did it influence the Forest Service recommendation
Letter 2060	I challenge the Forest Service's conclusion that these wildernesses and the 20 roadless areas are all the same What is your evidence? The conclusion that they are the same based on physiographic province or landform classification would be akin to concluding that cows and humans are the same because they are mammals I challenge the Forest Service to demonstrate genetic homogeneity in all these tracts
Response	The ID Team does not maintain that all roadless areas are the same or have equal value as additions to the National Wilderness Preservation System because they lie in the same ecosystem or landform
Letter 2204	Wilderness acreage will increase when existing areas have proven their worthlessness
Response	The ID Team is uncertain of the meaning of this comment.

Letter 2364 — *I agree with the Wilderness Society call for more Wilderness designations needing to be established. The 5% figure of permanently protected Wilderness area seems totally inadequate for our "NF". St. Mary's Wilderness for example is always crowded and when I think about it, it would be so easy to expand this area by added thousand acres from Big Levels.*

Response — *Big Levels contains examples of exemplary biological communities which merit special protection.* Both the Forest Service and the Virginia Division of Natural Heritage Program believe that wilderness designation may preclude, or at least complicate, the management practices needed to restore or maintain these special biological communities.

The three areas recommended for wilderness designation on the Pedlar Ranger District (The Priest, Three Ridges and St. Marys Addition) are better candidates for addition to the National Wilderness Preservation System.

Letter 2825 — I am interested in the Priest being managed as a wilderness area.

Response — The Priest Roadless Area will be recommended for wilderness study if the Regional Forester selects Alternatives 3, 8A, 9, 11 or 13 *as the Revised Plan.*

Letter 3728 — Management Area 8. It is our recommendation regarding wilderness study areas ("3 roadless areas") to either designate these areas as wilderness or resume normal mgmt activities by assigning these areas to some other MA designation

Response — Under the Eastern Wilderness Act of 1975, the Forest Service is limited to recommending areas for "wilderness study". It requires an act of Congress to establish wilderness

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Letters 3696, 3867, 3896

I support the USFS's plan to manage the Three Ridges/Priest area as a wilderness.

Response — The Priest and Three Ridges Roadless Areas will be recommended for wilderness study if the Regional Forester selects Alternatives 3, 8A, 9, 11 or 13 as the Revised Plan.

Letter 3711 — Bath County does not support additional wilderness.

Response — The Forest Service has recommended no land in Bath County for wilderness study.

Letter 4001 — Wilderness should be increased by designating existing roadless areas as wilderness and by creating buffer zones around, and corridors between, wilderness areas to the extent possible.

Response — *Alternative 3 has been formulated to explore the management of the Forest as a wilderness-corridor system.* Alternative 9 allocates all roadless areas to a management area that recommends wilderness study and provides migration corridors Both of these alternatives are considered in detail in the FEIS, and either could be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 2372 — A common objection to wilderness designation is that organizations that maintain the trails within an area will not be able to use chainsaws and power tools. As trail maintenance volunteers, we are perfectly willing to use *hand tools in keeping with wilderness regulations.*

Response — While the Forest Service appreciates your organization's willingness to maintain trails within wilderness without power tools, this concern was not a factor in deciding which roadless areas would be recommended for wilderness study

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Letter 5 — The east needs some big wilderness for biodiversity and for the evolutionary process to function. Commodity extraction should not be the highest priority in the George Washington National Forest.

Response — Commodity extraction, primarily timber harvesting, is but one of the many uses outlined in the Multiple Use - Sustained Yield Act It should be noted that such commodity extraction will impact only a very small portion of the Forest and will provide openings and food to ensure biodiversity

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Letter 19 — I am very concerned the momentum toward protecting forest lands from logging through Wilderness designation not be lost

Response — Wilderness is a unique and vital resource In addition to offering primitive recreation opportunities, it is valuable for its scientific and educational uses, as a benchmark for ecological studies, and for the preservation of historical and natural features While wilderness designation does preclude logging, that is not the purpose of such designation

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Letter 73 — We have oversupplied wilderness and semi-wilderness areas in relation to the amount of users for such activities

Letter 83 — I feel that there is no need for any more wilderness areas in the forest I hope that you also see this my way and the way of many of the people I associate with in the 4x4 community

Letters 1888, 1889, 1906, 1963, 1964, 1965, 1966, 1967, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 3114, 3115, 3116, 3117, 3118, 3119, 3151, 3152, 3153, 3154, 3155, 3156, 3157, 3158, 3159, 3160, 3161, 3162, 3163, 3164, 3165, 3166, 3167, 3168, 3169, 3170, 3171, 3172, 3173, 3174, 3175, 3176, 3177, 3178, 3179, 3180, 3181, 3182, 3183, 3184, 3185, 4076, 4077, 4078, 4079, 4080, 4081, 4082
We cannot support the proposed Three Ridges, Priest and Mt Pleasant Wilderness areas Because these areas are already "wilderness" type places we feel the management option should stay as it is so as to provide the professional NFS staff to be able to manage these areas for maximum protection and productivity We want the options for these areas to be available to cope with things like the gypsy moth, possible salvaging of dead trees from the gypsy moth areas, access for the elderly and handicapped and wildlife management

Letter 2891 — There is an adequate amount of existing wilderness areas and acreage, and (I) do not support any additional areas or even wilderness study

Letter 3822 — I believe there is more than enough wilderness presently on the National Forest and more is not needed A wilderness resource base is amply provided by the Shenandoah National Park for all of the interested parties

Letters 3660, 3831, 4013
Your final Land Management Plan must include no additional wilderness

Letter 3592 — We oppose ANY further Federal Designated Wilderness Areas We are not opposed to some wilderness type mgt.

Response — Alternatives 2, 4, 5, 7, and 12 recommend no additional lands for wilderness study. They allocate existing roadless areas, as studied in the planning process and discussed in the FEIS, to management areas that would allow development of motorized access. If one of these is identified as the alternative that maximizes net public benefits, it will be selected by the Regional Forester to serve as the Revised Plan

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Letter 35 — Release all proposed wilderness areas for full multiple use management.

Letter 1057 — Alt. 8 sets aside another 251,978 ac for wilderness Call it remote highlands or whatever you wish, but we presently have wilderness areas that aren't needed or desired by most American citizens

Letter 2039 — The current level of Wilderness Areas should be maintained and remain roadless

Letter 2586 — Since Congressman Olin refused to introduce wilderness legislation we believe that you should reopen these areas to multiple use once again

Letters 3573, 3574, 3575

Alternative 8 sets aside another 251,978 acres for wilderness. We presently have wilderness areas that aren't needed or desired by most American citizens

Letter 3660 — Need release language for all roadless areas.

Letter 3951 — All other [wilderness] study areas need to be clearly released in the Final Plan for Multiple Use Management.

Letter 4256 — We feel since Congressman Olin refused to introduce the Wilderness legislation, the proposed "Wilderness" areas should be released for full multiple use management.

Response — The 27 roadless areas evaluated in Appendix C meet the Forest Service definition of roadless areas in Chapter 7 of the *Land and Resource Management Planning Handbook* (FSH 1909 12)

The Forest Service is finding that people want and need a wider array of uses, values, products and conditions from the Forest than in the past. These additional wants include environmental conditions associated with remote recreation and habitat for area-sensitive species Providing these conditions is consistent with the definition of "multiple use" in Section 4 of the Multiple Use - Sustained Yield Act The concept of multiple use recognizes that not every multiple use can be accommodated on the same tract of national forest land

As displayed in Table 3-17 of the FEIS, the 27 roadless areas are allocated to a number of management areas. 89% of the acreage in these roadless areas is allocated to management areas that exclude road construction and other management practices that would preclude their ability to meet the definition of roadless areas The exclusion of these management practices does not mean that the roadless areas are "de facto" wilderness. A number of "light-on-the-land" management practices (such as prescribed fire) are permitted on all roadless areas Salvaging of dead or dying timber and reconstruction (including relocation) of system roads are allowed in the periphery of most roadless areas Maintenance of existing wildlife improvements is permitted in most roadless areas Construction of new wildlife improvements is permitted on the periphery and along internal system roads in a number of roadless areas.

Although the Revised Plan can allocate roadless areas to a variety of management areas with different goals and objectives, it cannot "release them to multiple use management" "Release" language has traditionally been included in wilderness legislation The Forest does not believe that it would be appropriate or legal for the Revised Plan to attempt to accomplish this.

Letter 146 — In Alternative 12, the wilderness acreage does not increase at all The RPA projected increase in wilderness use suggests that additional wilderness should be recommended.

Letter 1453 — Alt 12 should also have some wilderness study areas.

Letter 3951 — Wilderness Study Areas - Add to Alternative 12 those three Study Areas that is included in Alternative 8

Response — Alternative 12 is one of the fourteen alternatives considered in detail in the FEIS The decision to not recommend any roadless areas for wilderness study is part of the overall theme of Alternative 12 (as well as Alternatives 2, 4, 5 and 7). In the record of decision, the Regional Forester will select the alternative that he has identified as maximizing net public benefits If Alternative 2, 4, 5, 7 or 12 were selected, then no roadless areas would be recommended for wilderness study

The technical analysis behind the 1990 RPA assessment is purposefully quite vague in its discussion of wilderness supply and demand due primarily to the lack of accurate information on wilderness use It acknowledges the tremendous increase in demand as represented by recreational use following World War II through the early 1980's and the levelling off of this use in recent years We are aware of the projections for future demand for wilderness Acreage recommended for wilderness study varies by alternative from none in several alternatives to a maximum in Alternative 3

Letter 171 — What is the difference between managing for "scenic" quality/r-word/attributes and managing "Wilderness"? Is there an ideological separation of these two? What about SBA and WA/WsA?

Response — We are not sure what "scenic quality/r-word/attributes" means Presumably "r-word" is Retention, one of the Visual Quality Objectives (VQO) of the Forest Service Visual Management System. Wilderness receives a Preservation VQO allowing only ecological changes with management activities prohibited. The Retention VQO allows for management activities that are not visually evident. Preservation is appropriate in wilderness and wilderness study areas Retention is appropriate in other parts of the Forest depending on the concerns for scenic qualities.

Letter 173 — Wilderness designation is imperative for protection of our national heritage.

Response — The Forest agrees that wilderness plays an important role in the protection of our national heritage

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Letter 369 — Wilderness/Remote Areas: To allocate 27% of the Forest for preservation as proposed by Alt 8 is unwarranted; it cannot and has not been justified by a comprehensive cost, benefit, and demand analysis The more than 80,000 acres designated for such use in Alt. 12 far exceeds demand

Response — Wilderness and lands recommended for wilderness study with a preservation visual quality objective make up about 4% of the total forest acreage Other lands discussed in this comment, Remote Highlands, are in Management Area 9. These lands classified as Remote Highlands are not intended to be wilderness and are not classified for preservation Though the areas are managed to provide older vegetation in remote and isolated areas, existing roads and trails remain in the area for access Light on the land management activities can and will occur.

Letter 371 — We are told that there should be no further designations of wilderness since they invite over-use. The reason that they are over-used is that there are not enough of them now. With an adequate supply, over-use would not be a problem

Response — Over-use of existing wilderness, primarily St Mary's, appears to be more of a location and access situation than amount. It's easy to get there and is readily accessible This is a management problem, not a designation problem.

Letter 735 — Pending Wilderness designation, we hope that the Mt Pleasant Area will be assigned to Mgt. Area 8, MA9 being our second choice

Response — The Forest Service preferred alternative establishes the Mt. Pleasant area in Management Area 21 as a Special Management Area. It is established to offer a variety of recreational experiences that are in harmony with protecting unique biological and primitive recreation opportunities

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Letter 2348 — I am against any more wilderness areas and areas classified as Remote Highlands. We have enough areas set aside now to meet the demand.

Response — Alternative 8A is designed to provide for a wider array of uses, values, products and conditions than traditionally recognized as multiple uses In deciding on the appropriate mixture of multiple uses, the ID Team considered values and environmental conditions which cannot be measured in terms of "demand". To conclude that portions of the Forest should not be allocated to Management Areas 4, 5, 6, 7, 8, 9 or 21 simply because they are not needed to meet the demand for "primitive, non-motorized" recreation ignores the fact that these areas are also providing biological values and conditions desired by the public Development of these areas would require extensive roading that cannot be economically justified on a Forest with a below-cost timber harvesting

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Letter 3927 — If the specialized areas such as Wilderness, Research areas, etc. are kept as proposed in Alternate Plan Eight, this will result in too much specialized management in the Pedlar district Regular recreation and timber management will be greatly reduced.

Letter 3927 — The Forest Service should continue to manage Big Levels, Three Ridges, The Priest and Mt Pleasant as currently utilized Under the current management, maximum use of the forests are obtained

Response — The Pedlar Ranger District contains areas of unique biological and recreational values. The Forest Service preferred alternative recognizes that there are trade-offs involved in managing these areas to retain these values.

Letter 968 — My priorities are preservation of wilderness areas and access to the public for hiking and wilderness camping. I do not believe in putting in lots of roads and opening up areas for timbering.

Response — Existing wilderness areas are preserved in all alternatives. Additional recommendations for designation of wilderness study areas vary by alternative Trail construction and reconstruction projects are contained in Appendix B of the Revised Plan This project listing does not vary by alternative Trails to be constructed each year will be determined on an annual basis once funding is received and priorities are determined The Regional Forester will select the alternative that maximizes net public benefits, taking into account the need for hiking access and wilderness camping as well as the need for roads and timber harvesting.

Letter 4016 — Saving unique areas as nature preserves has its place but holding large tracts of land as "non-utilization" preserves serves no critical environmental function.

Response — The Forest has reduced the amount of land suitable for timber production from the 1986 Plan, but has not appreciably reduced the amount of lands on which a variety of management practices can occur. Even on most of the lands unsuitable for timber production, other management activities may take place. The expanded wildlife management program provides habitat manipulation in areas where timber quality is poor, where there are weak markets for such products, and/or in remote areas where associated roading costs are extremely high. These conditions exist in many portions of the forest, and designating such areas as unsuitable for timber production helps avoid below cost timber sales. Overall habitat management increases, compared to Alternative 2 (Interim Management), and estimates made for game species' populations do not show declines.

Most roadless areas retain their roadless status, and are contained primarily within Management Areas 4, 9 and 21. Management for wildlife is not excluded Other management areas such as 14, 15, 16, and 22 are managed primarily for wildlife The values that these areas provide are detailed in Chapter 3 of the Revised Plan

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Letter 2283 — Our national forests need to be protected so that there may be a green corridor for native species to survive

Letter 2283 — The existing Forest Service recommendations for wilderness would leave less than 5% of the GWNF as permanently protected wilderness This is totally inadequate to provide for recreation needs and biological diversity in this critical green corridor

Letter 2536 — My main and very strong objection is the totally inadequate provision for permanently protected wilderness areas. Expanding wilderness areas would also provide unfragmented habitat for non-game wildlife, which is a need virtually ignored in the plan This critical need for habitat and migration corridor protection will not be met on private lands

Response — The Revised Plan identifies three areas for further study for possible recommendations as Wilderness Most roadless areas are contained primarily within Management Areas 4, 9, and 21. Under this allocation their basic roadless characteristics are not compromised

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Letter 4001 — The entire Laurel Fk area should be managed as wilderness We are not conversant with all of the details of Special Biological Area and Research Natural Area mgt; however, the following features should apply· no timber cutting for any reason; no oil, gas, or mineral development; no motorized vehicle (ATV/ORV) use, no reservoir development; no developed rec area not now in place; no road construction, no grazing permitted, hunting and fishing permitted with restrictions to protect ETS & some other species; no trapping; minimal trail maintenance for foot travel only We support the mgt. proposals by Curtis Seitzer (letter, 9 Mar 92) with the exception that bobcat hunting not be permitted and that bear hunting using packs of dogs, radio tracking, or other excessive means not be permitted

Response — In the Revised Plan, the Laurel Fork Roadless Area has been allocated to Management Area 21 as a Special Management Area This roadless area contains biological and mineral values which outweigh its value as wilderness

The Laurel Fork Special Management Area is classified as unsuitable for timber production Some harvesting of fuelwood will be permitted along FDR 106 and FDR 457 There may also be some harvesting associated with the elimination of non-native red pine plantations Salvage of timber killed by gypsy moth or other natural or man-made causes is permitted on portions of Middle Mountain accessible from FDR 457 and along the roadside corridor of FDR 106 This salvage will be conducted in such a manner that the roadless character and primitive appearance of the Laurel Fork Special Management Area are not significantly modified

The Laurel Fork Special Management Area is available for oil and gas minerals with Controlled Use Stipulations, and is available for other leasable minerals on a case-by-case basis and is not available for common variety minerals

Public motorized access is limited to open system roads The intention is to relocate approximately 1 1 miles of FDR 427 along Middle Mountain on the eastern side of the Laurel Fork Special Management Area and to construct an access road and parking lot off State Route 642.

There are no opportunities for grazing in the Laurel Fork Special Management Area and no grazing permits will be issued

Any regulation of hunting, fishing and trapping is a legal responsibility of the Commonwealth of Virginia and is, therefore, outside the scope of the revision of the Forest Plan

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Letter 371

We are told that wilderness will inhibit "management" for endangered species The rare and endangered species of the Southern Appalachians are for the most part inhabitants of undisturbed forests of the mountains Wilderness designation is the best single method of management for these species

Response

Wilderness provides habitat for many sensitive, threatened, and endangered species, but other land management designations provide protection, and in many cases, more latitude in management for these species Management Area 4 is specifically used for the management and protection of such species Forest Service policy provides for the protection of these species, regardless of where they are located on the Forest In addition, the Endangered Species Act provides specific protection to species listed as federally threatened or endangered

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Letter 1059

I spend 1-2 weeks a year hiking and camping in the GWNF and I strongly believe this area should be managed as a wilderness area

Response

The various alternatives in the FEIS present varying amounts of land recommended for wilderness study. The Regional Forester will select the alternative that maximizes net public benefits based on management for all resources including the wilderness resource

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Letter 3801

The Laurel Fork division has thrived under special mgmt If the mgmt. plan is to be changed, we would be irresponsible if we did not consider a wilderness-type of plan (At least, for the Laurel Fork division)

Response

The Laurel Fork Roadless Area is recommended for wilderness study in Alternatives 3, 9, 11, and 13 In the preferred alternative, Laurel Fork remains a Special Management Area

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Letter 2242

Give future consideration to wilderness areas from Rough Mountain to Rich Hole

Response

It is assumed that this comment refers to the Mill Mountain Roadless Area The preferred alternative allocates this area to management areas that protect the roadless characteristics of Mill Mountain such that it may be considered for wilderness or wilderness study area designation in the future

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Letter 2273

It appears that the inclusion of the area (The St Marys) into Management Area 8 is based on no valid reasons whatsoever, except perhaps a response to perceived public demand for land so designated.

Letter 2273 The St. Marys Addition does not really have wilderness qualities It is near civilization, is bounded to the south and practically to the east by roads, has contrived boundary exclusions, and is populated by remains of old mines and mining activity. Boundaries would be hard to define and vehicular access hard to control

Letter 2273 Perhaps the recommendation was made to provide a buffer area for, or to dilute heavy usage of the existing St. Marys Wilderness area Is this justifiable? I suggest that inclusion into management area 4 would be more appropriate.

Response *The Wilderness Act and subsequent legislation designating wildernesses does not provide for buffers. The area* is viewed as a logical addition to the Saint Mary's Wilderness and has been evaluated as having values that warrant a recommendation for wilderness study area designation.

St Marys Addition Roadless Area has not been nominated for consideration as a special biological area Management Area 4 only contains those unique communities nominated by an appropriate state or federal agency

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Letter 2273 The Priest and Three Ridges are very similar, in fact they are separated only by Route 56 A common feature of both these areas is the presence of the Appalachian Trail, and that factor is the basis of my concern.

Response The Priest and Three Ridges were determined to contain biological and physical characteristics that would render them valuable additions to the National Wilderness Preservation System and are recommended by the *Regional Forester for wilderness study area designation This evaluation is contained in Appendix C of the FEIS.* The Regional Forester's recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, Secretary of Agriculture, and the President of the United States.

Letter 2273 Trail maintenance is best accomplished using mechanized tools such as chainsaws and weedeaters Although the Wilderness Act allows the use of motorboats and aircraft, "where these uses have already become established", it does not appear to make the same provision for the use of mechanized tools

Letter 2273 The DEIS indicates that "the AT and its related structures may represent a desirable existing use "and that *mechanized tools would not be used, "except as expressly allowed by the land managing agency". The* weakness in this proposal is that such hedging leaves too many questions unanswered.

Response The language from the Wilderness Act mentioned in the comment was specifically put in the legislation to allow for continued use by motorboats and aircraft in the Boundary Waters Canoe Area Subsequent legislation designating wildernesses has not made provisions for mechanized tools

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Letter 2273 If these areas (The Priest and Three Ridges) were to truly become wilderness, the two shelters, should be removed Trail maintenance, as we now know it, would cease I do not see either of these scenarios as desirable

Response *Standards allow for existing facilities within wilderness areas to be maintained, but new facilities will not be* constructed. This is applicable to areas recommended for wilderness study area designation. Trail maintenance would be by non-motorized means The AT already passes through several existing wildernesses and would be maintained similarly in the Priest and Three Ridges areas

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Letter 2273 The inclusion of these areas into management area 4 would seem to accomplish the same goals, without permanent and oppressive regulation The conclusions I draw is the same as stated in Appendix A of the DEIS· "The present management of the Appalachian Trail corridor retains wilderness characteristics " "If an area is not recommended for wilderness study, there are several other management options, or management areas where they can be protected or lightly managed so that their wilderness characteristics are preserved".

Response Management Areas 4 and 8 have different goals Wilderness study area designation, a Congressional action, is to allow for a close study of the area, an extention of the evaluation as contained in Appendix C of the plan. *If the area is not recommended for wilderness study, there are indeed several options The Regional Forester* will make a recommendation based on the net public benefits including the benefits of recommending the area for wilderness study area designation or not

Letter 2273 In light of the "serious negative impact" of wilderness designation, why designate? If the Management Plan is truly developed to best utilize and protect the forest resources, then inclusion of these lands into management area 4 would be more effective. It would be naive to state that those are the only dynamics involved. Certainly public opinion, even that of a few small but vocal groups, needs to be considered I would recommend that only the Three Ridges and The Priest sections be recommended, and only with the expressed desire that the existing uses of the Appalachian Trail, Shelters, and mechanized trail maintenance be perpetuated

Response The suggestion that the area may be more suitably assigned to management Area 4 is noted for the FEIS. The "serious negative impact" mentioned in the comment must be balanced with the entire scope of benefits of wilderness study area designation. In fact, this is the purpose of wilderness study area designation, to allow for the study of impacts, positive and negative, with regard to wilderness designation With reference to the Appalachian Trail, the Standards adopted for Management Area 6 recognize wilderness as an integral part of the Appalachian Trail experience As such, use of power equipment in maintenance of the trail would be prohibited This standard has been developed in cooperation with the Appalachian Trail Conference, other National Forests in the Southern Region, and the Southern Region Office.

Letter 2273 According to the DEIS "an estimated 6,000 visitor days of recreation use were recorded in St. Marys Wilderness in 1989 This significant amount of use has led to serious negative impacts on the area's wilderness qualities and resources.

Response The significant impact of use is known in the St Mary's Wilderness. The Ranger District, in cooperation with concerned citizens, has developed a management plan for the Wilderness Part of this is the implementation of closures and other regulations in order to allow the impacted areas to heal. The damage to the resources of the area would very likely have occurred without wilderness designation. The area is heavily used because it is readily accessible, not because it is wilderness. If anything, the wilderness designation has lessened the impacts by limiting motorized and non-motorized vehicular traffic

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Letter 2319 The McGraw Gap and Fore Mt. East, Warm Springs Mountain South, including the Clifton Forge Reservoir watershed and Bald Knob should be considered for wilderness designation

Response The recommendation for several areas to be included for consideration for wilderness designation is noted In the selected alternative, the Regional Forester will make a recommendation for lands to be designated as wilderness study areas. Congressional action is required for actual designation as either a wilderness or wilderness study area In making this recommendation, these lands should contain certain values that would make them valuable additions to the National Wilderness Preservation System There were 27 roadless areas studied to determine if they had values appropriate for wilderness designation Of the areas mentioned in the comment, only the Bald Knob area was included in one of the 27 areas, Dolly Ann

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Letter 2572 [Alternative 8] would permit activities that will cause 24 of the 26 inventoried roadless areas to be further decreased in size or quality of habitat or altogether removed from future inventories.

Response As displayed in Table 3-17, the preferred alternative 89% of the lands in existing roadless areas are to managements areas that retain the roadless character of these areas.

Letter 2612 We need more wilderness areas set aside for now, and for the future, the protection of existing wilderness areas and designation of new ones is of paramount importance.

Letter 2615 Some areas are so beautiful that they do need some form of protection such as the Wilderness Area System Travel should be kept to the foot in these areas

Response Designation of wilderness and wilderness study areas requires Congressional legislation. The preferred alternative recommends three areas for designation as wilderness study areas With this designation, the areas will be managed as though they are wilderness This recommendation is a preliminary administrative step that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture,

and the President of the United States before being sent to Congress where still additional modifications can occur.

Letter 2633 — *The majority of my constituents do not want new wilderness designations in Amherst, Nelson, or Augusta counties*

Response — *In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years. Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits.*

Letter 2694 — I am opposed to designating any more National Forest land as wilderness Wilderness designation eliminates management of the area by trained personnel, it prohibits handicapped use, and in Virginia and other Eastern states, the tract size of these recommended areas is so small that designation usually has the opposite effect of creating "wildness" because of the traffic it creates resulting from wilderness designation.

Response — Contrary to what the comment indicates, wilderness management requires very special management by trained personnel. Persons with disabilities are not prohibited from entering wilderness, however, they are presented a greater challenge The purpose of wilderness is more than just outdoor recreation. It is a benchmark against which the changes in surrounding lands may be compared It is a repository of scientific, educational, scenic, geological, ecological, and historical values. Existing overuse in wildernesses, as in St. Mary's, is a result of relatively easy access rather than wilderness designation. Rich Hole and Rough Mountain, designated as wildernesses in 1988, have received relatively little use. Area specific management documents have been prepared to deal with the overuse in St Mary's Wilderness.

Letter 2710 — Man has played such an intrusive role into all ecosystems, can't we leave some areas untouched? Wilderness should exist for its own sake. It brings recreational dollars into the area and it requires the FS to spend less resources

Response — Wilderness is designated for more than its recreational values. In addition to providing outstanding opportunities for primitive and unconfined recreation, it contains ecological, geological, or other features of scientific, educational, scenic, or historical values Wilderness management does require time, effort, and funding.

Letters 1953, 1954, 1955, 1956, 1957, 1958, 1959, 2067, 2068, 2768, 3058, 3146
I would like to recommend that the "Priest" and "Three Ridges" continue to be managed at current status. By leaving it off the WD list, at least the NF has access into the area and options available in the event of fire, plane crashes, gypsy moth control, etc

Response — It is important to realize that federal legislation is needed to establish a wilderness or wilderness study area The Priest and Three Ridges were determined to contain biological and physical characteristics that would render *them valuable additions to the National Wilderness Preservation System and may be recommended by the* Regional Forester for wilderness study area designation This evaluation is contained in Appendix C of the FEIS. The Regional Forester's recommendation is a preliminary administrative recommendation that will receive *further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the* President of the United States.

Letter 3659 — Plan No. 8 includes 3 wilderness study areas We have enough wilderness areas now. This is one of the greatest waste of our natural resources in existence today. There is a wilderness area about 15 miles from our farm and about 2 years ago, it caught fire and because it was a wilderness area, they did not try to extinguish it. The smoke settled in our area and for about a week, it was difficult to breathe Some people had to have medical attention.

Response — Wilderness designation does not preclude fire fighting It is presumed that the fire referred to was in the Barbour's Creek Wilderness on the Jefferson National Forest. This fire was actively fought Like any wildfire, it took time and weather, along with positive steps taken by fire fighters, to extinguish it.

Wilderness is a resource unto itself, a repository of geological, ecological, or other features of scientific, educational, scenic, or historic values It is a benchmark against which areas outside of the wilderness may be compared Appendix C of the FEIS contains an evaluation report on each of the 27 roadless areas A number of these areas contain biological and/or physical qualities that would render them valuable additions to the National Wilderness Preservation System It is on this basis that areas are recommended by the Regional Forester for designation as wilderness study areas

The Regional Forester will select an alternative to serve as the Revised Forest Plan that maximizes net public benefits The wilderness values are among the benefits that must be considered in balance with other resources

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Letter 3504 — I question the wisdom of increasing the wilderness area proposed in some of the plans The wilderness area from the GWNF will during the coming years be the specially important nursery for the gypsy moth

Response — The vast majority of the Forest is not treated for gypsy moth infestation because it would be essentially infeasible and too costly. The acreage recommended for wilderness study in any of the alternatives makes up a relatively small amount compared to the rest of the Forest that is untreated There is no reason to believe that wilderness designation will hasten the spread of the gypsy moth

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Letter 3812 — The Mt Pleasant region occupies the same high region encompassed by the proposed wilderness on 3 Ridges and the Priest and should not be excluded from study. The high peaks of the Pedlar District are traversed by the Appalachian Trail and offer the best and largest region for dispersed recreation in the Forest Consolidation of these peaks into a large wilderness region is the best method to preserve their remoteness and protect it from roadbuilding and timber harvesting

Response — The Mt. Pleasant Area is included in Management Area 21 Remote, non-motorized recreation is emphasized in this area

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Letter 3812 — The western edge of the Pedlar District is composed of steep sandstone ridges which are unsuitable for development of any kind The Adams Peak and 3 Sisters areas, which encompass these ridges both north and south of Buena Vista should be included as Wilderness study areas The nature of the slopes and low quality of the timber make these areas of no interest for development, and there is no sensible reason why they should not be afforded Wilderness protection

Response — All of Three Sisters and 98% of Adams Peak will be unavailable for development in the Revised Forest Plan and will retain their roadless, remote, non-motorized characteristics.

Letter 3894 — Take no action that would disqualify Roadless Areas from recommendation for designation as Wilderness.

Response — In the preferred alternative, 89% of the land in the 27 evaluated roadless areas remains as wilderness or otherwise unavailable for development

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Letter 3927 — I am opposed to any more Wilderness Areas for the reasons listed below.

Response — Reasons listed in the comment are responded to on an individual basis

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Letter 3927 — 1 Wilderness Areas reduce management options

Response — Wilderness is a management option unto itself and is fully recognized as a part of multiple use management under the Multiple Use Sustained Yield Act of 1960

Letter 3927 — 2 Reduce access to the forest for the Handicapped and Elderly persons

Response — The three areas that are recommended for wilderness study area designation have little likelihood of having increased access even if they were not recommended

Letter 3927 — 3 Does not necessarily contribute to Wilderness and sometimes causes more harm to the forest because of increased usage

Response — Over use in wilderness, such as has occurred in St Mary's, results more from easy access and previous use than from wilderness designation.

Letter 3927 — 4. All proposed areas have some of the best timberland anywhere in the State of Virginia and all areas have been used for timberland with the timber being harvested periodically.

Letter 3927 — 5 If these areas are declared wilderness, this will be a complete waste of one of our natural resources -- the timber

Response — Even though there is some good timber in each of the three areas recommended for wilderness study area designation, any attempt to harvest this timber would be very difficult due to limited access and steep terrain. Road development is not considered economically feasible.

Letter 3927 — 6 Wilderness areas would go against the current and past uses of the area

Response — *All 27 areas evaluated in Appendix C of the FEIS are essentially roadless now Wilderness Study Area designation would maintain this current status* It is acknowledged that wilderness designation would bring new uses and differing values The Regional Forester will select the alterative that best maximizes net public benefits

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Letter 3939 — Roadless areas considered for wilderness study but not selected should be released for development such as timber and wildlife management This must be clearly stated in the EIS and Plan to prevent them from being held in a de-facto wilderness status forever

Response — Chapter 3 of the FEIS presents how the 27 evaluated roadless areas are managed in the varying alternatives The Regional Forester will select the alternative to serve as the Revised Plan that maximizes net public benefits

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Letter 3968 — Wilderness is not necessary to protect the forest Wilderness is single use.

Response — The purpose of wilderness is not to protect the forest Wilderness is a recognized, legitimate part of multiple use management under the Multiple Use Sustained Yield Act of 1960 Wilderness is a resource unto itself, a repository of ecological, geological, or other features of scientific, educational, scenic, or historic values It is an area where man is a visitor and does not remain It serves as a benchmark against which to compare areas outside of wilderness where man's activities are readily apparent

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Letter 4013 — Why are areas like Reddish Knob, Meadow Knob, Elliott Knob, and Skidmore hollow being considered for wilderness designation when primitive roads exist? These primitive roads are what the four wheel drive recreationalist uses

Response — The geographical features mentioned in the comment are in or near one of the 27 roadless areas that are evaluated in Appendix C of the FEIS None of the areas mentioned are recommended for wilderness study area designation.

Letter 2824 — We request that you circulate maps showing the revised boundaries of the roadless area inventory The revised areas should be based on a review of the road and the ROS inventory to assure that all eligible areas have been included in the roadless area inventory These maps, and any written descriptions of additional roadless areas should be distributed for public review and comment

Response — *There was only one adjustments to the roadless area boundaries in the FEIS The northwestern portion of the* Big Schloss Roadless Area was removed Upon closer inspection, it was determined that the density of open roads in this area exceeded the definition of a "roadless area" in FSH 1909 12

Letter 2628

The Roadless Area inventory dated 4/7/92 shows boundaries for Little Mountain area which encompass greater area than shown in alternative 8. The boundaries in alternative 8 should coincide with the inventory.

Response

Two roadless areas use the word "Little" in their names: Little Alleghany Mountain and Little River. Upon review, the ID Team believes the question pertains to the Little Alleghany Mountain Roadless Area In the DEIS, the Forest did recognize that the preferred Alternative 8 allocated the area west of Little Back Creek to Management Area 15 that, if development occurred, would preclude it from wilderness consideration in the future because roadless area values would be lost. Alternatives 3, 9 and 13 examine a range of allocations for this particular area that protect all of the area's roadless values. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because: a) the area is high elevation and remote providing wildlife habitat that's free from continued disturbance, b) the area is covered by oil and gas leases, and c) the expansion plans for the Bath County Pumped Storage Station could call for construction north of Long Spring Run (FEIS Appendix C). The final decision regarding land allocations will consider the significant public involvement that has occurred.

Letter 2628

The boundaries of the Mill Mountain Roadless Area should coincide with the boundaries drawn on quad sheets with Steve Sherwood at the JNF office in Roanoke. No reason has been given for changing the boundaries drawn at that meeting.

Response

In formulating the boundary for the Mill Mountain Roadless Area, the ID Team considered three options, one of which is the map to which the commenter refers. All three met the criteria for describing roadless areas in the east (FSH 1909.12-7.11b). The boundary which is shown in Appendix C of the Revised Forest Plan is based on meeting the above mentioned criteria while also being easily identifiable on the ground The other two options used elevation lines and contained cross country lines which don't track well on the ground Based on these criteria, the ID Team believes the inventory boundary as described in Appendix C to be appropriate.

Letter 3742

The preferred alternative should give a rationale for the recommendation for wilderness study or not for wilderness study on each roadless area inventoried.

Response

It is important to realize that federal legislation is needed to create wilderness or wilderness study area. The Regional Forester can recommend certain roadless areas for wilderness study in the record of decision for the FEIS. This recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, Secretary of Agriculture, and the President of the United States. The Congress has reserved the authority to make final decisions on wilderness designation.

The ID Team wishes to stress that the recommendation on the roadless areas recommended for wilderness study is part of the overall theme of Alternative 8A (as well as the other alternatives).

In the record of decision, the Regional Forester will select the alternative that he has identified as maximizing net public benefits. While this document will explain the rationale for this decision, the Regional Forester is not required to justify every management area allocation in the selected alternative.

Letter 987 — Proposed wilderness areas should be protected as Study Areas until final decisions are made.

Response — Alternatives 3, 6, 8A, 9, 11, 10, and 13 allocate certain roadless areas to Management Area 8. This management area contains standards designed to manage these roadless areas in a manner comparable with wilderness study areas.

Letters 503, 763, 933, 1167, 1439, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1634, 1671, 1730, 1731, 1732, 1943, 1944, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 2925, 3087, 3088, 3147, 3148, 3149, 3150, 3756, 4093
All other roadless areas should remain roadless.

Letters 760, 762, 1070, 1173, 1281, 1320, 1346, 1378, 1551, 1656, 1822, 1823, 2005, 2010, 2061, 2375, 3870, 4253
All other roadless areas should remain roadless and be managed to protect biological and recreational values.

Letter 3567 — There should be no timber sales, road building, common mineral extraction, salvage, or synthetic habitat manipulations in the few remaining roadless areas. There should also be, whenever possible, migration corridors which would connect these areas together. These should be scientifically based. The critical issue is to not further fragment the last one-fifth of the forest with roads, and allow for movement of wildlife between these areas. Old growth and roadless areas could be dealt with simultaneously.

Letters 884, 877, 1329, 1557, 2613, 2675, 3892, 3911
ALL other roadless areas should be managed to maintain their roadless condition.

Letter 982 — There are 26 roadless areas inventoried in the plan. All should be kept in their roadless state.

Letter 1072 — Don't touch any roadless area

Letters 1275, 1292
Motorized intrusion into roadless areas should be eliminated.

Letter 1615 — All roadless areas (and particularly Little River, Ramsey's Draft Addition, Big Schloss, Kelly Mountain, Southern Massanutten, Mt. Pleasant, Skidmore Fork and Laurel Fork) must be protected Alternatives to Management Area 8 might include putting these areas into MA 1, 9 or possibly 14. All SPNM areas should be maintained as such. No new roads or timber cutting should be allowed in these areas. The criteria for MA 9 should be tightened to prohibit timber cutting, even for "salvage" or "wildlife improvements".

Letter 1809 — Roadless areas which protect the biological and recreational values of this great area must be protected.

Letters 1992, 2035, 2534, 3662, 3691, 3735
The four other roadless areas should remain roadless and be managed to protect biol. and recreational values.

Letter 2272 — The 4 other roadless areas should remain roadless

Letters 2453, 2454, 2455, 2625, 2795, 2796, 2797, 2798, 2799, 2800, 2801, 2802, 2803, 2804, 2805, 3091, 3092, 3248, 3249, 3250, 3251, 3252, 3253, 3254, 3255, 3256, 3257, 3258, 3259, 3260, 3261, 3262, 3263, 3264, 3265, 3266, 3267, 3268, 3269, 3270, 3825, 3999, 4152, 4153, 4154, 4155
The four other roadless areas should be managed to maintain their roadless condition

Letter 2505 — Roadless areas remain so

Letter 2892 — ALL roadless areas should be managed to maintain their roadless and wilderness character.

Letter 2896 — Protection is important for areas on The Friar, Little Friar, Maintop, Porter's Ridge, Cold Mountain, Bald Knob, Elk Pond Mountain and Mt Pleasant. If these areas are disturbed with timber harvest and road construction, they will lose their existing composition of habitat for diverse species (including nongame species) and their value for clean water supplies.

Letter 2902	Eliminate all salvage sales and wildlife mgt. in existing roadless areas
Letter 3543	Preserve as much roadless and undeveloped land as possible
Letter 3558	Existing roadless areas should be protected
Letter 3619	ALL twenty-six roadless areas inventoried should be managed to maintain their roadless condition to reduce forest fragmentation and thereby protect important wildlife habitat.
Letter 3680	No salvage cutting of any type in the "Remote Highland" areas Our highlands are particularly sensitive areas and should be maintained with care.
Letter 3736	Roadless areas should remain as such, and managed to leave these areas in their present condition
Letter 3840	All roadless areas that are not selected for wilderness candidates should be managed to continue their roadless characteristics, with no roadbuilding, no timbering, no wildlife management requiring timbering, roadbuilding or burning These areas identified as Management Area 9 should become part of the climax forest habitat type.
Letter 3899	The four existing roadless areas should remain roadless, and roads in other areas scaled back
Response	Management Area 9 prescribes conditions that are essentially roadless, protecting the roadless characteristics All alternatives maintain at least some of the existing roadless areas with Alternatives 3, 6, 8A, 9, and 13 having a large majority of roadless acreage remaining roadless in Management Area 9 or other management areas that retain roadless qualities Under the preferred alternative, 89% of land in existing roadless areas remains roadless whether in Management Area 8, recommended for wilderness study, or one of the several other Management Areas under which the lands remain unavailable
Letter 2029	I am concerned that the lands included in the MA 9s do not seem to "dip down" in select areas to include what presumably would be cove forests and related situations which are critical to many organisms The biological significance of MA 9 should be given the highest priority, not various kinds of recreation, trails and roads and "Wildlife".
Response	The Revised Plan recognizes the important biological significance of Management Area 9, however, it is primarily a recreation prescription derived from roadless area inventories Lands within MA 9 include not only ridgetops and sideslopes but many coves with their associated forest and riparian areas plus associated species
Letter 4266	These areas have been identified as having wilderness values worth preserving. The Forest Service's recommendations would leave less than 5% of the Forest permanently protected We can do better than that
Response	As discussed in Table 3-17 of the FEIS, the Revised Plan allocates 89% of the roadless acrea acreage to management areas that will limit management practices to those that will NOT change the roadless character of these lands
Letter 4268	Plan - EPA recommends that additional roadless areas be considered for wilderness study areas or through some other mechanism, afforded similar long-term protection from disturbance (beyond the planning period of this Plan) Priorities should be established within the context of adjacent lands For example, those roadless areas located in the western portion of the Forest may receive higher priority for consideration due to their adjacency to the Monongahela National Forest or other wilderness areas, etc This would also serve to initiate/enhance cooperative efforts among the other nearby National and State Forests
Response	In the Revised Plan, 89% of the land in the inventoried roadless areas will remain roadless Three areas are recommended for wilderness study area designation The rest are allocated to Management Areas that maintain their existing roadless status and allows for consideration for wilderness designation in the future

Letter 2060 All salvage sales, wildlife management, and mineral extraction should cease in all 26 listed roadless areas

Letters 986, 2227

Eliminate all salvage sales, wildlife management and mineral extraction on existing roadless areas

Letter 2515 Eliminate all salvage sales and mineral extraction in roadless areas

Response The only way that there can be assurance that all 27 roadless areas are not available for mineral entry is to recommend them for wilderness study and have Congress establish them as wildernesses with the appropriate language that removes them from mineral entry.

Letter 3739 No mineral extraction activities in roadless areas

Response Congress has provided for minerals management on each National Forest This fact is reflected in the laws governing mineral leasing and the mineral policies of the Departments of Agriculture and Interior The production of minerals, when present and available, is a valid use of the George Washington National Forest under the Mineral Leasing Act of August 7, 1947 (61 Stat 913 30 U S C 351-59)

The Regional Forester has the authority to request, but not to withdraw, large areas of the George Washington National Forest from operation of Federal mineral laws Such a change in status must be accomplished by the Bureau of Land Management with Congressional oversight Alternative 3 was formulated on the assumption that the Regional Forester would request that all lands be made unavailable for mineral entry Since such wholesale withdrawals would not be compatible with balanced resource management envisioned by Congress for the National Forests, the likelihood of the entire George Washington National Forest being withdrawn is very low

Alternatives 3, 6, 8, 8A, 9, 10, 11 and 13 recommend varying amounts of roadless areas for wilderness study The most likely way to have roadless areas withdrawn from mineral entry is to have them designated as wilderness through Congressional action with minerals withdrawal as part of the legislation

Alternatives 3, 6, 8, 8A, 9, 10, 11 and 13 are considered in detail in the FEIS The Regional Forester will select one of these alternatives to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2229 *I request that the Mt Pleasant Special Management Area in the Pedlar District continue to be managed as is and* that no changes be made in that SMA

Letter 3660 Maintain the Mount Pleasant SMA if you must But only at 5,900 acres, not 8,900 acres.

Letter 3959 Mt. Pleasant I am concerned that extensive timbering will be allowed here. I hope you will reconsider this because of the exceptional recreational values

Response In the Forest Service preferred alternative, an enlarged Mount Pleasant "Special Management Area" has been allocated to Management Area 21 The management of this roadless area resembles the management direction in the 1986 Plan

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Letter 3754 Do not allow the Mt Pleasant area to be logged

Response In the Revised Plan, the Mt. Pleasant Special Management Area is unsuitable for timber management. Salvage of dead and dying trees can only occur from existing roads Helicopter logging of high quality dead or dying *timber is also allowed within one-half mile of the perimeter of the area in cases of broad scale mortality from* gypsy moth or fire It is unlikely that any salvage logging will occur except perhaps along perimeter roads for *purposes of safety*

Letter 2322 Your Little River SMA has been enlarged Half the size or less would be enough

Response In the Forest Service preferred alternative, the Little River Special Management Area includes all of the Little River Roadless Area Alternatives 2, 4, 5, 6, 10 and 12 retain the original "special management area" in the 1986 Plan One of these alternatives will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 2942 Do nothing in existing roadless area other than study how to and begin to return these areas to Pre-Western Culture condition

Response Alternative 3 manages the roadless areas in a manner that responds positively to this concern. This alternative is considered in detail in the FEIS and will be selected as the alternative to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 3643 The Department recommends that the Alternative 13 roadless area plan be incorporated within the Alternative 10 forest plan The Alternative 13 roadless area option recommends 77 percent of the roadless areas for wilderness study areas and designates 21 percent of the roadless areas as unavailable for development

Response Rather than modify Alternative 10, the ID Team modified Alternative 13 Alternative 13 provides a strong response to these concerns In particular, Alternative 13

1. maintains all roadless areas in an unroaded condition and recommends 22 of the 27 roadless areas for wilderness study,

2 eliminates ATV use and restricts OHV use to the open transportation system roads;

3 constructs no new system roads,

4 limits timber harvesting to within 1/2 mile of system roads and limits removal to the use of skid trails or temporary roads,

5 maintains migration corridors; and

6 restricts the use of non-timber management practices to promote habitat for game species to maintenance of existing openings in Management Areas 14, 15 and 16 and to prescribe burning 100 to 300 acres per year.

Letter 1661 Areas like Mt. Pleasant and Little River should be maintained in their present condition

Response Mt Pleasant and Little River will be maintained in their present condition in the Revised Forest Plan.

Letter 1980 - I would like to recommend that the Priest and 3 Ridges continue to be managed at current status. Looking at 3 Ridges as an example, there is no timber worth harvesting, the only access for the public is to walk, therefore by leaving it off the WD list, at least the NF has access into the area and options available in the event of fire, plane crashes, gypsy moth control, etc

Response The Priest and Three Ridges were determined to contain biological and physical characteristics that would render them valuable additions to the National Wilderness Preservation System and may be recommended for wilderness study area designation by the Regional Forester This evaluation is contained in Appendix C of the FEIS. The Regional Forester's recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States.

Letter 1797 I am against any designation of Remote Highlands for the following reasons· 1 Remote Highlands is a new designation that does not serve any purpose other than setting up future roadless areas, 2. Remote Highlands will not provide adequate habitat diversity for wildlife, 3 Remote Highlands will not contribute to a timber sale

program needed by Western Virginia localities, and 4 Remote Highlands will provide a breeding-ground and food supply for the gypsy moth

Letter 2308 — The proposed application of the concept of "Remote Highlands" is a master stroke in its wide-ranging recognition that extensive portions of the GWNF have greater value and benefits for their natural qualities than for timber harvesting and other development

Letter 2334 — MA8 acreage for wilderness and wilderness study seems appropriate. Remote highlands will provide additional de facto wilderness without the undesirable restrictions and the threat of catastrophic loss to adjacent landowners inherent in legislated "Wilderness" areas

Letter 2380 — [We are in favor of] 1/4 of the forest managed as "remote highlands" for animals and plants that require undisturbed habitat and for back-country recreation.

Letter 2667 — Alternative 8 seems to be another preservation-type management decision of our federal government. Scenic highlands sound like more bureaucratic terminology for preservation

Letter 3613 — MA 1 and MA 9 are de facto Wilderness. Only Congress can create Wilderness It is illegal for the Forest Service to create de facto Wilderness

Letter 3926 — *We do need any more Wilderness Those Remote Highlands are the same*

Letter 3660 — *I do not support Remote Highlands. This is de-facto wilderness. This acreage should be put into Management* Areas 14 & 15

Letter 3684 — MA8 acreage for Wilderness and Wilderness Study seems appropriate Remote highlands will provide additional *defacto wilderness without the undesirable restrictions and the threat of catastrophic loss to adjacent* landowners inherent in legislated "Wilderness" areas

Response — The Forest Service is finding that people need and want a wider array of uses, values, products, and conditions *from the Forest than in the past These additional multiple uses include environmental and social values not* traditionally identified as multiple uses.

143,000 acres of the Forest have been allocated to Management Area 9 ("Remote Highlands") in the Forest Service preferred alternative. This management area has been designed to recognize and manage areas that contain special biological and recreational values stemming from the fact that they contain few, if any, roads and have largely recovered from past disturbances Remote Highlands offer opportunities for solitude, primitive recreation and habitat for area-sensitive species These are values, uses, and conditions which are rare in mid-Atlantic States

Remote Highlands are not "de-facto" wilderness areas They permit management practices and uses that are incompatible with wilderness. At the same time, they are not lands suitable for timber production where early successional wildlife habitat and timber objectives will be achieved Instead, Remote Highlands offer a core area where habitat for late successional, remote and area-sensitive species can be provided There will be some habitat manipulation in the form of prescribed burning In portions of these areas in proximity to existing roads, maintenance of existing openings and even creation of new openings and other improvements is appropriate. Remote Highlands can be managed to supplement the higher degree of habitat manipulation in adjoining management areas

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Letter 3728 — Remote highlands (with boundary modifications) should allow some mgmt activities and possibly some temporary roads

Response — The philosophy of Remote Highlands, Management Area 9, is to manage the lands so that the existing roadless characteristics of the lands are maintained. While some existing roads may be maintained, there should be no road construction Where other types of management activities are appropriate, the lands are allocated to a Management Area that calls for road construction. The comment alludes to remote highlands not having any management activity It must be pointed out that managing for remote highlands is a management activity, very much as is managing for wilderness, timber, dispersed recreation, watershed, and so forth

Letter 3831 Your final Land Management Plan must include elimination of Upland Highland Category

Letter 3939 We are concerned with the "Remote Highlands" designation used in the plan There are 196,502 acres in this classification and in reading its description it is readily apparent that it is in fact a de-facto wilderness designation Clearly, the Forest Service should not be in the business of designating "de-facto" wilderness areas Another description name needs to be provided for this area and the acres must be reduced to approximately that displayed for alternative 12 (8,275 acres). It must also be made clear that these are not wilderness study areas and are not to be considered for formal wilderness designation in the future

Letter 3951 Remote Highlands - This Management Area is nothing more than defacto wilderness If this is retained then limit acreage to less than 9,000 acres (as in alternative 12) and restricted to mountain tops that are not roaded It serves no useful management purpose.

Response Most of the roadless area acreage has been allocated to Management Areas 4, 8, 9 or 13 in the Draft Revised Plan for four reasons

1 The roadless areas on the Forest offer opportunities for solitude, primitive recreation, habitat for area-sensitive species, and many of the unique biological resources found on the Forest These are values and uses which are rare in the mid-Atlantic States

2 The roadless areas *generally* contain the poorer and more remote sites which in which it is more expensive to build roads and harvest timber With the high degree of concern about below-cost timber sales by the public and Congress, the Forest would be submitting a much worse annual TSPIRS report if we committed much of our timber sale program to roadless areas

3 Forest Service NEPA policy requires an Environmental Impact Statement for any timber sale or road construction project that would substantially impact the roadless nature of a roadless area greater than 5,000 acres in size This policy also increases the costs of implementing any such projects

4 Given the intense public interest in maintaining the roadless areas, the probability of litigation is immeasurably higher on any developmental project within a roadless area

Based on comments received on the DEIS and Draft Revised Plan, the ID Team reviewed the allocation of roadless area acreage. The Revised Plan has a modified version of management allocations for the 27 roadless areas As displayed in Table 3-17, 11% of the roadless area acreage will be available for timber harvesting and road construction Chapter 3 of the FEIS discusses the implications of this management area allocation Table 2-2 in Chapter 2 of the Revised Plan displays the allocation of the roadless area acreage to different management areas

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Letter 2633 Many people have expressed extreme concern that the development of roadless areas will dampen hunting and other recreational activities

Response The development of roadless areas would change hunting and recreation opportunities in that access would be more readily available, but in all probability it would not dampen any opportunities Most of the areas are roadless due to the ruggedness of the terrain and the associated expense of building roads It's economically infeasible to construct roads in the areas

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Letter 2691 Leave roadless areas roadless The ease of access seems to affect user attitudes Easy access inherently brings more destructive and abusive use Road construction, for the protection of resources, should be minimized. I support the Wilderness proposals I could support further Wilderness Especially in the Three Sister's area of the Pedlar

Response Under the preferred alternative 92% of the lands in the roadless areas are considered unavailable for development and will remain essentially roadless All of Three Sisters is unavailable for development, but is not recommended for wilderness study area designation

Letter 2732 No timbering for any reason should occur in roadless areas

Response Under the preferred alternative, 89% of the roadless areas are classed as unavailable for development Salvage may occur along existing roads in these areas but no other timber harvesting is planned

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Letter 2825 I appreciate roadless areas and applaud all efforts to maintain the status quo

Response NO RESPONSE REQUIRED

Letter 3921 This alternative [#8] offers protection to many of the unique and outstanding areas on the Pedlar Ranger District. I support wilderness designation for the Three Ridges and The Priest areas and protection of the Mt Pleasant Special Management Area, the Friar and Little Friar area, and the Three Sisters area.

Response Management direction in the areas mentioned in the comment will retain the existing chacteristics

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Letter 2066 *I would like to see you add a category of management to be called "Special Management Areas," similar to the* provision in the current management plan Each of these would have a defined boundary and you would describe the management practices to be used within each Special Management Area The purpose of doing this is to preserve the unique natural features of certain forest areas and provide for the use of the areas by a wide variety of citizen users. The activities within the Special Management Areas would be more flexible but, at the same time, the natural features of the areas would be relatively well protected so that for decades these areas could bring pleasure to many visitors.

Letter 2066 I would propose the following areas to have the Special Management Area designation Little River - 28,000 acres, Laurel Fork - 10,000 acres, Big Schloss - 25,000 acres, Mt. Pleasant - 8,900 acres. You may want to include other areas I would caution against having too many such areas because I contemplate that these areas would involve reasonable management expenses for construction and maintenance of special roads or facilities and proper supervision

Letter 3831 Your final Land Management Plan must include limited Special Management areas (in number and size).

Response Big Schloss, Laurel Fork, Little River and Mount Pleasant comprise Management Area 21. Because of their unique features, complexity, and degree of interest, these areas are designated as Special Management Areas. Please refer to Chapter 3 of the Revised Plan.

Letter 142 The Draft Management Plan for the GWNF would put Mount Pleasant in Management Area 13 with Hidden Valley, Crabtree Falls and Lake Moomaw These last three areas are recognized by everyone as heavily visited areas and with significant amounts of developed recreation facilities To the contrary, Mount Pleasant has a low density of visitation with the exception of one A-T shelter has no developed recreation facility It is difficult to understand why Mount Pleasant is put in the same management classification. The writer has conferred with other leaders of the Virginia Wilderness Committee and our second preference for the Mount Pleasant areas is Management Area 9 (nine)

Response Mount Pleasant has been assigned to Management Area 21 ("Special Management Areas") in the Revised Plan A specific management area prescription has been developed for Mount Pleasant which includes a "desired future condition" and standards which are unique to this area

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Letter 3840 *Little River and Mount Pleasant are managed to retain their roadless characteristics and trails are to remain in* their primitive condition

Response In the Forest Service preferred alternative, Little River and Mount Pleasant are allocated to Management Area 21 ("Special Management Areas"). This management area is designed to permit traditional recreation uses and to restrict management practices which would result in the disqualification of the areas for future consideration for wilderness

Letter 3840 MA 13 status as it is intended in the Little River Area is more applicable to an area such as Big Schloss

Response Big Schloss has been assigned to Management Area 21 ("Special Management Areas") in the Revised Plan. Management Area 21 provides specific management direction for Big Schloss Permissible management practices will be applied in a manner that is sensitive to the roadless area values. Big Schloss will not, however, be managed SOLELY for the preservation of these roadless area values

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ROADLESS AREA MANAGEMENT: Remote Recreation Experience

Letter 2664 The ROS classification of semi-primitive, non-motorized should apply to recreational use, not resource management. The VWTF strongly urges the GWNF to allow USFS and VDGIF motorized access in this management zone to maintain and enhance wildlife habitat, and other appropriate resources and uses The VWTF also supports the creation of the new subclass 2 in semi-primitive motorized

Response Recreation opportunities are every bit as much a resource recognized by the Multiple Use — Sustained Yield Act of 1960 as is wildlife The MUSYA allows that not every acre can or must be managed for every resource The SPM2 class was created to address the concerns of the state wildlife management agencies that they would not be allowed in SPNM The recreation opportunities are the same when considered on a regional and national basis Because there is no true primitive classification on the Forest, the SPNM classification is managed as such Realistically, the SPNM areas are located where the states aren't going to want to enhance wildlife habitat for any particular species Additionally, there are wildlife species that thrive in the SPNM environment as opposed to the less primitive classes

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Letter 3840 All SPNM areas should retain this [MA 9] designated status No loss of primitive non-motorized should be considered We are very weak in this recreational type area.

Response Non-motorized dispersed recreation has traditionally made up a large part of the Forest Service recreation program and it will remain so in the Revised Plan Of the 27 roadless areas evaluated in the FEIS, 89% of the land remains unavailable for development in Management Area 8 as wilderness or recommended for wilderness study, in Management Area 9 or other allocation retaining the nonroaded characteristics The existing SPNM areas are resultant from the difficulty of road building in the areas in the past and this hasn't changed in the present In the preferred alternative, 89% of the lands inventoried as roadless will remain essentially roadless, unavailable for development and there is a strong emphasis on remote, non-motorized recreation opportunities A Forest trails program is described in Appendix B Priorities for construction and reconstruction will be set on an annual basis as funding allows The Regional Forester will select the alternative to serve as the Revised Forest Plan that maximizes net public benefit This will include a balance of management for timber, wildlife, recreation, soil, water, and other multiple resources

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Letter 3840 No timbering in SPNM areas These areas should be placed in unsuitable category.

Response Most of the areas that were inventoried as SPNM under the ROS system are unroaded and will remain unsuitable for timber production under the preferred alternative

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Letter 3840 Don't downgrade any ROS category of lands - too much roaded land as is - need more SPNM and SPM lands

Response Appendix G of the FEIS discusses ROS and its adopted allocation In virtually every case, the existing characteristics of the land will remain The breakdown of SPM is somewhat complicated and is explained further in the appendix

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Letter 3951 ROS - Map the ROS but do not place any restrictions on management activities in those areas There are too many conflicts between ROS and VQO Permit management activities in all ROS zones except in wilderness and wilderness study areas The only restriction that would be needed is whether roads would be open or closed to the public

Response — The recreation opportunity spectrum classes (with their associated standards) are incorporated in the different management areas to comply with NFMA and NFMA Regulations These regulations are discussed in Appendix G of the FEIS.

Letter 3951 — Permit logging and wildlife habitat improvements in SPNM areas, but close the roads to public use after the activity ends.

Response — This suggestion invalidates the purpose of the semi-primitive non-motorized (SPNM) recreation opportunity spectrum (ROS) The kind of primitive recreation experience associated with this ROS classification is not consistent with road construction and regulated timber harvesting If such management practices are necessary, any SPNM area can be reclassified as semi-primitive motorized (sub-class 2).

Letter 3728 — Management Area 14: Recreation 529 - Change to. "Lands within this MA are classified as SPNM or SPM2. Primitive, non-motorized dispersed recreation opportunities are emphasized to provide quality hunting, fishing, hiking and nature study opportunities. Public motorized use is restricted to open roads. Existing trails are maintained and the trail system may be expanded "

Response — Not all of Management Area 14 qualifies for the semi-primitive recreation opportunity spectrum (ROS) classification *Areas within 1/2 mile of existing open roads must be classified as either roaded natural or roaded modified* (depending upon the visual quality objective) The semi-primitive non-motorized ROS classification precludes *road construction/reconstruction and regulated timber harvesting This ROS seems to be inconsistent with the* management practices employed in this management area

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Letter 1437 — *[Standard] 529 indicates that some lands that are now classified as SPNM will become SPM Please keep all* SPNM areas in the same ROS, don't place them in SPM.

Letter 3840 — Pg. 2-110, [Standard] #554 - Do not change any SPNM to SPM

Letter 3962 — [Standards] 529, 554, & 578 Lands inventoried as SPNM should retain the non-motorized use in the new *standards.*

Letter 3962 — *EIS 3-18, Table 3-3, and Appendix G SPNM ROS All existing SPNM acres should remain SPNM. We have lost* 25,000 acres in this alternative

Response — The Forest Service preferred alternative contains 150,000 acres with an adopted ROS class of SPNM compared to the 167,000 acres in the existing inventory.

Alternatives 3, 6, 9, 11, and 13 increase the amount of lands with and adopted ROS class of SPNM. One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 3962 — MA 9. 2-62 Desired future conditions - Existing system roads should be eventually closed All of these areas are SPNM which does not allow motorized traffic

Response — All of the land allocated to Management Area 9 does not qualify for semi-primitive non-motorized recreation opportunity spectrum class. Remote Highlands contain a mixture of roaded natural, semi-primitive motorized (sub-class 1), semi-primitive motorized (sub-class 2), and semi-primitive non-motorized recreation opportunity spectrum classes Refer to Appendix G of the FEIS for a discussion of these different classes.

Letter 3962 — MA 9· [Standard] 274 Since these are roadless areas, how can "roaded natural recreation opportunities be offered?"

Letter 3962 — MA 13· [Standard] 514 Since these are roadless areas, how can "roaded natural recreation opportunities be offered?

Response	Many roadless areas are bounded by roads or at least their boundaries are in close proximity to roads Part of the definition of the semi-primitive (non-motorized or motorized) recreation opportunity spectrum is that the area is AT LEAST 1/2 mile from open public roads Portions of roadless areas within 1/2 mile of open public roads have been classified as roaded natural recreation opportunity spectrum by default
Letter 3962	EIS G-4, SPM 2, Access What does "generally closed" mean? You need to be specific about roads A proposed definition for Access: Motorized access is very limited Roads are closed to public use at all times but are minimally maintained for administrative purposes Public access is by foot, non-motorized bicycle, or animal
Response	Roads are closed to all but administrative use There may be exceptions made on a road-by-road basis for a one time occurance
Letter 10	I am in support of maintaining remote areas
Letter 146	In Alternative 12, the Semi-primitive Non-Motorized lands are greatly reduced Alternative 12 projects only 83,987 acres in SPNM management, down more than half from the current SPNM acreage
Response	Alternative 12 is but one of the alternatives considered. The amount of land that is classified as semi-primitive non-motorized varies by alternative with Alternative 3 providing the most and Alternative 4 providing the least All alternative will meet anticipated demand for SPNM recreation opportunities
Letter 1435	I favor retaining the current percentage of lands devoted to remoteness
Letter 3733	We wonder how you arrive at what you call the desired future condition On 2-9 of the draft plan "the desired future condition is to continue to meet public demand for a variety of motorized dispersed recreation opportunities in a variety of settings " What about the public demand for peaceful, quiet wilderness
Response	Management Areas 6, 8, 9, and 21 are specifically managed to provide remote, non-motorized recreation Other Management Areas offer similar experiences within emphasis for other resources There is a vast amount of peace and quiet in all Alternatives
Letter 2010	Primitive and non-motorized recreation should be emphasized in the management plan for GWNF
Response	Non-motorized dispersed recreation use has historically made up the majority of the recreation use on the Forest and plays an important role in all alternatives The Regional Forester will select the alternative for the Revised Plan that maximizes net public benefits Benefits from non-motorized recreation are considered in this selection
Letter 3733	We wonder how you arrive at what you call the desired future condition On 2-9 of the draft plan "the desired future condition is to continue to meet public demand for a variety of motorized dispersed recreation opportunities in a variety of settings " What about the public demand for peaceful, quiet wilderness
Response	Management Areas 6, 8, 9, and 21 are specifically managed to provide remote, non-motorized recreation. Other Management Areas offer similar experiences within emphasis for other resources There is a vast amount of peace and quiet in all Alternatives
Letter 17	The Recreation Opportunity Spectrum maps should be updated
Letter 2824	On January 13, 1992, we wrote to you asking for circulation of maps showing and updated Recreation Opportunity Spectrum inventory. We have pointed out areas which are incorrectly mapped and discussed frequently with your staff the importance for the planning process to correct these errors We have not received a corrected map for review. After these maps are distributed, we request a reasonable time to review and comment

Response — The Forest completed and updated the roads Transportation Information System inventory This information was mapped as a layer in the Geographic Information System Based on this information, the recreation opportunity spectrum inventory was updated

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Letter 990 — Alternative 2 models the current management direction. With reference to ROS allocation, the current Plan allocation is outlined on page II-36 in the EIS of the 1986 Plan/EIS 33,022 acres ae shown in the Primitive class; 250,978 acres are shown in the SPNM class Furthermore, amendment #4 to the LRMP states, "Scheduled timber sales and associated road building will be postponed in Semi-Primitive Non-Motorized (SPNM) areas during the Plan revision period " Alternative 2 is to model the "no action" alternative, it should reflect the ROS allocation in the 1986 Plan, as amended However, alternative 2 does not show this direction Rather it shows a great reduction in SPNM acreage and an elimination of the Primitive class entirely (EIS, p 3-19) Not only does this reduction fail to model the current direction in the 1986 Plan, it also fails to model the current inventory acres Alternative 2 should be remodeled to show current management direction

Response — The ROS inventory shown in the 1986 plan was completed using a localized set of criteria in the early 1980's These were found to be quite different from the national direction that came out in the 1986 ROS Book. The inaccuracies noted in the 1986 plan lead to a reinventory of ROS classifications in 1988 using national guidelines and it is this inventory that is considered current management in Alternative 2 Based on national standards, there is no land that qualifies to be classed as primitive and there is less land that qualifies to be classed as SPNM

ROADLESS AREA MANAGEMENT: Wildlife Habitat with No Recurrent Human Disturbance

Letter 49 — It is imperative that great tracts of land be made sanctuaries for the creatures and things which otherwise would undoubtedly suffer and diminish under the relentless conquest of humans

Response — Providing for biodiversity and large tracts of unfragmented, old growth habitat with an ecological perspective towards management are some of the values that members of the public desire on the Forest Alternative 3 was developed to explore the capability of the Forest to provide this value without providing for other uses such as timber, developed recreation, or wildlife habitat improvements

In the record of decision for the FEIS, the Regional Forester will identify the alternative that provides the mixture of values, products, uses and conditions that maximize net public benefits.

Letter 1156 — Keep as much roadless areas as possible in order to provide undisturbed habitat and wildlife migration corridors

Response — The majority of roadless areas are maintained, usually within the designation of Management Area 9 (Remote Highlands), Management Area 21 (Special Management Areas), and Management Area 4 (Special Interest Areas).

Letter 1163 — Currently, about one-quarter of the forest was managed to preserve remoteness, under the "new" plan, about 40% will be designated as remote area The logic behind this maneuver escapes me, because to my knowledge no special species or fauna indigenous to the forest justifies this increase

Response — A major concern, as determined by the quantity of comments, centered around the level of habitat management (in the form of direct wildlife habitat improvements and timber sales) Many reviewers expressed a desire to increase these forms of active habitat management Other reviewers expressed a desire to reduce the levels of habitat management, preferring more emphasis to be placed on providing unfragmented habitats

The preferred alternative does not maximize the potential value for either early successional or late successional unfragmented habitats It recognizes the value of both needs within a large forested area and provides for both habitats

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2 under "ISSUE 1 — BIODIVERSITY" and in "ISSUE 8 — VEGETATION MANAGEMENT"

(under the sub-heading of 'Featured Species'). Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife

SPECIAL MANAGEMENT AREAS: Wilderness Management

Letter 2344 — Take whatever measures are necessary to ensure that our wilderness areas are protected against the voracious appetites of commerce and industry.

Letter 2657 — Preserve the wilderness

Response — Wilderness areas are protected in all alternatives and will retain the values that render them valuable parts of the National Wilderness Preservation System.

Letter 3940 — Plan: Page 2-19, Paragraph 1. It should be made clear that "human manipulation" relates to vegetation manipulation, not wildlife population manipulation. Otherwise, the existing language (and that on page 2-5 [2-50?], paragraph 1) implies that hunting or fishing may be prohibited. We support Standard 174 that identified hunting and fishing as valid recreational activities in wilderness.

Response — The original wording was in error, and new language identifies hunting and fishing as valid recreational activities in the wilderness areas.

Letter 4001 — Management strategies within wilderness areas should, in general, be no mgt at all. Exceptions would include law enforcement, fire suppression when public safety is threatened, trail maintenance at minimum levels for foot traffic only, and protection of habitat for Endangered, Threatened, and Sensitive species.

Response — Wilderness is designated by Congress and must be managed to preserve natural conditions There can be no such thing as "no management at all" in maintaining the natural conditions. The exceptions noted in the comment are, in fact, part of management for wilderness.

SPECIAL MANAGEMENT AREAS: Wild and Scenic Rivers

Letter 92 — Why are lands for W&SR potential given interim protection and wilderness (Ref. L&RMP page 2-60, standard 252) not?

Response — The Forest Service has completed its evaluation of roadless areas with the publication of the evaluation reports in Appendix C of the FEIS, the evaluation of trade-offs in Chapters 2 and 3 of the FEIS and the recommendation in the record of decision There is no need nor mandate for "interim" protection of the remaining roadless areas.

Due to time constraints in the revision process, the suitability evaluation for rivers qualifying for inclusion in the National Wild and Scenic River System could not be completed The Forest Service is required by law to protect rivers under consideration for inclusion in the National Wild and Scenic Rivers System.

Letter 92 — Page 2-66, standard 292 why do you pick the lowest classification (Recreation) instead of the highest (Wild) until the studies are completed?

Response — As discussed in the introduction of Appendix D of the FEIS, the Forest Service has completed the eligibility and classification evaluations for the rivers qualifying for inclusion in the National Wild and Scenic River System Only the St. Marys River meets the criteria needed to be designated as "wild" The rivers and river segments identified as "recreational" do not meet the criteria for classification as "scenic" Referral was made to FSH 1908-8 classification criteria for determination of potential eligibility

Letter 1849 — We note favorably the recommendation of segments of 11 rivers for study to ascertain whether or not they qualify as recreational or scenic rivers

Letter 146 — *In 1986, the G W. proposed segments of only two rivers for study to see if they qualify as recreational or scenic* rivers The 1992 draft plan, which proposes segments of 11 rivers for study, is a great improvement

Response — *NO RESPONSE REQUIRED*

Letter 2665 — 6,000 acres of wild and scenic rivers are available for timbering, a clear violation of necessary protection (Plan, 2-75).

Response — Rivers eligible for scenic or recreation rivers classification can be designated as suitable for timber production and remain in concert with the management of rivers within the National River System.

Letter 3887 — *The North River is used extensively for recreation and this brings uncounted dollars into the economy of the* area. We are pleased that the planning map shows part of the stream under the wild and scenic rivers designation. This will protect the visual beauty of the river.

Response — The Forest Service plans to begin the suitability evaluation on the section of the North River qualifying for designation as a "scenic" river in late 1992 or early 1993. This evaluation will be the final step in determining if this river will be recommended for inclusion in the National River System.

Letter 3894 — Take no action that would disqualify waterways for designation as Wild, Scenic, or Recreational Rivers.

Response — *All rivers qualifying for inclusion in the National River System have been allocated to management areas that* prohibit management practices that would disqualify them for inclusion

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Letter 2609 — We support the use of Management Area 10C for rivers and streams considered for Wild and Scenic status

Response — Under the Revised Plan, all lands within Management Area 10 are unsuitable for timber production.

Letter 92 — I would suggest you not make any great expenditure of effort or funds on Recreational rivers. Give high priority to acquiring fee ownership on the wild and scenic sections

Response — The FEIS contains studies of 14 rivers in accordance with the National Wild and Scenic Rivers Act of 1968 and in response to the Nationwide Rivers Inventory (National Park Service, January 1982) The only river that qualifies as wild is already protected within the St. Mary's Wilderness Those qualifying for Scenic will be protected to the extent possible in the Revised Plan. This may involve purchase or exchange of land from willing sellers within the Forest proclamation boundary.

Letter 92 — On any river where you plan to provide access keep the parking areas back at least 300 feet from the river and let people take their canoes, kayaks or boats down a trail that is wide enough to handle collapsible wheels for hauling boats.

Response — There are several factors that come into play in designing a river access parking area. available land for development, access for persons with disabilities, expense, high water levels, and river viewshed protection to name a few. To the extent practical, the parking areas will be screened from the river. This may or may not be within 300 feet

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Letter 3660 — Need to allow multiple-use management in W, S, & R River corridors it is possible to protect one resource while utilizing another.

Response — Rivers found eligible need further study to determine if they meet suitability criteria and should be recommend-*ed to Congress for addition to the Wild and Scenic River system Until designation decisions are made or other*

river studies are conducted, National Forest System lands associated with eligible river corridors are managed to ensure that the rivers remain eligible

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Letter 3951 — Wild and Scenic Rivers - Keep as in Alternative 12

Response — Management for rivers that are potentially eligible for designation under the Wild and Scenic Rivers Act is essentially the same in all alternatives. Eligible rivers and surrounding corridors receive, as a minimum, protection as outlined in Management Area 10

SPECIAL MANAGEMENT AREAS: Scenic Byways

Letter 988 — I am opposed to the current proposal 'Highland Scenic Tour' on the JRRD

Response — Since the "Highland Scenic Tour" was established by the Chief of the Forest Service, any declassification is technically outside the scope of the revision of the Forest Plan Since such declassification is consistent with the intent of Alternative 3, this alternative has been reformulated for the FEIS to incorporate the assumption that the Highland Scenic Tour would be undesignated by the Chief

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Letter 3660 — Virginia does not protect its Scenic By-Ways by restricting land use along them The FS should follow suit

Response — Virginia does not designate Scenic Byways The Commonwealth designates Scenic Highways (which are rare) and Virginia Byways (of which there are many) The Commonwealth generally controls only a narrow strip along the roads with the majority of the viewsheds being in private ownership or controlled by Federal agencies The USDA Forest Service manages a national system of Scenic Byways The Forest has one byway in this national system -- the Highlands Scenic Tour This route was selected due to its scenic resources and rich local history. The Forest owns, and therefore can influence, much of the viewshed along this byway it is appropriate, therefore, to provide standards which emphasize protection of the resources which make this area distinctive

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Letter 3660 — We need to quit hiding good forest management from the public This will end up getting us into trouble - again We need to educate

Response — Interpretation of forest management is included in Appendix C, along with proposals for other interpretive programs (See C-32 and 33)

Letter 3660 — I am opposed to the Highlands Scenic Tour unless standards and guides are relaxed to allow multiple-use management

Response — The Highlands Scenic Tour is and will be managed for multiple uses. The standards for that area permit the management of aesthetics, cultural resources, minerals, pests, recreation, wildlife, timber and other vegetation

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Letter 134 — While the Highlands Scenic Tour would include some positive elements such as nature trails, it unfortunately also contains environmentally destructive proposals such as cutting a 900 ft long swath of beautiful forest for widths of up to 200 ft as part of rerouting Forest Road 447 at Top Drive Overlook At the same location earthen fill would be deposited at depths up to six feet or more over a 100 ft wide section

Letter 134 — The Highlands Scenic Tour is not only a financial boondoggle but it is also an ecological disaster It is conceived by urban planners who don't understand the complexities of these mountain forests, ecology, or even appropriate aesthetics The artificial landscape they plan will merely duplicate landscape-open fields, forest edges, roads already common on nearby private lands it will further fragment (divide into smaller units) habitat in an area in which existing fragmentation already threatens biodiversity It will encourage common edge and field species of birds and animals that prey upon rare and increasingly threatened forest interior species such as tropical migrant warblers that are also suffering from deforestation in their winter homes in the rainforests of Central America

Letter 134 Friends, the Highlands Scenic Tour already exists! The spectacular cove forests, old growth ridge "orchard" oaks with rhododendron understory and the complex heath shrub-huckleberry, azalea, fetterbush, laurel, etc all may be viewed along the existing road They don't need money-losing timber sales or bulldozers to expose them to view As for balds, they are best left to their proper locations

Letter 134 We thought it was a good idea when Washington told the Forest Service to switch to recreation from timber sales However, it's clear that they're distorting this message and are really trying to do the same old thing as clearcutting in a different way destroying the forest with heavy machines and overmanagement in make-work projects

Letter 134 They have refused to issue proper scoping notices and have arrogantly refused to do an environmental assessment all in violation of interim management guidelines in effect while the new forest plan is being done Illegally they have even begun construction at the Top Driver Overlook

Letter 134 Along Route 850 they plan to create a mini village with a museum/auditorium, restrooms and a variety of other expensive facilities to display the remains of 19th century iron mines

Letter 134 At another location an area of mountain slope covering 2600 acres would be drastically altered Here on very steep unstable slopes they would schedule a number of timber sales as "demonstrations." But far worse they also plan to construct "balds" or areas where all trees, except for a few, would be eliminated permanently Presumably this artificial landscape is planned to duplicate natural balds which are native to the Great Smokies of North Carolina but are not at all home in this area To construct these balds, one of which would be 700 feet long and 200 feet wide, they would have to bulldoze, blast or pull every stump or saturate the area with herbicides and other chemicals to prevent resprouting Furthermore this artificial landscape would require continuous input of work, energy and expense comparable to suburban lawns to prevent the forest's return. All this artificial terrain would be viewed from a steel tower But this is only the beginning.

Response The Highlands Scenic Tour has been designated as a Forest Service Scenic Byway by the Chief A concept plan is available for viewing at the Supervisor's Office and the District Offices

It is not known where the commenter received his erroneous information, but within the concept plan there is no mention of the alteration of 2600 acres, no plans to create artificial balds and no mention of the construction of a steel tower. Road improvements for safety and visual enhancement include the rerouting of a portion of Top Drive Interpretive facilities are proposed which may include restrooms, kiosks, trails, scenic overlooks (which may take the form of a platform or deck), parking and one or two picnic areas If there is demonstrated demand and it is financially feasible, a modest visitor center may be proposed

The comment that the Forest has not done the proper scoping is also in error A scoping notice was issued in January 1991 and a Decision Memorandum for the improvements to FDR 447 (Top Drive) was issued in March 1992 Other developments proposed in the concept plan will be evaluated on a project level basis, and the public will have opportunities to comment

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Letter 500 The proposals for facilities along the Highland Scenic Byway are excessive in expense. The cost should be reduced.

Response The cost estimate in Appendix C of the Plan includes salaries for staff to inventory resources, plan interpretive programs, design facilities and supervise construction It also includes labor and materials for construction projects The cost is not excessive for developing a Scenic Byway with interpretive opportunities.

Letter 3951 National Forest Scenic Byway - Go back to the original Conceptual Plan prepared by VPI Scrap that portion calling for "Individual Tree" selection and no even-aged cuts over five (5) acres Only use group selection and thinnings in the foreground of State Routes 850, 770, I-64 and FDR 447 (Top Drive) The unseen area should be modification. The theme of this Byway was to show how the National Forests are managed and to use it for education, history, wildlife and fishery management, timber management, etc As written in Alternative 8, it will only educate the public toward a preservation mode of management

Response There has been only one concept plan developed by the Community Design Assistance Center of Virginia Polytechnic Institute and State University This document is available for viewing at the Supervisor's Office and District Offices It went through several draft stages with minor changes made each time The concept has

always been to optimize the scenic driving experience while providing interpretation of natural and cultural resources and the management of them This remains the emphasis in the finalized concept plan

The Highlands Scenic Tour does not emphasizes preservation management The Tour provides an excellent opportunity for the Forest Service to showcase the management of all resources including recreation, visual, wildlife, timber, cultural and watershed. A wide variety of management activities are permitted in both the foreground and the interior, but they are carefully planned to meet the retention and partial retention VQOs respectively

Proposed interpretive facilities and programs are addressed in Appendix C and the Concept Plan for the Highlands Scenic Tour Decisions as to which of these proposals will be developed and the level of development will be made on a project level basis. The proposals are made in such a way that development can be done in stages. Portions can be dropped or new proposals made without affecting the entire Byway There will be further opportunities for public comment on a project by project basis

Most of the interior area of the Highlands Scenic Tour is visible from Interstate 81, the Tour route itself, and/or Cockscomb Overlook. All of these are inventoried with the highest sensitivity level. The small, dispersed pockets of seldom seen areas do not justify adopting the modification VQO, therefore the partial retention VQO has been assigned

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Letter 4038

The Highland Scenic Tour should also be an Interpretive Motor Route The initial plan for this route as discussed with the Department of Conservation should be revisited This route offers an excellent opportunity to demonstrate the mix of management areas, practices, and scenic and recreational offerings available on the forest The desired future condition should be modified to reflect this change in emphasis Many of the standards can still be applied to this Tour, but where management activities are being demonstrated and interpreted, the retention VQO should not be applied. The scenic attributes along this route will continue to dominate the visitor's experience. Some management activities may be located out of view of the road Visitors can be encouraged to park at a designated site and walk down a closed road to view the results of timber, wildlife or other management practices

Response

Proposals for the Highlands Scenic Tour provide both motorized and non-motorized interpretation of resource management (See Appendix C, pages 27-35). Since visual resource management is a resource, it shall be interpreted by all activities along the foreground zone meeting the retention VQO In every other respect, your comment is consistent with the Revised Plan

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SPECIAL MANAGEMENT AREAS: Important Scenic/Recreational Value

Letter 91

Since our right-of-way corridor is very narrow, we depend almost totally upon the Forest Service to protect our views along the Blue Ridge Parkway Your proposed wilderness study areas and planned management to enhance scenic and natural values adjacent to portions of the Parkway lend strong support to the realization of our management objectives Further, it appears that areas to be managed for timber production would have minimal or no impact upon Parkway views

Response

The Forest recognizes the value of the viewshed of the Blue Ridge Parkway and has, in the preferred alternative, placed it in management areas with a sensitivity to visual resources We will continue to consult with the National Park Service and the public at the project level to ensure that the integrity of the Parkway viewshed is maintained

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Letter 91

We would appreciate a statement of commitment in the Land and Resource Management Plan to work cooperatively to minimize degradation of Parkway views and other resources We feel that such a statement with specific reference to the Parkway would provide a positive basis on which to continue this vital cooperation into the future

Response

The Forest has shown good faith in protecting the viewshed of the Blue Ridge Parkway in the Revised Plan We will continue to act in good faith, consulting with the National Park Service at the project level of any management decisions which may affect the Parkway

Letter 3625 — I believe it is for the best interest of maintaining the Appalachian Trail that the Priest area be given the Special Management designation, also the area including Mt Pleasant, Cold Mt and Pompey should continue to be protected by the designation "Special Management Area"

Response — Each management area is "special" in its own right These mentioned areas are protected by allocating the *Appalachian Trail corridor to Management Area 6, The Priest to Management Area 8 and Mt. Pleasant to* Management Area 21

Letter 3540 — Laurel Fork is an area of specific interest and concern We oppose any clearcut logging operations within its boundaries, as well as mineral mining and/or oil and gas development Selective logging in the section east of *the stream is not opposed, if deemed absolutely necessary and performed in a closely controlled manner.* Recreational activities such as hunting, fishing, hiking and camping are the most favored uses of the areas. Additional motorized vehicle access and ATV trails are not supported.

Response — In the Revised Plan, the Laurel Fork Roadless Area has been allocated to Management Area 21 as a Special Management Area This roadless area contains biological and mineral values which outweigh its value as wilderness.

The Laurel Fork Special Management Area is classified as unsuitable for timber production Some harvesting of fuelwood will be permitted along FDR 106 and FDR 457 There may also be some harvesting associated with the elimination of non-native red pine plantations. Salvage of timber killed by gypsy moth or other natural or man-made causes is permitted on portions of Middle Mountain accessible from FDR 457 and along the roadside corridor of FDR 106 This salvage will be conducted in such a manner that the roadless character and primitive appearance of the Laurel Fork Special Management Area are not significantly modified

The Laurel Fork Special Management Area is available for oil and gas minerals with Controlled Use Stipulations, and is available for other leasable minerals on a case-by-case basis and is not available for common variety minerals.

Public motorized access is limited to open system roads The intention is to relocate approximately 1 1 miles of FDR 427 along Middle Mountain on the eastern side of the Laurel Fork Special Management Area and to construct an access road and parking lot off State Route 642

There are no opportunities for grazing in the Laurel Fork Special Management Area and no grazing permits will be issued.

Any regulation of hunting, fishing and trapping is a legal responsibility of the Commonwealth of Virginia and is, therefore, outside the scope of the revision of the Forest Plan

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Letter 296 — Standard 625 No grazing permits are issued

Letter 296 — Hunting and fishing to continue to be permitted

Letter 296 — I propose that the *Final Plan* include a new category, Management 4 B/Laurel Fork managed according to proposed MA4/SBA standards with the type of additions and deletions I have listed above.

Letter 296 — *Prohibition on hunting/trapping/taking ETS species. Brochure to be prepared for public distribution indicating* in words and pictures such species along with rationale and justification for their protection

Response — *In reference to Laurel Fork, no grazing permits are allowed*

In reference to Laurel Fork, as well as Forest wide, "TES" (threatened, endangered, sensitive) species are *protected by Virginia State Laws, Federal Laws, and Forest Service Policies*

Laurel Fork is designated as Management Area 21, but will retain all of the protective measures for sensitive, *threatened, endangered and sensitive species, as allocation to Management Area 4 would allow*

Hunting, fishing (and trapping) will continue in Laurel Fork — as within all of the Forest when in accordance with appropriate state and federal regulations

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Letter 296 — Prohibition of using Laurel Fork as a reservoir or water-storage facility. Justification provided by the revised EIS

Response — There is no current plan under consideration to use Laurel Fork as a reservoir Any future request of this nature would be analyzed and decided upon according to National Environmental Policy Act requirements.

Letter 296 — Installation of gates as needed to prevent unauthorized motorized access beyond the open-system roads

Response — Installation of gates on roads to prevent unauthorized motorized access is a normal practice on the George Washington National Forest. This practice is currently employed in the Laurel Fork area and will continue to be used as needed in the future

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Letter 296 — Designation and signs of cross-country ski and horse trails

Response — To the present time, demand for these uses of the trails has not been sufficient to provide designation and signing However, should there be sufficient interest, we would be willing to enter into partnerships with interested individuals or groups to identify suitable trails and provide the signing

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Letter 296 — Signs at trailheads indicating the types of access and activities that are permitted and prohibited.

Response — The frequency and standards of trailhead signing will be commensurate with use levels. Where needed, regulations and restrictions for use will be posted

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Letter 296 — Prohibition of mass camping

Response — Laurel Fork is open for camping in the general area and at Locust Springs The demand for camping is heaviest in the November rifle deer season. We are identifying areas that receive the heaviest dispersed camping and examining these areas to determine impacts Where adverse resource impacts are identified, we will take the necessary steps to reduce or eliminate them An example would be to close camping in wet areas and designate dispersed campsites in nearby dry, well drained areas The intent would be to permit historical use of the area to continue while reducing impacts in more sensitive areas

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Letter 296 — No motorized trail use

Response — Motorized use of forest development trails is not allowed within this management area

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Letter 296 — Prohibition of ORV/ATV use on all trails, including 457 (Middle Mountain), 450 and Slabcamp road.

Response — Motorized use of forest development trails is not allowed within this management area

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Letter 296 — Maintenance but no expansion or upgrading of Locust Springs campsite

Response — Minor expansion and/or upgrades at the Locust Springs site are not precluded However, based on direction in Management Area 21, needed facility changes would be minimal, subtle and designed to blend with the natural surroundings Any changes would be analyzed and decided upon according to NEPA regulations.

Letter 296 — Standard 636–No road construction Reconstruction is limited to only that needed for protecting resource values in the riparian area (The absence of a specific discussion of Laurel Fork makes it hard, if not impossible, to determine how this area is to be managed under Standard 22, 26 and whatever other road-related standard may or may not be applied The Final Plan and the Final EIS should discuss road standards specifically)

Response — The Red Oak Road, FDR 457, crosses from National Forest land to private land and back to National Forest land Relocation of this road is identified in the Revised Plan Approximately 1 1 miles of road will be needed An access road segment will be needed to the parking lot off State Route 642

Letter 296 — Trails. Standards 907-935 are applied to Laurel Fork as part of its MA4 designation I support these standards The Draft's Revised List of Projects, however, anticipates "reconstructing" 6 5 miles of FS Trail 450, which follows the path of the abandoned rail bed along the main creek as it flows north It's not obvious what the Draft envisions and to what standard the trail is to be built. The public cannot be expected to endorse or oppose this project without having additional information

Response — The Laurel Fork trail is identified as a potential trail reconstruction project in the Revised Plan The actual location and extent of the trail reconstruction and/or relocation would take place based upon project level analysis and public scoping according to NEPA procedures

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Letter 296 — Construction of 10-vehicle trailhead parking facility and trail access at or near the intersection of Laurel Fork and SR 642 Provide Laurel Fork information at trailhead to include map, boundaries of RNA, description of Laurel Fork's ETS population, list of activities prohibited, discouraged and allowed

Response — This project was identified in the 1986 Plan and will also be included as a potential project in the Revised Plan It would likely require acquisition of a small parcel of private land and a trail right-of-way. Information to be placed at the trailhead would be determined during the preparation of this project

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Letter 296 — Small camping parties to continue to be permitted, contrary to VNHP recommendations If human use poses threat to SBA/RNA objectives in the future, limitations should be considered and imposed

Response — The area has historically been available and used for small group camping The need to minimize adverse affects on sensitive areas is recognized. In some cases shifting use to designated sites on more resilient locations will help prevent these impacts Party size restrictions, though not precluded, would be a last resort due to cost and difficulty of administration

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Letter 296 — Recreation opportunities should be consistent with a primitive and semi-primitive non-motorized objective, with the exception of the existing Locust Springs campsite. (Standard 22, which applies to all MA4/SBAs, refers broadly to "lands classified as roaded natural, semi-primitive motorized [subclass 1] and semi-primitive non-motorized recreation opportunity spectra." [Draft, p. 2-29] Without a discussion focused specifically on Laurel Fork, it is once again impossible to determine what the GWNF plan is proposing)

Response — The unique qualities of Laurel Fork are recognized, and it is included within Management Area 21 for that reason The ROS inventory was reviewed since the publishing of the Draft Plan The current ROS inventory for Laurel Fork is adopted under Management Area 21

Letter 2665 — No natural succession viewsheds are provided in the plan (EIS 2-20)

Response — It is unclear what the commenter means by this statement No such statement is made in the EIS or FLMP documents.

Letter 2742 — By and large Alt 8 would preserve the existing status of the scenic areas of the Forest, and hopefully you will remain steadfast in this respect

Response — In the record of decision the Regional Forester will discuss the rationale for selection the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan Visual resource management was considered in the formulation and analysis of each alternative

Letter 91 — We share with you management responsibilities for the Appalachian National Scenic Trail, and hope to continue to work cooperatively to provide for the ever-expanding need for public recreation in the region.

Response — NO RESPONSE REQUIRED

Letter 1996 — The Appalachian Trail should be maintained as near wilderness without additional roads or scalping areas to ruin the views of hikers by clearcutting near the AT corridor

Response — The Appalachian Trail corridor is Management Area 6 and is managed for remote, non-motorized recreation opportunities. This is distinct from wilderness For instance, in the AT Management Area, mechanized equipment such as chainsaws is allowed for maintenance and there are trail shelters available Where the AT traverses lands recommended for wilderness study, the wilderness resources will be protected The Forest Service Visual Management System is used to protect the scenic resources of the AT

Letter 87 — On the Pedlar RD, Buena Vista, Big Island and Snowden quads, it is recommended that Management Area 17 be changed to Management Area 16 from the AT corridor and U S. Highway 60 on the North to Rocky Run, on the west to the forest boundary on the east and south because most of this area has a VQO of Partial Retention.

Letters 1622, 1623, 1802, 1803, 2180, 2487, 2622, 3648
The Rocky Row Run drainage area of the Pedlar District currently listed as Management Area 17 be changed to MA 16 which will provide viewshed protection along the A.T on Little Rocky Row, Big Rocky Row, and Bluff Mountain

Letters 1622, 1623, 1802, 1803, 2180, 2487, 2622, 3648
The area around Tarjacket Ridge, Maintop Mountain, and Spy Rock be changed from MA 1 to MA 13 which would provide viewshed protection for the A.T. and would provide opportunities for dispersed recreation.

Letter 1869 — I am in favor of the promotion of quality hiking which includes viewshed protection of the AT and other trails.

Letter 2239 — Protect the views along the Appalachian Trail, especially from Little Rocky Row, Big Rocky Row, Bluff Mountain, Maintop Mountain, and Spy Rock

Letter 2677 — The preservation and management of visual resources along the A T is of utmost importance to the A T.

Letter 2691 — My most blatant problem is the rape and pillage Management Area 17 on the eastern slope of Rocky Row in the southern part of the Pedlar District directly adjacent to the Appalachian Trail Corridor The no visual consideration nature of Area 17 is inconsistent with the forest's efforts to protect the Trail if not against the federal laws calling for the Trail's protection It is a situation I find unacceptable

Letter 2861 — Change the Management Areas in Pedlar District from MA 17 to MA 16 to provide a better viewshed Heavily traveled areas around Spy Rock and Tarjacket and Maintop would also be better served by changing it from MA 1 to MA 13

Letter 3717 — The preservation & mgmt of the visual resource along the AT is critical to the quality of the Appalachian Trail experience.

Letter 3764 — If the areas around Tarjacket Ridge, Maintop Mtn and Spy Rock were to be classified MA13, they would provide a greater opportunity for dispersed recreation

Letter 3941 — Forest-Wide Standards & Guides - for adjacent management areas seen from the Appalachian Trail that have an adopted VQO of modification or maximum modification, those portions of the areas seen from the Appalachian Trail will be managed to meet partial retention objectives

Letter 4027 — The aesthetic value of the land within the viewshed of the Appalachian Trail is far greater than the monetary value of the timber The plan should be designed to protect the biological resources of the area and yet provide for a diversity of recreational opportunities that will not be detrimental to the resource

Letter 4041 The view from Spy Rock numbers among the most spectacular Everything should be done to prevent degradation of this viewpoint.

Response The Revised Plan has been formulated to ensure that no lands visible from the Appalachian Trail have a lesser visual quality objective than the existing inventory In addition, a standard for Management Area 6 states that management activities, such as those associated with timber harvesting, visible from the trail but outside the management area are modified to reduce negative impacts from the hiker's view in accordance with the visual management system A standard is also in place to assure that site-specific project planning include consultation with local Appalachian Trail clubs.

Letters 1622, 1623, 1662, 1802, 1803, 1863, 2180, 2242, 2260, 2328, 2339, 2492, 2825, 2928, 2912, 3549, 3769, 3772, 3829, 3830, 3883, 4041

We are concerned with preserving the A T. hiking experience as a near-wilderness experience with strong protection of viewshed and we are very interested in minimizing the intrusion of roads and motorized vehicles into or near the A T corridor We also desire minimal impact of logging operations as they might impact the A.T.

Response Management Area 6, the Appalachian National Scenic Trail and environs, includes all land within the foreground viewshed as mapped using the Forest Service Visual Management System. This management area is the same in all alternatives with the exception of lands recommended for wilderness study. These lands in Management Area 8 provide a non-motorized, remote experience that is fully compatible with the AT experience Standards were developed in cooperation with the Appalachian Trail conference, other Southern Appalachian National Forests, and the Forest Service Southern Region Office This provides protection to maintain the remote, non-motorized experience of the trail for foot traffic only

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Letter 2009 Minimize the intrusion of roads and motorized vehicles near the A T

Response The remote, non-motorized experience of the Appalachian Trail is very important and is maintained in the preferred alternative

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Letter 2514 I request that Alternative 8 be adopted, as proposed, for the George Washington National Forest in regards to the location of the Appalachian Trail through that area.

Response The location of the Appalachian Trail is the same in all alternatives The variation by alternative that affects the AT corridor is the recommendation of certain areas for wilderness study.

Letter 2381 Keep ORVs off and far away from the Appalachian Trail & preferably out of the NF.

Response The Appalachian Trail is in Management Area 6. This Management Area is the same in all alternatives with the exception of lands recommended for wilderness study area designation. A remote non-motorized recreation experience is provided. Standards were developed in cooperation with the Appalachian Trail Conference, other Southern Appalachian National Forests, and the Forest Service Southern Region Office This provides protection to maintain the non-motorized experience of the trail for foot traffic only

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Letter 2612 The provision of a buffer zone for the Appalachian Trail corridor and the wilderness areas is essential for their protection.

Response The Forest Service policy has long been one that wildernesses contain their own buffers This policy, however, does not preclude the designation of roadless areas adjacent to existing wilderness to enlarge wilderness areas Nor does it preclude the management of roadless areas adjoining existing wilderness to emphasize their roadless qualities for primitive recreation

In essence, Management Area 6 provides the buffer for that portion of the Appalachian National Scenic Trail that passes through the Pedlar Ranger District

Letter 3642 The Appalachian Trail experience is one that must be at lease maintained in its present state Once lost, it will be gone forever

Response In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan Since management of the Appalachian Trail is part of "ISSUE 6 -- SPECIAL RECREATION MANAGEMENT AREAS", it will be discussed in the record of decision

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Letter 3660 Too restrictive on roads close to the AT Need to be more flexible

Response Open roads that cross or closely parallel the Appalachian Trail, Management Area 6, are not compatible with the non-motorized trail values of the AT However, road locations that are the only reasonable and prudent alternatives are allowed after all impacts have been mitigated to the maximum extent It is realized that it is impossible to prevent all road impacts

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Letter 3697 I am against clearcutting along the Appalachian Trail

Response All of Management Area 6, the Appalachian National Scenic Trail, is unsuitable for timber production and therefore it will not be clearcut

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Letter 1824 I desire a reduction in the total number of acres to be clearcut on the forest and minimal impact of logging operations as they might impact the AT

Response In conformance with the new national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other timber harvest method can achieve the objectives or desired future condition of the given management area Standards are included in the Revised Plan for Management Area 6 that mitigate impacts on the Appalachian Trail from logging operations

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Letter 3792 Keep the Appalachian Trail corridor protected from activities that negatively impact the wilderness experience.

Response The Appalachian Trail corridor is Management Area 6 and is managed for remote, non-motorized recreation opportunities This is distinct from wilderness For instance, in the AT Management Area, power mechanized equipment such as chain saws are allowed for maintenance and there are trail shelters available Where the AT traverses land recommended for wilderness study, the wilderness resources will be protected

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Letter 3921 This alternative [#8] provides protection for the Appalachian Trail

Response NO RESPONSE REQUIRED

Letter 3941 The Appalachian Trail Mgt Area is delineated as MA6 in the draft plan, and standards and guides for the Appalachian Trail are incorporated into the plan We believe that it is ESSENTIAL that the final approved version of the regional standards and guides be substituted for the S&Gs for the Appalachian Trail Mgt Area in the draft plan Our primary concern is that the meaning of the revised S&Gs be incorporated in the GWNF Plan

Letter 3941 The mgt corridor for the A T "disappears" within areas proposed for wilderness designation, and we suggest two possible solutions to this problem The first option would be simply to describe the Appalachian Trail mgt. area as proposed in our draft This would, in effect, recognize that the AT mgt area overlaps the wilderness mgt. area We are concerned that the S&Gs for mgt of the A T are recognized where the Trail passes through wilderness, subject to the guiding principles of wilderness mgmt The second option would be to incorporate by reference the A T S&Gs from MA6 into the S&Gs for MA8 The revised S&Gs for the A T mgt area include a statement declaring compliance with the Wilderness Act of 1964 and subsequent wilderness-designating acts You could also reference the existing Virginia Wilderness Acts

Response	The Pedlar Ranger District through which the AT spans the Forest, has long standing excellent relationships with the three clubs that maintain the AT on the Forest Language to the effect of the comment has been added to the Revised Plan
Letter 3941	Standards & Guides - Where practical, avoid placing motorized equipment on the Trail
Letter 3941	Standards & Guides - Prescribed fire may be used when compatible with the objectives of the management area
Letter 3941	Standards & Guides - Coordinate work projects for the Trail at the district level with partner trail clubs based on the ATC Trail assessment process, and conduct a work planning session at least once annually.
Letter 3941	Standards & Guides - Facilities such as shelters, privies, stiles, bridges, spring boxes, registers, and trailheads will be constructed so as to meet resource protection and hiker needs in partnership with ATC and local A T clubs
Letter 3941	Standards & Guides - Primitive camping is encouraged where resource protection is not a limiting factor.
Letter 3941	Standards & Guides - Where feasible, locate new shelters no closer than two miles from open roads and other access points
Letter 3941	Standards & Guides - Motorized, horse, packstock and bicycle use on the Trail is prohibited except where the Trail crosses or is located on Forest system, state or county roads Actively manage to exclude these uses.
Letter 3941	Standards & Guides - Trail shelters and related facilities will be managed, constructed and maintained in accordance with the ATC Overnight Use Principles and the responsible A T club local management plan.
Letter 3941	Standards & Guides - Ensure that relocations provide a Trail environment that is equal to one better than that of the existing location
Letter 3941	Standards & Guides - Exercise care that Trail relocations and improvements not cause a progressive loss of the primitive quality or simplicity of the footpath
Letter 3941	Standards & Guides - Prohibit the broadcast application of herbicides for control of vegetation in utility right-of-ways within the Appalachian Trail management area
Letter 3941	Standards & Guides - Apply full mitigating measures to protect trail values and environment Proposals for new or upgraded utility lines shall be the subject of an environmental assessment or environmental impact statement, with full consideration given to Appalachian Trail values and where proven to be the only prudent feasible alternative
Letter 3941	Standards & Guides - Acquire lands or interests in lands identified in the Appalachian National Scenic Trail Land Acquisition Inventory–Region 8, 1988, as modified through subsequent application of the Optimal Location Review procedures
Letter 3941	Standards & Guides - Plan for protection and/or management of identified populations of proposed, endangered, threatened and sensitive species in cases where such actions are needed in cooperation with ATC and the local trail club.
Letter 3941	Standards & Guides - Conduct and maintain a biological inventory of proposed, endangered, threatened and sensitive species within the management area in cooperation with ATC and state natural heritage program.
Letter 3941	Standards & Guides - An inventory of geological features will be carried out to identify interpretive opportunities.
Letter 3941	Standards & Guides - As appropriate, use prescribed burning, hand tools, power tools, herbicides, and grazing to control vegetation
Letter 3941	Standards & Guides - Report incidents of criminal behavior to the Appalachian Trail Conference and the Trail maintenance club

Letter 3941	Standards & Guides - Establish procedures for Forest Service law enforcement officers to timely respond to and investigate Trail incidents and randomly patrol trailheads and easily accessible facilities, particularly those with a history or pattern of incidents.
Letter 3941	Standards & Guides - Keep hiker regulations as unrestrictive as possible. Restrict use only to the extent proven necessary to protect the Trail, its environment, the interests of adjacent landowners, and the Trail users Incompatible activities will be controlled by educational efforts and, failing these, by enforcement of laws and Trail regulations Foster an unregimented atmosphere and encourage self-reliance and respect for Trail values by legitimate users.
Letter 3941	Standards & Guides - Site-specific projects that may affect the visual resource, and adoption of VQOs, will be coordinated with the ATC and the local trail club
Letter 3941	Standards & Guides - The area mapped as foreground from the A T. footpath and associated viewpoints, shelters, campsites, water sources and spur trails to these features, will have a VQO of retention.
Letter 3941	Standards & Guides - Signing and blazing will be consistent with the ATC Stewardship Manual Trail Design, Construction, and Maintenance and the USFS Sign Handbook (FSH 7109 11), except that mileage will be shown to the nearest tenth mile
Letter 3941	Standards & Guides - Design the treadway according to soils, drainage, vegetation, topography, and other resource constraints Consider safety in trail design, construction, and maintenance, without sacrificing the aspect of the trail which challenges a hiker's skill and stamina
Letter 3941	Standards & Guides - Use the Optimal Location Review (OLR) to initiate the decision making process and follow approved relocation procedures described in FSM 2353, R-8 Supplement #42, 9/83
Letter 3941	Standards & Guides - Where feasible, provide parking facilities at locations where the Appalachian Trail can be accessed by a short spur trail rather than at locations where the trail footpath crosses a road
Letter 3941	Standards & Guides - Analyze all roads crossing or paralleling the trail within one mile for their potential undesirable impacts on the trail experience and either close or document decision to leave open as appropriate Allow new roads only if they are the only prudent and feasible alternative and only after all impacts have been mitigated to the maximum extent
Letter 3941	Standards & Guides - Require a landscape management plan screening, feathering and other vegetation management techniques to mitigate the visual and other impacts of new, upgraded or re-authorized utility right-of-way
Letter 3941	Standards & Guides - Apply appropriate Secretary's rules and regulations
Letter 3941	Standards & Guides - All new leases will stipulate no surface occupancy in the management area When existing leases expire or are terminated, new leases will reflect this standard.
Letter 3941	Standards & Guides - Locate the trailhead, shelters, toilets, and primitive camps to minimize the possibility of contamination of drinking water Educate users on low-impact camping, including sanitation practices that minimize the potential of contamination of drinking waters Educate users on proper treatment of all unprotected water before use
Letter 3941	Standards & Guides - Follow construction and maintenance standards found in the Appalachian Trail Conference Stewardship Manual
Letter 3941	Standards & Guides - Timber activities on the Appalachian Trail will be to enhance environment only, they will be limited to cutting to improve health of the stand, provide scenic vistas, control insects and disease, attract wildlife, or when needed provide for public safety or resource protection All timber volumes are non-chargeable The ATC and the local trail club will be consulted on any timber management activity that may affect the Trail experience
Letter 3941	Standards & Guides - Manage the A T within designated wilderness in accordance with the Wilderness Act of 1964, the specific area designating act, and the area wilderness implementation schedule (developed in consultation with ATC and the affected trail clubs)

Letter 3941	Standards & Guides - Develop habitat improvements that are complementary to the Trail Such improvements will be carried out within visual management and ROS guidelines, objectives, and standards. The Forest Service will recommend habitat management practices along the Trail that will enhance wildlife viewing opportunities
Letter 3941	Standards & Guides - Where appropriate, interpret cultural resources through maps, guidebooks, signs and other Trail-appropriate means. The Forest Archeologist will inventory cultural and historic resources, and will recommend appropriate protection methods.
Letter 3941	Standards & Guides - Maintain an Agreement for Sponsored Voluntary Services between each RD and partner Trail club, to be reviewed and renewed annually
Letter 3941	Standards & Guides - Vehicular access to trail shelters will be limited to access for administrative purposes only. Minimize open roads within 1/2 mile of shelters
Letter 3941	Standards & Guides - Limit additional development to facilities compatible with the Appalachian Trail Manage existing trail-related facilities to meet trail hiker needs
Letter 3941	Standards & Guides - Place emphasis on evaluating hazard potential and determining if efforts are needed to prevent or control loss of trail values
Response	New wording has been added to the discussion of Management Area 6 in the Revised Plan Modified versions of these standards are included
Letter 3941	Standards & Guides - The seen ones viewed from the A T and associated shelters, viewpoints, campsites, and water sources, and the spur trail linking these features are classified as Sensitivity Level 1.
Response	The AT itself will have a Sensitivity Level 1. Associated side trails and facilities will have a determination made on a case by case basis.
Letter 3951	Appalachian Trail - Keep the acres as in Alternative 12 but with the three Wilderness Study areas some additional acres will need to be added to this Management Area Freeze its location at the present location. Set the VQO in the middleground and background as modification and partial retention to permit sound resource management.
Response	The AT location is the same in all alternatives It is possible that very short segments will be relocated to ensure natural resource protection and provide for the optimum location to enhance trail experiences. For the Forest, this relocation is expected to be very minor Where the AT crosses Management Area 8, in lands recommended for wilderness study, the acreage is counted in Management Area 8 rather than in Management Area 6 Acreage in Alternatives 2, 4, 5, 7, 10, and 12 is higher because there is less land in areas recommended for wilderness study, not because there is more land protected for the AT
Letter 3693	If you have to cut [trees] at all, use Alternative 8 and cut away from the [Appalachian] Trail
Response	The Appalachian Trail (Management Area 6) is unsuitable for timber management Dead or dying trees may be cut and felled or removed, for scenic rehabilitation or to provide for public safety Harvesting visible from the Trail, but outside the management area is designed to reduce negative impacts from the user's view

Letter 296 — Designate Locust Springs Run, Slabcamp Run and Laurel Fork as featured-species Brook Trout streams, unless this represents a serious conflict with RNA management

Response — The Revised Plan does not use the term "featured species" for trout streams Instead, all native trout streams receive a high degree of protection

All perennial streams in Management Area 21 are part of Management Area 18 There are special provisions for protection of native trout streams in Management Area 18

The stream inventory map is a sensitive data base shared with the Virginia Department of Game and Inland Fisheries This data, particularly the wild trout stream inventory, is generally not made available to the public The inventory is dynamic and being updated continuously and is not a legal document that determines management practices On the ground, site-specific analysis of streams dictates management practices For example, if the inventory lists a stream as cool-water and site-specific analysis finds it to be a wild trout stream or potential wild trout stream, the standards for wild trout streams would apply

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Letter 1153 — Wildlife mgt equates to vegetative manipulation as well as the stocking of streams with non-native fish

Letter 3637 — We support an improved bass fishery at Lake Moomaw Additional fish structure[s] should be seasonally erected and shoreline cover and trees should be planted

Response — Your recommendation has been considered and the Forest has incorporated the concept into the preferred alternative Stocking and special regulations are not under the Forest Service's authority but are recommended and set by the VDGIF. The Forest Service manages habitat under its authority and consults with State biologists on projects affecting fisheries resources

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Letter 1258 — [Emphasize] protection of fish..

Letter 1297 — Maximize protection of fish

Letter 3951 — Wildlife and Fishery Management - Keep as in Alternative 12. An active timber management program will take care of most of the needs and is the most economical method to use in the management of these resources

Response — In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan All alternatives give protection to fisheries resources through standards, guidelines and other mitigation measures. Economic efficiencies and costs of the fisheries program will be considered

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Letter 3637 — We would like to see the Jackson River access and fishery management issue resolved to the mutual satisfaction of both the State and landowners and a blue ribbon trout fishery promoted and supported

Response — The Forest Service has provided public access to the Jackson River below Lake Moomaw The issue of fishing and trespassing on the river has not been resolved where the river borders private lands The issue is beyond the scope of the plan in that it involves private lands, State's rights and water law for the State of Virginia

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Letter 3728 — All coldwater streams on the Forest should be inventoried by a fisheries biologist to determine the specific habitat needs of each In all cases, except Wilderness Area, the Forest is obligated to correct problems causing environmental damage and to a slightly lesser degree provide additional recreational fishing opportunity

Response — The preferred alternative delineates the range of desired future conditions for all types of streams on the Forest and the levels where corrective actions are initiated Because the majority of riparian areas may not be at the desired future condition, a priority system will be needed to correct the problem gradually as time and money become available

Letter 3840 Pg 2-129, [Standard] #686 - Absolutely no timbering or salvage from a wild trout stream or any trout stream

Response Under the preferred alternative the riparian area (Management Area 18) along wild trout streams is unsuitable for timber production Salvage of dead and dying timber is allowed only on a site-specific basis and only if the desired future can be met Outside the riparian area and along stocked trout water the areas may or may not be suitable for timber production and salvage Under the right conditions and following appropriate standards, timber harvest can occur without detrimental efforts on trout streams.

Letter 3883 Liming of trout streams which have become too acidic should be authorized under professional guidance

Response The mitigation of acid rain through the addition of limestone is allowed on a case-by-case basis after site-specific analysis Widespread use of this technique will be limited by access and budgetary constraints.

Letter 3940 Plan. Page 2-4, Paragraph 9· Allow the use of artificial structures until habitat from large woody debris is adequate

Response The desired future condition of the preferred alternative has sufficient amounts of large woody debris that provide self-maintaining habitat, consequently additional artificial structures are not required Where the desired future condition is not met, artificial structures are added to provide sufficient habitat

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Letter 4268 Plan - EPA questions the validity of Standard 697 providing preferential treatment to trout over other fish species for fish passage structures

Response Brook trout, brown trout and rainbow trout generally migrate upsteam to spawn Blockage of upstream migration could isolate important spawning areas and greatly affect populations throughout the stream The need to provide fish passage for fish other than trout is determined on a case-by-case analysis based on species, migratory behavior, spawning behavior and population dynamics

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AESTHETICS: Updating the VQO Inventory

Letter 17 The Visual Quality Objectives map should be updated

Letter 2824 On January 13, 1992 we wrote to you asking for circulation of maps showing an updated Visual Quality Objectives inventory We have had many discussions with your staff the importance for the planning process to have an updated inventory. We have not received a map for review After these maps are distributed, we request a reasonable time to review and comment

Response NFMA requires that the visual resource be inventoried and evaluated as an integrated part of formulating alternatives In the last three years the VQO inventory map has undergone an intensive review and update. This inventory has been used in evaluating the alternatives, each of which assigns a VQO for each management area.

Letter 990 All areas in the updated Recreation Opportunity Spectrum inventory shown as Semi-Primitive Non-Motorized (SPNM) should be placed in a Management Area which affords at least Retention standards for VQOs This is to bring the visual management into compliance with the ROS direction for SPNM management

Letter 990 All areas in the updated Recreation Opportunity Spectrum inventory shown as Roaded Natural (RN) and seen from a sensitivity level 1 or 2 travel route should be placed in a Management Area which affords at least Partial Retention standards for VQOs This is to bring the visual management into compliance with ROS direction for RN management

Response Alternatives 9 and 13 retain all areas inventoried as semi-primitive non motorized as such Each of these areas adopts a VQO of retention or preservation. This alternative is considered in detail in the FEIS and will be selected

as the alternative to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefit.

Letter 3981 — EIS 3-120, paragraph 4 - As an examination of Table 3-26 reveals that statement "Alternative 8 has nearly a half-million acres classed with a preservation VQO" is totally false The correct figure is a "minuscule 46,143 acres" Say so.

Letter 3981 — EIS· 3-121, paragraph 2 - Alternative 11 does not have "over one-half million acres" with a preservation VQO It does not have "the second largest acreage..." Alternative 9 does - say so.

Letter 3988 — P 3-120 erroneously states that "Alternative 8 has nearly a half-million acres classed as preservation VQO". This is not true. Only 46,143 acres of preservation VQO are indicated elsewhere in the DEIS for Alternative 8 This is a serious error—especially if it was one of the considerations in selecting it as the preferred alternative

Response — The typographical error was discovered after the Draft Revised Plan went to print. The erroneous figure was not used in the selection of the preferred alternative. The figure in the written description has been corrected, and the discrepancy eliminated

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Letter 3988 — P 3-118. The Figures on preservation VQO for Alternative 3 do not agree with those on the previous page. If 811,270 acres would go into preservation VQO in this alternative, I would expect a massive rehabilitation program

Response — This typographical error was discovered after the Draft Revised Plan went to print The error has been corrected. Alternative 3 would not provide a sizeable visual rehabilitation program, since a large portion of the Forest would adopt a preservation VQO under that alternative Preservation emphasizes ecological changes only, rather than man made changes to the environment Consistent with the definition for that VQO, the Forest would generally not rehabilitate naturally occurring changes to the landscape

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Letter 990 — All areas in the updated Recreation Opportunity Spectrum inventory shown as Semi-Primitive Motorized (SPM) and seen from a travel route with a sensitivity level of 1 or 2 should be placed in a Management Area which affords at least Partial Retention standards for VQOs This is to bring the visual management into compliance with the ROS direction for SPM management

Response — Alternative 2 adopts ROS classes as inventoried, however it does not provide compatibility between ROS classes and VQOs. All of the other alternatives provide compatibility between adopted ROS classes and VQOs. All of the foreground corridors for the inventoried roads with a sensitivity level of 1 or 2 adopt a VQO of at least partial retention For the most part, this is also true for the middleground areas inventoried as partial retention

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Letter 3988 — The use of "legal and administrative plans" as an element of visual resource inventory is confusing (See para. 5 on p 3-116 of the DEIS) Does it refer to Wilderness designations, etc ?

Response — The sentence has been modified in the FEIS for clarification

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Letter 3988 — The statement on the second paragraph of P 3-117 that "This acknowledges that management activities on the Forest meet more stringent VQOs than dictated by VMS" is inaccurate VMS does not "dictate". Further, the inventoried VQOs referred to in that sentence already reflected a compromise down to the lowest level of visual quality that was expected to be acceptable

Response — Because Alternative 2 adopts the VQOs as inventoried, the paragraph to which the commenter refers has been deleted in the FEIS The inventoried VQOs do not reflect a compromise to the lowest level of visual quality expected to be acceptable The inventory was conducted following the guidelines provided in USDA Handbook 462 "National Forest Landscape Management" Volume 2, Chapter 1

Letter 4012 — PATC urges the inclusion by the Forest Service of the Big Blue and Big Schloss trails system under Management Area 6 as 'sensitivity level 1' trails

Response — In the preferred alternative, the Big Blue and Big Schloss Trails have been placed in management areas which adopt a VQO of partial retention at a minimum This is consistent with the inventoried VQOs for those trails

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Letter 4219 — We disagree with the assignment of a Modification VQO to communications sites (MA 20). Many of these sites have higher VQOs assigned as part of the site plan approved by the Regional Forester. These VQOs should not be lowered Where no VQO is assigned by the existing site plan, the VQO should be determined by the VQO of the surrounding land.

Response — *The standard has been changed to be more consistent with the inventoried VQOs and the adopted VQOs of the* adjacent management areas.

AESTHETICS: Effects of Management on Aesthetics

Letter 146 — In Alternative 12, the protection of visual quality along major highways is much less than under current management direction Timber harvesting along Sensitivity Level 1 roads or trails would seriously degrade the views from these travel routes

Letter 3963 — The Recorder, 20 Mar 1992 "We are primarily a tourist county and too much cutting could be detrimental to that."

Response — In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Forest Plan. Recreation and visual resource management were considered in the formulation and analyses of the alternatives

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Letter 3711 — Timber harvesting should be done back from public view and not along public highways.

Response — In order to meet a management goal of keeping new road development to a minimum, harvesting along some existing public roads in the Forest is permitted in the preferred alternative. Management activities must meet a visual quality objective assigned to the areas where they occur Along travel routes where public concern for scenic quality is demonstrably high, management activities are carefully planned to maintain a natural or near natural appearing landscape

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Letter 3981 — EIS 3-74, paragraph 4 - The last sentence is demonstrably false - a natural appearance will dominate little of the Forest under Alt 8 - Say so For corroboration of this see Fig. 2-21 on pg 2-44. PRES VQO is only on 41,143 acres of the Forest. This tiny portion is where a "natural appearance" dominates.

Response — Natural appearing areas of the Forest which adopt the retention VQO will remain natural appearing Many portions of areas adopting the partial retention VQO will also remain natural appearing

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AESTHETICS: Opposition to the Maximum Modification VQO

Letter 146 — The draft plan proposes to eliminate the Maximum Modification VQO This is a great improvement over the discredited 1986 plan.

Response — The maximum modification VQO is compatible only with the urban and rural ROS classes Since this Forest contains no lands within those classes, the maximum modification VQO is inappropriate and is not assigned to any management area

AESTHETICS: VQO as a Management Goal

Letter 72	The foreground of all Sensitivity Level 1 routes should be placed in an MA which affords a Retention VQO
Letter 72	All Partial Retention areas in the current VQO inventory should be placed in an MA which affords at least a PR VQO
Letter 72	The foreground of all Sensitivity level 1 trails should be placed in an MA which affords a Retention VQO
Letter 188	All Retention areas in the current VQO inventory should be placed in an MA which affords at least a Retention VQO
Letter 990	Alternative 2 models the current management direction Current management direction is to manage the VQO inventory as the adopted VQOs There should be no discrepancy between the VQO inventory and Alternative 2 allocation to various VQO classes This discrepancy should be eliminated
Letter 3988	P. 3-118 states that "Compared with the existing inventory, Alternative 2 calls for a substantial increase in acreage on which preservation and partial retention VQOs are adopted" Unless there was an existing visual condition inventory, this is an untrue statement as there is no basis for it I would expect that Alternative 2 actually would reduce the existing scenic quality.
Response	Alternative 2 does not reduce existing scenic quality. In the FEIS, the VQOs in Alternative 2 are adopted as inventoried This is reflected in Table 3-21 of the FEIS If it is identified as the alternative which maximizes net public benefits, the Regional Forester will select it to serve as the Revised Plan. The Revised Plan has placed the foreground of Sensitivity Level 1 and 2 roads in Management Area 7 There is a list of these roads in Chapter 3 of the Revised Plan
Letter 990	According to the written description of Alternative 8 on page 3-120 of the EIS, nearly a half-million acres are classed with a preservation VQO. This contradicts the figures given in table 3-26, which shows 523,771 acres in the Retention classification, not Preservation This discrepancy should be corrected
Response	The ID Team also discovered this error after the Draft Revised Plan went to print The figure in the written description has been corrected, and the discrepancy has been eliminated
Letter 1824	I support Alt 8 with some minor changes. the Rocky Row Run drainage area of the Pedlar Dist currently listed as MA17 should be changed to MA16 which will provide viewshed protection along the AT on Little Rocky Row, Big Rocky Row, and Bluff Mtn The area around Tarjacket Ridge, Maintop Mt, and Spy Rock should be changed from MA1 to MA13, which would provide viewshed protection from the AT and would provide opportunities for dispersed recreation.
Letter 1868	I am writing in favor of Alternative #8. I also favor the modifications to provide viewshed protection along the A T on Little Rocky Row, Big Rocky Row and Bluff Mountain as well as around Tarjacket Ridge, Maintop Mt and Spy Rock as recommended by NBATC and including reduction in the total of clearcut acreage and mineral intrusion of roads and motorized vehicle into the A T. corridor
Letter 3764	The Rocky Row drainage area should not be classified as MA17 If it were instead a MA16, viewsheds along the Appalachian Trail would be preserved along Little Rocky Row, Big Rocky Row and Bluff Mountain
Letter 3941	In the area from Brown Mountain Creek to the James River adjacent to the Trail (see Area D on Map #2), lands adjacent to an in the middleground view area of the Appalachian Trail should be designated as Management Area #16
Letter 3941	This is the only section of the Appalachian Trail where areas viewed from the Trail are managed less sensitively than under the present Forest management guidelines These lands are a portion of the area designated as Management Area #17, an area managed to emphasize timber production that carries a visual quality objectives of "modification " We feel that the portion of those lands that are veiwed in the middle ground from the

Appalachian Trail should be managed to meet a visual quality objective of "partial retention," which would require management activities in areas seen as middleground from the Trail to avoid dominating the landscape

Letter 3959 — Viewpoints from the AT on Bluff Mt. and Big Rocky Row These will be impacted by timber activities on portions of MA17. Change the VQOs on parts of this area from Modification to Partial Retention

Response — Portions of Management Area 17 visible from the AT have an adopted VQO of partial retention

In addition, a standard for Management Area 6 states that management activities, such as those associated with timber harvesting, visible from the trail but outside the management area are modified to reduce negative impacts from the hiker's view in accordance with the visual management system A standard is also in place to assure that site-specific project planning include consultation with local Appalachian Trail clubs

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Letter 57 — Visual values are not that distinct. We need diversity there also

Response — In the range of alternatives there are various VQOs assigned to each management area Some emphasize the modification end of the range, such as Alternative 5 Others emphasize the preservation end of the range, such as Alternative 3 Within the preferred alternative, there is a range of VQOs from preservation to modification, with the majority of management areas adopting the middle of the range, retention or partial retention The visual values are protected while representing at least the same level of diversity which is commonly found in the natural landscape

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Letter 78 — We recommend use of MA 5 in areas appropriate to protect high scenic qualities

Letter 3840 — MA 5 should be applied in areas requiring protection of high scenic values

Response — Management Area 5 is used in Alternatives 3, 6, 8A, 9, 10, 11 and 13. It was not included in Alternative 8 at the time the Draft Revised Plan was issued In the Forest Service preferred alternative, the use of Management Area 5 is appropriate for use along Interstate 81 through the Shenandoah Valley. This valley carries national acclaim for its outstanding scenic quality, therefore the viewshed, up to three miles, is protected by assigning it to Management Area 5.

Letter 82 — Use should be made of MA 7B for road corridors along Sensitivity Level 2 roads in areas which emphasize animals such as bear or turkey

Response — In the preferred alternative, limited use has been made of this management area prescription along roads carrying a sensitivity level of 2 These few roads are assigned a scenic corridor because they extend another scenic corridor to a logical destination or they provide access to a major private or public recreation area, an interpretive point of interest, or another Management Area 7 corridor. This management area prescription adopts a VQO of partial retention Management Areas 14, 15 and 16 which emphasize wildlife management also carry a VQO of partial retention. The visual resources will be protected in those areas while providing management emphasis for the wildlife resource.

Letter 146 — The assigned Partial Retention VQO for MA 14, 15, and 16 is a great improvement over the 1986 plan

Letter 2664 — The emphasis on Visual Quality Objectives (VQO) and the Recreational Opportunity Spectrum (ROS) in the Draft Plan is excessive The VWTF is appalled that only 69,069 acres are classified for modification and that 523,771 acres have a VQO of retention. The large area of retention will have a negative impact on the ability of Forest resource managers to harvest timber using optimum silviculture methods and enhancing wildlife habitat Partial retention should be the maximum VQO classification for much of the Forest, and modification the VQO for MAs 11, 14, 15, 16.

Letter 3728 — We recommend VQO and ROS classifications in MA's 14, 15 and 16 be subordinate to wildlife habitat objectives.

Letter 3728 — Management Area 15. Aesthetics 551 - Refer to MA 14 [Standard 524 rewrite] for the suggested wording of this standard

Letter 3728 — Management Area 16. Aesthetics 576 - Change partial retention to modification or reword the sentence as follows. "Visual Quality Objective is subordinate to wildlife objectives "

Letter 3728 — Management Area 14· Aesthetics 524 - Change partial retention to modification or reword the sentence as follows "VQO is subordinate to wildlife objectives."

Letter 3934 — The Plan applies restrictive visual quality objectives and recreational opportunity spectrum classifications to areas of the Forest designed to emphasize wildlife management. These restrictions severely limit the type and amount of wildlife habitat manipulation that can be done in these areas Wildlife management objectives should override all other factors in areas emphasizing wildlife

Letter 4038 — Change Standard 576 on page 2-114 of the Draft Revised Forest Plan to read. "The area is managed to meet a visual quality objective of modification. Where wildlife habitat objectives conflict with VQO, the VQO is subordinate to the wildlife objectives "

Response — The suggestion to change the visual quality objective to "modification" in Management Areas 14, 15 and 16 is inconsistent with the desire to manage these areas under semi-primitive recreation opportunity spectrum classes The visual quality objective of modification is inconsistent with these recreation opportunity spectrum classes. While the Revised Plan can use adopted visual quality objectives to permit the degree of latitude necessary to accomplish wildlife habitat objectives, they must be applied in a manner that is consistent with other objectives associated with these management areas.

The Forest Service uses visual quality objectives to comply with two NFMA requirements: 36 CFR 219.27(b) and 36 CFR 219 27(c)(6) Therefore, it is inappropriate to use a standard like "VQO is subordinate to wildlife objectives".

Letter 171 — What is the difference between managing for "scenic" quality/r-word/attributes and managing "Wilderness"? Is there an ideological separation of these two? What about SBA and WA/WsA?

Response — The ID Team is uncertain what the commenter means by the "r-word", but can make an assumption that this refers to the retention VQO. If this is the case, there are differences between managing for a VQO of retention and managing for a VQO of preservation. In areas carrying a preservation VQO, the emphasis is on ecological changes only, as in a designated Wilderness. A wide variety of management activities may occur in a retention VQO zone, provided they are permitted within the specific management area Managing to meet retention requires careful planning so that the landscape retains its natural or near natural appearance

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Letter 2281 — The value of nature and our public lands is greater than its value as scenery alone Aesthetics should not be the overriding principle on which the National Forests are managed

Response — Title 36 CFR 219.21 (f) requires that "the visual resource shall be inventoried and evaluated as an integrated part of evaluating alternatives in the forest planning process, addressing both the landscape's visual attractiveness and the public's visual expectation Management prescriptions for definitive land areas of the forest shall include visual quality objectives " As required by law, each management area is assigned a VQO. These allocations are based on a combination of factors including the VQO inventory, compatibility with the recreation opportunity spectrum class, and compatibility with the general management goal for the area

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Letter 2492 — Alternative 8 would manage 54% of the Forest to meet the most protective VQO's Continue to manage our critical forest resources with an eye to the "big picture" and do not yield to greed and short-sighted uses of our precious natural resources

Letter 2708 — Manage the Forest in a way that preserves the natural beauty while allowing for reasonable timber harvest.

Letter 3705 — Consistent management of visual resources of the Forest are necessary to insure a high quality recreational experience for visitors to both the Forest and the State

Response — In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan Visual resource management has been considered in the formulation and analysis of each alternative

Letter 2665 VQO is defined as an image (not reality) that people expect (which people?). As such it cannot be applied to biological reality.

Response *A visual quality objective is the degree of landscape alteration which is acceptable to the average Forest visitor* as interpreted by Forest personnel It is based on both physical and sociological characteristics of an area.

Letter 2823 Within Management Aras 14, 15, 16 and 17 there is a need to have a less restrictive VQO than that shown in the draft plan. The majority of these lands should be placed (set) into the modification VQO in the final plan.

Response *VQO allocations to management areas are based on a combination of factors including the VQO inventory,* compatibility with the recreation opportunity spectrum class, and compatibility with the general management goal for the area The modification VQO is not compatible with the ROS classes within management areas 14, 15 and 16 The majority of management area 17 adopts a VQO of modification

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Letter 3613 Alt. 8 assigns virtually all the Forest outside of Wilderness to the highly restrictive VQOs of Retention and Partial *Retention. Assigning over 945,000 acres to such restrictive VQOs shows no balance in regard to the needs for* other resources, particularly wildlife and commodities Although such VQOs theoretically allow some mgt. activities, the reality is they effectively prohibit many activities Instead of having VQOs established from certain viewpoints or corridors, each mgt area is blanketed with a VQO This is nonsensical, and will, as a practical matter, prohibit commodity production virtually everywhere in any mgt area. The same comments apply to the highly restrictive ROS classes.

Response *The preferred alternative allocates the modification VQO to management Areas 17 and 20. By law all lands must* be assigned VQOs Title 36 CFR 219 21 (f) states "Management prescriptions for definitive land areas of the Forest shall include visual quality objectives." VQO allocations in Alternative 8 are based on a combination of factors including the VQO inventory, compatibility with the recreation opportunity spectrum classes, and compatibility with the general management goal for the area.

Letter 3660 Why would an unseen area on any part of the Forest be managed for PR (see page 2-46).

Response There are no "unseen" areas of the Forest This term was used erroneously in the Draft Revised Plan, but it has been corrected to "seldom seen". The adoption of the partial retention VQO in seldom seen areas is primarily for compatibility with the ROS classes in those management areas

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Letter 3728 Visuals should not dominate mgmt. direction in any MA

Response *The USDA Forest Service is the largest provider of outdoor recreation in the world The scenic quality of the* Forest is one of the primary attractions. Lands allocated to Management Areas 5, 6, 7, 10, 12 and 13 reflect viewsheds where public concern for visual quality is demonstrably high While a variety of management activities may occur in these management areas, they are carefully planned and executed in order to remain subordinate to the goal of protecting the visual resource.

Letter 3779 *If this area is to be managed to "meet a visual quality objective of partial retention" why is timbering allowed at* all? p 2-114

Response Timber management is consistent with the visual quality objective of partial retention.

Letter 3840 Major trail routes should receive a corridor of protection such as MA 6 affords the Appalachian Trail. [These] are the Big Blue, Wild Oak and hiking trails used in the vicinities of developed recreation areas These trails should be upgraded from a sensitivity level 2 to a 1.

Response This recommendation is generally consistent with the theme for Management Area 13 in the preferred alternative The Wild Oak Trail and day use trails associated with highly developed recreation areas are placed in this management area While the inventoried sensitivity levels of these trails do not change, the VQO for the foreground corridors in this management area adopt a retention VQO The Big Blue is not placed in Manage-

ment Area 13 in its entirety It passes through several management areas, all of which adopt a minimum VQO of partial retention, consistent with the inventoried VQO for the foreground of that trail

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Letter 3840 VQOs need to be much more restrictive and carefully managed under a MA #7 designation

Response Management area 7 adopts a VQO of retention or partial retention A variety of activities are permitted within Management Area 7, but they are carefully planned to remain subordinate to protecting the visual resource

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Letter 3840 All state open roads should be placed in a MA 7 (A, B or C) Foreground zone would define the management area This would especially be helpful adjacent to MA 14 and MA 15 The foreground of all Virginia Byways, sensitivity level one roads and trails, should be placed in a MA which affords a Retention VQO

Response The purpose of Management Area 7 is to protect and possibly enhance viewsheds along visually sensitive travelways such as interstates, the Blue Ridge Parkway, and certain US and State routes where public concern for scenic quality is demonstrably high These include roads to major recreation areas and points of interest Based on the definition for the management area, it would be inappropriate to put all of the open State routes into Management Area 7 Not all of the Virginia Byways meet the criteria or could be managed to meet the desired future condition for Management Area 7. Scenery is one of six criteria used by the Commonwealth in designating a Virginia Byway, but it is the primary emphasis for this management area

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Letter 3951 VQO's - Reduce the acres of Retention and Partial Retention while increasing the acres of Modification When the Management Areas are finally established then set the VQO for that area and don't change it down the road

Response Alternative 5 addresses this issue Of the fourteen alternatives considered, it allocates the most acreage to the modification VQO. Alternative 5 provides for an uninterrupted flow of marketable goods and services It could be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits Once an alternative has been selected to serve as the Revised Plan, an amendment to the Plan would be required to change the adopted VQO of any particular management area.

Letter 3988 3-118 indicates that "all alternatives allow for the application of the enhancement and rehabilitation VQOs" What determines the "enhancement and rehabilitation VQOs"? Since there is apparently no existing visual condition inventory, how are rehabilitation needs judged? How can they be accounted for in the budget if they are not identified?

Response Landscape rehabilitation is a short-term management alternative used to restore landscapes containing undesirable visual impacts to a desired visual quality Enhancement is a short-term management alternative aimed at increasing positive visual variety where little variety now exists When necessary and economically feasible, these short-term management tools are used in areas with an adopted VQO of retention or partial retention, and to a much lesser degree those areas with a preservation or modification VQO Use of Rehabilitation or Enhancement is permitted, but it is anticipated that they shall be rarely, if ever, necessary Therefore, use of these short-term alternatives has not been a factor in the budget analysis for the alternatives considered

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Letter 3988 P 2-17 The statement that "The image that people expect in specific portions of the Forest is defined by the Visual Quality Objectives (VQOs) that have been adopted for each management area" is incorrect The VQOs adopted are just what they will get---not necessarily what they expect or wanted

Response The sentence has been modified in the Revised Plan

Letter 3988 P 4-10 The monitoring for visual resources is not adequate Monitoring of rehabilitation to meet the VQOs is necessary Monitoring of the progress on desired landscape character is necessary Also, I see nothing about the need for corridor viewshed planning nor a monitoring item to keep track of progress in doing these plans

Response Monitoring of visual resources is included in Chapter 5 of the Revised Plan One result of this monitoring will be the determination of where it is necessary and appropriate to assign the short term management alternative of Rehabilitation None of the alternatives specify that corridor viewshed plans shall be developed, however

such plans may be formulated as a tool to work toward achieving the desired future condition for Management Area 7

Letter 4038 — Add the following new paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan. "Recreation experiences compatibly with a roaded natural ROS classification and VQO of modification are provided "

Response — *The visual quality objective (VQO) of "modification" is incompatible with the recreation opportunity spectrum* (ROS) classification of "roaded natural" The Revised Plan has been reformulated so that a variety of ROS and VQO classes are available for use. The management area prescriptions assigned to different parts of Management Area 17 will set the VQO and ROS classification that will be assigned to that area The modification VQO is only compatible with the roaded modified ROS. The partial retention or retention VQOs are compatible with either the roaded natural or semi-primitive motorized (sub-class 1) ROS.

Letter 72 — The foreground of all Virginia Byways should be placed in an MA which affords Retention VQO standard

Response — In the preferred alternative many, but not all, of the Virginia Byways are placed in management areas which afford a retention VQO The Commonwealth uses scenic resources as only one of six criteria when designating byways The VQO inventory update performed during the revision process did not identify all of the Virginia Byways as highly sensitive to the traveling public Likewise many are not characterized as having outstanding landscape variety For these reasons, not all of the Virginia Byways have been placed in management areas which adopt a retention VQO

VEGETATION MANIPULATION: Optimality of Clearcutting

Letter 3728 — The emphasis on uneven-aged forest mgmt is less cost-efficient and therefore undesirable We recommend the application of even-aged forest mgmt WHENEVER IT IS DEMONSTRATED TO BE THE BEST METHOD TO ACHIEVE THE DESIRED OBJECTIVES

Response — The National Forest Management Act (NFMA) requires that even-aged timber harvest cutting methods (other than clearcutting) be determined to be APPROPRIATE to meet the objectives and requirements of the Revised Plan before they can be selected. The specific regeneration harvest method will be determined on a site-specific analysis under the direction in the Revised Plan

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Letter 3804 — Clearcutting is an accepted way to regenerate hardwood stands Clearcutting is the most cost efficient method of harvesting timber Clearcutting provides some of the best wildlife habitat available Clearcutting insures *reproduction of shade intolerant, mast producing species Clearcutting does not harm the environment when* done properly Clearcutting is a new beginning, not an end.

Response — NFMA states - Clearcutting can only be used when it is the optimum method to achieve management objectives. Often other cutting methods are sufficient in obtaining the management objectives Cost effectiveness can't be the primary reason for the selection of clearcutting

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Letter 3840 — Shelterwood, seed tree and clearcutting are all even-aged management practices and as such should only be used where site-specific analysis has determined no other form of timber practice will meet the overall needs of the area from a stand point of the values of the Alternative #8 philosophy.

Response — NFMA only requires that shelterwood and seed tree cutting can be used as cutting methods on National Forest lands where those methods are determined appropriate to meet the objectives and requirements of the land management plan Clearcutting must be determined to be the optimum method

Letter 2380	Clear cutting the maximum of 300 acres proposed is reasonable
Letter 2664	(Quoting Virginia Department of Game and Inland Fisheries)"The Draft Plan arbitrarily dictates the acres of timber harvest to be accomplished by the various cutting methods All cutting methods should be evaluated for each proposed project on a site specific basis and the best method to accomplish the stated management goals and objectives should be used."
Letter 2822	Site-specific evaluation and analysis should guide the selection of appropriate silvicultural techniques and timber harvest methods used to achieve the Plan's goals and desired future conditions Forest mgt. practices should not be pre-selected in the absence of such analysis
Letter 2882	Allow silvicultural treatments to be prescribed on a site basis and do not ignore clearcutting as a silvicultural tool (or its attendant economic benefits)
Letter 3934	Silvicultural and cutting method decisions should not be part of the Land Management Plan These decisions should be made only as a result of site-specific evaluations.
Letter 4038	Change Standard 993 on page 2-172 of the Draft Revised Forest Plan to read "The decision to use either even-aged or uneven-aged management timber harvest cutting methods is based on which silvicultural system best meets the goals, objectives, desired future condition and standards for that management area as described in the Revised Forest Plan and is documented during project level environmental analysis "
Response	The Revised Plan contains a standard under "Common Standards" in Chapter 3 that requires site-specific analysis to determine which even-aged regeneration harvest method will be selected during project-level implementation The acreages displayed in Chapter 2 of the Revised Plan are estimates of the mixture of regeneration harvest methods that will be used in implementing the Revised Plan. The management direction in the Revised Plan does limit the use of clearcutting to specific circumstances. This restriction is consistent with the NFMA and other laws and regulations
Letter 4038	Delete Standard 995 on page 2-172 of the Draft Revised Forest Plan
Letter 4038	Delete Standard 994 on page 2-172 of the Draft Revised Forest Plan.
Response	These standards meet a requirement of NFMA and can't be deleted as standards
Letter 2665	Management Area 17 is defined by cutting method, even-aged management only "Silvicultural needs" cannot be determined from a perspective of forest ecology standpoint if it is pre-determined by area
Response	Uneven-aged management will be practiced in portions of Management Areas 7, 11, 13, 15 and 17 The Revised Plan identifies criteria for the location of where uneven-aged management can be practiced All other areas suitable for timber production will use even-aged management
Letter 3728	The designation of silvicultural system and acres to be treated by various cutting methods is inappropriate in the Draft Plan Such decisions can only be made by site-specific silvicultural prescriptions and designated mgmt objectives
Response	The Revised Forest Plan provides for allotting the use of even-aged or uneven-aged silvicultural systems to certain management areas The allocation of regeneration harvest methods within either system is left to a site specific determination
Letter 990	Alternative 12 would harvest annually 2900 acres by clearcutting and only 39 acres by other even-aged harvest methods Decisions about clearcutting and other even-aged harvest methods are sharply defined by the 1976 National Forest Management Act It is inappropriate to specify the acres to be harvested by these methods until a site specific assessment has been conducted to see if the conditions allow for the use of clearcutting or other even-aged methods

Response — The requirements of the National Forest Management Act specify that site-specific analysis is required to support any decision to use even-aged regeneration harvest methods This does not, however, mean that the FEIS cannot estimate the acreage which could be treated annually by different management practices Since the use of different regeneration harvest methods comprise one of the thirteen issues being addressed in the revision, the ID Team believes that the disclosure of the estimated amount of different practices by alternative is not only appropriate but essential to addressing the issue

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Letter 3728 — Management Area 15: Add the following new Forest Standard. "The decision document for any project should determine the appropriate silvicultural method and method of cutting to meet the goals, objectives and DFC within this management area "

Letter 3728 — Management Area 14: Add this NEW Forest Standard' "The decision document for any project should determine the appropriate silvicultural method and method of cutting to meet the goals, objectives and desired future condition of this management area " This Forest Standard should applied to all management areas in the Plan. See "Major Points of Concern", Number 5.

Response — *Under the latest interpretations of NFMA and NEPA, any decisions on even-aged or uneven-aged timber harvest* methods must be based on site-specific analysis during implementation Any alternative can, however, limit or eliminate the use of timber harvest methods that do not achieve the objectives of the management areas in any alternative or the desired future condition of the entire alternative

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VEGETATION MANIPULATION: Opposition to Clearcutting

Letter 7 — Applaud any plan that moderates the use of clear cutting This is not an environmentally sound practice

Letter 10 — *I am in support of the reduction in the amount of clearcutting*

Letter 57 — You must have valid criteria for any clearcutting in your N F. In clearcutting eastern mixed hardwoods consider only decadent stands with little or no good growing stock or even-aged stands of practically all mature trees

Letter 80 — I support the idea of limiting clearcuts on the George Washington National Forest

Letter 146 — *The draft plan estimates that clearcutting would not exceed 300 acres per year. We agree with the prohibition* of clearcutting except when no other harvesting method will work The 1992 proposal is far better than the discredited 1986 plan, which proposed to harvest nearly 4500 acres per year using clearcutting.

Letter 284 — Please end clearcuts! It is not the efficient way to log, let alone the best way to manage our national forests

Letter 354 — I am against clearcutting as a timber harvesting method, in all of our National Forests Thus, I believe your Alternative 8, or any other alternative that provides for less acreage to be clearcut, is the best for our forest

Letters 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 561, 562, 563, 564, 565, 567, 568, 569, 844, 845, 846, 927, 928, 929, 930, 931, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1107, 1108, 1109, 1125, 1183, 1184, 1185, 1186, 1539, 1729, 1928
I am against clear cutting as a timber harvesting method, in all of our National Forest. Thus I believe your alternative 8, or any other alternative that provides for less acreage to be clear cut, is the best for our forest.

Letter 502 — No clearcutting because it destroys the ecosystem in the clearcut and considerable damage can spread to other *areas*

Letter 755 — NO to strip cut or clear cut of any of the forest, there will be no profit from this to help the State or Federal budget or the environment.

Letters 90, 978, 1097, 1429, 1843, 2285, 2806, 3521, 3594, 4217, 4234
NO clearcutting should be permitted

Letter 1472 I didn't like too many clearcuts in Alt 12.

Letter 1820 Why do you have to clearcut. The erosion is going into the river in Wirt County Please do not clearcut as there will be no way we can hunt up there if you clearcut

Letter 1834 I am firmly against the practice of clear cutting I do not feel this practice is good for the growth of a new stand of timber or forest products

Letter 2215 Clearcutting wreaks havoc with habitats and should be banned or severely limited

Letter 2347 Although the Plan would appear to limit clearcutting, it nevertheless would allow this devastating practice to continue in the name of wildlife habitat improvement Clearcuts of any size can form no part of an ecologically sensitive proposal

Letter 2366 I disagree with your stand encouraging clearcutting, which is disturbing Clearcuts promote increases in deer at the expense of other species such as bear and turkey Nongame species such as bats, a wide variety of birds are eliminated in clearcut areas. Regeneration generally features the following species· striped maple, sassafras, dogwood, ailanthus, and locust These species are a poor substitute for oak and poplar.

Letter 2590 Minimize the use of clearcutting as a timber harvesting method.

Letter 2633 Clear cutting could be cut to approximately 1,000 acres per year, which would make timber cutting more economical and also provide more habitat for game and allow more use of the forest for hunting

Letter 2895 The fewer clearcuts the better -- as they have a negative impact on the visual wilderness experience, beside noise pollution in doing so

Letter 2931 Be very careful especially in allowing large areas to be "clear-cut" If Western Virginia is found suddenly to be no longer beautiful, we may lose everything we have gained in tourism

Letters 2943, 2944, 2945, 2946, 2947, 2948, 2949, 2950, 2951, 2952, 2953, 2954, 2955, 2956, 2957, 2958, 2959, 2960, 2961, 2962, 2963, 2964, 2965, 2966, 2967, 2968, 2969, 2970, 2971, 2972, 2973, 2974, 2975, 2976, 2977, 2978, 2979, 2980, 2981, 2982, 2983, 2984, 2985, 2986, 2987, 2988, 2989, 2990, 2991, 2992, 2993, 2994, 2995, 2996, 2997, 2998, 2999, 3000, 3001, 3002, 3003, 3004, 3005, 3006, 3007, 3008, 3009, 3010, 3011, 3012, 3013, 3014, 3015
Restrict the number of acres that can be clearcut within the National Forest within a given year I agree with Plan #8 which is less clearcutting.

Letters 3447, 3448, 3449
The practice of clearcutting could and should be minimized or eliminated all together. Clearcutting of steep slopes does irreparable damage by erosion Elimination of clearcutting will do more for preservation of recreational areas than any other single action Hunting, fishing, hiking, biking, camping all depend on the presence of forest cover for maximum pleasure by the participant Sales of food, camping supplies, fuel, hunting and fishing supplies are drastically curbed near forest areas that are destroyed

Letter 3479 Please, please, please work towards keeping the clearcuts and roads to remove timber at a minimum

Letter 3490 Clearcutting is a travesty in my opinion.

Letter 3520 Extensive clearcutting would be ultimately detrimental to the watershed, quality of life here in central VA, but most importantly the fragile remnants of Eastern ecosystems

Letter 3531 Clearcutting seems such an archaic and environmentally harmful practice that its persistence seems amazing - why cannot it be eliminated entirely?

Letter 3536 Other options under consideration are much more shortsighted. While massive clearcutting might provide a short term economic benefit, the destruction of our biological resources is, over the long run, far more costly

Letter 3592 In reference to clearcutting policies. The George Washington National Forest plays a major role in our diversification efforts in the area of tourism Visitors do not understand the importance of various types of forest management and have strong negative reactions to large, very visible clearcut areas.

Letter 3608 I wish to formally go on record as opposing any forest mgt plan that recommends clearcutting. There is a 40% increase in storm-water runoff from clearcutting.

Letter 3680 G) Clearcutting should no longer be considered as a viable method of timber harvest. Clearcutting is not consistent with the life-death cycle that is naturally established by the Forest Selective cutting is more harmonious with the cycle of the Forest

Letter 3695 Clear cutting does not work for anyone save this corporation

Letter 3696 Extensive clearcutting of the Forest may benefit the timber industry but, I believe, is not in the general public interest and threatens to destroy the natural beauty.

Letter 3700 It is critical that the harvesting of timber be done in a responsible way I find it disturbing to know that clear cutting continues presently though we all know what a loss this produces

Letter 3701 Decrease timber cuts, especially clear-cutting, emphasize new, ecologically sound plans for harvesting and repopulating woods.

Letter 3809 The current timber harvesting method of clearcutting allows timber companies to profit at the expense of a healthy forest ecosystem. Wildlife habitat is lost along with biodiversity Clean rivers become polluted as valuable soil erodes from the now-barren landscape. Scenic beauty and recreational opportunities are also destroyed The ability of these areas to be useful in all of these additional ways is lost at the expense of one poorly managed use. This does not in my opinion represent responsible, multiple use mgt

Letter 3711 The Board does not support clearcutting as the primary method of timber harvesting.

Letter 3827 We don't approve of federal land being clearcut with taxpayer's funds

Letter 3901 The Mountaineer Chapter opposes all clearcutting in our national forests and other public lands

Letter 4028 Limited timber cutting (certainly no clearcutting)

Letter 4048 I am against clearcutting as a timber harvesting method, in all of our National Forest

Response In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

Alternatives 9, 11 and 13 explore the use of timber harvest cutting methods other than clearcutting to manage the Forest timber sale program. These alternatives are considered in detail in the FEIS One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 3687 Certainly timbering will always be a part of forest management However, clearcuts and single species replantings belong on private lands and farms.

Response In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management.

Most regenerated stands will use natural methods through sprouting or seedfall. Hand planting of pine seedlings is limited to those stands where the reproduction potential of a stand has been severely reduced by gypsy moth infestation, and where it is a natural component in the stand

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Letter 85 I wish to comment on your statement "the Revised Forest Plan contains a substantial decrease in the use of clearcutting" Many euphemisms are used to eliminate the unpopular - our "graveyards" are now "memorial

gardens". A clearcut with a few remaining trees becomes a seed tree cut. A clearcut with a few more trees, set aside for cutting in a few years, becomes a shelterwood cut A clearcut reduced in size and with a little modification to the definition, can become a group selection cut. Yes, we do want a substantial reduction in clearcutting and the estimated 20 miles per year of required roads, but not by using the old "euphemism game" This will not happen until the Forest Service accepts uneven-age management as the accepted way to manage the George Washington

Response — The Revised Plan strives to utilize both even-aged and uneven-aged management to manipulate vegetation to meet economic and ecological needs Research does not support the widespread use of uneven-age management for large acreages of oak-hickory forests on xeric sites where maintaining the oak-hickory component is a desired future condition Several alternatives in the FEIS analyze the limited use of uneven-age management.

Letter 1275 — The practice of even-aged mgt must cease, whether performed under the language of clearcutting, road building, wildlife enhancement, shelterwood cuts or group selection.

Letter 3763 — Greater restrictions on clearcutting, by whatever name

Response — Even-aged management is a proven, widely used, environmentally safe silvicultural practice entirely suitable to the vegetation existing on the Forest when applied thru the direction of the Revised Plan.

Letter 2060 — Clearcutting and its variants cannot be justified in any context here in the eastern U S Clearcutting and related techniques result in destruction of entire populations of flora and fauna, thereby erasing genetic diversity of the species and inhibiting evolutionary mechanisms of survival Clearcutting also selects against interior forest-dwelling species, thereby reducing biodiversity at the landscape level

Response — Even-aged management as proposed in the Revised Plan along with selection cutting provide ideal conditions for improving diversity at the landscape level There is no evidence or reason to suspect these management practices, as proposed in the Revised Plan, will result in destruction of entire populations of flora and fauna.

Letter 1072 — No clearcutting or even-aged mgt of any area should be allowed It causes too much edge and fragmentation.

Letter 1847 — Alternative 8 calls for the continuation of even-aged management which decreases biodiversity, water quality, and soil quality It also calls for the continuance of clearcutting for the management of game species which are already grossly over represented at the expense of other "less desirable" or non-game species

Letter 2215 — Clearcutting is ostensibly limited in the preferred alternative, but due to patch clearcuts for wildlife openings, clearcutting will continue to dominate the forest Clearcutting is extremely detrimental to maintaining native biodiversity, which is mandated by law and regulation.

Response — On the scale of the Revised Plan which encompasses the entire forest ecosystem of the Forest, even-aged management as planned, does not decrease biodiversity Some species can live in several different habitats, some require a specific but common habitat, and some require a specific but rarely occurring habitat. Even-aged management implemented over a wide, where suitable, area can provide variations of habitat necessary to many species Water and soil quality are not degraded by even-aged management practices when carried out under the standards in the Revised Plan

The Revised Plan designates extensive amounts of land to provide unfragmented habitat

In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

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Letter 4262 — I further object to clearcutting and shelterwood cutting which in effect are the same as no designated areas are sighted thus leaving the integrity of the forest at risk

Response — The Revised Plan does not identify site-specific locations for the application of cutting practices. This is done during project-level decisions. The Plan does analyze the long-term capability of the land and assures that the integrity of the forest is not at risk

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Letter 4249 — Further reductions in timber harvesting can be justified in the light of past sacrilege of wanton over-harvesting clearcutting I applaud the 300 acres per year figure as reasonable Is the 300 figure real? See EIS Appendix B, "40% of the volume in the first decade must be by clearcutting"! Under Constraint on same page the 27 mbf that you "must harvest" sounds like a minimum number. I think, at least, it should be a ceiling.

Response — The discussion about 40% is a mistake. The text in Appendix B has been rewritten to correct this error. By law, the allowable sale quantity of any alternative is the most volume that can be harvested off lands that are suitable for timber production.

Letter 3744 — No clearcutting. Biologically and esthetically it wages war on the forest. "Shelterwood" and "seed tree cutting" is basically clearcutting

Letter 3870 — I totally oppose any clearcutting plans or any variations of it.

Response — In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

As discussed in Appendix H of the Revised Plan, modified shelterwood and seed tree regeneration harvest methods can be used to regenerate shade intolerant oaks less effectively than clearcutting, but still at acceptable levels

Where a market exists for the different portions of a tree (including the topwood), utilization of these different parts must be considered Most of the pulpwood harvested on the Forest comes from the harvest of low quality mature stands and topwood from mature sawtimber trees Harvesting only sawtimber would not provide for adequate regeneration of oaks or provide desired wildlife habitat

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Letter 3903 — I see no reason to destroy our national forests, drive thousands of species into extinction and in the process pollute our air, land, and water This is exactly what clearcutting does!

Response — Clearcutting has been used for about 25 years on national forests in the east There is no evidence, documented or otherwise, to indicate that these forests are destroyed or thousands of species have been driven to extinction, or that land, air, or water has been polluted by clearcutting

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Letters 134, 4034

It is repeatedly stated or implied that unless clearcutting is used, valuable but shade intolerant oaks will be replaced by less valuable but shade tolerant species such as Red Maple (eg p 2-8, DEIS; p 2-50, Draft Plan) But this argument conceals the fact that Red Maple is actually favored by clearcuts and oaks regenerate easily in areas much smaller than clearcuts On p 3-106 of the DEIS it is actually stated that "several clearcuts not too widely dispersed can diffuse the severity of browsing by deer, allowing oak regeneration a chance to compete with other vegetation " This despite the proven fact that clearcuts encourage the production of more deer!

Letter 4001 — Clearcutting and its fellow travellers, "shelterwood" and "seed tree" methods, should be abandoned. USFS arguments that clearcutting is necessary for the regeneration of valuable, shade-intolerant oaks is at variance with practical forestry experience as well as illogical in light of the clearly xeric conditions which exist over most of the GWNF and which FAVOR oaks

Response — Clearcuts are an efficient and effective way to provide abundant amounts of browse for deer. Browse is one type of food source for deer, but hard mast may often be a more limiting factor in maintaining a healthy population. Deer population is controlled more by hunting regulation than habitat manipulation, although both are factors that should be considered When hunting regulations do not reduce the population sufficiently, there is extra pressure on the food supply (browse and mast). This adversely affects oak regeneration, so more cutting helps assure that some oak survive.

Modified shelterwood and seed tree practices can be used to regenerate shade intolerant oaks less effectively than clearcutting, but still at acceptable levels Group selection and single tree selection will not provide adequate opportunity, given the deer populations in much of the forest, to perpetuate the oak-hickory forest type because the small openings don't provide sufficient sunlight for the oaks to compete with more shade tolerant species like red maple, blackgum and dogwood

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Letter 4047 — I do not see how there can be an increase or even maintain the recent rate of logging without having these mountains stripped of mature forests I think there has already been far too much clearcutting done in just a few years in Alleghany County

Response — All alternatives assure that a sustained yield of timber products can be harvested without reducing productivity of the land Much of the forest will never be harvested, under the Revised Plan

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VEGETATION MANIPULATION. Advocacy of Clearcutting

Letter 369 — Forest Service research indicates that clearcutting is usually the optimum method for regenerating the oak forests of the GWNF Alt 8 proposes to only clearcut 300 acres per year Alt 12 is the better choice since it proposes to clearcut 2900 acres per year

Letter 146 — In Alternative 12, the projected harvest by clearcutting (2900 acres/yr) is much too high It is higher than the ceiling placed by the Regional Forester for interim management, and it is approximately double the acreage currently slated for clearcutting

Letter 2542 — We support a minimum of 2,900 acres per year as in Alternative 12.

Response — There is clear National Policy that directs the Forests to reduce the amount of clearcutting, so the increase to 2900 acres is in direct conflict with national direction

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Letter 66 — Clearcutting is a tool which must be used to manage large acres of timberland To stop clearcutting would be truly harmful to certain wildlife species as well as certain trees

Letter 67 — The abandonment of the use of clearcutting as a means of timber production is as I see it a plan to do away with specific habitat areas for a number of wildlife

Letter 730 — (Paraphrase) The shift in mgt strategy away from CC and toward uneven-aged mgt, such as group selection harvests, will greatly impede efforts to promote habitats suitable for ruffed grouse and other early-successional species

Letter 856 — Clearcutting certainly helps wildlife I hope the forestry service has enough fortitude to stand-up to the antis

Letter 872 — Clearcutting timber is the best thing one can do for hunting

Letter 1163 — Clearcutting is being reduced from about 2,250 ac to about 300 ac This drastic reduction is needlessly severe, the existing figure of 2,250 ac far better enhances wildlife habitat improvement

Letter 1257 — Timber mgt based on sound clearcutting practices is of tremendous benefit to native wildlife--both game and nongame species I can see limiting clearcutting as having a detrimental impact on wildlife

Letter 1446 — A reduction of 93 3 % is not a reduction, it is tantamount to elimination of clearcutting

Letter 1685 — Most small game is along edges of heavy timber and clearcuts or trail areas Because of the number of hikers on trails, this once-small-game habitat is not as desirable for game Clearcuts clearly offer more game per acre

Letter 1686 — Under Alt. 8 probably zero acres will be clearcut, and I feel this is unacceptable for prudent mgt. for both forest regeneration (planting) and wildlife mgt

Letter 2171 I support clearcutting because it helps provide for a healthy forest and creates habitat for the game animals that I hunt

Letter 2216 Your Draft Plan states that most forest visitors expect to see an essentially unbroken forest canopy Then, they know nothing about proper forest management We need clearcuts to promote shade intolerant species of trees, provide edge and cover for game species, and to keep a young healthy forest at all times

Letter 2542 To maintain the oak component, even-aged management is essential

Letter 2542 The harvesting methods that provide the greatest assurance of maintaining the more valuable species should be the methods of choice We are concerned that the forest manager is limited to clearcutting only 300 acres in Alternative 8

Letter 2664 The VWTF strongly believes that the GWNF should retain the option to use clearcutting as a viable harvesting method with annual limits directed by resource needs

Letter 2737 I am opposed to the severe reduction in clearcutting contained in the 14 new mgt alts Clearcutting provides the best feed and cover conditions for ruffed grouse and deer Uneven-age mgt. systems will be unfavorable to shade-intolerant tree species and will reduce forest diversity Clearcuts should be made smaller than in the past, *or should have uncut strips dividing them into smaller compartments*

Letter 2744 Given the tree species and sites on the GWNF, clearcutting is an excellent harvesting and regeneration harvest method, and should continue to be an important part of the mgt plan

Letter 2898 The near elimination of the use of clearcutting as a regeneration method as presented in Preferred Alternative 8 [makes it] an [un]acceptable alternative

Letter 3637 We favor clearcutting as a wildlife and silvicultural tool when used in moderation and sizes less than 20 acres

Response In response to public input and new Forest Service policies, the Forest is reducing clearcutting, but is retaining *even-aged management as the dominant regeneration harvest method The Draft Revised Plan identified less* than a quarter of the timber harvest to be uneven-aged management In the Revised Plan this percent was reduced to 2% This was in response to better selection of areas where uneven-aged management is most practical, and in response to a lack of support for the system from professional wildlife biologists Uneven-aged management has been confined to portions of Management Areas 7, 13, 15, and 17 Cut unit sizes will generally vary between one half and one and a half acres Experience has shown that intolerant hardwoods will generally successfully be regenerated on cut units greater than one-half of an acre In cut units smaller than this size, intolerant tree species suffer from shade and over browsing by deer

Modified shelterwood will be the primary silvicultural method to regenerate hardwood stands A low remaining basal area provides for regeneration of intolerant hardwoods, and softens the appearance for visual concerns Game species' benefits derived from modified shelterwoods should be essentially the same as from clearcuts

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Letter 2281 Timber management is the only economically effective method of large scale habitat management in areas where fire is suppressed. Modern forestry practices do not permanently damage the forest or water quality. I have observed clearcuts in the Jefferson National Forest which have not damaged nearby trout streams and have regenerated rapidly

Response Forest management on this Forest is conducted in such a way that soil and water resources are protected Visual concerns are addressed, and cutting unit size, shape, and distribution are carefully planned to improve habitats for game and non-game species that prefer early successional habitats Timber harvesting is usually the most economically efficient way to create this habitat on this National Forest

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Letter 1546 In your desire to be objective you failed to make any sort of value judgments or comparison of techniques For example, the document failed to explain what shelterwood harvesting was, or evaluate the pros and cons of shelterwood harvest against clearcutting Why would shelterwood harvesting be preferable to clearcutting and vice versa? under what circumstances? We would like to know the bottom line about why you have chosen Alt 8 We might better understand your choices if we knew the pressures, circumstances, and laws or regulations which helped shape those choices

Letter 2823 — Timber harvesting is the most economically efficient and widely used method for maintaining healthy forest stands and is a valuable technique for creating and/or maintaining wildlife habitat A major consideration in determining the appropriate timber harvesting for optimum wildlife benefit should be the capability of the harvest technique to regenerate the oak/hickory forest type presently found on the Forest (habitat beneficial to many game and non-game wildlife species). The Draft Plan shifts even-aged management methods from clearcutting to shelterwood harvesting, while at the same time significantly increasing the amount of uneven-aged management using group selection harvesting We feel that the Forest should reconsider this shift in direction in light of the need for reliable regeneration of oaks, development of desirable wildlife habitat, and economics.

Letter 3940 — The specific silvicultural techniques used in timber management should be determined by their effectiveness in meeting the identified habitat or biological objectives and not based on pre-determined quotas.

Letter 3940 — An arbitrary reduction in clearcutting may not be consistent with the philosophy of the Draft Plan to manage for the biological resources of the Forest. Silvicultural decisions should be based on habitat/biological objectives

Response — In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

As discussed in Appendix H of the Revised Plan, modified shelterwood and seed tree regeneration harvest methods can be used to regenerate shade intolerant oaks less effectively than clearcutting, but still at acceptable levels.

Where a market exists for the different portions of a tree (including the topwood), utilization of these different parts must be considered Most of the pulpwood harvested on the Forest comes from the harvest of low quality mature stands and topwood from mature sawtimber trees Harvesting only sawtimber would not provide for adequate regeneration of oaks or provide desired wildlife habitat

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Letter 3741 — We need to cut many more trees for forest health improvement including many more clearcuts. Clearcuts certainly beat fires for regeneration.

Letter 4011 — Under Alt 8, you propose to burn 3000 ac of forest land a year while reducing the amount of land harvested by clearcutting significantly. Since clearcutting mimics many of effects of fire without the waste of fiber that literally goes up in smoke, would it not be advisable to continue to promote the positive effects of moderate disturbance through silvicultural clearcuts as opposed to fire? Hardwoods have never demonstrated the same affinity for fire that the pine species have

Response — Prescribed fire is the most cost effective way to achieve certain wildlife habitat objectives Most of this prescribed burning would be underburns and would generally be scheduled for lands unsuitable for timber production to supplement the wildlife benefits from timber harvesting on lands suitable for timber production

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Letter 145 — Annual clearcut acres are reduced from 4,555 to only 300 This makes Alternative 8 one of the worst alternatives with regard to cash-flow. Others are more efficient. The primary reason for the inefficiency of Alternative 8 is the virtual elimination of clearcutting, the most economical and cost-effective method of harvesting

Letter 293 — You can not develop any cash-flow by only harvesting 300 clearcut acres per year

Letter 988 — The budget on this alt is a bit high I would up the clearcutting to 600 ac or even 800 to focus the ASQ in a lesser road mileage - this would help with costs

Letter 1300 — Alternative 12 allows more acres to be clearcut which is the most economical and cost-effective method of harvesting

Letter 1990 — Today's method of clearcutting increases the productivity and efficiency of forest growth and contributes to the national economy

Letter 2066 It would also be advisable to increase the area suitable to clearcuts to 2,500 acres per year or more. This is the best harvest method for high growth portions of the forest. It costs less and regenerates faster when clearcuts are used in the right places

Letter 2348 Alt. 12 promotes proper forest mgt. Clearcutting, especially with the below-cost issue, is the most economically efficient method of timber harvesting It is needed to regenerate high quality shade-tolerant species. It creates vital habitat for such game animals as deer, turkey and bear. Also, it prepares stands for the approaching gypsy moth.

Letter 2542 Clearcutting generally results in a greater present net value when compared to the other regeneration methods and clearcutting may help preserve the oak component from loss to gypsy moth impacts which will be discussed below

Letter 2616 The primary reason for the inefficiency of Alternative 8 is the virtual elimination of clearcutting, the most *economical and cost-effective method of harvesting.*

Letter 3660 The best, most efficient way to control cost is to clearcut.

Response In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area

Removing a higher ratio of sawtimber on better quality sites provides substantially more revenue at only a small increase in cost. Oftentimes, regeneration harvest methods other than clearcutting yield a higher ratio of sawtimber More acres have to be harvested to achieve this, but it is possible. Adequate regeneration of high *value species can be obtained without clearcutting*

There is no substantial difference in the amount of new system road construction needed for different even-aged regeneration harvest methods.

Letter 3831 Your final Land Management Plan must include clearcutting emphasized where hardwood regeneration is desired

Response Professional foresters have found that the hardwood species on the Forest can be regenerated by a number of regeneration harvest methods, including clearcutting The Revised Plan identifies modified shelterwood as the *most commonly used regeneration harvest method, but the final selection of regeneration harvest method must* be based on site-specific analysis under the direction provided in the Revised Plan.

Letter 3 Clear cutting might look ugly to some for a few years, but it is often the best method environmentally.

Letter 67 For someone to use the argument that clearcutting has no aesthetic value is in the eye of the beholder. Clearcutting is not only productive but a must if we ever want to get the forest back to where it used to be.

Letter 2542 Special planning can reduce to a minimum any possible adverse visual impacts of clearcutting Clearcut areas can be shaped to conform with the topography

Response Clearcutting does dramatically alter the appearance of an area immediately after harvest, but revegetation quickly alters that appearance Under the Revised Plan, the use of clearcutting is limited to site specific instances where no other regeneration harvest method can achieve the objectives for the management area. These other methods may not be the best methods, however they are adequate in achieving the objectives and therefore will be used in place of clearcutting.

Letter 3660 I would like to see the data supporting the statement that Forest visitors expect to see an unbroken canopy I want to see diversity

Response	The Forest Service has reams of correspondence that demonstrate a public aversion to clearcutting
Letter 53	I am highly disappointed that the draft Plan has only 300 acres per year set up for using the optimum system of regeneration
Letter 150	Clearcutting is also a valuable tool in forest management To reduce the amount allowed based merely on public view and not on good forest management principles is poor forest management
Letter 730	The selected alt suggests that clearcutting will be virtually eliminated and will likely be employed only in response to substantial and acute stand deterioration, as is the case after a serious gypsy moth infestation. Given even these extreme circumstances, only 300 ac. will be annually clearcut, an 86% reduction in the use of this resource mgt tool
Response	The Forest Service is moving away from the concept that the national forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization that the Forest must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people The key point is that we are not managing the Forest to maximize the mixture of uses, values, products and conditions that seem most appropriate to resource professionals Instead, our resource professionals are employing new and innovative management practices to achieve the goals, objectives and desired future condition expressed by the public

VEGETATION MANIPULATION: Alternate Regeneration Harvest Methods

Letter 2665	Management Area 17 is defined by cutting method, even-aged management only "Silvicultural needs" cannot be determined from a perspective of forest ecology standpoint if it is pre-determined by area.
Response	Uneven-aged management will be practiced in portions of Management Areas 7, 11, 13, 15 and 17 The Revised Plan identifies criteria for the location of where uneven-aged management can be practiced. All other areas suitable for timber production will use even-aged management
Letter 3939	Group selection requires gentle terrain and haul roads in place to be economical There is no information presented that shows there is enough roaded gentle terrain available to provide the 65,500 acres of suitable acres needed for group selection for the first decade in alternative 8 It is doubtful that the Forest can even sustain an ASQ of 27 mmbf/year by placing emphasis on group selection as proposed in alternative 8
Response	The Revised Plan identifies 11,000 acres that will be committed to uneven-aged management These lands were carefully located by members of the ID Team and District representatives These lands are (1) on gentle terrain, (2) accessed by existing roads, and (3) in blocks of at least 100 acres
Letter 3940	Plan Page 2-15, Paragraph 1 We understand that national direction is to reduce clearcutting However, clearcutting has a place in sound forest management and is a useful technique for regenerating shade intolerant tree species, such as oaks We would support a modified shelterwood regeneration harvest method to simulate the effects of clearcutting to meet habitat objectives Specifically, shelterwood harvests should remove all but 15 to 30 sq ft of basal area, with several dominant or co-dominant residual trees retained This method will result in one entry with the residual trees remaining in the regenerated stand
Response	Professional foresters have found that the hardwood species on the Forest can be regenerated by a number of regeneration harvest methods, including clearcutting The Revised Plan identifies modified shelterwood as the most commonly used regeneration harvest method, but the final selection of regeneration harvest method must be based on site-specific analysis under the direction provided in the Revised Plan

Letter 2898 — The emphasis on the use of even-aged systems [other than clearcuts] in Alternative #8 is positive. The James River District has made some effective applications of the shelterwood and modified shelterwood systems Shelterwoods can be very effective in keeping the oak component in these average-site stands.

Response — The increased application of the shelterwood and modified shelterwood regeneration harvest methods is a good example of how Alternative 8 is implementing the national ecosystem management policy.

Letter 57 — Cut only mature and poor (non-rotation) trees Do not cut good immature trees which have a low value per unit of volume (Not clearcutting or patch clearcutting sometimes called group selection by Forest Service). We do not need an unbroken canopy Openings for regeneration are small and will blend with whole forest as in nature with natural mortality, windthrow, etc Scattered small openings adds to vertical diversity

Response — The described regeneration harvest method does not conform with any known regeneration harvest method that would permit the successful regeneration of oaks and other shade-intolerant species

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Letter 57 — *Your group selection should be defined and done properly. It is not patch cutting It depends on nature of trees* cut

Response — The Revised Plan identifies areas where uneven-aged management can be practiced These areas are accessible, gentle terrain where inventory data can be gathered and management can be directed towards achieving volume regulation and monitoring can be used to evaluate the impacts of such management.

Letter 57 — Your 2000 acres of even-aged cutting per year would very soon catch up with the 6500 acres of uneven-aged cutting, about 3 years You are still working against the uneven-aged natural ecology of the forests on G.W

Response — The Revised Plan strives to utilize both even-aged and uneven-aged management to manipulate vegetation to meet economic and ecological needs Research does not support the widespread use of uneven-aged management for large acreages of oak hickory forests where maintaining the oak-hickory component is a desired future *condition. Several alternatives in the FEIS analyze the limited use of uneven-aged management (refer to Table* 3-29).

Letter 279 — If the final plan DOES allow sale logging, a complete ban on all forms of clearcutting, and the use of selection mgt procedures which preserve the ecological structure of the affected areas [is suggested]

Response — As displayed in Table 3-29, Alternatives 9, 10, 11 and 13 in the FEIS analyze a mixture of regeneration harvest methods other than clearcutting One of these alternatives will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits The Revised Plan strives to utilize both even and uneven-age management to manipulate vegetation to meet economic and ecological needs. Research does not *support the widespread use of uneven-age management for large acreages of oak-hickory forests where* maintaining the oak-hickory component is a desired future condition Several alternatives in the FEIS analyze the limited use of uneven-age management.

Letter 3660 — Group Selection does not provide adequate habitat, nor does it provide insurance of shade tolerant regeneration

Response — In response to public input and new Forest Service policies, the Forest is reducing clearcutting, but is retaining even-aged management as the dominant regeneration harvest method. The Draft Revised Plan identified less than a quarter of the timber harvest to be uneven-aged management. In the Revised Plan this percent was *reduced to 2%. This was in response to better selection of areas where uneven-aged management is most* practical, and in response to a lack of support for the system from professional wildlife biologists Uneven-aged management has been confined to portions of Management Areas 7, 13, 15, and 17. Cut unit sizes will generally vary between one half and one and a half acres Experience has shown that intolerant hardwoods will generally successfully be regenerated on cut units greater than one-half of an acre In cut units smaller than this size, intolerant tree species suffer from shade and over browsing by deer

Modified shelterwood will be the primary silvicultural method to regenerate hardwood stands. A low remaining basal area provides for regeneration of intolerant hardwoods, and softens the appearance for visual concerns. Game species' benefits derived from modified shelterwoods should be essentially the same as from clearcuts.

Letter 1081 — Shelterwood and seed tree cutting are mere variations on clearcutting; more truly selective harvesting should be researched.

Letters 1094, 1169 — Clearcutting is greatly reduced in Alt 8 However, shelterwood and seed tree cutting are simply variations on clearcutting. Group selection is a little better, but the plan should require investigation of a truly site-specific selective technique.

Letter 1310 — Though you are be be commended for reducing clearcutting, shelterwood and seed tree cutting as proposed in Alt. 8 are not much of an improvement.

Letter 1982 — The plan should require investigation of a truly site specific selective technique [for timber management].

Letter 3553 — The plan should require investigation of a truly site specific selective technique or at the very least group selection

Letter 3709 — What timber is cut should be selective with as low an impact on the area as possible.

Letter 4001 — Where cutting is done, it should be done by single-tree or small group selection methods

Response — Alternative 8A allocates 11,000 acres to uneven-aged management in several management areas. Monitoring during the plan period will evaluate the suitability of uneven-aged management in achieving the desired future conditions of these areas The Revised Plan strives to use both even-aged and uneven-aged management to manipulate vegetation to meet economic and ecological needs. Research does not support the widespread use of uneven-aged management for large acreages of oak-hickory forests where maintaining the oak-hickory component is a desired future condition Several alternatives in the FEIS analyze the limited use of uneven-aged management

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Letter 2308 — The substantial reduction in clearcutting is laudable However, apparently clearcutting would largely be replaced by "seed tree" and "shelterwood" cutting The practical result is little difference in their undesirable ecological effects. The living forest and its multiple benefits are essentially obliterated for an extended period, the soil is further eroded and reduced in nutrients, promising young trees 15 to 20 years old are completely cut down and discarded [With] "group selection" and "individual selection" the potential to maintain a living forest, healthy, self-renewing and diverse in character, is certainly available. Their use also implies that timber harvest will be substantially confined to sawtimber - not pulpwood

Response — Modified shelterwood harvests, in particular, and shelterwood and seed tree harvests to a lesser degree, differ significantly from clearcutting in ecological effects In neither is the living forest obliterated. Soil erosion and nutrient depletion are minimal and do not impair productivity of the land Small supressed trees, generally the same age as the overstory, are cut to provide vigorous sprout reproduction in concert with advance reproduction Uneven-aged management, which is provided for in the Revised Plan, provides all age classes in a stand by cutting in all diameter classes, not just sawtimber

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Letter 1292 — Positively all forms of even-age management should be eliminated This includes the creation of wildlife clearings, shelterwood cuts and group selection (patch clearcuts)

Letter 1314 Require group selection rather than shelter and seed tree cutting

Letter 1454, 2063, 2701
The Forest should be managed using uneven-aged silvicultural methods

Letter 1684 In order to further reduce clearcutting, timber mgt. should require site-specific selective cutting techniques.

Letter 2347 Timber should be harvested through selective cutting that leaves intact the GW's natural integrity.

Letter 2755 Shelterwood and seed tree harvest methods are quite similar to clearcutting. We would like to see more true uneven age management involving individual tree selection High grading should be avoided

Letter 3545 Selective cutting should become the predominant method of timber harvest.

Letter 3546 Reduce even-age cutting, including clearcutting, shelterwood and seed tree cutting.

Letter 3870 Selective management should be the only allowed form of logging in the GWNF and that should be restricted to areas within one-half mile of existing roads

Letter 4231 Reduce clearcuts volume. "Shelterwood cutting" does some damage as clearcut. True selection management, *where the ecological integrity of the area is maintained, is missing from the forest & forest plan*

Response Alternative 9 is considered in detail in the FEIS. It limits regeneration harvest methods to individual tree and *group selection It will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes* net public benefits

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Letter 2348 I would like to amend Alt 12 by reducing the number of acres in group selection harvest. Group selections are another form of high grading They are short-sighted Has the USFS done any studies to the logging cost involved in harvesting by group selection? What type of regeneration returns?

Response The Forest is still evaluating regeneration results in group selection cuts Deer browsing intensity may be a significant factor affecting the success rate. With proper sale design logging costs are similar to these occurring in even-aged systems

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Letter 2366 The shelterwood method offers the following benefits. mast production, den potential, soil stabilization

Response The Revised Plan utilizes a high percentage of shelterwood and modified shelterwood harvest.

Letter 2664 Shelterwood harvest methods will likely regenerate oaks, however, they are more costly because they remove less timber and can require two or more entries to accomplish the same goal as a clearcut These additional costs may make it more difficult to do timber harvesting on the GWNF

Response Shelterwood harvest will most often use only two entries and for modified shelterwood only one entry. Costs may be higher, but economic conditions alone cannot be the basis for the selection of a regeneration harvest method

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Letter 3660 Group selection does one thing well - it raises cost and decreases revenue.

Letter 3660 Single tree harvesting drives costs up and revenues down

Response Costs may be higher, but economic conditions alone cannot be the basis for the selection of a regeneration harvest method

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Letter 1615 The Forest should be implementing "New Perspective" type timbering and continuing to decrease emphasis on all even-age techniques, including shelterwood

Response	In conformance with the new national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area
Letter 3660	Small openings, ie GS, will not provide oak reproduction
Response	Openings can range from 1/4 to 1 1/2 acres depending on surrounding tree heights and aspect. This size will allow enough sunlight in the opening, according to research, to provide for establishing oak regeneration.
Letter 3660	Frequent entries required by your Plan cause problems for wildlife and water resources Get in, get out, and leave it alone
Response	Even-aged management results in very infrequent entry into a stand Even-aged management is applicable to 337,000 acres which is a significant portion of the forest land being impacted by timber management
Letter 3660	Study the cumulative impacts of multiple stand entry to perform harvest You need to stay away from multiple entries
Response	Multiple stand entries are a feature of uneven-aged management As this system is implemented, the impacts will be observed
Letter 3710	NRDC remains concerned that large openings characterized as "group selection" may, in reality, differ little from acknowledged clearcuts We urge forest managers to limit the size of such openings to that appropriate on a site-specific basis and to consult with local conservationists extensively in the planning of timber sales to minimize negative impacts
Response	Group selection openings will range from 1/4 to 1 1/2 acres As in all timber sale projects the final application of a regeneration harvest method on the ground is determined by site specific analysis. The public has the opportunity to comment on projects during the scoping process
Letter 3728	The Plan proposes a drastic increase in the use of uneven-aged silviculture in MA's 14, 15 and 16 Such a change will more rapidly convert the Forest to shade-tolerant vegetation Maintain, in as much as possible, the oak/hickory forest type upon which many forms (game and nongame) of wildlife depend Such direction will maintain the Forest's essential character and ecological values without major change.
Response	The Revised Plan limits uneven-aged management to portions of Management Areas 7, 11, 13, 15 and 17 for a total allocation of 11,000 acres. This amount will not threaten the maintenance of the oak/hickory forest type on the forest
Letter 3728	We suggest the GWNF staff investigate the current research applications of the 2-aged harvest cutting method presently being researched on the Fernow Experimental Forest in West Va. and assess its applicability for the GWNF WVDNR would strongly support a "modified shelterwood", or other "2-aged deferred cut", or some other similar silvicultural method whereby residual trees are left in an otherwise clearcut treatment Such a cutting method should include the following· 20-35 sq ft of basal area in residual trees; sawtimber-size residual trees with large crowns capable of producing optimum mast yields, preferred species of residual trees should be red oak, white oak, chestnut oak, black gum, ash, and hickory A good mix of these "durable" tree species should be left to ensure mast diversity, to meet wildlife objectives, all residual tree species left should be mast-producing
Response	The modified shelterwood proposed in the Revised Plan does accomplish the items identified by the commenter except that the size of trees to be retained will not be merchantable sawtimber

Letter 3840 Use existing roads for uneven-aged management

Response The Revised Plan uses existing roads as one criteria for locating where uneven-aged management may occur.

Letter 3942 What I see missing in the plan is any individual tree selection. While we want to avoid highgrading, selective cutting can be an environmentally sound practice with a minimal disturbance to wildlife habitat and soil quality. Consider including individual tree selection as a method of harvest, at least on an experimental basis.

Response The Revised Plan does provide for using single tree selection (see appendix A) Actual application will depend *on site specific analysis during project implementation*

Letter 3942 Standards 1012 and 1013 need to be changed 40 acres is too large for an even aged cut Please limit this to 20 acres, with no exceptions

Response The NFMA requires that even-aged openings cannot be larger than 40 acres in the Appalachian hardwood *ecosystem. This is discussed in detail in the process paper Incorporation of the NFMA Requirements for Even-Aged Management into the Revision of the Land and Resource Management Plan for the George Washington National Forest.*

Management Areas 7, 11, 14, 14, 16 and 17 permit even-aged management but have differing standards on the size of openings The reader is referred to Chapter 3 of the Revised Plan.

Letter 2838 What is a modified shelterwood harvest? You must define this term precisely.

Response See the glossary in the FEIS.

Letter 2664 The VWTF is opposed to the amount of group selection harvesting (600 acres per year) Based on economics, silviculture applications for the forest species present and principles and practices of wildlife management, the VWTF believes that group selection is neither the most viable management tool on the GWNF, nor the most beneficial long term.

Response In the reformulation of alternative 8, the amount of group selection was reduced

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Letter 3984 From Table 2-7, shelterwood and especially seed tree harvesting have the very same aesthetic and biological effects as clearcutting, except that the former methods when properly administered make regeneration easier. I suggest you interpret the five years to start when the first stage of harvesting a sale area begins.

Response The purpose of the initial cuts for seed tree and shelterwood is to get adequate regeneration established, *therefore it follows that the 5-year period begins at that time.*

Letter 145	Wildlife populations will be neglected, impacted because of a poor age class distribution over a high percentage of the forest.
Response	The distribution of well-balanced age classes provides the optimum habitat for many of the game species While the Forest Service believes that providing habitat for these species remains important, they should not be emphasized on every acre across the entire Forest. Analysis shows that most of the game species benefit from a variety of habitats, not just early successional stages. Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 11, 13, 14, 15, 16 and 17. Non-timber wildlife management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas
Letter 146	The standard in the draft plan calling for long quiet times between major projects in MA 14 or 15 is a great improvement over the discredited 1986 plan.
Response	The period between entries has now been addressed in the "desired future" for Management Areas 14 and 15.
Letter 2204	Food available for game animals will decrease when population levels are at capacity levels.
Response	This statement is true for all alternatives developed
Letter 2273	A major concern is the apparent cessation of wildlife clearing construction except on Area 16 lands. Many other areas may allow the maintenance of existing clearings, but do not appear to allow further development of such sites Wildlife clearings not only benefit wildlife, but they provide significant "viewing opportunities".
Letter 2273	One of the stated objectives for Management Area 16 is "moist soil management areas for woodcock". There are only so many such suitable places in the Forest, and how many of them happen to fall within the meager Area 16? Again I would suggest that this could be remedied by encouraging diversity within all areas With woodcock numbers on the decline, habitat improvement should be a priority
Response	The Plan provides for additional woodcock habitat management in Management Areas 10 and 22. See Chapter 3 of the Revised Plan
Letter 2606	Elimination of wildlife management for all recaptured species with the exception of naturally occurring disturbances
Letter 2664	To increase dispersion of cutting units and enhance habitat suitability for wild turkeys, the VWTF recommends an increase in Standards 1005 and 1007 from five to ten chains separating even-aged regeneration cuts
Response	In attempting to respond to the below cost and road building issues, the Revised Plan strives to increase dispersion whenever possible in Management Area 15
Letter 3660	I agree that recreation activities be limited if necessary if conflicts arise in MA's 14, 15, & 16.
Response	Standards are provided in each management area pertaining to wildlife Over much of the Forest, open road densities are limited, and many roads may be seasonally closed to minimize disturbance to wildlife during the nesting and rearing season Refer to Chapter 3 of the Revised Plan
Letter 57	Disturbance happens in nature Some is good. Wildlife emphasis is a mixture, not a single practice for a single species on a given forest

Letter 986 — Eliminate wildlife mgt for all featured species.

Letter 1370 — Eliminate wildlife mgt. for all species with the exception of naturally occurring disturbances.

Letter 1971 — *Eliminate wildlife mgt for all "featured species" with the exception of naturally occurring disturbances* An ecosystem needs all forms of life to sustain it, not just those that are attractive to humans.

Letter 2060 — Habitat manipulation for "featured species" should be halted

Letter 2227 — *Eliminate wildlife management for all featured species with the exception of naturally occurring disturbances*

Letter 2665 — Eliminate wildlife management for all featured species with the exception of naturally occurring disturbances

Response — The featured species concept has been dropped, but wildlife management (including game management) is an integral part of the Revised Plan. Chapters 2 and 3 of the Revised Plan provide a more detailed strategy of wildlife management on the Forest.

Letter 11 — By reducing even-age management to 300 acres, there is little opportunity for vegetative manipulation for wildlife

Letter 145 — Average annual harvest acreage for the first decade is 2,600 acres. That is 0.25 percent of the total acreage Can *habitat and biological diversity objectives be met with that level of harvest?*

Letter 1679 — The FS has been on the right track for a number of years and the consideration of not cutting or clearcutting on 75% of the GW just downright doesn't make good sense I am opposed to the proposed revision of the mgt plan to the GW. Timbering provides an economical means to manipulate forest vegetation and provide an ongoing base of quality wildlife habitat. The elimination of forest product harvesting over 800,000 acres of the forest almost certainly ensures that many species of forest wildlife will be nonexistent across most of the GW

Letter 1858 — Alternative 8 allows for 2,600 acres to be harvested in the first ten years of the plan. How can this create or even maintain forest or habitat diversity? In order to maintain species and age class diversity, there needs to be some type of harvest

Letters 2164, 2941, 3670, 3587 — *With Alt 8, an annual average harvest of 2600 acres will not provide the vegetation manipulation necessary* Clearcutting only 300 acres a year compounds the problem While being the most efficient method of harvest, clearcutting also provides the greatest benefit to wildlife. How do you plan to maintain an oak component without clearcutting and without controlling the gypsy moth?

Letter 3660 — Your Plan cannot come close to meeting the habitat and biological diversity needs of the Forest

Letter 3876 — The result you have come up with is a vast disappointment. You people have let the below cost timber sale item addle your minds. You have reduced timbering and clearcutting, which are the backbone to game and wildlife management, to almost nothing.

Response — By-in-large, biological diversity, and the demand for game can be met The Forest has reduced the amount of lands suitable for timber production from the 1986 Plan, but has not appreciably reduced the amount of lands *on which a variety of management practices can occur Even on most of the unsuitable timber lands, other* management activities may take place. The expanded wildlife management program provides habitat manipulation in areas where timber quality is poor, where there are weak markets for such products, and/or in remote areas where associated roading costs are extremely high. These conditions exist in many portions of the forest, and designating such areas as unsuitable for timber production help avoid below cost timber sales Overall habitat management increases, as compared to Alternative 2, and estimates made for game species' populations do not show declines.

In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those site-specific instances where no other regeneration harvest method can achieve the objectives or desired future condition of the given management area Other even-aged regeneration harvest methods can adequately provide sufficient oak regeneration

Management for wildlife is not excluded in the Revised Plan Management Areas 14, 15, 16 and 22 are managed primarily to achieve wildlife objectives

A more complete discussion on biological diversity and game management is presented in Chapter 2 of the Revised Plan under "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species").

As discuss in Chapter 2 of the Revised Plan under "ISSUE 11 – GYPSY MOTH", silvicultural practices cannot control gypsy moth populations

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Letter 2929 — The Forest Plan should budget for 1,000 acres per year for vegetative manipulation to benefit wildlife

Response — The Forest estimates that about 3,000 acres of wildlife habitat improvement will be accomplished each year There will be a mixture of habitat management activities to benefit sensitive, threatened and endangered species, non-game species, and game species

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Letter 2666 — Bear habitat (Management Area 14) should be relatively undisturbed since bear need remote, undisturbed habitat There should be no timber cutting in bear habitat

Response — Standards restrict open road densities to provide habitat that is free from continual disturbance. Timber cutting, as allowed in this management area, is restricted to achieve long rotation ages and minimize localized disturbances Revegetated cut units provide dense hiding cover and spring foraging areas.

Letter 2755 — Since bear need remote, undisturbed habitat, we would like to see all of Management Area 14 designated as unsuitable for timber All cutting in Management Area 14 should be done for wildlife purposes only Clearcuts for bear should be no larger than 10 acres

Letter 3962 — MA 14. [Standards] 540-550 No commercial timber operations should be allowed in this Management Area because bears need undisturbed areas These standards should be deleted

Response — Bears do inhabit areas where timber harvesting occurs, but they usually avoid the immediate area during cutting Having portions of Management Area 14 classified as suitable for timber production helps to achieve the desired future condition Having cut units larger than 10 acres provides for larger patches of hiding cover Larger areas provide more springtime feeding areas, in which case bears may not need to move from area to area as much. With long rotation ages, and open road density guidelines prescribed for Management Area 14, quality bear habitat can be maintained

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Letter 2029 — In respect to trails and motorized activities and MA 15, in Alternative 8 nearly 300,000 acres are designated for MA 15. That amount of acreage to encourage "older" areas must be viewed as positive for the biology of the Forest However, if I read it correctly, there could be as many as 600 miles of open roads in that acreage. It is good that public vehicle access will be curtailed from April 15 through July, the season when enough energy is available for supporting the costly processes associated with reproduction and raising of young. The point, it is good that certain species, both game and nongame, are not being further stressed by motorized activity during reproduction, but it is the remainder of the year--the cold season--that is actually the most stressful. We are not doing them favors by not curtailing human activities in the cold season Or the fall when they are preparing for the cold seasons Or in late-winter/early spring when those that survived are fattening back up and preparing for reproduction These comments about reproductive strategies and the season of greatest stress apply to all MAs, and should be taken into account whenever "forest multi-user activities" and the biology of the Forest are considered.

Response — Standards provide for restrictive motor vehicle access in Management Area 15 Seasonal closures were based on the recommendations of state wildlife agencies.

Letter 2929 — All timber sales on lands in Management Area #15 should be driven by biological considerations, not the economics of timber marketing All sales should be laid out and approved by wildlife biologists for specific wildlife benefits

Response

Timber sales in Management Area 15 are used to achieve the desired future condition of that area. Specific standards ensure that all management activities are contributing to, or at least compatible with the objectives of this area. Site specific implementation decisions are made through the NEPA process, which are open to public input and participation In addition, yearly monitoring is used to determine if the actions, or series of actions within this area are truly achieving the desired future conditions

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Letter 3779

MA16. "Recreation experiences compatible with a semi-primitive motorized " What is "motorized recreation" *doing at all in this small area? p. 2-113*

Response

Management Area 16 includes some lands that are classified as semi-primitive motorized recreation opportunity spectrum. The Revised Plan adopts the classification of semi-primitive motorized (subclass 1) for these lands.

Letter 1269

I have reviewed Alt. 8 I am appalled to discover that only 25% of the forest land will be available for timber mgt. Less than 5% of forest land can be managed as early successional habitat. Under the proposed scenario I believe the ruffed grouse is in grave danger of becoming extinct in the GWNF. I am in favor of clearcutting and thinning! I am very distraught that the entire Little River area in Augusta County is off-limits to any timber mgt

Letter 3822

Under the guidelines of Alternative 8, much of the progress that the USFS and the VA Dept. of Game and Inland Fisheries has made over the years will be erased This alternative greatly restricts the number of acres to be managed for 1) the enhancement of deer and grouse and 2) the acres managed in old timber with isolated disturbance for the benefit of bear, grey squirrel and pileated woodpeckers

Response

Alternative 8A does not erase the wildlife habitat management activities of the past It is true that the Virginia *Department of Game and Inland Fisheries (VDGIF) is abandoning much of the wildlife openings that have* developed over the decades, due to budget and employment constraints. This is a state agency decision that is taking place regardless of the alternative selected.

The Revised Plan actually more than triples the annual acreage of habitat management to be performed by the Forest Service. This habitat management will be done to benefit sensitive, threatened, endangered and sensitive species, non-game, and game species.

The Revised Plan does not maximize the potential value for either early successional or late successional habitats. It recognizes the value of both, somewhat conflicting needs, within a large forested area and provides for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

Estimated white-tailed deer carrying capacity is not reduced Currently, in some areas of the Forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced *browse line which can be detrimental to many bird species that feed and nest in the understory, and that some* rare plant species are preferred as deer food Forested areas that contain high deer populations, over time, may *loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest* hunting stamp sales) shows a very slow decline in the numbers of hunters. Based on past sales declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas, but there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives probably do provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate Grouse hunting accounts for approximately five percent of the hunting days on this Forest In light of a below cost timber program, it is economically hard to justify an increased timber program to increase ruffed grouse hunting success rates

The amount of habitat for bear, pileated woodpecker, and gray squirrel are increased in relation to Alternative 12, and an estimate of carrying capacity for bear (and wild turkey) shows that these species' population levels are higher in Alternative 8A in comparison to Alternative 12

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so *that those species which prefer this habitat will be found throughout the Forest*

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the Forest is provided in Chapter 2, "ISSUE 1. BIODIVERSITY" and in "ISSUE 8. VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife

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Letter 1854

Alternative 12 includes nearly 115,000 acres of land in Management Area 14 with other trees, etc , for animals requiring them like the black bear, gray squirrel and pileated woodpecker Alternative 12 also has almost 5 times the number of acres managed for white-tailed deer and ruffed grouse than does Alternative 8

Response

Many management areas provide similar habitats It is not biologically accurate to make a simple acreage comparison of one management area of one alternative to another alternative Take black bear and pileated woodpecker for example. Many other areas in addition to Management Area 14 contribute to black bear and pileated woodpecker habitat and include, but are not limited to, Management Areas 4, 6, 8, 9, 15, 18, and 21. Estimated habitat carrying capacities were made for all alternatives, and Alternative 8A had a higher habitat carrying capacity for black bear and wild turkey than in Alternative 12. Alternative 12 had a higher carrying capacity for white-tailed deer. As Alternative 12 is currently mapped, many areas to be managed for deer and grouse would contribute substantially to below-cost timber sales due to high roading costs, low value of the timber, and weak markets for such products in some areas of the Forest. Alternative 8A projects the carrying capacity for deer to remain at current levels There are biological concerns in relation to increasing the deer herd on the forest and include increased regeneration problems due to increased browsing, the development of a pronounced browse line which can be detrimental to several bird species that feed and nest in the understory. Some species of rare plants are favorite deer foods, and carrying a large deer population over a long period of time, may cause the local extirpation of these species.

Letter 2029

Emphasizing management to maintain or enhance habitat with older trees. If there is to be management for game species as there is except in a small fraction of the Forest, MA 14 must be encouraged It most approaches the kind of situation that not only benefits the bear, but forest species in general On the other hand, the harvest methods to achieve wildlife objectives, regeneration openings, permanent wildlife openings (up to 2500 acres), water holes, herbicide use, roads and other perturbing factors indicate that a few forest edge and open forest species other than the bear are given high consideration in MA 14 Except for increasing levels of cutting, clearing, roading and associated factors, it is difficult to separate MAs 14, 15 and 16

Response

Given the management requirements for black bear, most of the best habitat for this species is in the more remote areas of the Forest which lie within roadless areas Many of the alternatives, including 8, 8A, 9, 10, 11 and 13, provide a mixture of habitats that will be very beneficial to black bear. It is not possible, however, to manage for black bear everywhere on the Forest

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Letter 2275

[Alternative 12] would enhance the habitat for wildlife

Response

This can be said for most of the alternatives, as each alternative provides a different mixture of wildlife habitats.

Letter 1253

The Draft Plan fails to provide adequate wildlife habitat due to reduced age class distribution

Response

The Revised Plan provides adequate habitats for both game and non-game species Populations of game species remain high, great care is given to the management of sensitive, threatened and endangered species, and non-game species are provided for The plan provides for a wide range of habitats from early successional to old growth, in amounts that adequately provide for all wildlife species inhabiting the Forest

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Letter 2056

Encourage wildlife management for all species and not just game species

Response

The Revised Plan carefully blends several management areas to achieve a balanced approach to the many facets of wildlife management Refer to Chapters 2 and 3 of the Revised Plan for more detailed discussions on how sensitive, threatened and endangered species, non-game species, and game species are managed

Letter 2320 — I think Alternative 8 is a move away from proper game management Hunting will suffer greatly under Alternative 8 direction. No soft mast and browse means reduced habitat for our game. Less clearcutting means less edge effect Less road building means more areas unavailable to hunters

Letter 2320 — I like 12 because clearcut acres are increased to 2900 acres. 60% of the Forest will be managed to emphasize wildlife species.

Letter 3595 — Alternative 8 is a move away from proper game management No soft mast and browse means reduced habitat for game Less clearcutting means less edge effect. Less roadbuilding means more areas unavailable to hunters.

Response — There is clear national policy that directs Forests to reduce the amount of clearcutting, so the increase to 2900 acres is in direct conflict with national direction.

Clearcutting is not the only way to manage wildlife. The Revised Plan provides many alternate methods for wildlife, including timber manipulation Wildlife management can occur on the vast majority of the Forest Using timber management to enhance wildlife habitat will be emphasized on almost half of the Forest. Research has shown that clearcutting does not provide a positive benefit for soil nutrient availability, nor do clearcuts act as a barrier for wildfires The thick early successional vegetation which exists for a few decades following a clearcut provides cover for wildlife However, this can also be accomplished by other cutting methods and management techniques, such as prescribed burning, with equally good results.

The Forest has reduced the amount of lands suitable for timber production from the 1986 Plan, but has not appreciably reduced the amount of lands on which a variety of management practices can occur. Even on most of the lands unsuitable for timber production, other management activities may take place. The expanded wildlife management program provides habitat manipulation in areas where timber quality is poor, where there are weak markets for such products, and/or in remote areas where associated roading costs are extremely high. These conditions exist in many portions of the Forest, and designating such areas as unsuitable for timber production helps avoid below cost timber sales Overall habitat management increases, as compared to Alternative 2 (Interim Management), and estimates made for game species' populations do not show declines. Estimates were made for deer, bear, and turkey for each alternative. Alternative 8A produced more bear and turkey, while Alternative 12 produced more deer.

Hunting, which will be monitored through the sales of National Forest stamps, is not predicted to drop as a result of implementing the Plan. Hunting has declined, and this Forest appears to be closely approximating national trends A slight annual decrease in hunting is predicted for the next decade

Less road construction does not mean less areas are available for hunting Forest engineers estimate that there are approximately 1760 miles of Forest Service administered roads. They also estimate that 60% of these roads are open all year or open seasonally for hunter access This does not include the numerous county and state roads that traverse the Forest. This open road mileage facilitates easy access to the majority of the Forest

Some areas remain roadless. The majority have perimeter roads, so even these areas are relatively accessible There is a demand for hunting areas away from roads, as well as demand for hunting areas that are easy to access by motorized vehicles

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Letter 1437 — My greatest concern [about MA 14] is that you are recommending that the open road density increase to one mile per thousand acres Increasing open road density sets the stage for poaching. Please keep the open road density no higher than the current standard, 1/4 mile per thousand acres

Response — In Management Area 14 of the Revised Plan, the open road density does not change to 1 mile per thousand acres but remains at 1/4 mile per thousand acres

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Letter 1437 — I would like to commend the draft plan for stating explicitly that "Public motorized use is restricted to open system roads" in MA 14

Response — NO RESPONSE REQUIRED.

Letter 1437 With respect to [Standard] 537 under MA 14, I object to the use of herbicide treatment to keep wildlife clearings open

Response Herbicide use to maintain wildlife openings in Management Area 14 is not expected to be a frequent practice From a management perspective, this might be occassionally necessary to control an aggressive species such as fescue or black locust The use of herbicides will be in compliance with numerous standards, guides, and policies that strictly control pesticide use on National Forests

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Letter 1437 [In MA 14, I would like to suggest] that all bear habitat be designated as unsuitable for timber Commercial timber operations have no place in bear habitat since they cause continual disturbance

Response Bear utilize a variety of habitats including recently harvested areas. These areas provide for a certain amount of spring foods that are less available in a continuous forested area Dense regeneration stands also provide important cover areas for bear. Also, regenerated harvest areas on the GW appear to be used frequently as denning sites (dense regeneration in combination with logging slash). Overall, the intensity of timber management in Management 14 areas is low, as there is a high proportion of unsuitable lands mixed with the suitable lands, and standards and guides dictate that only a small percent of the suitable can be harvested This all adds up to long rotation ages and little overall disturbance to bears as a result of timber harvesting

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Letter 1437 Of the 85,000 ac recommended to be managed as MA14 (bear habitat), half is suitable for commercial logging This seems too large, since bear need remote, undisturbed habitat

Letter 1437 In areas designated as suitable for timber [in MA 14], the clearing size is 20-25 ac Is there any evidence that such large clearings are needed for bear? Shenandoah National Park has the highest density of black bear in the U S , and NO clearings are provided except for the small grassy areas along Skyline Drive I would like to suggest that the clearing size be reduced to 10-15 acres.

Response Shenandoah National Park has no bear hunting season, which is probably the main reason why the Park has a higher bear density than the Forest The Park does not harvest timber, but due to the long linear nature of the Park, many if not most Park bears have ample opportunity to access timbered acres on adjacent lands It is a common occurrence for these bears to leave the Park in search of new food sources, including timber harvest areas, orchards, and farms

Bears utilize timbered areas during different times of the year, and for different purposes--food, cover, and for denning sites Sizes greater than 10 acres afford more opportunities for feeding in one area, provide larger blocks of cover, and larger dense areas for cover

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Letter 2664 While some of the MA standards address grapevine control, others do not They gypsy moth does not eat grape leaves, making this species an important food source for a variety of birds and animals. The VWTF is strongly opposed to any grapevine control on the GWNF The standards and guidelines should be amended to say, No grapevine control is allowed anywhere on the Forest It is not cost-effective for timber management and is detrimental to wildlife management efforts

Response Grapevine control for timber management is allowed in only Management Area 17, with guidelines that do not eliminate, but control the species in a particular cut unit Management Area 17 contains 9 % of the Forest. The grape component appears to be increasing in many areas of the forest due to light gaps created by gypsy moth killed trees

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Letter 57 Half of the timber cutting in wildlife emphasis areas is too arbitrary Do it where ecologically sound

Response In the Revised Plan, changes were made to land allocations to better facilitate the benefits that timber harvesting have for improving wildlife habitats Consideration was given to improving economic efficiency, and to analyze current habitat capabilities, and spatial arrangements of management areas The Plan attempts to provide timber for industry, improve both game and non-game habitats, provide for a variety of recreational activities, protect watersheds, all within the framework of maintaining the Forest's biological values

Letter 3660 All rotation ages are too long Need to cut them by 15-20%.

Response Adjustments were made in the rotation ages, and in general, they were lowered. This was made in conjunction with Forest Service foresters and state wildlife agency wildlife biologists Each management area containing suitable lands describes the appropriate rotation ages This information is provided in Chapter 3 of the Revised Plan

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Letter 2823 An area of concern to our members is how wild grape arbors are handled in the standard and guides. We strongly recommend that provisions be incorporated to maintain and improve the clumps of wild grapes where found, regardless of Management Area These are extremely important to a wild variety of wildlife species.

Response The Revised Plan allows for grapevine control to be practiced on a small portion of the Forest on a very restricted scale.

Letter 2823 Wildlife habitat improvement and maintenance is important in all areas on the Forest. We feel that in other Management Areas, (in addition to Management Areas 14, 15, 16, and 17) there is a need to create and maintain openings and waterholes for various species of wildlife We know that this cannot be done in the existing designated wilderness areas but should be permitted in all other areas to maintain viable wildlife populations

Letter 3660 Need to maintain and increase the number of waterholes for wildlife

Response Provisions are now made in the Revised Plan, in general, to allow for the development of up to four water sources (water holes) per square mile, where free flowing water is lacking

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Letter 1268 Timber should not be harvested in the name of game mgt

Response Several of the developed alternatives provided no timber/game management The Revised Plan recognizes the value that timber harvesting provides to producing early successional habitats that are generally beneficial to *game, and many non-game species, and that there is a demonstrated demand for game species. Therefore,* much of the proposed timber harvesting will improve habitats for such wildlife species This is particularly true for Management Areas 14, 15 and 16 Chapter 3 of the Revised Plan provides more details

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Letter 3660 It is very important to close roads during young raising season

Response Management areas 14 and 15 contain specific guidelines pertaining to open road densities in order to minimize disturbance Seasonal road closures are also used to provide additional freedom from disturbance during the nesting and rearing seasons.

Letter 3779 "Rotation of even-aged stands of 135+ years do not approximate a diverse, biologically interdependent healthy forest It is a tree farm maintained at tax payer expense for a few favored companies, and cannot be represented otherwise

Letter 3779 "Public motorized travel may be seasonally prohibited" is not good enough because it may also not be prohibited p 2-109

Letter 3779 How can motorized use be allowed at all? Keying it to conflicts with indicator species is only a narrow view of potential impact on wildlife. p 2-110

Response *The ID team feels that this is appropriate for Management Area 15*

Letter 3489 Any realistic environmental impact statement would show that the present proposed plan would result in changing the character of the forest and the loss or reduction in valuable intolerant tree species so valuable to wildlife, reduction in intolerant species on the forest floor that provides food for wildlife, reduction in the biodiversity that meets so many needs

Response Disclosures for each alternative, including the Plan, are provided in the FEIS in Chapter 3 under "Vegetation."

Letter 3779 Revised Plan MA 14. How much in hard numbers will "Public vehicular access" be limited? p. 2-105

Response Standards allow for 1/4 mile of open road per 1,000 acres.

Letter 3779 "Even aged timber harvest cutting methods (ie , clearcutting) are used with longer rotations" to "provide mosaic groupings of older and younger trees" This is definitely a very suspicious statement, probably written by a timber company executive

Response This was written by the Forest ID Team to describe one of the desired future conditions

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Letter 3779 "Prescribed burning and timber harvesting are used to achieve wildlife objectives" Which objectives? Certainly not for most species

Response A variety of species may include maintaining fire regime dependent plant communities.

Letter 3779 (Alt. 8 call for permanent 1 to 5 acre wildlife openings that may be created per every 160 acre area on lands unsuitable for timber production, effectively breaking up large unfragmented tracts p. 2-107)

Letter 3779 What do "prescribed openings" (1 to 5 acres/160 acres) do for wildlife except increase deer and turkey habitat and threaten deep forest birds? Biodiversity and non-game species balance is not supported by this activity. p. 2-111

Letter 3779 "10- to 15-year cutting cycles" on lands suitable for timber production in this MA15 is a joke Why are we timbering at all if "maintaining or increasing habitat for wildlife" is a goal? p 2-111

Letter 3779 "10 to 12 acres per square mile are developed into grassed openings if openings do not occur as adjacent farmlands or utility rights-of-way " In the EIS, p 3-138, Robin, et al, 1989, are quoted as saying that unfragmented minimum acreages needed are 15 to 400 acres for some bird species found in the George Washington. Why is the FS sponsoring so many "grassed openings" in addition to the recreation roads, motorized trails, timber roads and etc, and etc ?

Response This applies to only certain management areas, and relates to the desired future condition of that area The Forest provides vast acreages of unaltered habitat

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Letter 3779 "Even aged management is the predominant silvicultural system used to meet wildlife requirements" seems to me a mutually incompatible statement p 2-114

Response Use of even-aged management is appropriate to meet the desired future condition for Management Area 16.

Letter 3779 Need a commitment for closing excess roads, not that "forest officers look for opportunities". Not good enough p 2-110

Response This standard was worded in recognition that there are locations within Management Areas 14 and 15 where the desired future condition of a minimal number of roads could not be achieved The intent was that Forest Service would do the best that could be accomplished under the situation

Letter 3726 We have a small farm, which is plagued with deer, therefore, we would like to see a reduction in MA14, with those areas shifted to areas 15 or 16.

Response Reallocating lands from Management Area 14 to 15 and 16 will not necessarily cure your deer "plague". In theory, these areas could provide more food for deer, but also for a higher deer carrying capacity. It could result in even more deer next to your property, and eventually more deer damage

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Letter 4268 Plan - EPA recommends that the acreage allotted to this management area [#16] be restricted and any management activities should reflect a clear need for increased habitat for early successional species.

Response Management Area 16 encompasses only 4% of the Forest Management activities necessary to achieve the desired future conditions will be documented through the NEPA process

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VEGETATION MANIPULATION: Maintain Current Level of Timber Cutting

Letter 46 I urge you to remain consistent on the timber cutting as it is at present and not reduce cutting any further

Letters 63, 68, 69, 70, 75, 76, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 141
I would like to see the Forest Service's Management Plan maintain current levels

Letter 71 For the sake of the cultural health of our area and of our country the annual harvest and the acres classified as suitable for timber production should be kept at current levels

Letters 20, 59, 73, 184
We must at least keep harvest levels and suitable acreage areas of the George Washington National Forest at current levels

Letter 131 It is important to keep harvest levels at least at current levels

Letter 150 The Land Management Plan should at least be maintained at current levels, any reductions would be a poor forest management choice

Letter 744 The Authority believes that the current volume should be maintained

Letters 1888, 1889, 1906, 1963, 1964, 1965, 1966, 1967, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 3114, 3115, 3116, 3117, 3118, 3119, 3151, 3152, 3153, 3154, 3155, 3156, 3157, 3158, 3159, 3160, 3161, 3162, 3163, 3164, 3165, 3166, 3167, 3168, 3169, 3170, 3171, 3172, 3173, 3174, 3175, 3176, 3177, 3178, 3179, 3180, 3181, 3182, 3183, 3184, 3185, 4076, 4077, 4078, 4079, 4080, 4081, 4082
We feel that because of the economic condition that exists that every effort be made to continue timber harvest amounts at current levels

Letters 1953, 1954, 1955, 1956, 1957, 1958, 1959, 2067, 2068, 2768, 3058, 3146
Maintain the current level of timber harvest at 35 million board feet annually This provides needed stability and security for those involved in timber harvest and related occupations It also benefits the N.F. through harvesting the mature timber, allowing the smaller timber to prosper and providing food and cover for wildlife needs.

Letter 3927 The current level of timber harvesting should be maintained Maintaining current levels of timber harvesting helps to maintain a continuing food supply and cover for wildlife Harvesting the mature trees helps to eliminate the diseases which occur in older trees and allows more growth of young trees

Response Alternative 2 was considered in detail in the FEIS It continues present management of the Forest as amended in the Forest Plan with the additional interim direction set forth by the Chief Alternative 2 could be selected to serve as the Revised Forest Plan if it is identified as the alternative that maximizes net public benefits

Letter 282	I am opposed to the recent decision by the U S. Forest Service to greatly limit timber management.
Response	Alternatives 2, 4, 5, 7 and 12 offer higher allowable sale quantities than the Forest Service preferred alternative One of these alternatives will be selected to serve as the Revised Forest Plan if it is identified as the alternative that maximizes net public benefits

Letter 3953	We are not opposed to timber cutting We recognize the economic impact and support reasonable logging similar to past volume
Response	The Revised Plan provides a reasonable amount of timber harvest

Letter 1661	I would not want a plan that would increase cutting
Letter 3640	I oppose increasing logging operations
Response	The Forest Service preferred alternative has a lower amount of timber harvest than the 1986 Plan.

Letter 3895	Don't increase the timber volume in 8
Response	Alternative 8 retains an allowable sale quantity of 270 MMBF (or an average annual offer of 27 MMBF) The Forest Service preferred alternative in the FEIS (Alternative 8A) has an ASQ of 330 MMBF (or an average annual offer of 33 MMBF)

VEGETATION MANIPULATION: Reduce Level of Timber Cutting

Letter 10	I am in support of the reduction in amount of timber to be sold
Letter 2471	Severely limit the timber harvest
Letter 3687	Keep the timber harvest at the suggested amount in Alternative 8 Congressman Olin has urged increasing the board-feet to 40 million/yr, but you should stay with what your biologists have assessed would be a sustainable harvest, which is below 30 million
Letter 3721	Increased logging and road building not only kill the natural beauty of the area, but also the wildlife and furthermore my business in and near the forest areas
Letter 4029	We need to act immediately to reduce the amount of timber harvest
Letter 4234	I fully support the reduction in timber cutting
Response	Alternatives 3, 6, 8, 8A, 9, 10, 11 and 13 in the FEIS analyze a lower timber offer program than the 1986 Plan as amended. One of these alternatives will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

Letter 55	Increased timbering plans are well beyond limits already established With the construction of new houses down, there is not a real need for having so much wood cut
Response	Only alternatives 4, 5, 7, and 12 in the FEIS analyzed higher timber levels than the current Forest Plan as amended All other alternatives analyze lower timber offer levels While market demand is considered in determining timber harvest levels, amenity and environmental values are also considered. Timber offer must be based on long-term sustained yield and not as a response to short-term fluctuations in the market place

Letter 279 — Suggest NO ASQ for timber products or lands suitable for timber production Timber harvesting is limited to providing fuelwood and other misc products for traditional personal use, and achieving safety objectives such as the removal of hazard trees

Response — These ideas are expressed in alternative 6 of the FEIS Alternative 6 will be selected to serve as the revised forest plan if it is identified as the alternative that maximizes net public benefits.

Letter 986 — Plan should eliminate logging on the GW (too much has been logged already!)

Response — Alternative 3 was considered in detail in the FEIS It does not allow any logging It will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 1072 — Too much timber harvest is called for in Alt 8 Your goal should be reduced by at least 50%

Response — *Alternatives 9, 10, 11 and 13 analyze the effects of a lower timber harvest level than Alternative 8 One of those* alternatives will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 1078 — Excess timber cutting is destroying our remaining forest throughout the United States All timber harvests should be limited to within one-half mile from an existing road Timber management should also reduce the amount of *pulpwood cut from George Washington National Forest*

Letter 1149 — The amount of wood cut for pulpwood must be greatly decreased

Response — US Forests have recovered substantially from their low point at the turn of the century in response to forest and conservation policy choices and improvements in technology The rate of tree growth in 1900 was a fraction of the rate of harvest Today timber growth greatly exceeds timber harvest Alternatives 11 and 13 have been *formulated to analyze the effects of limiting timber harvests to within 1/2 mile of an existing road Pulpwood* is harvested in conjunction with sawtimber to achieve the necessary silvicultural treatment to assure adequate stand regeneration to desirable species Pulpwood is also harvested from low quality or mature stands in order to provide vegetation manipulation to meet desired future conditions.

Letter 1268 — Timber cutting is appropriate in the GWNF for certain purposes, i e , to control gypsy moth damage and to harvest limited amounts of timber in an environmentally sensitive manner

Response — Alternative 8A portrays the commenter's concerns.

Letter 1275 — Only about 5% of the State's wood products needs come from National Forests Virtually all those needs are met by the private sector, as they should be. The GWNF should serve as a biological preserve It should not be converted into a tree farm to be exploited by the timber industry. There should be no commercial logging permitted. Only about 3% of the GWNF exists as designated wilderness while virtually all other lands are being "mined" by loggers

Letter 1310 — I feel very strongly that there should be no timber harvest in the GWNF It is only a small percentage of VA's timber base, probably less than five percent, not enough to be of much commercial value but with tremendous recreational, watershed, wildlife values and an opportunity to maintain biological diversity, opportunities and values that are in short supply in this part of the country.

Letter 1313 — Timber cutting should be eliminated

Letter 1552 — I am totally against allowing lumber companies to cut down the trees of our national forest There is no benefit to the public in allowing them to cut, actually it COSTS us money and the State of VA cannot afford that

Letter 1842 — Timber cutting is not needed to maintain living standards except for the timber industry itself Logging operations should not be permitted in GWNF.

Letters 2606, 2902

Elimination of, or moratorium on timber harvesting.

Letter 2809 — I don't want to see ANY logging in the GWNF, no salvage sales either.

Letter 2942 — Eliminate or begin to phase out all logging on the GW.

Letter 3490 — I like my forests unlumbered

Letter 3490 — Specifically, I would like to know considerably less timber harvesting is being done.

Response — Alternative 3 is considered in detail in the FEIS It does not allow any logging. It will be selected to serve as the Revised Forest Plan if it is identified as the alternative that maximizes net public benefits

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Letter 501 — To keep what amounts to only three percent of the forest out of the logging and mineral industries and ATV and offroad vehicle owners hands is unacceptable

Letter 1434 — Minimize timber cutting to that which is necessary to maintain the forest and NOT for commercial profit.

Letter 3703 — Quit timber harvesting in the George Washington and work on preserving what remains for future generations to enjoy.

Letter 3675 — I would like to see less land opened to Timber Harvesting.

Response — The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products, environmental conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions This fact results in major disagreements over which alternative should be selected as the Revised Plan

Alternative 8A was developed to respond to a wider array of uses, values, products and conditions including amenity values and environmental concerns Alternative 8A is also responsive to the emerging policy on ecosystem management.

Letter 2045 — Timbering must be eliminated, at least for several years, in the GWNF in order to allow it time to recover Oak decline, dogwood blight and dying foliage on other trees are distress signals of the forest to which we must listen

Response — Disease and insect damage occurs naturally in the Forest environment, but becomes more prevalent as the forest grows older and trees have less resistance to their onslaught Harvesting a portion of the forest and providing for reproduction by natural means or planting, replaces old trees with younger more healthy trees

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Letter 146 — The draft plan calls for harvesting volume of 27 million board feet This is much more realistic than the 49 million board feet proposed for harvest in the discredited 1986 plan.

Letter 2572 — Alternative 8 would allow a large increase in the volume of timber removed from the Forest

Response — Alternative 8 allows an annual harvest of 27 MMBF and interim management direction (Alternative 2) allows no more than 38 MMBF This is a substantial decrease The Forest Service preferred alternative in the FEIS is Alternative 8A The ASQ for this alternative is 330 MMBF (or an average annual offer of 33 MMBF)

Letter 2380 [We are in favor of] timber harvesting on no more than the 24% of the forest as proposed.

Response *The FEIS contains three versions of Alternative 8 Alternatives 8A, 11 and 13 have respectively the following* amounts of land suitable for timber production (in thousands of acres). 348; 280; 185

Letter 2574 The ORV community and logging community do little to offset the access privileges they utilize

Response The timber sale contract requires installation and maintenance of erosion control structures and revegetation of temporary roads built to log timber. Purchasers also pay a commensurate share of road maintenance for their use of system roads Many OHV users provide maintenance and erosion control measures thru volunteer agreements on the trails they use

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Letter 2885 I am opposed to the harvesting of timber in the George Washington National Forest except for fuel gathering by individuals.

Response Alternative 6 is analyzed in detail in the FEIS. It limits timber harvest to fuelwood and other miscellaneous products It will be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2892 Far too much timber cutting is permitted Sustained yield requires long growing cycles.

Response All alternatives in the FEIS meet the requirement of sustained yield.

Letter 4250 We are troubled by provisions allowing for virtually unrestricted logging throughout the forest, under a variety of different guises, the most pernicious of which is "salvage".

Response The Revised Plan provides specific limits on the locations for salvage

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Letter 3744 No salvage sales in roadless or biological areas

Response The formulation of Alternative 8A provides standards for limited removal of dead or dying trees from biological areas in Management Area 4 and removal of dead, dying or damaged trees from roadless areas without any new road construction in Management Areas 9 and 21

Letter 3739 No logging until the wilderness and biodiversity potentiality has been thoroughly studied

Response Wilderness has been thoroughly studied for many years. Biodiversity will be continually studied for many years so we can understand more about our interactions with the forest Logging needs to continue so we can better understand the complex relationships involved with providing goods and services for the public from our forests.

Letter 3984 With regard to budgeted timber stand improvement, one way to convert from a pulp forest to a saw forest is to groom truly valuable straight trees. It is implied in your public documents, and you don't seem to be living up to your goal Even your Draft EIS admits that 23,000 tons of sediment per year can be expected to be deposited in streams as a result of the planned timber harvest, I suggest that this is reason enough alone to cut back on the cut.

Response The 23,000 tons of sediment annually is from natural background erosion that occurs regardless of man's activities, plus all sediment resulting from all other activities, including timber harvest. Most sediment comes from existing roads, which are going to be used whether timber is harvested or not.

VEGETATION MANIPULATION: Increase Level of Timber Cutting

Letter 66	I am for more timber cutting on the National Forest
Response	Alternatives 4, 5, 7 and 12 in the FEIS analyze higher timber production levels than the 1986 Plan as amended One of these alternatives will be selected as the Revised Plan, if it is identified as the alternative that maximizes net public benefits
Letter 95	The forest is a crop. We must manage it.
Response	The Revised Plan recognizes that timber production is one of the multiple use resources of the national forests and proposes a sustainable, even-flow of timber be provided as part of a variety of uses, values, products and conditions
Letter 379	The George Washington National Forest is capable of perpetually producing many times the amount of wood products suggested in Alternative 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils and all other uses
Letter 384	A high level of timber production from the GWNF, based on sound, scientific forest management, is in the best interest of all the people. The George Washington National Forest is capable of perpetually producing many times the amount of wood products suggested in Alternative 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses including wilderness
Letter 487	I think timber harvest levels ought to increase dramatically to harvest older, less vigorous timber, mitigate mortality loss, and move toward sustained yield of a younger, healthier forest
Letter 756	Using Alt. 12 the GWNF is capable of perpetually producing many times the amount of wood products suggested in Alt 12, and of course, Alt 8
Letter 875	The GWNF is capable of perpetually producing many times the amount of wood products suggested in Alt 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses
Letter 878	The GWNF with sound, scientific forest management is capable of producing many times the wood products suggested in Alternative 12 also providing for all the other uses
Letter 893	A high level of timber production from the GWNF, based on sound, scientific forest mgt , is in the best interest of all the people The GWNF is capable of PERPETUALLY producing many times the amount of wood products suggested in Alt. 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses
Letter 4042	Since a high mortality has occurred in recent years to the timber, more should be sold
Response	Based on historical use, the total annual cut has never exceeded 50 MMBF on the Forest So while the Forest may be capable of producing more timber, there is little point in doing so if the market place can't absorb it
Letter 707	Trees and wildlife are two of our country's most precious and renewable resources
Response	As required by law, trees and wildlife are renewable natural resources that are managed on national forest lands.
Letter 1990	It is essential that timber sales should continue at least at the same level as in the past and preferably at a somewhat higher level During the past several months lumber prices have soared upward in the face of a recession because of perceived shortages of National Forest land timber sales One report in the Central Virginia region cites a 35% increase in lumber prices since January 1, 1992, partly because of the negative impact of Forest Service policies on timber harvesting This is neither good for the economy nor for the timber industry

Response — Timber harvest levels are developed to provide long term sustained yield and do respond to the up and down swings of the sawtimber market. A steady supply of timber would help to stabilize the prices

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Letter 2313 — "If you don't use it - you lose it!" when it comes to mature timber Your own statistics on growth/mortality will certainly bear this out With a national debt in excess of three trillion dollars, how can we afford to continue to eliminate this resource from our economy -- a renewable one at that!

Response — It is beyond the scope of the revision to cut the national debt

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Letters 1355, 1373

A high level of timber production from the GWNF, based on sound, scientific forest mgt , is in the best interest of all the people The GWNF is capable of perpetually producing many times the amount of wood products suggested in Alt 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses

Letter 1808 — I am under the impression that NFs were supposed to supply timber to the public If Alt 8 will cause so many jobs to be lost, then you are not supplying enough timber Consider cutting more timber like in Alt. 12

Letter 2542 — The anticipated demand for GWNF timber is expected to increase from 38 MMBF in 1989 to 45 5 MMBF per year by 2000 Utilize the vast supply of timber to meet the increasing demand

Letter 2542 — The net growth on the Forest is approximately 200 MMBF per year. Approximately 30% of this growth is on land where no timber harvesting is possible. This leaves a net growth of approximately 140 MMBF on the rest of the Forest In Alternative 8, only 27 MMBF per year could be harvested This indicates that 5 times the 27 MMBF amount could be cut and not adversely affect the ability of the resource to sustain itself indefinitely. Even if 50 MMBF per year are cut, as in Alternative 12, the net growth exceeds harvest by a factor of 2 8

Letter 2562 — It is a gross mistake to curtail logging in the George Washington National Forest I support Alternative 12

Letter 2577 — I feel with the increasing demand for wood products, the forest resource on the George Washington National Forest is being under utilized, I support Alternative 12.

Letter 2578 — The GWNF is capable of producing, on a continuous basis, many times the amount of wood products as suggested in Alternative 12, while at the same time adequately providing for wildlife, aesthetics, soils, and all other uses

Letter 3556 — Alternative 8 fails to even approach capturing the biological potential of the forest in terms of wood products. It barely recovers usable timber in an amount approximating the natural rate of death and decay

Letter 3963 — Roanoke Times, 25 Mar 1992. According to government estimates, approximately 83 million board feet are lost every year to fire, disease, etc., and new growth amounts to about 337 million board feet per year It is obvious that logging can proceed at many times the levels requested by the preservationists without endangering the George Washington National Forest

Response — The Forest Service is moving away from the concept that the National Forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization that National Forests must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people

The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should provide for all of these needs and wants. The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

Alternative 12 provides a mixture of goods and services based on the traditional concept of multiple use management. In particular, timber management, motorized recreation use and providing habitat for early successional wildlife species are emphasized more than in the Forest Service preferred alternative

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan

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Letters 2334, 3684

MA17 designates 24% of the forest as suitable for timber production but only about 6% for actual production Assuming an 80-year rotation, only 0 07% or one in 1400 acres would be harvested per year The remainder is wasted as a potential national asset We lose the wood, its contribution to our standard of living, a source of community income, biodiversity, including much wildlife, and the chance to improve product quality through improved silvicultural methods At the very least, timber stand improvement and crop tree release should be practiced, along with appropriately sized and shaped clearcuts, to improve the quality of trees as a future resource High value timber should be harvested before loss to gypsy moth and other devastation Reforestation remains a requirement

Response

The Forest Service is moving away from the concept that the national forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization that national forests must be managed scientifically to best achieves the goals, objectives and future conditions desired by the American people.

Trees on lands unsuitable for timber production will not be harvested for wood products, however this does not mean they are wasted or lost The forest cover created by those trees contributes to the Forest's scenic, recreation, wildlife and water resources A sufficient amount of timber production is being provided by the trees on suitable land Timber stand improvement, crop tree release will be practiced where appropriate on those suitable lands High value timber will be harvested before loss to gypsy moth on suitable lands Reforestation will occur following timber harvest

Maintaining the biological diversity on the Forest is a major goal of the Revised Plan. Biological diversity, or biodiversity, is the variety of life and its many processes in an area. Depending on scale it can be viewed as the maintenance, or possible loss, in the variety of genes, species, biological communities, or ecosystems or particular areas Timber harvesting is one of the most cost effective ways of creating early successional wildlife habitat

Economic analysis indicates that timber stand improvement and crop tree release are not cost effective on most sites due to the long rotations over which the cost must be considered

The Revised Plan provides for silvicultural practices in advance of gypsy moth infestations on lands suitable for timber production.

Letter 2542

Cutting timber helps maintain species diversity in the overstory and understory and different age classes. When cutting takes place, a mix of intolerant and tolerant species of all ages is maintained instead of a shift to the more shade tolerant species and a less broad mix of ages

Response

The Revised Plan incorporates these practices

Letter 3963

The Recorder, quoting Daniel Deeds, 20 Mar 1992. "The mortality rate is 90 million board feet,""What we don't cut just falls down and rots We should at least cut what dies."

Response

Mortality of 90 MMBF includes suitable and unsuitable land, so cutting that amount on only suitable land could not be sustained Dead trees have a value in the ecosystem for decay organisms and nutrient recycling

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Letters 3752, 2890

I disagree with the cut back in timbering and ask that you revise the new plan prior to its implementation to include more cutting in order to continue to enhance wildlife habitat

Response

Alternative 8A, the Forest Service preferred alternative in the FEIS, has an allowable sale quantity of 330 MMBF, an increase over the 270 MMBF in Alternative 8, the Forest Service preferred alternative in the DEIS

Letter 14 — In Alternative 12, the 50 MMBF timber harvest volume is too high. It would even increase the timber volume over the discredited 1986 plan. It is more than 31% higher than the current timber harvesting.

Letter 3660 — *If the FS says timber demand is 45 mmbf, then cut 45 mmbf, Period.*

Response — The public submitted a number of suggestions for modifying Alternative 12. Many of these suggestions were either contrary to the overall theme of Alternative 12 or were contradictory with one another. Adjustments were made in Alternative 12 where the suggestions seemed consistent with the overall theme of providing a full range of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat and where it allowed the Alternative to provide a more positive response to the issues

Lowering the allowable sale quantity for Alternative 12 to 450 MMBF (or an average annual offer of 45 MMBF) provided a substantially better response to the "Projected Net Revenue" displayed in Figure 2-4 of the DEIS. Therefore, Alternative 12 was reformulated with an allowable sale quantity of 450 MMBF

Alternative 12 is considered in detail in the FEIS The Regional Forester will select it as the Revised Plan if it is identified as the alternative that maximizes net public benefits.

Letter 3738 — We favor Alt 8. However, we would like to *see more emphasis on reforestation especially in the case of* clearcutting.

Response — Alternative 8A has been identified as the Forest Service preferred alternative in the FEIS As displayed in Table 3-29, Alternative 8A contains a larger reforestation program than Alternative 8

In conformance with the national ecosystem management policy, the Revised Plan limits clearcutting to those *site-specific instances where no other timber harvest method will achieve the objectives or desired future* condition of the given management area

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VEGETATION MANIPULATION: Prescribed Burning

Letter 1437 — I also object to prescribed burning for silvicultural purposes Burning should be done only for wildlife habitat improvement.

Response — Prescribed burning is a proven and useful tool for site preparation for natural yellow pine regeneration It is *certainly less costly than artificial regeneration on low value yellow pine sites.*

Letter 2664 — The VWTF is concerned that the GWNF has placed too much emphasis on controlled burning as its primary wildlife habitat improvement tool without providing other proven options available, i.e clearcutting.

Response — Burning is an inexpensive tool to create a mosaic of habitats, and particularly quality brood range. Lack of brood *range is believed to be the limiting habitat factor for wild turkey on this Forest Other methods, such as timber* cutting and creating and maintaining small permanent openings are also used to create a mosaic of habitats.

Letter 2737 — I would like to see more use of controlled burning

Response — Alternatives generally offer an increased burning level, primarily for vegetative manipulation. It is anticipated that an annual program of approximately 3000 acres will be authorized it is impractical to prescribe burn more of the Forest

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Letter 3665 — Value of controlled, prescribed burns will benefit certain trees and native wildflowers and shrubs.

Response — The Forest Service recognizes that fire is a natural process in ecosystem functioning and prescribed fire is an important management tool for many plant and animal populations

Letter 3728 — We question the validity of 3,000 ac per year of burning without site-specific data showing that prescribed burning is the optimum method to reach mgmt objectives

Letter 4268 — Plan - EPA recommends that in Management Area 9 (and other management areas, as applicable), prescribed burning be used only in cases where the community/population survival is fire-dependent. All other manipulations of habitat by fire should be reviewed within the context of landscape needs.

Letter 4268 — Plan - Management Area 16 provides early successional habitat. EPA again recommends that prescribed burning be used for only those species/communities which are fire dependent for their survival

Response — Burning is an inexpensive (approx $30/acre) tool to create a mosaic of habitats Compared to other methods of treatment, it is believed to be the most cost effective method of habitat improvement.

Letter 3951 — Prescribed Burning - I don't feel that enough is known about the effects of this in the Appalachian Mountains Use it in bear oak areas and for some species of plants and animals where fire is needed as part of management Limit its use to no more than 1,000 acres per year One exception to the above would be site preparation for regeneration of areas logged Would make a better site for most pine planting and would insure low stump sprouts (in clearcuts) where hardwoods are the target species (if burned at the right time of year and hot enough).

Response — The burning program is aimed at specific target vegetation, as a result of an evaluation of methods available to establish those goals Recent gains have been made in studies as mentioned by the commenter on using burning to improve hardwood regeneration The burning program on the Forest will likely exceed the commenters request, but only as a result of careful past burn evaluation to assure that desired objectives are being met

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Letter 4219 — We support the use of prescribed burning as a valuable management tool to achieve specific wildlife and safety objectives

Response — The Revised Forest Plan permits the use of prescribed fire to achieve resource objectives in most management areas

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Letter 3981 — EIS· 3-133, paragraph 5 - A discussion of the negative effects of controlled burns is necessary. (see Christmann) Contrast controlled burns with natural fire regime Why is shrubby understory referred to as "unproductive"? A full discussion of this intentional decrease in diversity is needed. What biological data were used to determine that there is a shortage of turkeys and grouse on the GW and that they have to be actively managed for? Documentation and discussion please. A full discussion of the wildlife negatively impacted by controlled burning should be disclosed

Response — Brood range is believed to be the limiting habitat factor for wild turkey on this Forest When improving brood range through controlled burning, reducing the overstory stem density and cover of mountain laurel is a standard objective of a burn In this narrow sense, shrubby understory could be termed "unproductive"

Controlled burns on this Forest accomplish many things, such as improving turkey brood range Controlled fires are also used to rejuvenate one of the Forest's most reliable mast producers--bear oak This species stagnates at approximately 15 years of age and fire is the most effective tool to retain this species Native yellow pines, generally occurring in lands unsuitable for timber production, will also benefit from controlled burns Their existence is due to the presence of periodic fire in the ecosystem, but now encroachment by scarlet oak, due to lack of fire, is reducing their acreage Planned burns in pine forest types such as the table mountain pine, will help perpetuate this forest type

From strictly a biological aspect, grouse and turkey would survive in viable numbers throughout the Forest without active habitat management One of the values of wildlife is for demand, whether it be for viewing or hunting or both (many game species are hunted only for a few weeks, and most of the year they are non-game) Turkey, grouse, squirrel, deer, and bear all fit into this category All are popular with wildlife viewers, and all serve as popular game species Hunting is considered an important use of this National Forest, and management to enhance habitats for these species is one of the wildlife goals of the Revised Plan

Letter 61	Work to reduce deleterious logging, road building, and other human activities which jeopardize wildlife, fisheries, water quality, and other natural values
Response	The new agency ecosystem management policy stresses that all management activities will be applied in a manner that maintains resource sustainability The ID Team formulated Alternative 8A to provide a mixture of multiple use benefits within this framework
Letter 77	I hope the George Washington National Forest will be managed for the health of the land and its native creatures, not riddled by ORV and timber interests.
Letter 293	Alternative #8 seems to turn its back on any practical management of the forest
Letter 323	We urge you to reconsider the Revised Land and Resource Management Plan. It fails to protect the forest from destruction and misuse It should be based upon forest ecology and ecosystem restoration.
Letter 382	Alternative 8 supposedly emphasizes biological values Yet it is simply preservationist management that will degrade biological diversity
Letter 880	No benefit for anyone, now or in the future, can be derived by allowing valuable, mature trees to remain standing to ultimately deteriorate or succumb to disease and fail to regenerate
Letter 973	Adopt as protective a stance as you possibly can regarding the irreplaceable natural resource you are charged to protect.
Letter 976	Putting the needs of hunters and fishermen over the proper management of an ecosystem is indeed, in our opinion, mismanagement.
Letter 1153	The only truly "new perspective" would be an ecological view, an ecosystem approach to forest mgt that incorporates the precepts of Conservation Biology & Island Biogeography The GWNF should be managed to serve as an ecological preserve, where the process of natural evolution may occur. It should be managed to restore ecosystems previously damaged by humans & to maximize native biodiversity
Letter 1168	The recent finding of taxol from the yew tree is just another reminder of the need to protect entire areas of nature
Letter 1275	The GWNF should be managed according to biological imperatives
Letter 1275	Wildlife should be understood to include all non-domesticated species of flora and fauna The term "wildlife" therefore must incorporate the concepts of Conservation Biology. It entails leaving the forest alone as much as possible. And it requires large tracts of unfragmented wilderness open only to non-consumptive users such as anglers, hikers and horse back riders The revised Plan should take an ecosystem approach to forest mgt. It should restore the features of the land to those of historical times.
Letter 1292	The Forest Service has no comprehensive species inventory It does, however, have elaborate plans for road building and timber removal These practices must cease.
Letter 1292	The GWNF should be managed according to the latest findings of unbiased science, in accordance with the principles of Conservation Biology and Island Biogeography The Forest Service must change from "timber managers" to conscientious stewards of the land.
Letter 1320	Manage the Forest to maximize production of its fish, birds, and wildlife, watersheds, non-motorized recreational values, and to maximize the destruction timber cutting causes to those values
Letter 1554	I was stunned to hear that George Washington National Forest is being so environmentally abused What kind of world will be left for me and my children when I grow up? Choose another form of management for our forest.

Letters 1909, 1910, 2826, 2987, 3187, 3188, 3189, 3190, 3191, 3192, 3193, 3194, 3195, 3196, 3197, 3198, 3199, 3200, 3201, 4092
Alternative #8 is both flawed and unacceptable Alternative #8 would continue to allow roadbuilding, road reconstruction, and clearcutting (through the wildlife management and salvage sale programs) in roadless areas. New roadbuilding is necessary Protection of watersheds and riparian areas should be maximized Alternative #8 protects zero acres Alternative #8 continues to emphasize even-aged timbering which results in losses of biological diversity of forest interior species and excessive siltation of streams and rivers. Wildlife management for game species is accomplished by increased clearcuttting while sufficient populations of these species already proliferate the forest. Alternative #8 will continue to cost taxpayers over a million dollars a year in below-cost timber sales.

Letter 1987 Alt 8 proposes the encouragement of activities that would threaten these things so vital to our future

Letter 2046 Increase protection for our forests; less logging and more focus on what ecosystems require to stay healthy; less intrusion by humans.

Letter 2375 On behalf of this great planet of ours, I ask the U S Forest Service to manage the George Washington National Forest to maximize protection of fish, birds, and wildlife, watersheds; non-motorized recreational values; and minimize the destruction timber cutting causes to those values.

Letter 2572 The ecological perspective is totally absent from your preferred alternative.

Letter 2665 Alternative #8 is a deeply flawed and ecologically illiterate plan

Letter 2757 Believe that forest management policy should place far more emphasis upon the preservation of healthy ecosystems than it does on matters pertaining to commodity output.

Letter 2823 More of the GWNF should be available for wildlife and timber resource work directed by sound forest and wildlife management practices. Our Chapter believes that a matrix of vegetation covering the entire range of early to late succession species creates and maintains biological diversity, for both plants and wildlife and a healthy ecosystem. This cannot be accomplished by putting nearly half of the GWNF in a "hands off" mode of management, and declaring only 21 percent of the land area suitable for timber harvest (using harvest methods dictated by public opinion instead of silviculture and economics) and restricting wildlife management work

Letter 2834 I am of the impression that we, as a nation, set this land aside to preserve it from exploitation. Let us destroy it as little as possible.

Letter 2942 Wildlife Management should be based on a return to what was in the forest prior to Western Culture's affects

Letter 3521 Manage our forest as an ecosystem

Letter 3619 This plan ignores the importance of some of the most basic principles of ecology, and as a graduate student at UVa in Environmental Planning I realize how devastating it could be to the future of one of Virginia's most precious resources

Letter 3633 Manage all areas for efficient timber production and total environmental protection.

Letter 3665 Resource sustainability should be at the forefront of management of the George Washington National Forest and our statement on habitat supports this perspective of air, water, soil and sunlight requirements of plants

Letter 3695 Wildlife - Ecosystem approaches is the only realistic way to understand and protect the forests This would have wildlife migration and habitat protected

Letter 3705 The landscape approach to addressing the ecological interconnectedness of the physical, biological and special relationships of the forest eco-systems must be more thoroughly explained

Letter 3715 Restoration ecology and biological integrity is imperative to the future of the George Washington National Forest

Letter 3740 I am disturbed that the proposed plan puts at risk the very qualities that make this NF land so valuable to the state of VA The value of this land is INTRINSIC, it does not depend upon harvesting of trees, building of roads, opening of access to ATVs and other intrusive modes of exploitation to justify itself The use of ATV and other

vehicles in the NFs is disturbing to soil and wildlife, as well as humans who would like to enjoy a wilderness experience. The forest is a refuge FROM such mechanized inanity, both for humans as well as for wildlife The forest offers IRREPLACEABLE opportunities for education, both for specialized scientific research and the general enrichment of citizens. The current policy of selling timber at below cost to harvesters is economically absurd Most disheartening about the proposed policy is that it fails to allow for significant protection of streams from timber harvesting.

Letter 3797 — Do anything that is possible to preserve the increasingly limited areas that are so critical to an ecological balance. Let's do something right for a change and not be influenced by all the short-term demands of some who seem to be wearing blinders to the eventual consequences of bad decisions

Letter 3909 — The plan should focus on ecosystem management, placing equal emphasis on non-game species.

Letter 3961 — Preserve and restore healthy streams and rivers by keeping the forest intact. This means the forest should be unfragmented and managed as wilderness Low impact activities such as hiking, fishing & camping should be encouraged The overriding concern should always be the health of the forest. This requires an ecosystem approach to management

Letter 3969 — I support the strict management of the timber industry's use of all lands, and likewise support more stringent enforcement of the preservation and retention policies to lands open to that industry's use I additionally support management of timber industry such to preserve the delicate balance of the forest ecosystem and the aesthetic impact on adjoining wilderness areas and facilities such as the Appalachian Trail

Letter 3981 — Alternative 8 continues the same cycle of inadequate wilderness recommendations, lack of wildlife corridors, unnecessary logging (private lands are more than adequate for the regions needs, the DEIS acknowledges this), miles of frivolous road construction (with no program of active road closure and reclamation) deficient streamside protection, and expansion of fragmenting and degrading vehicular activities (such as ATVs)

Letter 3996 — Look at diversity of wildlife and plantlife, and manage for this and improved diversity This means that trees and animals are not looked at solely for means of making profit and lawmakers cease to succumb to large lobbying groups (guns & hunters, timber)

Letter 4050 — Into current draft plan is environmentally ruinous and needlessly destructive to the wilderness that is left The plan is "criminal behavior masquerading as forest management". it is a plan for clearcuts, hundreds of miles of needless roads, uncontrolled logging and mining, watershed destruction, et al Plus ATV/ORV lawlessness

Letter 4061 — The current preferred plan is an outrage. It is the second most expensive plan and it would open up almost the entire forest to logging and roadbuilding, both of which kill large numbers of native wildlife by destroying and fragmenting their habitat

Letter 4262 — Alt 8 is inadequate in many areas and refuses to recognize the most basic principles of ecology.

Response — The Forest Service will use ecosystem management as the means to meet goals specified in the Revised Plan. Ecosystem management is the means to an end. It is not the end itself The Forest Service does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values. For the Forest Service, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems

This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services. In others, it is on resource products and uses. Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need.

Letter 4001 — The concept of wildlife "mgmt." should be abandoned except to aid in the preservation of habitat for ETS species or the reintroduction of extirpated species Ecosystem mgt to restore the natural diversity of the original forest should be implemented Artificial "wildlife openings," created by logging or otherwise, tend to encourage species which are common on private lands and which sometimes occur in nuisance populations (e.g , deer) at the expense of species native to the original forest which require seclusion from humans and/or large areas of unfragmented habitat In all areas where logging or other intensive uses are permitted, special care should

be taken to protect and preserve large hollow, dead or dying trees or snags These valuable den trees are largely absent from the forest today due to clearcut logging and other discredited mgt practices

Response

The Forest Service preferred alternative attempts to find the appropriate emphasis on game and non-game species The Forest Service believes that management for game species remains a priority for the American public The management for non-game species, especially those requiring unfragmented habitat, has assumed a greater importance under the new agency ecosystem management policy

The Forest Service uses ecosystem management as the means to meet goals specified in the Revised Plan Ecosystem management is the means to an end It is not the end itself The Forest Service does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the Forest Service, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems

There is a good deal of disagreement over the subject of "fragmentation" The Forest Service recognizes that fragmentation of habitat for proposed,threatened, endangered and sensitive species or unique biological communities is a real concern that needs to be addressed in the Revised Plan The Forest Service also recognizes that there is an opportunity to provide habitat for "area-sensitive" species (such as neo-tropical migrants) that require relative large and undisturbed habitats for survival The Forest Service does not, however, accept the premise that large tracts of unfragmented and connected habitats is necessary for the survival of all plant and animal life Habitat for species that are area-sensitive where reasonable opportunities exist has been incorporated The ID Team has also worked with representatives of the USDI Fish & Wildlife Service and state agencies to ensure that habitat conditions favorable for the recovery and enhancement of proposed, endangered, threatened and sensitive species and unique biological communities are maintained and, where feasible, enhanced

There is very little area (virtually only small, isolated pockets) of the Forest that has not been fragmented by past human activities, in many areas, the old roads and timber harvests have regenerated and recovered to a state where there is minimal if any fragmentation of habitat The largest blocks of this "unfragmented" habitat lie within the roadless areas The Forest Service preferred alternative has allocated 89% of the roadless area acreage to management areas where further fragmentation will not occur Although there will be some vehicular use on existing roads and a small amount of salvaging and fuelwood gathering in the immediate vicinity of system roads, these activities will not affect the unfragmented core of these roadless areas

It is unlikely that private farmland would provide the needed habitat for many early successional wildlife species Many farmers consider these animals as pests and strive to eliminate them from their lands It is inappropriate to expect those landowners to provide habitat for species that are being hunted on the Forest.

Standard 1023 in the Draft Revised Plan is included in the Revised Plan to ensure that an adequate number of snags and den trees are provided during timber harvests and any subsequent silvicultural activities.

Letter 367

I am writing to voice my objection to the recent decision to restrict timber and wildlife management practices within the George Washington National Forest

Response

The Forest Service is finding that people want and need a wider variety of uses, values, products and conditions from the Forest than in the past Many of these values could not be provided by emphasizing timber and wildlife management on all the acreage of the Forest

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Letter 501

The plan that has been proposed has no money allocated to help in the restoration of the forests damaged ecosystems

Response

The Forest Service preferred alternative includes funding for the revegetation of disturbed areas and the closing and revegetation of system and non-system roads which are causing environmental damage Practices which can be considered are the restoration of natural ecosystems include the use of prescribed fire and providing for the development of old growth forests The restoration of natural community structure and functioning plus the restoration of plant and animal populations is included in the standards and funding for the recovery of

threatened, endangered, and sensitive species Additional standards and funding for management considered *restoration and maintenance is found under wildlife and fisheries.*

Letter 77 — In support of the Wilderness-Corridor System alternative management plan Big Wilderness is absolutely necessary for biodiversity and to evolutionary process

Letter 77 — Wilderness and roadlessness does provide special recreation opportunities, but more important is the opportunity for wildlife and a healthy ecosystem in such areas

Letter 1252 — Only Alt. 3 results in the highest net revenue for the taxpayers who own this land and preserves the ecological qualities that the public desires from its NFs

Letters 3445, 3446, 3632

Alternative #3 views the forest from an ecological perspective and not from the "commodity harvest" ideology *of all other alternatives In this respect, Alternative #3 is the only alternative whose basic premise is totally* missing from the preferred alternative

Letter 3997 — We encourage the re-establishment of natural processes as appropriate that will encourage old-growth forest cores, wildlife corridors, and a full range of functional natural community and ecosystem types To the extent possible, we would support future efforts on forest-wide mgt that would coordinate closely with adjacent state and federal public land including the JNF, the Blue Ridge Pkwy, Shen Nat Park and to contribute to a regional landscape mgt approach for the mid-Appalachians

Response — Providing for biodiversity and large tracts of unfragmented, old growth habitat with an ecological perspective towards management are some of the values that members of the public desire on the Forest. Alternative 3 was developed to explore the capability of the Forest to provide these values without providing for other uses such as timber, or wildlife habitat improvements

Alternative 3 precludes opportunities to provide other values, goods, services and uses desired by the public There is, therefore,"a trade-off" in terms of other multiple uses

In the record of decision for the FEIS, the Regional Forester will identify the alternative that provides the mixture of values, products, uses and conditions that maximize net public benefits.

Letter 1847 — Alternative 3 provides the highest protection for biological diversity, air quality, water quality, soil quality and fire protection according to the EIS

Letters 2182, 2183

Alternative 3 provides minimum soil erosion, maximum water quality, minimum taxpayer expense, maximum non-motorized recreation, and maximum protection for the rarest and shyest of species. This alternative also meets the objective of maximizing net public benefit I support it without qualification The wise use of our National Forests is not extraction, but preservation

Response — Alternative 3 has been identified as the most environmentally preferable alternative. This fact, however, does not mean that it is the alternative that maximizes net public benefits. That determination will be made by the Regional Forester in the record of decision for the FEIS

Letter 502 — The terms of each contract should provide for the complete protection of the environment and cutting rules that are on a sustained yield basis

Response — The timber sale contract provides for protection of the environment and the ASQ in the Revised Plan is based on a sustained yield

Letters 279, 986, 1971, 2227, 2337, 2515, 2606, 2902, 3739

Provide for restoration of forest ecosystems damaged by USFS and human activities.

Letter 2022 — The plan would not adequately prevent misuse of the forest and there is no revision for restoration of damaged ecosystems

Letters 2022, 4262

Preservation and restoration of our national forest should be paramount in a long range plan.

Letter 2056 — Restore forest ecosystems which have been damaged including reintroduction of animal and plant life native to the forest which have been destroyed or severely reduced through human activity.

Letter 2215 — The preferred alternative has no provisions for ecological restoration. It does not even consider large scale (or even local) ecology and habitat. The creation of large "wildlife areas" will only aid opportunity species, such as grouse and deer which are under no threat of extinction. The extensive acreage of cleared areas on private lands surrounding and in the forest furnish more then enough habitat for these endangered species. The shale barren plants on rich mtn are severely threatened by deer, who browse then extensively

Letter 3861 — You do not emphasize restoration and preservation enough

Response — The restoration of natural community structure and functioning plus the restoration of plant and animal populations is included in the standards and funding for the recovery of threatened, endangered, and sensitive species Additional standards and funding for management considered restoration and maintenance is found under wildlife and fisheries

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Letter 2665 — Plan allows for "changes in vegetation" to accomplish "resource objectives" (MAs 14, 15, & 17). Forest management should not alter the biological systems and processes that give rise to those ecosystems.

Response — The changes in vegetation allowed for in Management Areas 14, 15, and 17 are short term which result from changes in successional stages. Forest Management will not result in an alteration of biological systems and processes on a landscape scale

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Letter 1292 — Aside from the designated wilderness all other areas of the forest are open to logging operations The result· extensive habitat loss and fragmentation, roads and mass extinctions These artificial clearings also open the forest interior to the invasion of exotic, non-native flora and fauna

Response — Only portions of Forest considered "suitable" are available for timber production from logging operations Under the preferred alternative this amounts to 350,0000 acres or 1/3 of the total forested lands

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Letter 2757 — If the present draft is implemented, the negative impact upon biological diversity and animal migration patterns will be considerable

Response — The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat which provide for the movement and continued viability of plants and animals In particular, Management Areas 4 and 8 provide a 33 mile long corridor on the upper elevations of Shenandoah Mountain where relatively unfragmented habitat is needed to maintain and enhance habitat for the Cow Knob Salamander Also, Management Area 9 has been allocated to the western side of the Pedlar Ranger District to create a relatively unfragmented corridor from the James River Face Wilderness and Three Sisters Roadless Area to the St Marys Wilderness

The Forest does not support the designation of lands solely for migration corridors Long term viability needs vary considerably by species Habitat corridors are provided in all management areas depending on the species being considered

Letter 1292 — The GWNF should be an ecological preserve A place where natural evolution occurs without disturbance. Clearly, the Forest Service has failed to meet those objectives

Response — The Forest, by law, will be managed to provide for the uses values, products, and conditions desired by the public While doing so it will maintain viable populations of all native and desirable non-native plants and animals during the implementation of all projects. Coupled with this maintenance will be the restoration of natural communities and populations of plant and animal species. This work will be carried out by a wide variety of specialists who are part of the Forest Service staff and will include biologists, botanists and ecologists among many others

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Letter 2060 — An aggressive campaign should be initiated to restore human-damaged ecosystems One critical item in this context would be a campaign to stem the spread of exotics such as honeysuckle, kudzu, and ailanthus.

Letter 3665 — Address the issue of invasive exotic plants, an acknowledged threat to native plants Foremost in choking out natives is Japanese honeysuckle, Kudzu and Ailanthus. Management be eradication is encouraged

Response — The Forest Service recognizes the effects of "biological pollution," specifically the establishment and spread of plant and animal species which were introduced to this region within the recent past and are now considered pests. These exotic species, now naturalized, are an unfortunate component of the ecosystem. A program to control their spread would be costly and have no chance of success

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Letter 3537 — Especially crucial to maintaining landscape diversity in this region would be protecting the integrity of large watershed systems

Response — All watersheds are managed using standards designed to protect and maintain water quality and long-term soil productivity thus insuring the integrity of watershed systems

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Letter 3537 — The opportunity to restore and protect whole watershed ecosystems is basically available only on national forest lands Consequently, careful consideration should be given to changing the management area designation of the entire headwaters of the Cowpasture River above West Augusta to ensure old-growth restoration and preclude forest fragmentation activities The Dry River above Rawley Springs should also be considered for similar protection, even though much of the floodplain is still in private ownership

Response — National forests offer an opportunity to restore and protect entire watershed ecosystems However, placing the Cowpasture River watershed north of West Augusta in Management Area 15 and the Dry River watershed upstream of Rawley Springs in Management Areas 4, 7, 9, 11, 14 and 15 are considered consistent with the overall theme in the preferred alternative. The management of ecosystems within watersheds will be done in a manner consistent with Forest standards which maintain resource sustainability

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Letter 3732 — Significant changes to the Plan are essential for the preservation and restoration of the Forest

Concentrate on protecting present habitats from human influences and restoring those habitats that have been damaged and destroyed

Response — The Forest Service preferred alternative includes standards and funding for the revegetation of disturbed areas, the closing and revegetation of system and non-system roads which are causing environmental damage, plus the control of erosion from man-caused activities The restoration of natural community structure and functioning plus the restoration of plant and animal populations is included in the standards and funding for the recovery of threatened, endangered, and sensitive species Additional standards and funding for management considered restoration and maintenance is found under wildlife and fisheries

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Letter 4268 — EPA recommends that all disruptive activities (e g timber harvesting, roadbuilding, construction of facilities, oil and gas leasing and development) be carefully considered within the context of the regional and forest landscape The need for additional timber, access roads, etc should be balanced against the potential for degradation/alteration of healthy ecosystems

Response — Although the Forest Service recognizes the need for a wider array of uses, values, products and conditions from the Forest, including healthy ecosystems, management of the Forest must remain within the context of maximizing net public benefits All activities, including those which may be disruptive, are considered in context with the regional and forest landscape to the fullest extent possible Some of this analysis is not yet possible due to constraints on present GIS capabilities

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Letter 3537 — The revised management plan for the GW does not go far enough in protecting the landscape diversity of the region Old-growth should cover at least half to 3/4 of the Forest, instead of the proposed 5% of the landbase Contiguous, unfragmented tracts of forest interior should be variously sized, including a bioreserve-sized tract centered on the Ramsey's Draft Wilderness in addition to the many smaller areas proposed in the preferred alternative Comparable buffers from intensive timber management should be extended to the two wilderness areas that border the GW in the Jefferson National Forest

Response — Alternative 3 was formulated to manage the Forest under a wilderness/corridor complex Alternatives 9 and 13 also contain a large number of roadless areas recommended for wilderness study with connecting migration corridors One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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RESOURCE SUSTAINABILITY· Extirpated Species

Letter 279 — Serious and sustained consideration of the re-introduction of extirpated species [is suggested]

Letter 3981 — With other agencies, prepare plans for the recovery to presettlement abundancies of all species that would naturally be occurring in the GWNF (such as cougars)

Letters 3985, 3986 — Wildlife management should include the protection and reintroduction of endangered species and rare species which are native to GWNF including the reintroduction of large mammals and predators

Response — Returning extirpated species to the Forest is a function of state wildlife agencies and in some cases, the USDI Fish and Wildlife Service The Forest has worked closely with the Virginia Department of Game and the USDI Fish and Wildlife Service in returning the Endangered Peregrine Falcon to the Forest, and has assisted the Department with augmenting populations of the snowshoe hare and river otter Returning species such as the gray wolf, elk, and cougar to the Forest at this time, is not considered practical

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RESOURCE SUSTAINABILITY: Timber Management

Letters 496, 766, 767, 970, 1086, 1139, 1158, 1260, 1429, 1443, 1557, 1608, 1621, 1652, 1823, 1886, 1976, 2010, 2040, 2053, 2292, 2364, 2512, 2674, 2705, 2749, 3849, 3863
Timber harvests should be within 1/2 mile of an existing road

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1454, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2063, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4157, 4158, 4172
All timber harvest should be done along existing roads

Letter 933 Timber cutting in the George Washington National Forest should be limited to within 1/2 mile from an EXISTING road

Letter 981 Road construction should be further reduced This can be accomplished if timber harvesting takes place near existing road Furthermore, unnecessary roads should be closed and reclaimed.

Letters 982, 1149, 1297
Timber harvesting should be limited to 1/2 mile from an existing road and no new roads should be built.

Letter 1059 Timber cutting should be limited and should not occur within 1/2 mile of existing roads.

Letter 1069 Limit timber harvest to within one-half mile from existing roads

Letter 1074 Timber cutting should be limited to areas accessible by existing roads

Letter 1156 Timber harvests should be limited to those areas accessible by current roads

Letter 1168 Logging must be strictly limited so as not to interfere with wilderness areas. This means limiting logging around the already existing roads

Letter 1250 Timber cutting should be restricted such that new roads are not needed for the cut

Letter 1258 Timber harvesting should be done as close as possible to roads to limit damage to the Forest

Letter 1268 Road building and timber cutting creates noise and air pollution, causes serious land erosion, and destroys the natural beauty of the GWNF. To provide an appropriate balance, the Plan should provide that existing roads that are necessary be maintained, that no new roads be built, and that unnecessary roads be closed Timber harvest should be limited to within one-half mile from existing roads

Letter 1281 Limit timber cutting within 1/2 mile of existing roads

Letters 1317, 1557
Timber harvest should be limited to within one half mile of any existing road

Letter 1434 Please safeguard and expand designated wilderness areas by not building new roads

Letter 1615 All timbering should take place along existing roads and there should be no timbering in roadless areas, including for salvage and wildlife management

Letter 1655 Can you be any more restrictive with road building and attain your goals with logging?

Letter 1684 Cutting should be prohibited within one-half mile of an existing road

Letter 1885 Use ecology principles to construct a plan to allow some logging in some areas that already have usable roads

Letters 2007, 2237, 2272, 3892, 3911
No timber harvest should be allowed past one-half mile from an existing road No new roads should be built to enable timber harvest.

Letter 2027, 4231
No new roads should be built. All timber harvest should be done along existing roads

Letter 2276 Timber cutting should be limited to within one-half mile of the existing roads

Letter 2283 All timber harvest should be minimized and limited to within one-half mile from an existing road

Letter 2498 Timber harvesting should be limited to areas accessible to current roads

Letter 2513 If timber harvesting is required, there should be a maximum harvest level specified but in no case no harvesting farther than 1500 meters from an existing road Once the timber has been harvested, the commercial vendor (if there is one) should be required to reclaim the road by regrading and plantings.

Letter 2529	Limit timber harvesting to areas along existing roads
Letter 2666	Timber harvesting should be done from existing roads.
Letter 2675	No new roads should be built and unnecessary roads should be closed and re-claimed. Any timber cutting should be done close to existing roads It should not be allowed in areas close to streams
Letter 2755	The forest already has an excessive number of roads. No new roads should be constructed All timber harvesting should be done from existing roads.
Letter 2835	Build no new logging roads--we have too many to properly maintain already.
Letter 3546	New road building should be severely restricted if not totally banned. Once the accessed area is timbered, the road should be closed and rehabilitated
Letter 3619	None of the 200 miles of proposed new roads should be built to increase timber harvesting accessibility. All timber harvest should be limited to within one-half mile from the TOO EXTENSIVE road system already in place
Letter 3656	Timber harvest should be limited from within 1/2 mile from existing roads with no new roads being built
Letter 3732	All timber harvesting should be limited to what can be accessed from existing roads. No new roads should be constructed for logging purposes or any other purpose
Letter 3797	YES to limiting timber harvest within one-half mile of existing roads NO to new roads. YES to careful timber mgmt
Letter 3909	Timber harvest on the National Forest should be reduced and restricted to certain areas where suitable roads have already been constructed No new logging roads should be built This marginal timber harvest would be best shifted onto private landholdings.
Letter 3938	If all timber harvesting is done within 1/2 mile of existing roads, then no new roads will be needed.
Letter 3962	The timber program should be evaluated with all cutting within 1/2 mile of existing roads in an attempt to reduce the cost of timber sales and eliminate new roads.
Letter 3965	All timber harvesting should be limited to within a half mile of existing roads, with no new roads built for this forest management purpose.
Letter 4053	Limit logging to within 1/2 mile of existing road, with emphasis away from pulpwood
Letter 4183	Timber harvesting should be done along existing roads.
Letter 4266	I recommend that all timber cutting be done within a half-mile from existing roads, and that no new timber roads be built
Letter 4268	Plan - EPA recommends that clearcuts be established in areas already severely fragmented, e g along major roads, etc. Although, aesthetics are often cited as reasons for avoiding public access areas, the Forest Service could use the opportunity to educate the public on edge effect, fragmentation, etc.
Response	The miles of road needed for timber harvesting cannot be governed solely by straight line distance of the individual cutting units from existing system roads Topography, soil type, harvest method, vegetation, and landownership patterns are some of the factors affecting the number of miles of road needed between the cutting units of any particular timber sale and existing system roads. The determination of the specific access needed to each cutting unit in a given timber sale requires a site-specific analysis that is beyond the scope of the programmatic analysis supporting the Revised Forest Plan Alternatives 11 and 13 have been formulated with a limitation on lands suitable for timber production to areas of the Forest within 1/4 to 1/2 mile of system roads Any timber harvesting within these lands would be accomplished through the use of temporary roads and skid trails These temporary roads and skid trails would be permanently closed and revegetated following the timber sale contract

In all probability, many of the stands in the area suitable for timber production would require temporary roads of a longer length than is permissible under existing national direction. This alternative explores the advantages *(or disadvantages) of relaxing national direction to permit longer temporary roads*

Alternatives 11 and 13 are considered in detail in the FEIS and one of them will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits.

Letter 2757 — Machinery used for the removal and transporting of logs would cause extensive and, in many cases, irreparable damage to other symbiotic species. Erosion and the silting of streams would be another factor in many areas.

Response — The removal and transporting of logs will not affect the viability of any species since only small areas will be involved and no unique habitats will be disturbed by management activities. As indicated in the FEIS, long-term soil productivity will be maintained and beneficial uses of water will be protected.

Letter 3840 — No salvage or timbering in or adjacent to MA 9 areas, or MA 13B.

Response — Management Area 9 contains two management area prescriptions management area prescription 9A is allocated to roadless areas not recommended for wilderness study and other remote areas in Alternatives 6, 9, 11 and 13 This management area prescription precludes any timber harvesting, even for salvage purposes

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Letter 3561 — How can we decry the destruction of the Amazon forests and yet permit the gradual depletion of our own?

Response — There is a good deal of difference between the DEFORESTATION of the Amazon forests and ecosystem management as practiced on the Forest

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Letter 13 — I support every action to stop the logging

Letter 973 — This park needs no timber cutting.

Letter 1153 — All commercial logging on the GWNF should be eliminated.

Letter 1292 — All logging in the GWNF should be ended and its associated road construction and road reconstruction.

Letters 1569, 2227, 2515 — Eliminate logging in the George Washington National Forest.

Letter 2665 — Eliminate (or at least request a 10-year moratorium) on timber harvesting on the GW

Letter 3471 — Timber harvesting [is not necessary in the GWNF]

Letter 3568 — I would like to have clearcutting and logging ended in the GWNF We don't need forest products from the GW. Not for jobs, certainly not for the income and not for national wood supply Most commercial timber owners would actually benefit if the government were no longer competing with them.

Letter 3601 — I prefer that timber harvesting in NF be abolished The clearcuts I am aware of are ecologically unsound and aesthetically displeasing.

Letter 3736 — I favor strict limits on all timber harvests in the NF.

Letter 3850 — Stop logging, especially riparian areas Don't hide logging figures in game management, gyspy moth and salvage programs

Letter 3981 — Eliminate all logging on the GW (except for small research and interpretive sites close to developed recreation areas)

Letter 4021	We don't need looser timber cutting restrictions We need tighter ones
Letter 4050	All logging and roadbuilding must stop
Response	Alternative 3 is considered in detail in the FEIS It does not allow any logging. It could be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 67	Trees grow back and allow other animals and plants to live we must cut our forest now and forever Trees are one of the few resources that with proper management will be here forever
Response	Only Alternatives 3 and 6 in the FEIS limit timber harvest as a means to manipulate vegetation conditions The Revised Plan provides for managing trees as a renewable resource

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Letter 165	Instead of destroying trees you should be planting them
Response	The timber management program on the Forest removes some trees from the forest and utilizes them to produce wood products desired and used by people Harvested trees are replaced using natural or artificial regeneration

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Letter 165	If you permit massive harvesting of the George Washington forests, not only will you be violating a national trust, you will simply be helping to kill the earth
Response	All timber harvest levels in the alternatives of the FEIS are at sustainable levels that do not impair the long term productivity of the land This is in accordance with Section 4 of the Sustained Yield Act

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Letter 165	The very people who may benefit temporarily from cutting these trees may pay a terrible price for such carelessness
Response	Timber harvests are conducted in a manner that allows for continued regrowth of the forest at a sustainable level without impairing the long-term productivity of the land

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Letter 73	Reducing timber harvests on significantly less acreage, less clearcutting and putting one third of the forest into single use designations takes all of the flexibility out of the decision process and will poorly meet the requirements of a healthy forest
Letter 166	There seems to be a strong current through the alternative plans to write off timber production to any major extent on the George Washington. The Forest Service certainly has to be extremely sensitive to public concerns and attitudes about timber cutting, especially on forests with heavy recreational use. But I think there is also a need and responsibility to teach the public that timber cutting is not just an end in itself for commercial purposes Any effort to maintain the forest in a state of vigor over the decades for its whole array of uses requires judicious use of timber cutting -- the only real tool for manipulating the vegetation The proposed levels of timber harvesting are barely adequate to achieve that, even on rotations that approach two hundred years. Appalachian forests have been cut over for two centuries Only in the last half of this century have they been managed Timber cutting has been modest since age classes and volumes in mature trees were limiting Two or three generations have become accustomed to seeing the forests in this semi-dormant state Over the next century, as the high forest exceeds 100 years old, reasonable strategies must be used on such forests with varied cutting systems to maintain stand vigor, age class distributions (do we really want a million acres with one dominant age class?), wildlife habitat, varied vistas, etc
Letter 3660	Forest health and quality will decline due to an aging Forest This needs to be minimized
Letter 3660	Below-cost sales are justifiable if for no other reason than we will leave future generations with a healthier, more vigorous Forest

Response

The Forest Service has found that concern for a "healthy" forest involves the question of social, economic and environmental values The ID Team has encountered two opposing viewpoints on this subject Many people believe that the Forest is a natural ecosystem where natural processes should proceed with minimal interference from humans Many others believe that the Forest is a repository of natural resources which need to be developed and used for the benefit of mankind

The belief that a "healthy", vigorous forest means a regulated forest where trees are harvested to capture their value before mortality is consistent with the second viewpoint It can also be argued that the natural cycle of an ecosystem includes the death of individual plants and animals, recycling of their nutrients and new growth.

The below-cost timber sale issue cannot be dismissed casually with a rationale of the need to manipulate vegetation to maintain a "healthy" forest. Therefore, the Revised Plan is sensitive to the below-cost timber sale issue

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Letter 858

Good conservation is needed to truly maintain the Forest Any practice that does not allow the removal of old timber and natural reseeding will end in a dead diseased Forest of no use to anyone - especially wildlife.

Response

Wise use of forest resources is a mandate of the Forest Service that is considered and provided in the Revised Plan The ID Team recognizes that dead, dying and down trees are important components of forest ecosystems and cannot be removed from the forest in large numbers without having negative impacts

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Letter 883

That portion of the forest which is suitable for timber production should be managed at least as well as the private sector manages its holdings This includes, whenever possible, efficient harvesting practices utilizing a reasonable growth rotation

Response

The private sector usually has different objectives for managing land than those of the national forests. What is right for private sector landowners might not be appropriate for national forests which have many "landowners" which desire a wide variety of uses, values, products and conditions

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Letter 884

I strongly agree that the ASQ of timber products be kept at 27 MMBF I would like to see clearcutting be used only after other silvicultural methods are considered I also suggest that existing roads be used for timber harvesting where practicable and permanent road construction kept to a minimum

Response

Alternative 8 is generally consistent with the recommendations put forth in this comment. Alternatives 11 and 13 have smaller ASQ's, prohibit clearcutting, and prohibit permanent road construction to harvest timber One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 885

Timber should be an agricultural crop on private land

Response

The Revised Plan does not direct management on private land

Letter 979

I believe in sustainable timber harvest Harvest quotas and logging subsidies are atrocious and irresponsible Tree monocultures and seedling suppressing chemicals should be avoided

Response

All alternatives with timber sale programs have sustainable levels of timber harvesting. Tree monoculture is not practiced. Most of the regeneration harvests in all alternatives uses natural regeneration Herbicide use is a viable option to be considered on a site-specific basis

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Letter 1064

Clearcuts [should] be limited to no more than 10 ac in size & SW cuts no more than 20 ac in size Larger CC's make sections of the forest impassable and reduce the amount of "edge" that is important to wildlife

Response

The size of openings of regeneration areas range from less than one acre up to forty acres, depending on what level of vegetative manipulation is needed to meet the desired future condition of certain management areas

The controlling factor for "edge" is the shape of an opening, not its size A ten acre opening only two chains wide has 30% more edge than a 40 acre square opening

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Letter 1073 — I oppose the large scale harvesting of low quality timber for pulpwood. Communities are cutting back on newspaper recycling programs because they cannot find a market for the recycled paper. The national forests should not be adding to the problem by facilitating the harvesting of trees for pulpwood

Letter 1075 — Reduce the amount of timbering, particularly for pulpwood, as there is already a glut of recycled paper.

Letter 1168 — Timber harvest should be limited to sawtimber. The harvesting of pulpwood in the national forest is no longer acceptable Recycling of pulp products is a national necessity All virgin pulp that is needed can and should be obtained from private stands

Letter 1879 — I find it difficult to understand the need for the Federal government to support the harvesting of pulpwood, when local governments are having a hard time finding markets for recycled paper Our national priority must go with supporting recycling.

Letter 2060 — Absolutely no pulpwood should be produced on the GW. The enviromnental damage caused by the harvest, processing, and disposal (landfills, incinerators) is simply too great

Letter 2685 — A consideration of forest products from the standpoint of favoring small diameter, that is, mainly pulpwood, production appears especially shortsighted To permit our National Forests to compete with private timber production, especially in this regard, is to ignore such obvious phenomena as our current difficulty in attempting to recycle newsprint.

Letter 3544 — Stop logging the national forests. We are presently selling 73% of the lumber cut on the GW for pulpwood This could be obtained from private lands Encourage recycling of paper to decrease demand for trees -- let's keep the public forests as reservoirs of natural beauty and genetic biodiversity

Letter 3629 — Selling timber below cost makes recycling unprofitable It is bad for our economy, as well as for the Forest, to subsidize the cutting of trees, and unfairly compete with recycling.

Letter 3785 — We have to use timber more efficiently It is silly to plan on selling timber below cost and make recycling unprofitable It is bad for our economy, as well as for the Forest, to subsidize the cutting of trees, and unfairly compete with recycling.

Letter 4001 — Pulpwood should not be cut on the GWNF except in conjunction with sawtimber cutting, where tops, limbs, and damaged trees unsuitable for sawlogs should be salvaged for pulpwood In general, there should be a much lower demand for virgin wood for paper production as higher and higher percentages of paper are recycled into new paper products. Recycling needs strong govt support and the USFS can do its share by reducing the availability of pulpwood

Response — Pulpwood is harvested in conjunction with sawtimber to achieve the necessary silvicultural treatment to assure adequate stand regeneration to desirable species Pulpwood is also harvested from low quality or mature stands in order to provide vegetation manipulation to meet desired future conditions Pulpwood is used to produce a variety of paper products, many of which cannot be made from recycled paper

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Letter 1081 — Salvage sales should be strictly defined allowed only when the value of the timber is demonstrably higher than the usual pulpwood, allowed only on existing roads, and prohibited altogether from biological areas, wilderness study areas, and roadless areas

Letters 1094, 1169, 1982, 3553, 3827
No salvage in roadless or biological areas Definition of salvage needs to be clarified. Salvage should consist only of timber certifiably valuable as sawtimber.

Letter 1310 — If you must do salvage timber sales, then they should only be done along existing roads but under no conditions should any salvage sales be done in roadless or biological areas

Letter 1314	Redefine "salvage cutting" to consist only of certifiable saw timber, and prohibit salvage in roadless or valuable biological areas
Letter 1684	The term "salvage" needs to be clearly defined, and should not include timber certifiably valuable as sawtimber. There should be no salvage in roadless or biological areas.
Letter 2337	Elimination of all logging within the forest salvage sales.
Letter 3553	No salvage in roadless or biological areas Salvage should be defined as only timber certifiably valuable as sawtimber.
Response	The standards for salvage have been revised to allow harvest, to utilize high value products, to provide for public safety, to provide for scenic rehabilitation, and to meet the demand for tag fuelwood. New standards describe restrictions in all or portions of several management areas.

Letter 1971	Eliminate all salvage sales and wildlife mgt in existing roadless areas
Response	Improvements involving water sources and herbaceous openings help provide habitat for wildlife which are part of the desired future condition. Salvage from existing roads for fuelwood, high value products and providing public safety are compatible with a degree of solitude and maintaining a near-natural state

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Letter 1153	There should be no salvage cuts permitted on the GWNF.
Letter 1292	All salvage operations, which are really a form of clearcutting in disguise, must cease
Response	The Forest Service recognizes that dead, dying or down trees have a value in the ecosystem and that their removal cannot occur without some negative consequences. The Forest Service also recognizes that timely salvage can utilize high value products for the economic and social well being of local communities, provide for public safety, provide scenic rehabilitation and provide fuelwood. Standards in the Revised Plan provide for some salvage to occur

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Letter 1162	Timber cutting in the Forest should be kept to a minimum. Hardwood stands of mature timber should be encouraged not eliminated.
Response	Alternatives 9, 10, 11 and 13 analyze the effects of a lower timber harvest level than Alternative 8A. If it is identified as the alternative that maximizes net public benefits, one of these alternatives will be selected to serve as the Revised Plan

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Letter 1368	The Valley Conservation Council urges a plan which will provide for a sustainable yield of mature saw timber through cost-effective sales on SUITABLE sites (SI at least 60). When harvesting by clearcutting, units should be no larger than 25 acres, with time intervals of at least 10 years before a neighboring unit is clearcut. Forest BMPs should be strictly enforced.
Response	The FEIS does not contain an alternative with this particular mixture of suggestions All of the alternatives with timber sale programs enforce BMPs and require at least ten years before a neighboring even-aged stand is regenerated. In terms of the restrictions on the size of clearcuts, Alternative 7 uses only management area prescriptions that limit even-aged openings to 25 acres of less Alternative 10 concentrates regeneration harvests on areas on the Forest with higher site indices.

Letter 1864	Stop destruction of timber.
Response	Timber is not being destroyed It is being harvested and utilized to meet the needs of the American people as directed by Congress

Letter 2003

Over 70% of wood currently cut in the GWNF is for pulpwood, this practice is short-sighted, as it creates an environment that emphasizes short-term gains over long-term forest mgt A stress on quality hardwood would help ensure that growing cycles are considered when determining areas to be cut

Response

Timber rotations are sufficiently long enough to grow high value sawtimber from sites that have capability. With both even-aged and uneven-aged systems, trees smaller than sawtimber size develop and have to be removed periodically or in the regeneration harvest To do otherwise would be improper silviculture

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Letter 2294

I would like to see the forest managed so that some live trees are being harvested instead of the Salvage type harvests we are seeing now.

Response

The Revised Plan provides for a combination of live and salvage timber harvest In all cases provisions are made for achieving regeneration of stands harvested on suitable land

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Letter 2615

Accessibility and Profit seem to be the main differences between the Alternative 8 and Alternative 12 proposals Yes, the Timber industry will always want to cut down more trees. That is a fact from a free market society with a heavy thirst for wood products The Forest Service must manage this land and its resources for SUSTAINED balanced yield

Response

All of the alternatives with timber sale programs operate under the requirements of the Multiple Use—Sustained Yield Act

The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions This fact results in major disagreements over which alternative should be selected as the Revised Plan.

Letter 2615

Areas of high timber value must be managed to provide sustainable production and optimum visual quality throughout

Response

Each management area has a different set of objectives and a desired future condition that emphasizes different values All management activities meet basic visual quality objectives, but some like Management Areas 5, 6, and 7 emphasize visual quality objectives more strongly. Management area 17 places emphasis on timber production

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Letter 2665

"Oak has a better chance to grow" where disturbances are natural and not man-made (EIS, 3-102). The timber program will, therefore, reduce the oak component of the forest overall

Response

The cited reference (DEIS 3-102) states that oaks and hickories will eventually replace white pine where it occurs in mixed stands, unless disturbances occur

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Letter 2665

"Heavy deer browsing (will) severely reduce advance reproduction of oaks and other species" as the result of the timber program through clearcutting, shelterwood and seed tree cutting (EIS, 3-102).

Response

The cited reference states that deer have an effect on forest regulation through browsing Large deer populations and heavy browsing are going to occur regardless of the level of timber production.

Letter 2665

The timber program results in an "artificial species diversity" (EIS 3-111) The result is a "managed" forest (EIS 3-112) Species diversity are determined in terms of trees only and not for all forms of flora, fauna, and biotic communities (including vertebrates and invertebrates).

Letter 2665 "The disturbance created by cutting practices will help maintain species diversity " (EIS 3-111) This is an artificial species diversity, not a natural diversity This diversity is abundant naturally on both private and other public lands, there is no need to maintain this artificially

Response The DEIS does not attempt to make a judgment as to whether diversity created by human activity is "better" than that created by natural events. The point is that changes in vegetation affect diversity of plants and animals. This portion of the DEIS 3-111, 112 describes affects on vegetation, not fauna Since wildfires are controlled quickly on national forest land, there is less naturally occurring change in vegetation (ie, diversity); therefore vegetation changes are provided "artificially" by timber harvest

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Letter 2822 The FS should promote innovative harvest practices specifically designed to minimize surface disturbance, reduce soil erosion, and eliminate stream siltation

Response The Revised Plan provides direction for using cable and helicopter logging techniques in certain circumstances.

Letter 3537 The assertion in the vegetation section of the EIS (page 3-114) that logging in high site index forest types would *enable understory plant communities to maintain diversity needs explanation. Research on wildflower communities* in cove hardwood forests in the Southern Appalachians indicates quite the opposite effect, especially from even-aged management (Dr. David Duffy, Institute of Ecology, University of Georgia, pers comm) As a corollary to the impacts that logging has on herbaceous vegetation, biodiversity research sponsored by the Forest Service in western North Carolina has recently documented that even-aged timber management is causing chronic, long-term declines in salamander populations throughout the Appalachians (fide Jim Petranka, Assistant Professor of Biology, University of NC) These research projects are currently awaiting publication. *Evidence to support the claim that logging promotes understory diversity, especially compared to the great* diversity attained in old-growth forests, should be cited or the statement should be modified or deleted

Response A forest landscape with stands of many ages, such as exists in the Yellow Poplar-Mixed Hardwood group will, all other things being equal, have more diversity than a single age, old growth forest landscape All the species coming and going throughout an even-aged forest will provide more diversity through recessional stages over time (Hunter 1990) Understory plant communities will be a part of this diversity created by even-aged harvest*ing*

Letter 3537 We urge the impact of timber management activities on the oak component and other hard mast-producing species be monitored carefully Research by Dr David Loftis indicates that even-aged timber management can greatly reduce the oak component of the forest, especially in high site index stands Because gypsy moth defoliation and mortality varies considerably in its intensity and distribution in the forest, the possibility exists *that it can actually stimulate advanced regeneration of oak on many sites Regeneration plans should be* developed for all timber harvests.

Response The Revised Plan will specifically monitor whether group selection and modified shelterwood harvests are being restocked to desirable species. Reestablishment of desirable tree species is provided in all regeneration harvests and results are evaluated

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Letter 3603 It should be required that the land be reclaimed with hardwoods and the proper mix of pines etc. to provide for the future.

Response Regeneration of lands suitable for timber production is required within 5 years The Revised Plan provides standards to achieve this requirement

Letter 3660	Do not restrict cable logging anywhere This is a viable method of removing timber.
Response	Cable logging is only limited when the necessary terrain features are not present

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Letter 3741	All forest land with a site index of 65 or higher would be primarily managed for timber All visual quality objectives would be sublimated to the resource The public would be educated about the beauty and importance of growing trees Recreation, wildlife and all other activities compatible with tree growing would be included in these high site indexes
Response	High quality sites occur in a very dispersed pattern, making allocation of management areas that have a common objective very unwieldy Appendix C of the Revised Forest Plan contains a very extensive Interpretive Plan for explaining forest management to the public

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Letter 3742	Timber harvesting and salvage cutting should take place under the silvicultural guidelines prepared by Dr Kurt Gottschalk, an adjunct member of the Interdisciplinary Team for the GW planning process.
Response	Many of Gottschalk's ideas are incorporated in the Revised Plan.

Letter 3776	The modified shelterwood cut, taking the basal area down to 20 square feet per acre, sounds promising on some sites We want you to be able to use every tool available on as much of the Forest as possible
Response	The Revised Plan does feature modified shelterwood harvests.

Letter 3840	Salvage sales can only occur in areas suitable for timbering
Response	The overall emphasis of managing forest land for biological values requires salvage harvests from unsuitable lands when it helps meet the desired future condition for that land management area

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Letter 3894	Timber and other vegetation should be managed as outlined in the Overview for Plan #9.
Response	If Alternative 9 is identified as the alternative that maximizes net public benefits, it will be selected to serve as the Revised Plan

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Letter 3924	Manage George Washington National Forest to sustain its quality as a multiple use public resource over the long run. That means that no more timber harvesting take place than growth replaces each year, and that some portions of the forest be left to reach a natural climax state at some time in the distant future [And] that timber harvesting be conducted in such a way as to limit the destruction of habitat through substantial clearcutting.
Response	The Revised Plan provides for the items mentioned by the commenter.

Letter 3981	EIS 3-102, paragraph 7 - Add "The variety could increase over time in response to patterns of natural disturbance allowed for by Alternative 3 " This paragraph as written makes it seem that a forest can't get by without disruptive timber harvests - this is patently false (see Baker in Robinson 1988)
Response	The existing forest in the white oak-black oak group is a diverse forest because of severe disturbances from logging and field fires during the past 100 years or more If these two primary effects on vegetation are virtually eliminated the forest vegetation will gradually become less diverse as the less-tolerant species have fewer conditions favorable to their regeneration

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Letter 3981	EIS 3-104, paragraph 4 - What about the effects of natural disturbance processes and gypsy moths? White pine could increase in abundance Paragraph 5 - What is meant by "adequate"? What "conditions" that may be "eliminated" is this document referring to? Paragraph 6 - 2nd sentence is a mess - see my remarks under 3-100, paragraph 6

Response

Unless the natural disturbance is fire that exposes a suitable seedbed for white pine, white pine will decline on the better sites. Gypsy moth mortality may release white pine already present in the understory, but will do nothing to prepare a suitable seedbed for white pine regeneration "Adequate" refers to stocking levels in terms of stems per acre of desirable species that should occur within 5 years of harvest as specified in common standards for regeneration of stands in the Revised Forest Plan The "conditions" that may be "eliminated" are *the desirable site conditions following timber harvest that provide for regeneration of tree species.*

Letter 3981

EIS· 3-105, paragraph 7 - The sentence "when cutting practices " as written implies that without logging forest richness is diminished. In fact, logging creates a less broad mix of ages - by truncating succession, and cutting on rotations long before trees reach senescence Wild forests contain trees of all ages - the broadest possible mix - Revise this section to reflect this truth

Response

A forest landscape with stands of many ages (even-aged forest) will, all other things being equal, have more kinds of vegetation than a single-age or old-growth forest (uneven-aged forest) Many successional stages, continuously changing through time, is more diverse than one that arrives at a single stage of succession This is not to say that single-age forests should not be a part of the forest landscape They should be, and are provided in all alternatives because they provide unique characteristics that managed even-aged forest can't provide The greatest overall vegetation diversity is provided by a mixture of both

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Letter 3981

EIS 3-106, paragraph 6 - What is the Minckler 1961 reference? What species of oaks are referred to? Other studies suggest that individual tree selection will reproduce oak stands (see Runkle and McCormick & Platt and Stephenson) - Say so Wild forests with individual tree death gap dynamic succeeded to oak in the past, why not now? It is stated here that " white pine will be favored " Then why in paragraph 4 on pg 3-104 is there a stated need for "planting" white pine? Explain this contradiction Throughout the Vegetation section of "The Affected Environment" part of this DEIS is a reiteration of "red-maple dread" By this, I mean we are told that without intensively manipulative timber management, red maple will take over the forest So, why isn't the GW a red maple forest now? Why didn't the red maple take over after the loss of chestnut? How is it that present day Appalachian old growth fragments are not red maple forests? I want this issue researched, documented, and discussed in the EIS This species demonstrably takes over clearcuts - Why is this ignored in the EIS? The FS data on the species composition of the Signal Corps Knob T S do not even mention its existence - so clearcuts do not result in "the same species that previously existed in the overstory " What is the true result of FS logging policies in altering the species composition on the GWNF - especially as regards red and striped maple, white-tail deer, raccoons, grouse, and blue jays?

Response

The Minckler reference is to white oak. Most research and field expertise suggest even-age silviculture is most suitable for white oak growing in pure or mixed stands Uneven-aged silviculture has been considered, but it's difficult to develop a sustainable stand structure without continual cultural treatments, especially on better sites (Schlesinger 1976) Single-tree selection, which is being discussed in the cited reference, has not proven to be a workable system for managing oaks on a long-term, sustained-yield basis because regeneration is inadequate to ensure sustainability The cited reference to paragraph 4 on p 3-104 of the DEIS is not a contradiction It is stating that in of alternatives which do not allow timber harvesting with its associated soil disturbance and opportunities for planting, white pine will decline in the white oak-black oak type group In the other alternatives that allow timber harvesting, if single-tree selection cutting was used, white pine would continue to exist as a component of the black oak-white oak type group The silvics of red maple (Walters, Yawney 1990) and anticipated reduction of the oak component in all forest type groups due to gypsy moth are the basis for stating that red maple will increase its representation as a component of the vegetation on the Forest Where silvicultural practices are applied with the objective of regenerating species other than red maple, this natural tendency will be reduced Disclosure concerning red maple is presented in the EIS in the discussion of the red oak-red *maple type group*

Letter 3981

EIS· 3-107, paragraph 1 - Add "However, stump-sprout growth is known to result in a much lower quality of timber regeneration "

Response

The quality of stump sprouts depends on stump diameter and height Small, low stumps produce sprouts that have low incidence of decay in the future butt log Trees felled with crosscut saws had higher stumps than the trees now being cut with chainsaws, and did develop sprouts that had a high incidence of decay in future logs

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Letter 3981

EIS 3-110, paragraph 2 - It is stated "Defoliation would accelerate the successional progression to dominance by this type of maple" Where has this ever happened? Documentation please The extent of defoliation talked about here would result in conditions somewhat like a clearcut On pg 3-107 tree removal is said to result in replacement by "generally the same species that existed in the previous overstory " Explain this contradiction in the EIS

Response

Red maple is a subclimax species that can occupy overstory space in a stand, but it is usually replaced by other longer-lived species (Walters and Yawney, 1990) The gradual reduction of oaks in this type group, as a result of mortality caused by defoliation from gypsy moth, will more closely resemble single-tree selection harvesting as occasional overstory trees succumb The statement quoted by the commenter will be changed to read "Mortality would accelerate the successional proposition to dominance by this type of maple " Defoliation usually lasts only a few weeks during the spring and is followed by almost complete defoliation except for trees that die The increase in light intensity levels on the forest floor is sporadic and gradual over a period of years, not at all like the light intensity changes of a clearcut, rather more like a single-tree selection harvest or shelterwood harvest There is no contradiction with the statement that clearcutting results in generally the same species composition that existed in the previous overstory

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Letter 3981

EIS 3-111, paragraph 4 - Where has individual tree selection in red oak stands resulted in stands of red maple, beech, or hemlock in the central Appalachians of Virginia? Documentation please

Response

The cited reference is stating what most research has observed single-tree selection cutting practices will result in stands composed almost entirely of shade-tolerant species (Loftis 1991) A 30-year study of Appalachian hardwood stands (similar to the red oak-red maple type group) in West Virginia, using single-tree selection is the closest known research In describing stand structure results, the study notes that generally the maples and beech have made a major increase in number of trees during the study period This occurred in stands where red oak and sugar maple were major components of the overstory (Lamson and Smith 1991) References Regeneration of Upland Hardwoods with Single Tree Selection David L Loftis, USDA Forest Service, Southeastern Forest Experiment Station, at Uneven-aged Silviculture of Upland Hardwood Stands Workshop, Blacksburg, VA 1991, Stand Development and Yields of Appalachian Hardwood Stands Managed with Single-Tree Selection for at Least 30 Years Neil I Lamson, H Clay Smith, USDA Forest Service Northeast Forest Experiment Station Research Paper NE-655

Letter 3981

EIS· 3-112, paragraph 2 - Add "This necessitates re-entering these stands and further manipulating and disrupting them with biocides, thinning activities and other so-called timber stand improvements" I want this issued addressed in the EIS, ecologically and economically and thoroughly

Response

Timber stand improvement treatments (TSI), also called intermediate cuttings) can occur in existing stands or regenerated stands throughout their lifespan. These treatments attempt to mimic natural processes, just as regeneration cuts simulate the natural disturbances that cause interruptions in the natural successional process TSI treatments help enhance the expression of dominance that certain trees or tree species exhibit naturally TSI just does it quicker and allows some of the suppressed and intermediate trees to be utilized when there is a commercial treatment (i e , thinning or sanitation or salvage cut) TSI treatments can help to promote the overall representation of existing desired species in the stand by removing the intolerant and pioneer species such as sassafras or black locust or red maple from their respective crown positions sooner than would happen if left alone Generally only the highest quality sites benefit substantially from such treatments, so the application is limited in scope Most treatments are performed with hand tools, so impacts on remaining vegetation are minimal

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Letter 3984

Forest standard 996 lists your minimum level restocking standard as 150 spa for white pine and for hardwood stands, and 300 spa for those stands designated as mixed pine-hardwood These are the minimums required
I suggest as a minimum you take the lower end of the desired level, 250 spa for white pine and hardwood stands, 400 spa for mixed stands

Response — These stocking levels were established in the *Regional Guide for the South* (June 1984) Higher levels are more costly and are not justified

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Letter 3984 — In any case, it is not made clear in standard 996 at exactly what point in the harvesting process the management type for regeneration is selected As I read the standard, you have enough flexibility to choose management type based on site conditions that you can cut a sale area, wait to see what grows back in it, and call the result the intended goal

Response — The management type is determined when the prescribed treatment for the stand is made during the site-specific decision-making process This occurs before the stand is regenerated

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Letter 4041 — If this is a National Forest, why are we logging it?

Response — One of the purposes of the National Forests is to provide timber to the Nation (Multiple Use Sustained Yield Act).

Letter 4042 — Free wood should be made available to the needy or volunteer organizations who are cutting for the needy

Response — Present policy allows exceptions to the charge fuelwood system on a case-by-case basis Such a decision is administrative and is not appropriate in the Revised Forest Plan

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Letter 4243 — I strongly suggest that the U S Forest Service continue to resist efforts to increase the amount of acreage of the National Forest for timber harvest and clearcutting and that continued management plans be adopted that provide the greatest protection of the watershed and wildlife.

Response — The Forest Service is finding that people need and want a wider array of uses, values, products and conditions *from the Forest than in the past These additional multiple uses include environmental and social values* not traditionally identified as multiple uses Such an identification, however, is not inconsistent with the definition of "multiple use in Section 4 of the the Multiple Use -- Sustained Yield Act (MUSYA).

"Multiple use" means the management of all the various resources on the national forest so that they are utilized in the combination that best meet the needs of the American people, making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions, that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without the impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output "

Alternative 8A was developed in recognition that besides the traditional multiple uses of timber, wildlife and motorized recreation, the Forest Service needs to provide amenity values, such as aesthetics and remote, non-motorized recreation, as well as environmental conditions that promote healthy, diverse lands and water In providing this wider array, Alternative 8A is not fostering "single use management" but is a "multiple use" alternative

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Letter 184 — The National Forest System was created to provide a timber base for our country.

Response — Although the authority to cut timber (the Organic Act of 1897) was in place when the Forest was chartered (1918), timber was not a driving force behind the creation of the Forest. From "The Lands Nobody Wanted" by Shands and Healy "Land for these forests, which would later be combined to form the Forest, was acquired by the authority of the Weeks Act In order to be considered, the land had to have a direct impact on a watershed." And, paraphrased from "Impacts of National Forests on the Forest Resources of the South" by Young and Mustian This damage to the watersheds led to the creation of the Act of March 1, 1911 -- most commonly known as the Weeks Act This act helped solve two problems. it allowed land which was under private ownership to be purchased by the government, it also gave the government the authority to acquire land specifically for the purpose of watershed protection. Paraphrased from page 30, "Origins of the National Forests" edited by Steen The first Weeks Law forest was established in 1916 Through 1923, ten more forests were established...all

justified on their value as protectors of water flows. In 1924, the Clarke McNary Act added "the production of timber" as a purpose for forest acquisition, thus permitting the purchase of land beyond the headwaters of navigable streams

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Letter 66 — Timbering has not hurt the GWNF for the last 100 years, why now is it so harmful when it is constantly managed.

Response — Timber management is not harmful, and it is a part of the Revised Plan.

Letter 13 — Government can stop the lumberman from cutting them down and leaving such a destruction of them, we will not have any forest left to enjoy.

Response — Only a very small percentage of the Forest is harvested each year Regeneration of vegetation occurs very rapidly.

Letter 3951 — Harvest Systems - Be realistic, call for a mix of even-aged and uneven-aged systems depending on species and site specific information Use approximately 600 to 800 acres of clearcut, 2500 to 2900 acres of shelterwood, and 300 acres of group selection (annual harvest acres) Use thinnings and group selection in the foreground of the highly sensitive roads

Response — Table 3-29 contains a breakdown of the estimated acres regenerated during the first decade by different regeneration harvest methods for the fourteen alternatives

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Letter 2039 — Timber removal vs Timber cutting of naturally fallen trees obstructing trails is advisable.

Response — Trails will be maintained within available funding constraints Trees will be removed when it is cost effective to do so.

Letter 3558 — Group selection cutting should be emphasized, site specific cutting techniques should be emphasized or required

Response — Group selection is not an appropriate or effective cutting method for a large forest acreage comprised primarily of oak species Even-aged management will be the predominate system

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Letter 3540 — The logging industry is very important to Highland County This Board strongly supports efforts to provide access to timber products which are obtained with certain guidelines We encourage selective harvesting of timber which is damaged or diseased Clearcutting is not a favored technique except as a last alternative, and then only in small tracts and the least visible areas Given the scenic nature of our area and the trend toward additional tourism efforts, it is not desirable to allow cuts which will scar vistas such as the west slope of Shenandoah Mountain

Letter 3963 — The Recorder, 27 Mar 1992. "The forest needs to be managed differently for tourism than for logging I'm not saying we should ban logging, but you should pay attention to where you're logging, and how much you log "

Response — All alternatives recognize the scenic quality of the Forest and the visual quality objective (VQO) has been carefully mapped with a great deal of public input Certain areas are more visually sensitive than others, and the degree of vegetation manipulation is adjusted accordingly.

Letter 2891 — I believe that the site, and site alone, should dictate the management used Very poor sites, with site index of less than 50 or 60, should not be managed or harvested on, except for other uses, such as creating habitat for wildlife Better sites, site 70 or 80, should all be managed for timber, even if only on a long rotation, uneven aged basis. The only exceptions to this that I would support are immediately adjacent to high-intensity recreation areas (Sherando Lake, etc)

Response — The Forest cannot maintain a viable timber program if lands suitable for timber production are limited to highly productive sites (site indices of 70+).

Letter 2891 — Management of the forest for wood products should be done on a site specific basis only. Lands should not be locked up merely because they are within view of highways or near creeks Harvesting methods are available that should be used in all types of areas.

Response — Lands are not necessarily "locked up" because they are in sensitive viewsheds or riparian areas There are restrictions on vegetative manipulation activities that recognize the value of these other resources and strive to protect them from adverse impacts

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Letter 2530 — *My concerns have to do with a number of disturbing trends One is to allow more tree cutting for lumber than* is consistent with the needs of wildlife for suitable habitat. Once all or most of the trees are cut, what is left?

Response — Cutting is done to help develop desirable habitat conditions for several kinds of wildlife as well as for producing a continuous supply of timber products. Whenever a forest stand is harvested, provisions are taken for promptly establishing regeneration so there will always be trees

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Letter 3545 — No timber harvest of any kind (other than firewood cutting of dead wood along roads) should be allowed on lands classed as unsuitable for timber harvest

Letter 4241 — Lands designated unsuitable for timber management should not be subject to salvage unless there are compelling safety or biodiversity reasons to remove some mortality

Response — *Lands unsuitable for timber production are still being managed to achieve a desired future condition. Projects* involving timber harvesting on unsuitable lands are evaluated to determine that such harvesting is necessary to protect or enhance multiple use values other than timber production and that such harvesting is consistent with management direction for the management area

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Letter 3840 — No site index 50 lands should be part of the timber sales or wildlife management.

Response — Generally this is a good idea, especially for lands in Management Area 17 where intensive timber management is practiced to help achieve the desired future condition Often, however, in Management Areas 14, 15, or 16 vegetation manipulation may be needed in areas of lower site productivity When timber harvest is a cost effective means of carrying out the vegetation manipulation, it will be used.

Letter 3633 — Manage all areas for efficient timber production and total environmental protection.

Response — The Revised Plan attempts to efficiently manage for timber production and other resource values on lands that are suitable for these uses In all cases the productivity of the land is not impaired.

Letter 3984 — From Table A-1 your planning staff have assumed a ration of 7 05 board feet per cubic foot on the timber sold in the first ten years. I was surprised that the assumption was made without any discussion in the plan You may be misleading the timber companies into thinking that they will get more merchantable timber per acre than is really out there Measuring by cubic volume rather than board feet acts as a disincentive to allowing trees to grow to a diameter sufficient to be used as saw timber.

Response — Actually the conversion is 6.98 board feet per cubic foot. This information is provided in preparation for the conversion to cubic measurement scheduled for FY 1993. Product size specifications and rotation ages will not change Trees will continue to grow to sawtimber size before they are harvested as sawtimber

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 4068, 4073, 4074, 4075

Shelterwood and seed tree cutting are simply variations on clearcutting. Group selection is a little better, but the plan should require investation of a truly site-specific selective technique

Letters 3766, 3827

The plan should require investigation of a truly site specific selective technique

Response

Shelterwood and seed tree cutting are even-aged management cutting practices and in that sense are similar to clearcutting However, the appearance after harvest does differ Alternative 7, 8A, 9, 11 and 13 of the FEIS consider the use of uneven-aged management practices of group selection and single tree selection Single tree selection is not an appropriate vegetative manipulation practice that can be effective in maintaining biological diversity over extensive acreage of oak hickory forest. It can be effective in certain forest types occuring on a site specific basis An alternative that utilizes uneven-aged management practices could be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefit

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Letter 3840

Salvage should be the same as for any timber harvest No special and confusing rules should apply No salvage may occur where a timber sale cannot occur

Response

Salvage is different than timber harvest of live timber Management requirements of CFR 219 27(d)(2)(iii) recognize that established limit of size of opening shall not apply to the size of areas harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm. Both salvage and live timber sales can occur on lands unsuitable for timber harvest if such harvesting is necessary to protect or enhance multiple use values other than timber production and that such harvesting is consistent with management direction for the management area

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Letter 190

The total of 6,263 acres treated is less than the proposed in Alternative 8 (8,550) but is concentrated in more efficient cutting systems Therefore, more volume and subsequently more revenue, is generated from fewer acres

Response

Table 3-29 in the FEIS displays the estimated thousands of acres to be treated by alternative for the first decade under the revision The text explains the differences between the acres of even-aged regeneration harvest methods and uneven-aged regeneration harvest methods.

Letter 1552

[Flaws to draft plan include] timber harvest in the name of "wildlife (game) mgmt"

Response

Timber harvest is an effective means of achieving various stages of forest succession (mixture of different ages of vegetation) which provide desirable habitat conditions for numerous game species. Game animals are a resource that is managed on national forests

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Letter 4241

We urge that the impact of timber management activities on the oak component and other hard mast-producing species be monitored carefully Research by Dr David Loftis indicates that even-aged timber management can greatly reduce the oak component of the forest, especially in high site index stands Because gypsy moth defoliation and mortality varies considerably in its intensity and distribution in the forest, the possibility exists that it can actually stimulate advanced regeneration of oak on many sites Regeneration plans should be developed for all timber harvests

Response

Regeneration of harvested stands is carefully checked and results will be monitored and reported annually

Letter 279 [Suggest] re-examination of FS policy regarding chemical pesticides, herbicides, and defoliants

Letters 986, 1153, 1370, 2227, 2606, 2902, 3739, 3850
Eliminate the use of chemical pesticides, herbicides, and defoliants.

Letter 1153 The use of chemical defoliants, herbicides & pesticides should be banned immediately

Letter 1275 The use of pesticides and herbicides should be banned

Letter 1292 The use of herbicides, pesticides and chemical defoliants should be banned because of their insidious effects on forest health.

Letter 1370 Eliminate usage of pesticides, herbicides and defoliants

Letter 1971 [Eliminate] all use of chemical pesticides and herbicides and defoliants These pollute the air, soil and water of the forest AND surrounding areas

Letter 2060 In general, no herbicides, pesticides, or fertilizers should be applied to GWNF lands. Exceptions may be considered to halt newly introduced exotics and pests on a case-by-case basis. This could also include biological control agents, once a thorough EA was performed. This would not include gypsy moth control

Letter 2665 Eliminate all use of chemical pesticides and herbicides and defoliants

Letter 2809 I'm against using chemical pesticides and especially defoliants in the GWNF.

Letter 3660 Maintain use of herbicides and pesticides.

Letter 3961 Eliminate the use of all chemical biocides

Letter 4001 Chemical pesticides and herbicides should not be used in the forest Gypmo should be allowed to run its course. Grapevine should not be controlled

Letter 4048 I am supportive of treatment with pesticides

Letter 4050 All use of chemicals and wildlife controls must end

Letter 4268 Plan - EPA recommends that the use of herbicides be limited to avoid potential soil and water contamination

Response Alternative 3 explores the question of prohibiting the use of pesticides and other chemicals in the management of the Forest. Such a decision would entail changing existing national and regional policies established in previous decisions by the Chief and the Regional Forester.

The Revised Plan does not make any decision to **use** herbicides, insecticides, defoliants or other pesticides It merely **permits** their use in accomplishing any project Prior to the use of any pesticide, a site-specific environmental analysis must be performed and the environmental consequences of utilizing any particular pesticide in a project must be disclosed. Any site-specific environmental analysis on the use of pesticides will be "tiered" to the environmental disclosure in one or more of the following environmental impact statements. *Final Environmental Impact Statement — Appalachian Integrated Pest Management (AIPM) — Gypsy Moth Demonstration Project*, *Final Environmental Impact Statement as Supplemented [in] 1985 — USDA Gypsy Moth Suppression and Eradication Projects*; and *Final Environmental Impact Statement for Vegetation Management in the Appalachian Mountains*.

The Forest Service reserves the right to use chemicals approved by the Environmental Protection Agency and listed in the three environmental impact statements when they can be correctly applied and when they are deemed appropriate by the deciding officer The Revised Plan contains standards that must be used whenever a decision is made to employ pesticides in a project designed to achieve the goals and objectives of the Revised Plan

Letter 1066 — We would like to go on record as approving the use of herbicide in keeping trails free of brush, since the trail maintenance problem has increased dramatically due to the loss of canopy form Gypsy Moth damage. We feel this is the best use of dollars spent in dealing with the problem

Response — The decision to employ any herbicide on trail maintenance projects must be within the appropriate standards in the Revised Forest Plan and based on site-specific environmental analysis tiered to the *Final Environmental Impact Statement for Vegetation Management in the Appalachian Mountains.*

Letter 3779 — "Permanent wildlife openings are maintained by mowing or burning or selective herbicide treatment" p 2-107 Herbicides have residual and unknown effects at many levels and should not be used at any time in any area where biodiversity is desired (Remember Agent Orange in the rather recent past.)

Response — The Revised Plan provides standards governing the use of herbicides Herbicides will not be used until a site specific analysis is made which involves public input.

Letter 3840 — Pg 2-119, [Standard] #605 - Remove "including herbicides" language.

Letter 3840 — Pg 2-119, [Standard] #606 - Remove "including herbicides" language.

Response — Use of herbicides will remain as a viable alternative for post and pre-harvest site preparation.

Letter 3962 — MA 20 [Standard] 727 Aerial application of herbicide should only be allowed when other methods are uneconomical Ground spraying provides the chemical only at the needed point and not over the entire area. Hand clearing should also be evaluated economically

Response — Aerial application is the method the least commonly used on the Forest and is restricted to major sites. Utilities are commonly striving to establish plant communities that will require minimum maintenance. In many cases, broadcast application is detrimental to that effort. However, there are cases where to minimize negative visual impacts, utilities were located in remote areas, lacking reasonable ground access In those areas, aerial application is acceptable

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RESOURCE SUSTAINABILITY: Water Quality, Soil Productivity and Air Quality

Letter 57 — Abandoned farm tracts will most likely need erosion control, soil protection, and perhaps some planting.

Response — Before abandoned farm tracts are acquired, areas of eroding soil will be inventoried After acquisition, these eroding lands will be improved and maintained

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Letter 55 — Roads should not be cut through the forest because cutting new roads would only facilitate timbering and RV use in the forest, two disrupting causes of erosion

Response — Management of system roads under the Forest Service preferred alternative is described in Chapter 2 of the Revised Plan under "ISSUE 3 FOREST ACCESS"

Alternatives 3, 9, 11 and 13 provide a more positive response to these concerns by limiting or prohibiting system road construction and having a more aggressive road closure policy than Alternative 8A These four alternatives are considered in detail in the FEIS. Any one of these alternatives will be selected as the Revised Plan by the Regional Forester if it is identified as the alternative that maximizes net public benefits

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Letter 57 — Emphasize watershed and soil protection Depend more on erosion-free skidding methods, ridge top location of roads, and fewer roads

Response — All watersheds are managed using standards designed to protect and maintain the beneficial uses of water and to maintain long-term soil productivity Monitoring ensures that standards are implemented and are effective

Roads are not permitted in riparian areas except at designated crossings unless alternative routes have been reviewed and rejected as more environmentally damaging New local roads are closed and managed as linear wildlife openings when resource activity is completed, unless the road is needed for recreational use

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Letter 78 — Watersheds immediately above municipal water supply impoundments should be placed in MA 3

Letter 738 — Protect watershed areas, since all downstream areas depend on this.

Letter 1636 — The critical nature of soil erosion control and water quality management around all tributaries of the Buffalo and Upper Pedlar Rivers can not be over emphasized Establish extensive riparian protection zones around all tributaries of these rivers, both more extensive and more protective than the minimum required by the Streamside Management Zones normally utilized for public water supplies under best management practices

Letter 2215 — The watershed protection of the preferred plan is non-existent. This was the original impetus for the creation of the national forests. No areas are specified for this purpose.

Letter 2319 — I am concerned about the effect of cutting wood around our water supply. For Alleghany County, I am also concerned about its water supply, a lot of which comes from the Clifton Forge reservoir

Letter 2329 — Be conscientious of the fact that the George Washington National Forest in Amherst County makes up a significant portion of the watershed for two local water supplies, the Buffalo River for Amherst County and the Pedlar River for the City of Lynchburg

Letter 3537 — The preferred alternative should be amended to provide Management Area 3 protection to a minimum of 35,000 acres similar to those protected in Alternative 9

Letter 3547 — Give more consideration to the management of land around municipal watersheds This is an area that is still being much neglected in the GWNF.

Letter 3562 — Land use in the Upper Pedlar River Watershed should be limited to activities which will not effect the watershed's water quality It is critical that maximum water quality protection be provided to the Upper Pedlar River and Buffalo River Watersheds (Federally owned land in these watersheds include Brown Mtn., Shady Mtn , Panther Mtn., Floyd's Mtn , Mt Pleasant, Bald Knob, Fork Mtn , Clark Gap, Grapevine Ridge, and Piney Mtn) The Forest Service should, at a minimum, establish extensive riparian protection zones around all tributaries of these rivers, and that they be both more extensive and more protective than the minimum required by the Streamside Management Zones normally utilized for public water supplies under best management practices.

Letter 3630 — The Buffalo River is the primary drinking water source for the Town of Amherst and a future supply for the Amherst County Service Authority, while the Peldar River is the primary drinking water source for the City of Lynchburg. We request that the Final Forest Management Plan provide comprehensive water quality protection to the federally owned lands in the Buffalo and Pedlar Watersheds This should include the establishment of extensive riparian protection zones around all tributaries of these rivers, and that they be both more extensive and more protective than the minimum required by the Streamside Management Zones normally utilized for public water supplies under best management practices

Letter 3840 — Some watershed areas above municipal water supplies should be placed in MA 3

Letter 3684 — MA3 should be employed to protect water quality in watersheds and riparian areas

Letter 3840 — All streams shown as "wild trout" streams should be managed under MA 3B This MA should also apply to all streams which lead into municipal water supply impoundments.

Letter 3921 — This alternative [#8] allows for timber harvest, but focuses on the issues and resources for which the eastern national forests were established Watershed and soil protection were major reasons that national forest lands were bought from timber companies which had pillaged the land Your plan should provide more protection for streams, wetlands, and soils.

Response — To address this concern, riparian areas with set minimum widths and no timber harvesting are prescribed in a number of alternatives Management Area 19A, which is used in Alternative 2, requires widths of 100 feet. Management Area 19B, which is used in Alternative 7, has riparian widths of 100 feet on wild trout streams and

50 feet on other streams, while Management Area 19C, used in Alternatives 6, 11, and 13, doubles these widths Management Area 19D, which is used in Alternative 9, requires 200-foot riparian widths

In the preferred alternative, the widths of riparian management areas (Management Area 18) are determined using natural features of landform, soils, and vegetation, rather than set arbitrary distances. This will ensure protection and enhancement of the actual riparian dependent resources and ecosystem functioning Even the narrowest riparian management areas will be protected by filter strips, shade strips, and vehicle exclusion zones of at least 66 feet from each bank.

Vegetative management occurs in riparian management areas only if consistent with the desired future condition of those areas. Riparian management areas are suitable for timber management only if they are adjacent to suitable lands in Management Areas 13, 14, 15, 16, or 17 and do not include native trout streams Moreover, only those portions of these riparian management areas that extend beyond 66 feet from a bank are suitable Salvage of dead and dying timber is allowed only on a site-specific basis and only if the desired future condition can be met Logging is not permitted in stream beds

Riparian areas bordering and upstream from municipal water supply reservoirs are in Management Area 18C, which places special emphasis on water quality and is classified as unsuitable for timber management. Lakeside management zones bordering these reservoirs are widened to 100 to 200 feet, depending on land slope, and are also unsuitable for timber management.

Intermittent streams are protected by filter strips, shade strips, and vehicle exclusion zones of at least 33 feet from each bank

Limestone aquifers are protected by standards that include buffers around drainages into caves, sinkholes, and cave collapse areas

In Management Area 18, roads are not permitted in riparian areas except at designated crossings unless alternative routes have been reviewed and rejected as more environmentally damaging ATV trails are prohibited in riparian management areas except at designated crossings

Monitoring insures that protective standards are implemented and effective. Effectiveness of streamside management zones for protecting streams is evaluated through monitoring of aquatic macroinvertebrates, which includes habitat assessment.

Letter 135 — A water management zone is necessary to protect water quality, not just 1/2 mile corridor Restrictions must be resigned not only to protect water directly by keeping logging away from streams but also indirectly by keeping logging away from the areas that influence water and groundwater, like steep slopes and aquifer recharge areas

Letter 190 — There is no significant change in the accelerated soil erosion caused by humans, the soil reaching streams, or the water yield between alternatives 8 and 12

Letter 2685 — The increase in roads can only increase erosion and siltage of our waterways and reservoirs.

Letter 2899 — I note that Alt 8 has the 5th highest rate of man-caused erosion among the 13 alt plans studied I examined the EIS to determine sources of erosion, I found that Alt 8 has the second highest amount of roadbuilding among the alts.

Letter 3743 — [Alternative 12] provides more management activities while no significant changes occur in erosion, sedimentation or water yield.

Letter 3643 — Soil erosion would be reduced to 48 percent with Alternative 10 as compared to Alternative 8.

Response — There are only small differences in water yields between alternatives And in no alternative are soil erosion or sedimentation at levels that would degrade long-term soil productivity or have significant adverse effects on beneficial uses of streams

In the FEIS, the Forest Service preferred alternative has a reduction in the number of miles of road construction needed to support the timber sale program This in turn considerably reduces estimated erosion and human-caused sedimentation. See Chapter 3 of the FEIS for details

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Letter 885 — Soil stability & conservation should be priority one

Letter 3785 — It is important that the Forest be harvested in a sustainable manner It is our obligation that our children inherit a forest with as good soil as we have inherited

Response — Standards in the Revised Plan are designed to minimize soil erosion and maintain long-term soil productivity, in conformance with the requirements of the National Forest Management Act and with the concept of managing ecosystems to sustain both their diversity and productivity while providing for multiple uses

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Letter 1546 — *I found no discussion of air quality degradation from the increased use of vehicles in the Forest under the* different alts

Response — There is no measurable difference in air quality under the different alternatives

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Letter 2572 — The timber program alone will cause 23,000 tons of soil to be eroded from the mountains and continue to choke *biological communities in our rivers, streams and the Chesapeake* Bay

Response — The Draft EIS estimated for Alternative 8 an annual average of 23,213 tons of sediment reaching streams from Forest land. About 86% of this total is natural sediment Most of the rest is from roads, of which only part can be attributed to the timber program In the FEIS, the sediment total for the preferred alternative is lowered considerably due to a reduction in the estimated road construction needs for timber harvests.

Letter 2665 — Excessive soil compaction and nutrient loss are both results of this Plan. (EIS, 3-94)

Response — The EIS concludes that there are no nutrient losses severe enough to lower productivity over the short or long term, nor is soil compaction severe enough to result in long-term reductions in soil productivity

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Letter 2891 — *I believe the forest should be managed for many different uses Primary is the storage of rainfall and for water* quality

Response — The Forest is managed using standards designed to protect and maintain the beneficial uses of water, in compliance with the Clean Water Act The hydrologic function of the Forest is maintained

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Letter 3716 — From a water quality perspective, [a] substantial increase of clear-cut acreage (from 300 to 2900) could produce up to 30 tons of soil loss per acre/year (dependent on slope, soil type, and sediment delivery ratio). The deposit of this soil and nutrient downstream will significantly alter the balance of freshwater ecosystems already in threat

Response — The estimated acreages to be regenerated through clearcutting is the same for Alternative 8A, the Forest Service preferred alternative in the DEIS, as for Alternative 8, the preferred alternative in the DEIS

Letter 3883 — Maximum feasible forest growth on public lands will contribute to air quality by consumption of carbon dioxide Increase of forest foliage should be a major goal of forest management and silviculture specialists GWNF should also limit fossil fuel consumption by avoiding non-essential uses of heavy equipment and vehicles Non-motorized recreational activities by forest visitors should be encouraged; motorized activities should not be.

Letter 3883 — GWNF should facilitate silvicultural experimentation work related to doubling of atmospheric concentration of carbon dioxide

Response — Discussion of the alternative's effects on carbon dioxide and fossil fuel consumption are considered to be outside the scope of the analysis, since they were not identified as significant issues that needed to be addressed in order to make a reasoned decision. NEPA also states that "documents must concentrate on the issues that are truly significant to the action in question, rather than on amassing needless detail" (40 CFR 1500.1). The ID team has determined that a discussion of these effects is not significant to the action in question

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Letter 3887 — We are concerned about water quality and flow in the North River. Even though the river and its tributary, Dry River, both originate in the national forest, the water quality is quite good until the streams reach farm and developed land. Since the environmental problems related to this river are downstream of the GWNF, this indicates past forest land management practices have protected the river We are pleased that the new plan shows no significant change from these practices and that the watershed will continue to be managed in a manner that will ensure good water quality

Response — One of the objectives of the Revised Plan is to maintain water quality, so that beneficial uses of water are protected.

Letter 3981 — EIS· 3-123, paragraph 5 - We need some discussion on decreases in water yield from evaporation of exposed soils and increased water needs of young fast growing vegetation Also, effects of harvest on water temperature. Increase water yield is synonymous with increase run off - What are the environmental effects of these increase erosional events - on terrestrial and aquatic biodiversity?

Response — Research shows that the reduction in transpiration resulting from tree removal far outweighs any counterbalancing effects, such as increased direct evaporation from soils, and results in an increase in water yield. This increased water yield does not equate to increased erosional events. It reflects increased soil moisture and increased flow in stream channels, not increases in overland flow. The EIS indicates that differences in water yield between alternatives are quite small. An assessment of the effects of timber harvests on water temperatures was added to the EIS.

Letter 3981 — EIS 3-124, paragraph 3 - Alternative 3 is said to have the lowest yield - yield here defined as a mere reflection of timber harvest What are the effects on water yield of the more extensive fires earlier stated to occur under Alternative 3 management? What are the water yield effects of an extensive unbroken canopy (less ground and stream evaporation, cloud attractivity, etc)?

Response — Water yields from fires are difficult to predict The EIS, however, indicates that, while fires may be larger under Alternative 3, the risk of fires would be less, due to decreased management activity. Research comparing harvested watersheds to fully canopied untreated watersheds showed increased water yields from the harvested watersheds

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Letter 3981 — EIS· 3-125, paragraph 1 - It is stated that " .timber harvesting has negligible effects on flood levels in large streams " There is also research that shows the opposite - state and document this What is meant by "large"? What about flooding in small streams?

Response — As indicated in the EIS, because only a small percentage of the Forest is cut in a given year, effects will be negligible for any watershed, large or small

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Letter 3981 — EIS· 3-125, paragraph 6 - It is stated " forest management activities do not measurably impact the ground water resource " Research reveals otherwise This section needs to be developed If tables showing the effects of different alternatives on run off yield and sedimentation can be calculated, the same should be done for groundwater

Response — Because groundwater is subsurface, it is much more difficult to model effects on it As stated in the EIS, groundwater aquifers on the Forest are generally of limited extend, having little influence on deeper regionally important aquifers Limestone aquifers are protected by standards that include buffers around drainages into caves, sinkholes, and cave collapse areas

Letters 3985, 3986

The flanks of Crawford Mountain are essential to the health of the streams, springs, and aquifers which are recharged by the forested areas of the mountain.

Letters 3985, 3986

Stillhouse Run watershed and surrounding lands in the modified remote highlands or wilderness recommendation would best protect it and similar streams which feed Jennings Branch, a native trout stream

Letters 3985, 3986

These water resources are becoming all the more valuable economically and as regards environmental concerns.

Response

All watersheds are managed using standards designed to protect and maintain the beneficial uses of water, in compliance with the Clean Water Act. Monitoring ensures that standards are implemented and are effective. Riparian areas of all streams on the flanks of Crawford Mountain are classified as unsuitable for timber *management*

Letter 3547

We urge you, in the final plan, to give more consideration to ground water recharge.

Response

The Revised Plan includes standards to protect water resources in sinkholes and caves. The EIS concluded that management practices will not measurably impact groundwater resources

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Letter 3981

EIS· 3-94 - Compaction - State exactly what is meant by "long-term" and "Significant". Even-age management with heavy machinery and road construction are very much different from custodial management of wilderness - So then how can all alternatives be equal in this soil regard

Response

Maintaining long-term productivity means not degrading productivity from one rotation to the next. The DEIS does not say that all alternatives are equal in compaction, but that no alternative causes soil compaction that results in long-term reductions in soil productivity. This is due to lower clay content and stony conditions in the soil and to requirements for ripping, discing, and revegetating compacted travelways (skid trails, temporary roads, and log landings) in timber sales

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Letter 3981

EIS. 3-94 - Nutrient Loss/Cycling - This section is entirely inadequate and needs to be developed in greater detail and depth. What exactly is "short" and "long term"? "Most temperate soils" is so vague as to be virtually useless. What about the thin poor stony soils of the GWNF? What about localized losses? Where's the site *specific information and considerations? How long are "long rotations" What about soil microbes and fungi?*

Response

This section was expanded in the FEIS

Letter 4268

Plan - EPA recommends that priority watersheds for improvement be identified This may best be done through Management Area 3

Response

Watershed improvement needs are listed and prioritized in a watershed improvement needs inventory. Because project areas are constantly being added to the list as they are identified and deleted after they are treated, it is impractical to include this inventory in the Revised Plan These watershed improvement needs are generally localized, and do not involve entire watersheds Little River, the one watershed that has been identified as being in a degraded condition, is designated a special management area (Management Area 21)

Letter 3883 — GWNF should be adequately funded and organized for effective fire fighting and fire prevention, including public education. Prescribed burns and natural fires which are considered beneficial are not intended to be excluded, but their emission of carbon dioxide and other pollutants should be factored into the decision-making

Response — The programmatic analysis for the revision provides the basis for adequate funding to meet normal fire year needs Project-level planning for prescribed fires involves the consideration of smoke management as part of burning parameters

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Letter 3981 — EIS. 3-99, paragraph 4 - Add to last sentence "and where natural lightning fires burn." Paragraph 7 - Add "They will also be maintained by management of large areas where a natural fire regime is allowed."

Letter 3981 — EIS. 3-100, paragraph 6 - Add "or if natural fires are allowed to burn".

Response — None of the alternatives employ the wide-spread use of "natural fire" as a management practice. The natural role of fire in most of the ecosystems on the Forest is unknown and in need of further research The Forest Botanist and Forest Wildlife Biologist will be coordinating with the Virginia and West Virginia Division of Natural Heritage Program to consider the use of prescribed fire in those natural communities that are known to be fire-dependent Such use, however, will be based on site-specific analysis and disclosure

While Alternative 3 does not have a "natural fire" or "let burn" policy, it is assumed that the suppression response of confinement would be used more often than containment or control It is, however, difficult to predict, beyond professional speculation, what the outcome of this policy would be in light of the increased fuels created by gypsy moth defoliation and subsequent mortality

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Letter 3981 — EIS. 3-32, paragraph 2 - Add "However, uplands such as the land presently occupied by the GWNF received little pressure from man "[See pg 3-5]"

Response — This paragraph deals with the use of fire, not the settlement pattern. This suggested sentence is not pertinent to this discussion.

Letter 3981 — EIS 3-33, paragraph 5 - Add "Alternative 3 does not necessarily allow the development of fuels beyond other alternatives since natural fires can be expected to burn it".

Letter 3981 — The natural fire regime promoted by Alternative 3 is substantially different than the conditions imposed by controlled burns - the EIS should document this

Response — None of the alternatives employ the wide-spread use of "natural fire" as a management practice The natural role of fire in most of the ecosystems on the Forest is unknown and in need of further research The Forest Botanist and Forest Wildlife Biologist will be coordinating with the Virginia and West Virginia Division of Natural Heritage Program to consider the use of prescribed fire in those natural communities that are known to be fire-dependent. Such use, however, will be based on site-specific analysis and disclosure.

While Alternative 3 does not have a "natural fire" or "let burn" policy, it is assumed that the suppression response of confinement would be used more often than containment or control. It is, however, difficult to predict, beyond professional speculation, what the outcome of this policy would be in light of the increased fuels created by gypsy moth defoliation and subsequent mortality

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Letter 3981 — [EIS 3-32, paragraph 2 -] Also, "Summer burns are not necessarily more intense - they occur usually during rainstorms, and vegetation is often drier in the winter and fall" [See Christman]

Response — The part of the sentence dealing with the more intense summer burns has been removed from the FEIS

Letter 3981 — EIS. 3-33, *paragraph 6 - Add "However, reduced motorized access under Alternative 3 can also be expected to* reduce the number of human caused ignitions

Letter 3981 — EIS 3-34, paragraph 1 - Change and/or add something like "Since most man-caused fires are not due to arson, changes in access patterns and degree of access will affect frequency and extent of fires " I want this issue addressed - Alternative 3 may greatly diminish anthropogenic ignitions

Response — The Forest has a relatively small percentage of arson fires compared to most national forests in the Southern Region In 1991, for instance, only 35% of the wildfires were attributable to arson.

It is unlikely that reduced access in Alternative 3 would reduce the number of man-caused fires, although it might affect their locations Arguably, the local opposition to the management policies in Alternative 3 would result in an increase in arson However, in either case, neither theory can be substantiated

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MINERALS: Availability of Minerals

Letter 279 — *[Suggest] a ban on mineral exploration and development*

Letters 1153, 3739 — No more mineral extraction in existing roadless areas

Letter 2337 — Eliminate salvage sales, mineral extraction, and mineral extraction in existing roadless areas.

Letter 3733 — We are concerned by the statements on 2-60. "252 Roadless areas are available for oil and gas leasing with controlled surface use stipulations. These areas are available for other leasable minerals and common variety minerals on a case-by-case basis " This sounds like inadequate protection of potential wilderness areas.

Letter 3840 — *Above areas [Little River, Mt Pleasant, MAs 9 or 13B] are not available for oil and gas leasing or common* mineral extraction

Letter 3929 — I am absolutely opposed to mining and quarry extraction activities.

Letter 4001 — Mineral leasing should not be permitted in the special biological or wilderness areas which make up the bulk of the forest Congressional action should be sought to rescind existing rights in those areas Mineral leasing could occur around the periphery of the forest, subject to stipulations for minimal surface impact, preferably no surface occupancy.

Letter 4050 — All mineral extraction must end.

Response — National Forests are part of the Nation's mineral resource base Mineral exploration and development are part of the mix of benefits provided by the Forest The Federal mineral resource on the Forest is the public's mineral resource The Forest has a responsibility to provide for management of this resource, just as it has for other resources

Congress has provided for minerals management on each National Forest This fact is reflected in the laws governing mineral leasing and the mineral policies of the Departments of Agriculture and Interior. For example, the production of minerals, when present and available, is a valid use of the George Washington National Forest under the Mineral Leasing Act of August 7, 1947 (61 Stat 913:30 U.S C 351-59)

The Regional Forester has the authority to request, but not to withdraw, large areas of the George Washington National Forest from operation of Federal mineral laws. Such a change in status must be accomplished by the Bureau of Land Management with Congressional oversight Alternative 3 was formulated on the assumption that the Regional Forester would request that all lands be made unavailable for mineral entry Since such wholesale withdrawals would not be compatible with balanced resource management envisioned by Congress for the National Forests, the ID Team believes that the likelihood of the entire George Washington National Forest being withdrawn is very low

Alternatives 3, 6, 8A, 9, 10, 11 and 13 recommend varying amounts of roadless areas for wilderness study. The ID Team believes that the most likely way to have roadless areas withdrawn from mineral entry is to have them designated as wilderness through Congressional action with mineral withdrawal as part of the legislation

Alternatives 3, 6, 8A, 9, 10, 11 and 13 are considered in detail in the FEIS. The Regional Forester will select one of these alternatives to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 57

Ideally all mineral mining should be prohibited on National Forest. There is too much disturbance, too many roads, and too much of forest and site destroyed by the activity. Strip mining must be strictly prohibited at the very least

Letter 2665

97% of the forest continues to be open to mineral extraction (Plan, 2-7). Add to this the 200,000 acres of privately owned claims in wilderness areas and virtually the entire forest is open to mineral development. No mineral extraction should be allowed in any wilderness, sensitive biological or roadless area, as it is not conducive to any of the values of the forest (EIS, 3-63)

Response

To say that 97% of the Forest is open or available for mineral activities does not mean that 97% of the Forest will be disturbed or mined. To those people not familiar with mineral resources, figures like these may conjure up the false impression that most of the Forest is in danger of being mined However, mineral deposits suitable for development are scarce and highly localized Less than 1% of the Forest can ever be expected to be mined Mining is a temporary disturbance and mined areas will be reforested and reclaimed.

Exploration for minerals requires that large areas be searched. Most of the searching of these large area does not disturb the ground surface It is done by 1) analysis of satellite images, remote sensing images, aerial photos, 2) geologic mapping, and 3) study of existing data from previous exploration or mining.

Based on analysis of a large area, one or a few small areas may appear promising for actual sampling. Some sampling or drilling may occur. Most searches are abandoned at this point as not worthy of further efforts If a discovery is made, then the mineral may be extracted Areas needed for mineral extraction are relatively small and isolated features on the vast acreage of the Forest When the mining is completed, Forest Service regulations require that the area be reclaimed

Wilderness areas are formally withdrawn from mineral entry. On this Forest there are no "privately owned claims" or outstanding or reserved mineral rights in any existing wilderness. The 200,000 acres of privately owned minerals on the George Washington National Forest are outside of existing wilderness The Mining Law of 1872 does not apply to the Forest No mining claims under the 1872 Mining Law can be filed in the wilderness or any other part of the Forest.

The Regional Forester has the authority to request, but not withdraw, large areas of the George Washington National Forest from operation of federal mining laws Such a change in status must be accomplished by the Bureau of Land Management with Congressional oversight In view of this, the ID Team believes that the most effective way to pursue withdrawal of biological areas and roadless areas from mineral entry would be to have the Regional Forester withdraw the smaller biological areas under his authority and recommend all roadless areas for wilderness study Assuming that Congressional action would be forthcoming, these roadless areas (which include most of the larger biological areas) would presumably be withdrawn from mineral entry as part of the wilderness designation through Congressional legislation Alternatives 3 and 9 pursue such a course by recommending all roadless areas for wilderness and withdrawing all the remaining biological areas within the Regional Forester's authority

Unlike vegetation, wildlife and other surface resources, for which there are comparatively good inventories, much of the mineral resource is hidden in the earth If mineral resources are to be a part of multiple use management, then the Revised Plan must build some flexibility into the management of surface resources. This flexibility would accommodate the few occasions when a valuable mineral deposit might be discovered on the Forest For many management areas, there needs to be the flexibility to allow for some exploration and development

Letter 1064

Although there is not a current high demand for minerals in the Forest, the long-range Plan should anticipate the possibility of a drastic increase. The Plan should include a clear, strong policy to conserve the land surface, protecting it from roads, structures, gas line clearings, and quarries Specific policies should be·
(1) not renewing current leases as they expire.
(2) condemning or purchasing privately held mineral rights within the Forest.
(3) eliminating mineral leases and activities from biologically sensitive areas.
(4) not allowing any surface activity

Response

The Revised Plan contains standards to protect the land surface and resources. To not allow any surface activity would be to prohibit all mining activities. Some surface activity is needed by any type of mining. Surface disturbance will be minimized, but cannot be totally eliminated.

To prohibit gas development on all leased lands would require the government to break legal agreements and would constitute a "taking" of minerals rights granted to the lessees. Such an action would involve more compensation than just releasing the lessee from paying the annual fee for the lease The ID Team believes that *the "taking" of lease rights from the people and companies holding the leases would not be in the public interest* The exploration and development of the public's natural gas resources to meet public demands for natural gas is in the public interest

The purchase of 200,000 acres of private mineral interests within the Forest is not justifiable under current conditions The management areas in which most of these acres are located recognize mineral exploration and development as part of the multiple use in that management area.

Mineral development can take place in biologically sensitive areas in a manner harmonious with other valued resources Through the Federal leasing process, the Forest has extensive controls over all aspects of mineral leasing, including the siting, design and reclamation Management areas encompass large acreages, not all of which are critical to the enhancement of unique biological communities The Controlled Surface Use Stipulations, and other controls, enable the Federal government to permit mineral development in such a manner that the special biological values of various management areas can be protected

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Letter 3951

Minerals - Keep as in Alternative 12

Response

The specific mineral direction varies by management area objectives. The only way to retain the same mineral policy as in Alternative 12 would be to select Alternative 12 or another alternative with similar management area allocations. Alternative 12 is considered in detail in the FEIS and will be selected by the Regional Forester as the Revised Plan if it is identified as the alternative that "maximizes net public benefits".

Letter 3545

Mineral extraction should be reserved for areas classed as suitable for timber harvest.

Response

Mineral extraction needs to be where the mineral resource is located The location of mineral resources is unrelated to the location of lands suitable for timber production. Unlike timber, for which we have a good inventory, much of the mineral resource is hidden in the earth If mineral resources are to be a real part of multiple use management, then the Revised Plan must build some flexibility into the management of surface resources. This flexibility is needed to accommodate the few occasions when a valuable mineral deposit might be discovered on the Forest That means for many management areas, there must be flexibility to allow for exploration and some development

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Letters 2904, 3611

We fully support the Forest Service's position that the desired future condition is to continue to offer opportunities to explore for and develop mineral deposits within the Forest. Therefore, the adoption of a Plan Alternative should provide for access to the maximum acreage defined as Leasing Generally Available. When for justifiable reasons highly sensitive and significant areas are needed to be protected, private owners of mineral rights must be fairly compensated.

Response — The Revised Plan provides acreage for oil and gas exploration where current interest indicated highest likelihood for leasing interest The Revised Plan also provides for leasing of other minerals in the Forest Any "taking" of private minerals would require compensation at fair market value

The development of minerals needs to occur in a manner that is harmonious with other resource values This philosophy is consistent with the policies of the Departments of Agriculture and Interior

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MINERALS: Fluid Minerals

Letter 3710 — NRDC submits that the entire concept of oil and gas development on the GWNF needs to be rethought and planned with the same attention and care as the forest has given its timber program We question whether such development is appropriate at all on an eastern forest like the George Washington, renowned for its natural attributes and surrounded by private land subject to development of all types as market forces may dictate

Response — The entire concept of oil and gas development on the Forest has been rethought and planned with due attention and care That rethinking and planning is part of the revision process

Eastern consumption of natural gas has created major gas fields in distant states and thousands of miles of pipelines and other facilities in other parts of the country Equity suggests Eastern consumers share at least a small portion of the environmental impacts of meeting their natural gas demands

Mineral resources do not follow public/private boundaries. Natural processes determine where mineral resources are located With more than one million acres, the Forest has a responsibility to manage this major exploration base The scope and diversity of the Forest's exploration base is incomparable to any private landowner near the Forest

Most of the private land surrounding the Forest consists of towns, residential property, and farms Many private landowners, and their neighbors, do not want mineral development in their backyard It is becoming increasing difficult for private landowners to exercise their property rights and to start any new mining projects on private land.

Exploration for minerals requires that large areas be searched. Mineral deposits suitable for development are scarce Areas needed for mineral extraction are relatively small and isolated features on the vast acreage of the Forest

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Letter 3710 — The new planning documents [do not] offer any rationale for [an] extensive leasing program or the lack of more protective measures

Letter 3710 — The only rationale presented for such an extensive leasing program is the possibility of raising additional revenue In 1982, $726,000 was raised and, in 1990, $55,000 was raised. DEIS, E-5 The proposed plan argues that forest revenues can be increased at no environmental cost, since it is unlikely that the leases will be developed This is absurd No commercial enterprise is going to invest in an oil or gas lease from the forest unless it contemplates at least a possibility of development And the impacts could severely compromise all of the conservation benefits that this round of timber planning has finally promised to the forest

Letter 3710 — Environmental values would be comprised unnecessarily by the proposal to allow oil and gas leasing on nearly every acre of GWNF land, despite the current lack of interest among potential lessees and the lack of known potential for gas or oil deposits

Response — The leasing program is "extensive" because large areas need to be analyzed in order to discover the few areas where a commercial deposit might occur Most of this searching involves little or no ground disturbance When the search is narrowed down to a specific area, an exploration well is drilled and there is some ground disturbance, typically less than three acres If a discovery is made, additional wells will be drilled and there will be additional ground disturbance The ground disturbance will be located and designed to avoid or mitigate impacts to surface resources Upon completion of operations, sites will be reclaimed The ground disturbed by exploration and development will be less than 1% of the acreage in the "extensive" leasing program In the leasing program, the searching is "extensive", but the amount of ground disturbance is not

Several dry holes have been drilled within the Forest's proclamation boundary over a wide area on both private and Federal land While some gas discovery might be made in the future, it is unrealistic to imagine that gas development will be anywhere near as extensive as the leasing program. The Forest's record with its existing leasing program, where all the wells drilled have been unsuccessful, is further evidence that gas development will not extend throughout the Forest and will not "compromise all of the conservation benefits that this round of timber planning has promised to the forest "

The Revised Plan and FEIS recognize the potential impacts from oil and gas leasing in many ways and include a variety of mitigating measures For example, that recognition is reflected in the Standards for surface resources for each management area in which leasing may occur The Revised Plan and FEIS also recognize that Stipulations, where needed, will be attached to proposed oil and gas leases The FEIS also reflects the extensive regulatory control over lease operations through the Application for Permit to Drill. There is a large array of Federal and State laws and regulations already in place which provide sufficient protective measures

National Forests are part of the Nation's mineral resource base Mineral exploration and development are part of the mix of benefits provided by the Forest The Federal mineral resource on the Forest is the public's mineral resource The Forest has a responsibility to provide for management of this resource, just as it has for other resources

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Letter 3710 — We recommend that the proposed plan be revised to prohibit oil and gas leasing in Laurel Fork, pending a careful review of the desirability of leasing on all parts of the forest. This review should be conducted by a working group comprising representatives of conservation organizations, the forest staff, and experts in the environmental impacts of oil and gas development

Letter 3710 — Begin a comprehensive environmental review of oil and gas leasing on the forest

Response — Under the CEQ Regulations (40 CFR 1508 25), the Forest Service has the authority to determine the scope of the environmental impact statement The ID Team has concluded that a forest-wide evaluation and decision on consenting to oil and gas leasing on specified lands outside the Allegheny Front Lease Area would be counterproductive at this time given the low likelihood of interest in leasing outside the Alleghany Front Lease Area

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Letter 2899 — I was told that, when a leaseholder conducts oil and gas exploration, the results of the surveys were not released to the FS In my opinion, this information should be public record, since it concerns a resource which is public property. Knowledge of the survey results could help the FS establish a fair market value for lease of the mineral rights.

Response — The exploration results from well drilling are available to the Federal government [Bureau of Land Management (BLM), U S Department of the Interior] Oil and gas leases are offered through competitive sales The competitive sale process was established by Congress to insure that the Federal government receives fair market value for oil and gas leases.

MINERALS: Leasing Natural Gas In Laurel Fork

Letter 296 — The Roadless Area assessment says the Laurel Fork "field" has no "strategic importance" to the United States, and its "economic importance" is unsubstantiated

Letter 296 — If Laurel Fork's gas potential were to be compared with other likely gas reserves, not to mention other sources of BTUs, it is obvious that its real potential is something less than low, not "moderately high."

Letter 296 — Describing the Laurel Fork reserve as having "moderately high potential" for gas development in terms of four wells makes marginal sense only in comparison with the rest of the GWNF, which has little, if any, gas potential

Letter 3824 — It is obvious from the materials presented in the draft EIS and public discussions that the five-well gas field cannot be justified on the grounds of national security, net public benefits, resource needs, market economics or any other measurable criterion Natural gas is a plentiful commodity, occurring at thousands of sites in the US, most of which are far richer and more accessible than Laurel Fork

Response

Comparing the Laurel Fork gas potential with other sources of BTUs does not determine the need for the Laurel Fork gas deposit. Alternative energy sources and conservation strategies may make progress in the coming years But the Nation's need for gas is expected to continue for the foreseeable future. Congress is now working on legislation to promote natural gas as an alternative fuel to gasoline for cars. Natural gas is also seen as a cleaner burning fuel in other applications. Because of the environmental benefits of using natural gas rather than oil, coal or gasoline, it appears that the use of natural gas will actually increase in the coming years

"Moderately high potential" is not a comparison with other gas reserves or with other sources of BTUs "Moderately high potential" refers to the potential for the occurrence of natural gas and the potential for development of a gas field Natural gas has been discovered in this area Leases continue to be held. Interest in natural gas as a cleaner fuel is growing Such factors indicate a "moderately high potential" for this area.

Comparing the size of the Laurel Fork gas potential with size of other gas fields does not determine the need for the Laurel Fork gas deposit Small and medium size gas fields are a critical part of the Nation's energy reserves. No large field or group of large fields can satisfy the Nation's demand for gas All gas fields, regardless of size, are a needed and valuable energy reserve Gas consumption continually depletes gas supplies. New gas supplies, large and small, are essential to replenish reserves

In regard to economic importance, even a small gas field can have a large impact locally. The moderately high potential of Laurel Fork to produce billions of cubic feet of natural gas should not be slighted

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Letter 296

Only a far larger number of wells with gas at astronomical prices would justify development Several dozen wells would have to be brought into production to justify the costs associated with a Laurel Fork gas field.

Letter 3812

As a professional geologist I can state with confidence that gas development in the Laurel Fork region is absurd The price of natural gas would need to triple for this field to offer any prospect of paying out a profit

Response

The ID Team sees a group of factors which suggest that gas development is a reasonable possibility Based on the known presence of gas, the costs of drilling the existing gas wells, a potential increase in the demand and price for gas, and the fact that people in the gas industry continue to pay annual rentals on leases in Laurel Fork, there is sufficient ground for considering gas development as part of the Reasonably Foreseeable Development Scenario

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Letter 296

Mineral leasing in Laurel Fork is a door that should be permanently closed, not opened.

Letter 296

Prohibition of all future mineral leasing in Laurel Fork. This would delete Standards 19-21 and 900-925 for Laurel Fork.

Letter 1449

DEIS, p 3-61 Allegheny Front Lease Area Is it not leased at this time?

Letter 1449

DEIS, p 3-53 - 5th paragraph What is the maximum expiration date on outstanding leases?

Letter 3710

Of particular concern is the contemplated leasing on the Laurel Fork area of the Alleghany Front. With leased acres at an all-time low, the forest should take this opportunity to explore measures that would provide long-term protection from leasing for sensitive areas

Response

In the Revised Plan, the Laurel Fork Roadless Area has been allocated to Management Area 21 as a Special Management Area This roadless area contains biological and mineral values, which in the estimation of the ID Team, outweigh its value as wilderness

The Laurel Fork Special Management Area is available for oil and gas leasing with Controlled Surface Use Stipulations, is available for other leasable minerals on a case-by-case basis and is not available for common variety minerals

The following discussion from Appendix C of the FEIS is germane to this comment ,

"Issued leases cover 94 percent, approximately 9,768 acres, of the Laurel Fork area Depending on their respective issuance dates, these leases are set to expire in between 1996 and 1998, unless production is established Federal oil and gas lease BLM-A-0022918, containing 2,168 acres in the western portion of Laurel

Fork, is within the known structure of the field and is being held under a communitization agreement (CA) with the Bureau of Land Management This communitization agreement supersedes the original lease and determines the rules for the production of natural gas. The CA does not have an expiration date Annual rentals are still collected on the CA while production is inactive "

The maximum expiration date on mineral leases is ten years unless production/exploration is initiated.

There has been and continues to be expressed interest in mineral leasing in the Laurel Fork Roadless Area In light of this interest, the ID Team believes that the Regional Forester has three options within his authority that would lead to different decisions concerning the consent for natural gas leasing in Laurel Fork.

1 The Regional Forester could select Alternatives 3, 9, 11 or 13 as the Revised Plan Each of these alternatives recommends the Laurel Fork Roadless Area for wilderness study. Assuming that Congressional action would be forthcoming, these areas would presumably be withdrawn from mineral entry as part of the wilderness designation through Congressional legislation

2 The Regional Forester could decide to consent to leasing all (or part of) the unleased lands or lands where the leases have expired. This option is explored in Alternatives 4, 5, 6, 7, 8A and 10.

3. The Regional Forester could decide to not make a consent decision on all or part of the Laurel Fork Roadless Area at this time and, instead, make each consent decision on individual tracts at the time interest in mineral leasing is expressed by the Eastern States Office This option is explored in Alternative 2 The Regional Forester could, however, decide to modify any alternative selected as the Revised Plan to include this option.

Letter 296

Alteration of all current mineral leases in Laurel Fork to prohibit mineral development Leaseholders would be released from all payment obligations BLM is entitled to alter each of the Laurel Fork lease agreements to conform with "the public interest" stipulations these leases contain in Sections 4 or 5. Since all these leases were let prior to the EIS and Draft Plan, it is obvious that the public interest is being redefined in such a way that makes mineral development in Laurel Fork an unsuited use. Further justification should be provided by the GWNF's revised EIS, as outlined above, and in consideration of the 37 ETS species present in Laurel Fork

Letter 3824

No oil/gas development has occurred to date in Laurel Fork, despite leaseholding that goes back for decades All of the lessees are obliged to "exercise reasonable diligence in drilling and producing the wells herein provided ." Since none of the lessees have ever developed a well in Laurel Fork, it is obvious that they are holding these leases on a speculative basis, awaiting some catastrophic event in the natural gas market that *would force price up to a level high enough to justify developing the uneconomical deposits in Laurel Fork. In* the absence of any effort to comply with "reasonable diligence" provisions of these leases, the FS and BLM has ample justification for not renewing them

Letter 3824

As part of revising its draft Plan, the FS should initiate a discussion with BLM based on reasonable diligence, public interest and environmental protection--for the purpose of not renewing leases in the Laurel Fork area and prohibiting mineral development under current leases

Response

"Reasonable diligence" is being exercised by the lessees in complying with terms of their authorization. The wells are tested periodically to determine that they are capable of gas production The Federal government continues to receive annual rental payments on the leases.

To prohibit gas development on all leased lands within Laurel Fork would require the government to break legal agreements and would constitute a "taking" of minerals rights granted to the lessees. Such an action would involve more compensation than just releasing the lessee from paying the annual fee for the lease. The ID team believes that the "taking" of lease rights from the people and companies holding the leases would not be in the public interest The exploration and development of the public's natural gas resources to meet public demands for natural gas is in the public interest

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Letter 296

Mineral leasing on Laurel Fork is an unacceptable standard, given the area's abundance and variety of ETS species and the GWNF's own emphasis on primitive/semi-primitive, non-motorized recreation objectives in a naturally appearing forest environment

Letter 296 — It is doubtful that CSUs meet the standards envisioned for unavoidable mineral development in Special Interest Areas and Research Natural Areas, as proposed by VNHP.

Letter 296 — The Draft Plan permits leasing throughout Laurel Fork for all categories of minerals subject only to CSUs, the exact nature of which are not spelled out I doubt that this decision can be justified on a Net-Public-Benefits basis.

Letter 2899 — I am most concerned that the Laurel Fork Special Biological Area falls within the proposed gas lease area Allowing exploration and drilling within this area is clearly contradictory to the SBA's purpose of providing habitat for threatened and endangered species In my opinion, there is ample area in the Allegheny Front falling outside MA4, where the natural gas resource could be developed

Letter 3824 — The forthcoming final plan for managing the GWNF reflects a redefinition of the "public interest" It is entirely appropriate, therefore, that the FS recommend to the Secretary of the Interior that the values and objectives embedded in MA4/RNA status for Laurel Fork reflect a new definition of the public interest that is no longer compatible with mineral development. It follows that the FS should recommend that no mineral development be permitted under current leases and no future leasing should occur in Laurel Fork The FS should forgive the royalty obligations of the lessees

Letter 3824 — Permitting gas development in Laurel Fork, particularly the western half, is an activity that is diametrically opposite to the basic thrust of the GWNF's mgt objectives as outlined in MA4/SBA and RNA

Response — Mineral exploration and development are part of the multiple benefits available from the National Forest There is a moderately high potential for billions of cubic feet of natural gas in Laurel Fork The exploration and development of the public's natural gas resources to meet public demands for natural gas is in the public interest

Emphasis on management of, and sensitivity to, the biological resources in Laurel Fork does not require foregoing management of the mineral resource Through the Federal leasing process, the Forest has extensive controls over all aspects of mineral leasing, including the siting, design and reclamation Mineral development can take place in a harmonious relationship with other valued resources. The relatively small acreage needed for gas development can be accommodated in Laurel Fork Proposed wells sites and other facilities can be moved to avoid particular areas Applicable laws governing the protection of threatened, endangered and sensitive species will apply to lease activities Disturbed areas will be reclaimed The ID Team has analyzed the potential impacts and believes that the leasing of minerals in Laurel Fork will not significantly detract from the other natural values of the area

A discussion on the Controlled Surface Use Stipulation is found in Appendix E of the FEIS. The details of the stipulation are added at the time that any lease is processed A controlled use stipulation requires information specific to the particular lease. It would be developed for any new lease on Laurel Fork depending upon the intent of the management direction for Management Area 21 and the actual area encompassed in a lease.

MINERALS: Other Leasable Minerals

Letters 2904, 3611

In Minerals section there was a statement that the "Forest does not contain significant deposits of strategic or critical metals" It would be more appropriate to qualify these statements by adding the potential is low and no significant deposits are known to exist at this time Economics/market conditions constantly change as does new technology and additional exploration work can and often does find new deposits in areas thought to have none

Response — The last sentence of the third from the bottom paragraph on page 3-57 of the DEIS has been replaced with the following text in the FEIS

"The Forest contains small deposits of manganese and tin, which are strategic or critical minerals The potential for significant deposits of other strategic or critical metals is considered low at this time However, economics and market conditions constantly change, as does new technology Additional exploration work can, and often does, find new deposits in areas thought to have none"

Letter 3643 The DEIS summary of affected mineral resources, mineral laws/policies, and exploration methods (Appendix E) is excellent and gives the reader an accurate mental picture of the realities of mineral resource exploration and development The impact analysis, however, focuses primarily on oil and natural gas. It is not clear whether any of the alternative plans would affect future development of the small kaolin deposit or development of saleable mineral deposits We suggest a few remarks be added to future documents regarding impacts to the kaolin occurrence If saleable-minerals mines exist or permits have been historically concentrated in certain areas, the Affected Environment section should summarize impacts of the alternative plants to permit renewal If none of the alternative plans would create adverse impacts to the kaolin deposit or to saleable minerals, the document should so state.

Response Standard 903, which is a Forest Standard in the Draft Revised Plan, addresses the need for coordination with other resource values An application to develop a particular deposit will be subjected to an impact analysis and only granted if impacts can be mitigated acceptably. The Kaolin deposit is not specifically mentioned since the procedures would apply to any type of deposit Chapter 3 of the FEIS discusses environmental analysis needs

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MINERALS: Common Variety Minerals

Letter 3840 No common mineral mining operations anywhere in the Forest

Letter 3840 Pg 2-110, [Standard] #553 - No common mineral extraction

Letter 3962 Common variety minerals [should not be] available [in MAs 1, 4, 7,8, 9, 10, 11, 13, 14, 15, 16, 17, 18]

Letter 3962 Leasing or sale of common variety minerals should not be available on the GWNF. There is an adequate supply and availability of these minerals on surrounding private land

Letter 3962 Pg 2-162. [Standard] 905 Common variety minerals are not available for sale to the public, but are available for in-service use

Response Common variety minerals are handled quite differently than leasable minerals. Common variety mineral permits on the George Washington National Forest are special use permits and are evaluated and decided on a case-by-case basis. The typical common variety mineral permit is a pickup load of loose stone on the sides of roads which are used for fences or other construction. Requests for quarrying sandstone, sand, gravel or other common variety minerals are unusual

Common variety minerals may also be provided free of charge to public agencies, such as state highway departments

Given the nature of interest in common variety minerals on the George Washington National Forest and the requirement for specific evaluation and decisions on each application, the ID Team believes that the availability of common variety minerals in certain management areas is appropriate. In those management areas where the ID Team found it inappropriate, common variety mineral are not available

To the extent private owners continue to meet demands, there will not be demands for the Forest's common variety minerals. However, if and when private companies request that common variety minerals on the Forest be made available for sale, then it would indicate private sources are not meeting demands. The Forest Plan needs some flexibility to respond to future demands Regulations require the Forest Service to receive fair market value for any mineral materials it sells.

Letters 2904, 3611

Virginia was the fifth largest crushed stone producing state in the U S , ranking 8th in total aggregate production in 1990 The availability of construction aggregates and other essential industrial minerals is critical to the future economic growth of the Commonwealth

Response Generally, it would appear that aggregate material may not be in high demand on the Forest due to (1) the availability of similar materials on private lands closer to the market area, (2) lack of knowledge that selling or leasing minerals is a Congressionally permissible part of Forest resource management, and (3) general preference to avoid government "red tape" and delays. However, if the need arises, the Forest would consider the sale of industrial minerals on a case-by-case basis.

MINERALS: Stipulations

Letter 296	Controlled Surface Use Stipulations (CSUs) are a set of guidelines and restrictions that the GWNF negotiates with a lease holder
Response	The Forest does not negotiate with a lease holder to determine the Controlled Use Stipulations which will be required on a lease. The Forest determines what CSUs will be attached to a proposed lease before the lease is issued for competitive sale.

Letter 3840	No "surface occupancy" stipulations for other mining and oil and gas in MA 4, MA 9, MA 13A, MA 13B, MA 14, MA 15, MA 6 SPNM areas.
Letter 4268	A no surface occupancy stipulation [should] be included within these management areas [14 and 15]
Response	"No surface occupancy" stipulations have been included in areas where the ID team found it justifiable and necessary. In other areas, other stipulations and/or the existing laws and regulations applicable to operations were found to be adequate to protect surface resources. To apply "no surface occupancy" stipulations over vast areas of the George Washington National Forest would amount to a de facto withdrawal and prohibition of mining and oil and gas development Such wholesale withdrawals are not needed to protect surface resources and would not be compatible with balanced resource management envisioned by Congress for the National Forests.

Letter 3981	EIS 3-61, paragraph 1 - "The first sentence which contains "...prohibit surface occupancy in sensitive areas." is not objective. The entire Forest is sensitive This "sensitive" term in this sentence and others in this section need to be stricken These activities "disrupt" and "degrade" habitat and this issue needs to be addressed at all scales.
Response	In this part of the FEIS, we have replaced the word "sensitive" with "specific"

Letter 4268	Plan - EPA recommends that a No Surface Occupancy stipulation for oil and gas leasing and development be considered for all riparian areas
Response	The Draft Revised Plan requires facilities to be located out of riparian areas An exception is made for the short sections of roads or pipelines which, of necessity, must occasionally traverse some riparian areas. A "No Surface Occupancy" stipulation is not needed because Federal oil and gas regulations allow relocating any proposed facility by 200 meters, without any need for a stipulation

MINERALS: Adverse Environmental Effects

Letter 3710	Even the minimum drilling operations cause serious damage, since typical wells require the construction of a level well drill pad and reserve pit covering most of an acre, an access road of approximately 1/2 mile /2 acres, carrying daily traffic of 20-30 heavy vehicles, and piping of water from rivers, creeks, reservoirs, or wells.
Letter 93	Areas of concern which centered around oil and gas exploration and the ecological damage caused by such This mainly is based on pictures I have seen of the Brooks Range area in Alaska where the oil companies do a real seedy job of cleaning up after themselves.
Response	Chapter 3 of the FEIS addresses impacts of drilling operations It is accepted that they are disrupting but much of the disruption is short-term, taking place during the few weeks when the well pad is constructed and the drill rig bores a hole Following drilling, most of the well pad is reclaimed, leaving only a small area which is occupied by production facilities When production is complete, these remaining small areas are reclaimed

Letter 2029 I suggest that there should be protection from mineral activities in MA 4

Letter 3733 We wonder about some of the statements made in Management Area 4 – special management because of biologic, historic or geologic values. Under Special Biologic Areas (2-28) 19 The area is available for oil and gas leasing with the following stipulations· b in areas more than 300 acres, surface occupancy is highly restricted by using controlled surface stipulations. To us this sounds like inadequate protection of Special Biologic Areas.

Response Management Area 4 encompasses large acreages, not all of which are critical to the enhancement of unique biological communities In the case of oil and gas leasing, the Controlled Surface Use Stipulation enables the Federal government to permit mineral development in such a manner that the special biological values of these areas can be protected

Through the Federal leasing process, the Forest has extensive controls over all aspects of mineral leasing, including the siting, design and reclamation. The ID Team believes that the leasing of minerals in Management Area 4 will not significantly detract from the other natural values of the area.

Letter 3779 If this area is to be "managed to maintain or enhance wildlife habitat", p 2-105, under what reasoning can oil and gas leasing be allowed at all? p 2-106

Response Producing oil well pads provide excellent wildlife clearings This is one example where a harmonious relationship can exist If groundwater is discovered during drilling, there is an opportunity to develop water sources to enhance wildlife. In addition, the interim and final reclamation at well sites provides the opportunity to construct water impoundments for wildlife

Each Management Area provides a different mix of multiple resource benefits Emphasis on one resource, such as wildlife, does not necessarily require exclusion of other resource management.

Letter 3779 Oil and gas leasing should never be allowed in areas for wildlife that require periodic protection from human activities. How can there be any guarantee that 1 the lessees will honor that requirement and 2. that we humans can correctly gauge what periods wildlife need protection from human activities. p 2-110

Response Some disturbance is unavoidable. Best efforts are made to reduce the intrusion

The lessees operate under the terms of Federal leases and permits The lessees activities are inspected and monitored by State and Federal officials The lessees operations are bonded and are subject to fines and restitution Federal wildlife biologists provide direct controls on the location and timing of the lessees activities.

Letter 3894 Any mining that will degrade water resources should be prohibited

Response The Revised Plan contains standards that will provide protection to streams and riparian areas As discussed in Appendix E of the FEIS, detailed plans are submitted and must be approved before any mineral development takes place on a lease. Specific concerns about the effect of any drilling operation are addressed in the Surface Use Plan of Operations and the Drilling Program in the Application for Permit to Drill (APD). Casing and cementing requirements and other measures to protect ground water are a standard part of the drilling permit process

Letter 1449	DEIS, p 3-56 Lee Ranger District Might want to mention the well drilled by Amoco in '81, just to the north along trend in Frederick County
Response	Since this well is outside of National Forest area, the ID Team was not aware of this activity and consequently overlooked it. The FEIS has been rewritten to include a reference to this well
Letter 1449	DEIS, p 3-56 Pedlar Ranger District. Subsurface geology IS fairly well defined or tied down, and DOES provide a very high favorable, although highly risky, probability of hydrocarbon accumulations.
Response	Industry has not leased on the Pedlar in significant amounts They regard the Pedlar as the lowest interest area.
Letter 1449	DEIS, p 3-56 Warm Springs District Might want to mention active exploration, drilling, and current production directly along trend in West Virginia
Response	The discussion on the Thornwood-Horton gas field and the sentence on the three seismic surveys represents all the mineral activity known to the ID Team
Letter 1449	DEIS, p 3-60 - 2nd paragraph site "reclamation", not rehabilitation
Response	Either word is acceptable The ID Team has chosen to use "rehabilitation"
Letter 1449	DEIS, p 3-60 - 5th paragraph Concerning private minerals, indeed there could be development within even 5 years, it is certainly difficult for anyone to predict there would be no development within 10 to 15 years down the road
Response	The FEIS has been rewritten to indicate that some mineral activity may occur
Letter 296	A complete and impact-specific inventory of expected impacts is not presented The EIS provides no sense of scale, scope, intensity and duration of each type of impact
Letter 3824	To justify gas development in Laurel Fork, the GWNF must undertake a good-faith EIS that spells out the probable environmental impacts of various scales of gas development, including none at all The draft EIS is not such a document
Response	The description of environmental effects under the Alleghany Front Lease Area discussion in the FEIS has been rewritten to describe the environmental consequences of the reasonably foreseeable development scenario detailed in Appendix E of the FEIS The FEIS has also been rewritten to discuss total cumulative effects of field development in Laurel Fork
Letter 3779	Oil and gas leasing should never be allowed in areas for wildlife that require periodic protection from human activities How can there be any guarantee that 1. the lessees will honor that requirement and 2 that we humans can correctly gauge what periods wildlife need protection from human activities p 2-110
Response	Some disturbance is unavoidable Best efforts are made to reduce the intrusion You may wish to visit the well sites which were constructed about 30 years ago in the Thornwood-Horton field to see the effects on wildlife and the reclamation On the Forest there are other well sites that you may wish to visit to see the effects on wildlife and the reclamation The lessees operate under the terms of Federal leases and permits The lessees activities are inspected and monitored by State and Federal officials The lessees operations are bonded and are subject to fines and restitution Federal wildlife biologists provide direct controls on the location and timing of the lessees activities

There are far more controls and insurance about wildlife protection with lessees than there are with general *recreational access on the Forest.*

Letter 3824

I continue to be perplexed by the GWNF's plan to permit mineral development in Laurel Fork, especially in its *most biologically sensitive areas where RNA status is proposed The only justification I've been able to discern* for this proposal is the assumption that the likely scale of gas development is so small as to have little *environmental impact The five producing wells envisioned in the high-production scenario would have an* environmental impact on the western side of Laurel Fork far larger than simply five discrete wells standing in isolation. A system of roads, pipeline, pads, waste-disposal pits, excavations and timbering are inextricably associated with even so small a "field". The few number of wells projected is probably the most persuasive argument for prohibiting gas development altogether.

Response

The biological area in Laurel Fork is a large area comprising more than 6,000 acres The Controlled Surface Use Stipulation enables the Federal government to permit mineral development in such a manner that the special biological values of this large tract can be protected

Through the Federal leasing process, the Forest has extensive controls over all aspects of mineral operations, including the siting, design and reclamation. The ID Team believes that the leasing of minerals in Laurel Fork will not significantly detract from the other natural values of the area.

To prohibit gas development on all leased lands within Laurel Fork would require the government to break legal agreements and would constitute a "taking" of minerals rights granted to the lessees Such an action would involve more compensation than just releasing the lessee from paying the annual fee for the lease The ID team believes that the "taking" of lease rights from the people and companies holding the leases would not be in the public interest. The exploration and development of the public's natural gas resources to meet public demands for natural gas is in the public interest.

Letter 3981

EIS· 3-61,] Paragraph 3 - This is entirely inadequate and glosses over the issue - "would not necessarily result..." Future mineral activity in the East is expected to greatly expand according to the EPA and the FS itself - document this In fact, the entire section "General Effects of the Alternatives" is poorly developed and attempts to diminish and misrepresent the drastic effects brought about by these activities - I want this subject developed and documented

Response

There is more information on the effects in the FEIS and in Appendix E of the FEIS. We believe the standards in the Revised Plan, Federal Regulations and the NEPA process provide adequate protection for surface resources

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Letter 3981

EIS. 3-63, paragraph 3 - To write of ". limiting construction to times of year when wildlife will not be affected, is ridiculous. Wildlife is here all year "Wildlife will be killed whenever these activities are allowed in the Forest." - State this.

Response

Any type of activity is sure to have some impacts on wildlife Timing stipulations provide protection primarily during the season when young are being reared. We have revised the wording in the FEIS to suggest "less", rather than "no" effects.

MINERALS: Changes in Text of Draft Revised Plan

Letter 3728	The guidelines for mineral exploration and development are not consistent in some MA desired future conditions
Response	The Desired Future Condition of each management area has been re-written so that the standards are consistent.
Letter 3940	Plan. Page 2-6, Paragraph 11 Also include Riparian Areas, Special Interest Areas, and Remote Highlands as areas needing special protection
Response	These areas are included under the heading of "Areas Needing Special Protection" and need not be specifically listed
Letter 3962	MA 6· [Standards] 86 & 87 86 reads that minerals leasing may not occur, yet 87 reads that mineral leasing can occur Which is correct?
Response	The first sentence of Standard 87 has been rewritten so that it is clear that it only applies to oil and gas leasing.
Letter 4038	Change Standard 19 on page 2-28 of the Draft Revised Forest Plan to read: "These areas should be recommended for withdrawal from mineral exploration and entry If withdrawal is not possible, risks of potential conflicts from mining in the area should be evaluated, and measures that should be taken to avoid or minimize damage to the natural heritage resources on the area should be defined "
Response	This suggested change in Standard 19 of the Draft Revised Plan was considered, but not accepted The current stipulation language provides necessary protection to the level requested
Letter 4038	Change Standard 20 on page 2-28 of the Draft Revised Revised Plan to read "None of these areas should be available for common mineral activity."
Response	Standard 20 in the Draft Revised Plan has been deleted
Letter 4038	Delete Standard 21 on page 2-28 of the Draft Revised Forest Plan.
Response	Standard 21 in the Draft Revised Plan has been rewritten to state. "Areas are available for other leasable minerals and common variety minerals on a case-by-case basis based on analysis of needs and associated effects "
Letter 4038	Change Standard 63 on page 2-34 of the Draft Revised Forest Plan to read· "Research Natural Areas should be withdrawn from mineral exploration and entry If withdrawal is not possible, risks of potential conflicts from mining in the RNA should be evaluated, and measures that should be taken to avoid or minimize damage to the natural heritage resources on the area should be defined "
Response	The wording of Standard 63 in the Draft Revised Plan has not been changed The Regional Forester does not have the authority to withdraw large areas of land from oil and gas leasing The Controlled Surface Use Stipulation provides needed latitude to avoid specific sites where there are special biological values
Letter 4038	Change Standard 64 on page 2-34 of the Draft Revised Forest Plan to read "Research Natural Areas should not be available for common variety minerals "
Response	Standard 64 in the Draft Revised Plan has been changed to read "Little Laurel Run RNA is not available for other leasable or common variety minerals "

Letter 4038 — Add the following new standard (tentatively numbered 27b) to page 2-63 of the Draft Revised Forest Plan under the heading "Minerals". "Any approved mineral activities include appropriate reclamation plans "

Response — This standard was included by mentioning that Forest Standard 903 (in the Draft Revised Plan) also applied to this management area. In addition, Federal regulations require reclamation.

Letter 4038 — Change Standard 272 on page 2-63 of the Draft Revised Forest Plan to read: "Other leasable minerals and common variety minerals are generally restricted but can be available on a case-by-case basis. Availability depends upon the nature and degree of disturbance planned. Significant disturbances are not allowed."

Response — The existing wording of a "case-by-case" basis provides sufficient latitude for decision making Each application is evaluated for its environmental impacts

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Letter 4038 — Add the following new standard (tentatively numbered 272a) to page 2-63 of the Draft Revised Forest Plan under the heading "Minerals". "Proposals for mineral exploration and development are considered in coordination with *other biological values. Where exploration conflicts with the biological value of the area, conflicts are resolved* in favor of biological values. Forest officers work cooperatively with the public and appropriate state and federal agencies on requests for mineral activities while insuring that environmental concerns are fully considered."

Response — Chapter 3 of the Draft Revised Plan has the following "Desired Future Condition" under Management Area 9· "Mineral activities may occur in a few locations. Maintenance and restoration will be used to provide wildlife habitat."

Letter 4038 — Change the second paragraph under "Minerals" on page 2-73 of the Draft Revised Forest Plan to read. "Riparian areas within the Recreational river sections are not available for additional oil and gas leasing."

Response. — This standard has been deleted from the Revised Plan Riparian areas within rivers qualifying for designation as scenic or recreational rivers are allocated to Management Area 18

Letter 4038 — Repeat Standard 553 (tentatively 527d) under "Minerals" on page 2-106 of the Draft Revised Forest Plan. Area is available for oil and gas leasing, other leasable minerals and common variety minerals Timing stipulations may be used on a case-by-case basis

Response — Standards 527 and 528 in the Draft Revised Plan have been changed to incorporate wording that "Timing stipulations may be used on a case by case basis"

Letter 4038 — Delete Standard 528 on page 2-106 of the Draft Revised Forest Plan.

Response — Standard 528 in the Draft Revised Plan has been rewritten to state "The area is available for other leasable minerals and common variety minerals on a case-by-case basis with special attention as to the times of the year when mineral activities may occur "

Letter 3728 — *Management Area 15 Minerals 553 - Replace the last sentence with the following. "Timing and seasonal* restrictions may be used on a case-by-case basis in respect to motorized administrative access on gated roads "

Response — The use of "Timing Stipulations" as written provides the Forest Service with needed management flexibility

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Letter 3728 — Management Area 18. Minerals 627 - Change to "The area is available for oil and gas leasing Access roads *and gathering pipelines buried in road shoulders may be constructed across these areas."*

Response — There does not appear to be any advantage to rewording Standard 627 in the Draft Revised Plan to remove the restriction on drilling pads or production locations. The wording in this standard is, therefore, left unchanged

Letter 4038

Repeat Standard 628 (tentatively 527c) under "Minerals" on page 2-106 of the Draft Revised Forest Plan· "Other leasable minerals and common variety minerals are generally restricted but can be available on a case-by-case basis Confer with VDGIF and WVDNR regarding the potential impact of mineral exploration or mining. Mitigation measures will be required as needed to ensure protection of other resources. Availability depends on the nature and degree of disturbance planned Significant disturbances are not allowed."

Letter 4038

Change Standard 553 on page 2-110 of the Draft Revised Forest Plan to read: "Area is available for oil and gas leasing, other leasable minerals and common variety minerals Timing stipulations may be used on a case-by-case basis Concur with VDGIF and WVDNR regarding the potential impact of mineral exploration or mining. Mitigation measures will be required as needed to ensure protection of other resources."

Response

The Forest Service has no legal authority to require State concurrence on leasing of oil and gas and other minerals

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Letter 4038

Add the following new standard (tentatively numbered 553a) on pages 2-106 and 2-110 of the Draft Revised Forest Plan under "Minerals" "Some restrictions may be necessary in this prescription to limit disturbance to wildlife populations and to provide the semi-primitive non-motorized and motorized (Subclass 2) recreation opportunity Restrictions would apply to those activities that affect quiet time "

Response

Standard 553 as written in the Draft Revised Plan allows restriction application on a case by case basis. This places the holder on notice of the need for restrictions and provides needed flexibility.

Letter 4038

Add the following new standard (tentatively numbered 553b) on pages 2-106 and 2-110 of the Draft Revised Forest Plan under "Minerals"· "In and adjacent to developed recreation sites, administrative sites, or specially designated areas, minerals exploration may be severely restricted to prevent unacceptable adverse impacts to facilities or other resources "

Response

This standard has not been incorporated into the Revised Plan Coverage requested applies to areas that are in other management areas where restrictions are consistent with the intent of the management area and existing mineral laws and policies In addition, the environmental analysis conducted for mineral exploration or any other Forest project consider potential impacts of the project. Any project may be severely restricted to prevent unacceptable adverse impacts There is no need to reiterate this general principle which applies to decision-making based on environmental analysis

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Letter 4038

Change Standard 627 on page 2-122 of the Draft Revised Forest Plan to read· "The area is not available for additional oil and gas leasing Access roads and gathering pipelines buried in road shoulders may be constructed across these areas "

Response

Riparian areas will be protected, and therefore, there is no need to remove them from leasing.

Letter 4038

Repeat Standard 903 (tentatively 527a) under "Minerals" on page 2-106 of the Draft Revised Forest Plan· "Proposals for mineral exploration and development are considered in coordination with other resource values. Where exploration conflicts with the biological values of the area, conflicts are resolved in favor of the biological values. Forest Officers work cooperatively with the public and appropriate state and federal agencies on requests for mineral activities while insuring that environmental concerns are fully considered "

Letter 4038

Repeat Standard 904 (tentatively 527b) under "Minerals" on page 2-106 of the Draft Revised Forest Plan: "Any approved mineral activities include appropriate reclamation plans "

Response

The first paragraph on page 2-106 of the Draft Revised Plan incorporated this standard from the Forest Standards Forest standards were listed in the back of Chapter 3 to avoid endlessly repeating the same standard in most or all management areas

GYPSY MOTHS AND OTHER PESTS: Control of Gypsy Moth Populations

Letter 1336	I believe we should do everything possible to eradicate the gypmo and keep our forests producing good timber *for generations to come*
Response	Eradication of the gypsy moth is no longer considered feasible.
Letter 56	As to treatment locations, it is our strong feeling that the maximum amount of the GW Forest be treated, however we are aware of the limited resources.
Letter 145	Gypsy moth is a reality for the George Washington and all other forest lands in the region, and the moth will be with us for the foreseeable future. This voracious pest knows no property boundaries and will not distinguish between public and private lands. Left to its natural consequences, the infestation will destroy much of the oak component of the forest We now understand that much of the sprout regeneration, that was assumed would replace the dead mature trees, will also be lost
Letter 382	Neither Alternative adequately address the enormous gypsy moth threat, but Alternative 12 is definitely preferable
Letter 724	*To allow the (gypmo) infestation to destroy marketable timber is a gross waste of our best renewable natural* resource
Letter 1147	*Since gypsy moth is an introduced pest, I think that the oak-type forest areas should be protected. Especially* when it is so easy and economical to protect the oak stands
Letter 1355	*We need an effective program to control gypmo before we lose our oaks and the oaks' supply of food for wildlife.*
Letters 1371,1442, 1828, 2365	It would be a shame to let gypsy moth kill 25% or 50% hickory and oak and other mast-producing trees. This will have a long-range negative impact on game species such as deer, turkey, grouse and squirrel and bear.
Letter 1669	I am concerned about the potential gypsy moth invasion and I feel that the FS should adopt Alt. 12 instead of allowing the forest to become devastated by employing Alt 8
Letter 1804	The Gypsy Moths have taken a toll in the State Game Lands here in Pennsylvania and I consider it important that the mast producing trees be protected
Letter 1820	Spray for gypsy moths
Letter 1975	I support Alt 12. The gypsy moth should be controlled at all costs so as to keep the forest productive.
Letter 2044	Choose Alternative 12 which gives flexibility in gypsy moth management
Letters 2161, 2163	Alt 12 with some changes, like better gypsy moth control, would be more suitable mgt. for GWNF.
Letter 2306	The majority of the forested area will be treated for gypsy moth.
Letter 2662	Alternative 8 allows a mere 50 per cent of the forest to be sprayed [for gypsy moth]. Alternative 12, on the other hand, opens 83 per cent of the Forest for treatment
Letter 3506	Many of us have seen the damage that the Gypsy Moth can wreak on our forest and would like to see this pest controlled
Letter 3660	High site index areas should be treated to protect from the gypsy moth
Letter 3665	Gypsy moth control is encouraged Protecting white oak family encouraged, even by insecticide if necessary. Preserving oaks only for timber interests is not acceptable and stating the trees may not die "if treated with

insecticides or through timber harvesting to manage moth populations" seems incongruous Slow growing hardwood species should receive special consideration and management.

Letter 3743 [Alternative 12] provides more management activities to take place in response to the Gypsy Moth with 83% of the Forest (879,340 acres) available for management

Letter 3747 The Commission is endorsing the more reasonable Alternative #12 Gypsy moth must be planned for, managed and met with adequate resources with respect to both commercial timberland and public lands. Failing to act in advance of the progress of the moth and then attempting to salvage what is lost after the trees are killed would be a tragedy. Protecting our hardwood resources and the public perception of those resources is vital to the economic survival of our state

Letter 3747 Failing to act in advance of the progress of the moth and then attempting to salvage what is lost after the trees are killed would be a tragedy.

Letter 3799 If you do not spray for gypsy moth on all of the forest, there is no need to spray at all for they will kill what is not sprayed

Letter 3660 Gypsy moth is not going to go away We must dedicate resources to battling it. We must have flexibility to treat/manage all possible acres The FS does not need for NIPL's to take action because moths are leaving the Forest and eating their woodlots.

Letter 3833 I feel there is a need to maintain our forest with strong, healthy woodland and, in my opinion, this will usually be younger trees Where Gypsy Moth infestations have occurred in my residence area, the magnificent old trees seem to die out from the defoliation with the fires onslaught, while the younger trees seem to have an ability to come back It is hoped that any plan will provide for maximum effort to suppress the Gypsy Moth and to maximize timber use in potentially affected areas

Letter 3890 The entire GWNF should be available for proper gypsy moth treatment so that the GWNF's valuable timber resource is protected and that the GWNF will not serve as a brooding area for the gypsy moth which would adversely affect adjoining private forest ownerships Provisions should be made to harvest high value timber should a gypsy moth attack be imminent

Letter 3926 Alternative 12 combats the gypsy moth It's going to destroy our forest if we don't fight it.

Response The revision of the Forest Plan does not involve the magnitude of the gypsy moth control program As discussed in Chapter 2 of the Revised Plan under "ISSUE 11 — GYPSY MOTH", the protocol developed under the Appalachian Integrated Pest Management (AIPM) — Gypsy Moth Demonstration Project is used to make such decisions. Any decision on the amount of treatment undertaken in any given year must be supported by site-specific environmental analysis and disclosure Such analysis is outside the scope of the revision of the Forest Plan

Table 3-11 displays the amount of lands "generally available", "available under limited circumstances", and "not available" for insecticide treatment Alternatives 8, 8A and 12 contain no acreage that is "not available" Of all the alternatives, Alternative 12 has the most acreage that is "generally available".

Chapter 2 of the Revised Plan also contains a discussion on the effectiveness of different strategies to control gypsy moth populations.

Alternative 12 has a more aggressive timber salvage program than Alternative 8A Alternative 12 has more acreage suitable for timber production and, therefore, more acreage where silvicultural practices could be employed to regenerate oak species

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Letters 761, 870, 1056, 1058, 1798, 2162, 2165, 2908, 3588, 3589

Alt 8 hardly even mentions the gypsy moth control, salvage of moth-damaged timber, methods to maintain an oak component for our wildlife, methods to keep epidemic populations from spreading from your untreated stands into adjoining private land, etc

Letter 183 *Alternative 8 would, in my opinion, be a disastrous management policy with respect to Gypsy Moth suppression*

Letter 325 Alternative 8 will allow Gypsy Moth free reign and consequently drop oak and much wildlife in favor of other tree species, most probably pine and maple.

Letter 369 Gypsy moth: The Gypsy moth is a MAN-INDUCED pest that will have a SEVERE, NEGATIVE IMPACT. Left untreated, much of the oak component will be destroyed. Visitors will be faced with an unhealthy brown forest *that looks like mid-winter in July The danger from falling limbs will be a very real hazard. Lack of treatment will* devastate old growth timber stands. It is absolutely imperative that every chemical and silvicultural tool available be used on as much of the Forest as possible to combat the gypsy moth. Silvicultural treatments applied prior to the moths' invasion can limit damage and assure adequate oak regeneration. Alt 12: 879,340 acres are avail. for treatment; the harvest level and harvest methods allowed will provide urgently needed mgt. flexibility.

Letter 516 I am opposed to Alternative #8 due to its neglect of the Gypsy Moth issue

Letter 936 The Draft Plan does not aggressively address the coming Gypsy Moth. This pest knows no boundary lines and left to natural control, the pest will destroy the oak species on private and public timber lands of the County The County supports the use of effective pesticides along with silvicultural procedures to combat the spread of this destructive pest.

Letter 1253 The Draft Plan fails to provide an aggressive gypsy moth control plan.

Letter 1298 Ignoring the potential devastating affects of the gypsy moth on 79% of the forests under Alternative 8 is not practicing good stewardship

Letter 1304 Alternative 8 does not sufficiently prevent, control or salvage the effects of gypsy moth Many of our members own land adjoining the GWNF and fear that a lack of management on the GWNF will lead to damage by the gypsy moth on their lands.

Letters 1338, 2878, 2914, 3730
Alternative #8 fails to allow for proper treatment of the Gypsy Moth.

Letter 1377 I am strongly against this Alt. 8 which will allow the gypsy moth to kill 25%-30% of the National Forest. Our forests are already just about bare because of forest fires. Trees are just now starting to come back and if this gypsy moth gets out of control it could do more damage.

Letter 1543 The most disturbing part of Alternative 8 is that almost one half of the National Forest would not be protected *from gypsy moth damage.*

Letter 1826 Alternative 8 would allow Gypsy Moths to kill off 25-30% of the National Forest which will reduce oak and other mass producing trees. This, in time, will have a long-term negative impact on game species such as. deer, turkey, grouse, and squirrel.

Letter 2018 Alt 8 does not allow for any gypmo controls and without such, the gypmo will be in our area much sooner.

Letter 2531 Alternative 8 allows the unchecked and non-control of the Gypsy Moth so that it may infect 25% to 30% of the mast producing trees within the forest.

Letter 2616 In deciding to protect only those small portions of the forest that are classed as "suitable" for timber production from the Gypsy moth, U S Forest Service planners have made a decision to sacrifice much of the oak component of the George Washington National Forest to the advancing infestation. Failure to include in the plan an effective means of controlling Gypsy moth on the forest is a tacit decision to fundamentally alter the tree species composition

Letter 2623 It appears that alt. 8 plan would let 25-30% of the NF be destroyed by gypmo. This will have a devastating effect on our wildlife, which are already suffering due to loss of mast-producing trees, not to mention the waste of so much timber.

Letter 2635 The linkage between timber production acreage and gypsy moth treatment assures only minimal moth suppression on the forest Reliance on silvicultural treatments at this late date is no more than a cruel joke. This *devastating insect has already consumed significant state and federal resources in an effort to minimize*

environmental and economic losses Alternative 8 is unacceptably weak in dealing with moth depredation and constitutes a tacit decision to sacrifice much of today's mature forest, looking instead to what will surely be a much different forest forty to fifty years from now For the sake of the forest itself as well as for adjoining landowners the George Washington should be planning to aggressively combat the spread of gypsy moth.

Letter 2823 — The Covington-Alleghany Chapter of the IWLA believes that the GWNF must make an increased effort to preserve the oak component of the Forest Currently the only spraying done on the Forest to control gypsy moth is to protect high-use recreation areas, highways and a small research area Our Chapter strongly recommends that the GWNF select stands of oak over the entire forest that can be sprayed and protected. In addition, small scattered clearcuts of approximately 15-25 acres in size should be made in advance of the gypsy moth on the better oak-hickory sites It is essential that the GWNF put more emphasis on the impact of the gypsy moth on the long term health of the Forest ecosystem

Letter 3599 — Gypmo controls are too limited using Alt. 8, to minimize losses each and every method of control should be exercised whether it be chemical control or silvicultural control

Letters 3617, 2387 — The Draft Plan does not aggressively address the coming gypmo Left to natural control, the pest will destroy the oak species on private and public timber lands of the county. We support the use of effective pesticides along with silvicultural procedures to combat the spread of this destructive pest.

Letter 3683 — Alternative #8 fails to allow for the proper treatment of gypsy moths Besides the very real potential of considerable timber loss, there is the increased risk of wildfire

Letter 3814 — Alternative 8 virtually ignores any effective method of managing Gypsy Moth Under this Alternative, only 50 percent of the forest would even be available for Gypsy Moth treatment

Letter 3822 — In some areas the moth populations need to be kept in checked The National Forest should have the option to do this where needed Alternative 8 does not provide enough acres open to treatment to provide foresters and other resource professionals the option of controlling the gypsy moth.

Letter 3884 — A full-scale gypsy moth war needs to be added to Alternative 8

Letter 3940 — The Draft Plan does not provide adequate direction on how the GWNF will deal with the existing gypsy moth problem We recommend that the GWNF develop a proactive policy detailing both pre-moth (e g , silvicultural methods) and post-moth (e.g., salvage, spraying) strategies. Biologically-oriented protocols should be developed utilizing state, federal, and academic biologist expertise

Letter 3956 — Alt. 8 makes no allowance for moth mgt.

Letter 3963 — The Recorder, 27 Mar 1992. "There should be a lot more consideration put into this plan about the gypsy moth."

Letter 4257 — The reduction of gypmo controls in Alt 8 would most likely result in an increase in the gypmo populations and this will be disastrous for the area's public and private lands

Response — The treatment policy for the Forest Service preferred alternative is discussed in Chapter 2 of the Revised Plan under "ISSUE 11 — GYPSY MOTH"

Table 3-11 displays the amount of lands "generally available", "available under limited circumstances", and "not available" for insecticide treatment Alternatives 8, 8A and 12 contain no acreage that is "not available" Of all the alternatives, Alternative 12 has the most acreage that is "generally available"

For the Forest Service preferred alternative, 63% of the Forest is "generally available" and 37% of the Forest could be considered for treatment only under limited circumstances In practice, only a small number of acres have been treated annually. Over the past five years, the treatment acreage has ranged from 200 to 7,871 acres, with an average of 4,610 acres per year This amounts to about 6 4% of acreage severely defoliated by the gypsy moth every year

The Revised Plan does not limit the treatments of gypsy moth populations to lands suitable for timber production Silvicultural practices cannot control gypsy moth populations

Defoliated and recently killed trees within stands can increase the difficulty of suppressing wildfires and decreases the safety of firefighters Additional downed material can increase the intensity of wildfires This hazard, however, decreases over time as new vegetation replaces the dead trees

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Letter 2542 The forest managers should be given as much latitude as possible to combat this destructive pest (gypsy moth) This includes the number of acres that could be considered for insecticide treatment We endorse having the ability to treat 879,340 acres per year

Response All reasonable options for the management of gypsy moth populations and their impacts are available under Alternative 8A The use of any of these options must be based on sound biological evaluations and compelling economic analysis.

Letter 279 [Suggest] additional study of the effects of gypsy moth presence.

Letter 3984 I propose as a mitigation of the very real gypsy moth problem a massive increase in research done by the Forest Service on integrated pest management that would involve biological controls of the moth, coupled with a monitoring program that does not involve salvage sales

Response Many groups, including Universities, Forest Service Research, and other research branches of the Department of Agriculture are studying the effects of gypsy moth on forest ecosystems

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Letters 145, 374, 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1428, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2338, 2379, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 3904, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

Alternative 12 will accommodate the use of effective pesticides to combat the spread of the moths

Letter 183 Alternative 12 is the best management plan for suppressing the spread and the destruction of the Gypsy Moth

Letter 753 My family owns some hardwood timberland in Amherst County The acreage is not presently infested with gypsy moth but acreage in the area is If the National Forest does not make a maximum effort to control the gypsy moth we may suffer the consequences I believe that Alt 12 of the plan would best serve the interests of the entire public, especially if it can be modified to give more emphasis to gypsy moth control

Letter 1058 Gypsy Moth problems can be better addressed with Alternative 12

Letters 1166, 3423, 3424, 3822

Provisions for Gypsy Moth control or treatment are limited, with only 50% being available for treatment in Alternative 8 I believe the 83% in Alternative 12 will do more to minimize losses, not only on the Forest Service lands, but on nearby private lands as well

Letter 1293 I support Alt. 12 I feel that the threat of the gypsy moth is an important concern. The trees of the NFs should be protected and preserved Not only am I concerned for the financial effect of the loss of trees, but I am also concerned for the environmental effect I often enjoy controlling the overpopulation of many varieties of wildlife, by hunting I do not wish to imagine our forests without the presence of wildlife By ignoring the issue of spraying for gypsy moths, we are allowing the slow destruction of the forests

Letter 1984 I am in favor of Alt 12. Failure to use pesticide to control the population growth of the gypsy moth will eventually result in a great decline in our native American wildlife due to a lack of habitat Selecting only certain areas as suitable for saving will also have a devastating effect on the wildlife as the mast from oak trees is their source of food

Letter 2066 Adequate flexibility to deal with the gypsy moth should be in the plan In this respect, Alternative 12 permits greater acreage to be treated Gypsy moths are going to be going through the whole forest over the next 10 to 15 years They will be a major factor in recreation and timbering They will probably alter the nature of many areas of the forest There should be adequate provision in the plan to adapt to the changes this will involve.

Letter 2348 With gypmo approaching, Alt 12 insures the survival of our forest It allocates a 33% increase in acreage for treatment

Letter 2531 All reasonable efforts possible [should] be initiated to control and/or destroy the Gypsy Moth's growth and habitual destruction Alternative 12 is more suitable and encouraged

Letter 2587 Alternative 12 will allow more of the forest to remain in a healthy growing condition and should moderate the effects of pests like the Gypsy Moth which attack older, weakened forests

Letter 2610 Gypsy moth is a reality that will be with us for the foreseeable future. Left to its natural consequences, the infestation will destroy much of the oak component of the forest and, we now understand, much of the sprout regeneration that it was assumed would replace the mature trees that die Alternative 12 will accommodate, the use of effective pesticides to combat the spread of the moths. In lieu of pesticides, specified timber harvests are an absolutely essential tool Forest managers must be able to prescribe timber harvests before infestations take place in order to preserve tree species diversity.

Letters 2647, 2642, 2643, 2644, 2646, 3320
I support Alternative 12 as far as gypsy moths If the forests aren't treated for them there will be no forests for anyone

Letter 2926 The timber losses certain to be caused by the gypsy moth will be vastly greater with Alternative 8 Alternative 12 allows more realistic levels of pesticide treatments to control gypsy moth, and an allowable sale quantity that would allow the GWNF staff to plan harvests before infestation occur so our timber resources are not wasted!

Letter 3706 Alternative 12 will provide for adequate means to combat the Gypsy Moth spread and prevent the destruction and loss of the valuable timber resource

Letter 3939 Alternative 12 will accommodate the use of effective pesticides to combat and slow the spread of the moth

Letter 3951 Gypsy Moth - Keep as in Alternative 12

Letter 4059 This plan (Alternative 12) will be more effective in combating the gypsy moth by using effective pesticides to prevent the spread of the moths. Something must be done to protect our oak trees from devastation by these pests

Response Eradication of the gypsy moth is no longer considered feasible

The revision of the Forest Plan does not involve the magnitude of the gypsy moth control program As discussed in Chapter 2 of the Revised Plan under "ISSUE 11 — GYPSY MOTH", the protocol developed under the Appalachian Integrated Pest Management (AIPM) — Gypsy Moth Demonstration Project is used to make such decisions Any decision on the amount of treatment undertaken in any given year must be supported by site-specific environmental analysis and disclosure Such analysis is outside the scope of the revision of the Forest Plan

Table 3-11 displays the amount of lands "generally available", "available under limited circumstances", and "not available" for insecticide treatment. Alternatives 8, 8A and 12 contain no acreage that is "not available" Of all the alternatives, Alternative 12 has the most acreage that is "generally available"

The widespread use and reliance on insecticides is biologically ineffective It will not stop the spread of gypsy moth Furthermore, widespread use would adversely affect the biological diversity of other insects inhabiting the Forest

The gypsy moth is becoming a naturalized part of the hardwood forest ecosystem of the Forest The Forest will change as a result of the gypsy moth These changes will play out over several generations of trees Forest change will be a long-term process The Revised Plan recognizes the importance of ecosystem processes and diversity in the changing landscape of the hardwood forest following the appearance and establishment of the gypsy moth

There is concern about the effects of gypsy moth mortality on the oak component, and indirectly on many wildlife species Repeated gypsy moth defoliation may severely damage the oaks in some stands and may reduce the density of oaks in other stands However, most of the oaks are not being destroyed in gypsy moth

impacted areas Forest change is inevitable now that the gypsy moth is spreading throughout the Forest. The gypsy moth will initiate a long process of forest change and adaptation, where weakened trees die and are replaced by new vegetation. Trees surviving gypsy moth impacts will continue to grow and provide resources for wildlife.

On areas of the Forest that receive heavy gypsy moth defoliation and subsequent mortality, compositional shifts in vegetation patterns and species dominance are anticipated The Revised Plan includes provisions for monitoring the oak component of the forest, along with other species, in order to evaluate the impact of gypsy moth defoliation.

Alternative 12 has a more aggressive timber salvage program than Alternative 8A. Alternative 12 has more acreage suitable for timber production and, therefore, more acreage where silvicultural practices could be employed to regenerate oak species.

Letter 56 — We landowners contiguous to the National Forest strongly support all Forest Service efforts in gypsy moth control.

Letters 1166, 3423, 3424

In Alt. 12 provisions for Gypsy Moth control or treatment are 83% and will do more to minimize losses, not only on Forest Service lands, but on nearby private lands as well. As a private land owner near GWNF I feel threatened by your actions in Alternative 8 has 50% available for treatment.

Letter 2262 — We urge the adoption of Alternative #12. One of our concerns involves the Gypsy Moth Unless adjacent public lands are also protected, the gypsy moth can overwhelm the efforts of private individuals If oaks, are lost from large areas, it will be tragic for such species as deer, squirrels, turkeys, and bears, as well as many other animals

Letter 2342 — Alternative #8 would surely cause the spread of gypsy moth on the forest, the private landowner will have no chance to control the moth on his private property.

Letter 2633 — Many adjoining landowners have also expressed concern about uncontrolled gypsy moth infestations in forest areas where no roads or control measures are allowed. These people in the main oppose wilderness designation.

Letter 3823 — The reduced level of control [of gypsy moth] proposed in Alternative 8 would accelerate the destruction of our members private stands of timber.

Response — Chapter 2 of the Revised Plan contains a discussion of the gypsy moth program for the Forest Service preferred alternative under "ISSUE 11 — GYPSY MOTH".

The most efficient approach to gypsy moth management is to allow populations to rise and fall naturally. A virus disease (NPV) usually brings about a collapse of damaging gypsy moth populations in one to three years

There are no data to support the contention that populations of gypsy moth that are under natural control will in any way influence timber impacts on private lands Populations on private lands increase and decrease relative to natural control and through pest suppression on those private lands

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Letter 56 — Of particular concern to our Forest contiguous acreage, homes, and buildings is the need for a GW Forest suppression buffer strip as wide as possible next to the private land This would lessen blow-overs from untreated Forest land and, more important, provide a form of fire break as the untreated Forest becomes shadeless dry trees and tender understory

Response — Treatment of a buffer strip of National Forest land to manage gypsy moth adjacent to private landowners would only perpetuate the population in a pre-outbreak mode and would be too costly to implement. Many landowners do not want insecticides sprayed on their forest and indicate that they would prefer little or no spraying on the Forest

Letter 3711 The impact of gypsy moth on board harvest should be considered.

Response The impact of gypsy moth on forest vegetation is covered in the Vegetation section of the FEIS

Letter 1456 Because of the threat of gypsy moth, I feel we should keep all mgt. options open to allow for treatment of areas, salvage of dead trees

Letter 3927 Because of the threat and uncertainty of the effects the gypsy moth will have on the forests, I think all options should remain open for treatment of the areas, salvage of dying and dead trees, etc

Response The Revised Plan was written to provide forest managers with reasonable options for managing gypsy moth outbreaks and gypsy moth impacts, with due consideration given to the ecological adaptation of our forests and the exploitation of natural biological control agents.

Letter 2060 The gypsy moth is here to stay It must be allowed to integrate into the ecosystems and be brought under natural biological control.

Response Forest managers recognize that the gypsy moth is here to stay. Forest change and adaptation will be a long-term process. The ecological processes of plant succession and biological control on the Forest will be important stabilizing forces in the adaptation of our hardwood forest ecosystem

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Letter 2203 You don't have an alternative listed that adequately addresses the gypsy moth None call for enough Dimilan *spraying Bt doesn't work No alternative calls for enough advanced cutting, before infestation What about* salvage? You should offer every stick of wood the market will bear.

Response The Revised Plan does not identify specific treatments for gypsy moth Such a decision requires site-specific analysis and disclosure As such, it is beyond the programmatic analysis supporting the Revised Plan

Those gypsy moth treatments which are evaluated in the *Final Environmental Impact Statement -- Appalachian Integrated Pest Management (AIPM) -- Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 -- USDA Gypsy Moth Suppression and Eradication Projects* may be considered to manage gypsy moth populations on the George Washington National Forest.

Table 3-11 of the FEIS demonstrates that a number of alternatives permit treatment on virtually all of the Forest.

Alternative 5 has a very ambitious silvicultural and salvage program. It is debatable if the local timber market could absorb more volume than would be offered annually if this Alternative is selected as the Revised Plan.

Letter 2483 The Gypsy Moth infiltration into our forests deeply concerns me. It would be a shame to see our oak and possible other hardwoods go the route of wild chestnuts Alternative 12 sounds by far the better route to take as opposed to #8. I'm asking you to put Alternative #12 into action as soon as possible

Response The tendency to equate the loss of American Chestnut to chestnut blight to the loss of oaks to gypsy moth is not valid. Long-term research has demonstrated that oak woodlands persist in spite of the gypsy moth

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Letter 4241 We urge the Forest Service to monitor the impact of gypsy moth defoliation on the oak component of the forest

Response The Forest Service will document annual gypsy moth defoliation and periodically determine the extent of severe stand damage. Stand inventory data are obtained on suitable lands on a ten year cycle

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Letter 4241 Gypsy moth defoliation on the 150+ year old oak-dominated stands should be studied immediately in order to assess the impacts of this pest on the structure and species composition of potential old-growth forest

Response — The oak stands on the Forest are aging As they age, mortality from oak decline, gypsy moth and other natural causes is anticipated. The Revised Plan was developed under the understanding that a naturally evolving ecosystem is one of the values that the public wants on the George Washington National Forest This value has to be balanced against the other values, products, services and uses needed and wanted by the public

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Letter 2531 — The deer herds will be forced to relocate to find food and thus the farmers will suffer in crop loss The turkey populations will decline from lack of a food source as well as other species of wild game and non-game animals within all effected areas

Response — To date, research has demonstrated that only squirrels are adversely impacted by gypsy moth defoliation Other game species seem to be able to maintain populations in the wake of gypsy moth impacts

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Letter 505 — I feel that doing nothing about Gypsy Moth is not letting nature take its course since these pests were introduced by man without natural predator to keep their population in balance Ideally, introducing these predators without causing additional imbalance to the ecosystem would be the desired solution but this could be as risky as the introduction of the gypsy moths themselves

Response — *The principal natural enemy of the gypsy moth is a species-specific disease agent, called a nucleopolyhedrosis* virus or NPV It was unwittingly introduced into the United States by entomologists in the early 1900s on the body of wasp parasites of the gypsy moth Many other natural enemies have been introduced over the years, some have become established and others have not Natural enemies that are specific to gypsy moth are favored over natural enemies that attack many different insect species Introduction of the latter type of natural enemy may adversely impact the abundance of other insect species in our woodlands

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Letter 2342 — Alternative #8 would be the beginning of the end of timber supplied from the National Forest. A lot of people's livelihood could be affected if the proposed plan #8 goes into effect.

Response — *Repeated gypsy moth defoliation may severely damage the oaks in some stands and may reduce the density* of oaks in many other stands However, most of the oaks are not being destroyed in gypsy moth impacted areas. Forest managers recognize that forest change is inevitable now that the gypsy moth is spreading through the Forest The gypsy moth will initiate a long process of forest change and adaptation, where weakened trees die and are replaced by new vegetation This should not, however, be construed as "the beginning of the end of timber supplied from the National Forest."

Letter 2531 — This is ill-advised with an expected wide-spread effect contrary to good forest management The impact from such action will not only destroy a food source for game and non-game species alike but such action may well prove to be fatal to more than the proposed high estimate of forest loss

Letter 2545 — The gypsy moth is not a natural threat We should be as active and assiduous in meeting this threat as we would be in fighting a forest fire.

Response — While the impact of gypsy moth on the vegetation of the Forest is a serious concern, we must learn to live with the impacts of gypsy moth and allow, for the most part, natural enemies to regulate gypsy moth populations Direction in the Revised Plan provides forest managers with reasonable options for managing the gypsy moth and its impacts.

Letter 1368 — Gymo· The Council recommends the substitution of the policy statement in Alt. 9 which would permit the gypmo to run its natural course, except in cases when intervention is needed to protect critical habitat for endangered, threatened, or sensitive species

Response — The Forest Service believes that limiting treatment of gypsy moth populations only to situations where it is "needed to protect critical habitat for endangered, threatened or sensitive species" is too restrictive. In practice, only a small number of acres are treated annually Over the past five years, the treatment acreage has ranged from 200 to 7,871 acres, with an average of 4,610 acres per year. This amounts to about 6.4% of acreage severely defoliated by gypsy moth every year

Letter 82

The Forest says it will strive for an average rotation of even-aged stands of 135+ years in Management Areas 14 and 15 With the arrival of the gypsy moth, this may not be possible We request a reexamination of this standard in light of gypsy moth impacts.

Response

Long rotations will help meet the desired future condition for these management areas. We must not abandon desirable objectives at the first sign of a problem, but rather we must learn to live with the impacts of gypsy moth and allow, for the most part, natural enemies to regulate gypsy moth populations Direction in the Revised Plan provides forest managers with reasonable options for managing the gypsy moth and its impacts

Letter 56

As to the alternatives proposed, we believe the Forest Service is in the best position to determine how to control the moths with very limited resources This would be Alternative 6

Response

In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Plan. This selection will involve a number of factors including the response of the alternatives to concerns about gypsy moth.

Letter 1546

I am most concerned with the use of pesticides to control the gypmo In general, the less the human interference, the healthier the ecology. Even when acting with only good intensions, the tinkering of mankind with nature often has unexpected and often immeasurably destructive results. Pesticides are incredibly dangerous substances to be using in a forest which harbors some of the last remnants of a natural and fully functioning ecology. The hazards involved in treating the gypmo outbreak cannot be rationalized by the benefits Good sawtimber and preserving a pretty forest in the short term so people won't be shocked by little worms and defoliage doesn't seem like a good reason to tinker with pesticides on such a massive scale A natural solution, such as introduction of a natural enemy of the gypmo or simply letting nature run its course is a far better solution The ecology simply needs time to adapt to its introduction and restore some checks and balances Only dense stands of oaks will be affected Once those die out other species not as favorable to gypmo will move in The gypmo infection will die down as its favorite food source becomes scarce. Isolated oaks will be able to continue the presence of the species in the forest until an opportunity to repopulate occurs There is nothing inherently wrong with different species achieving domination in the Forest, either temporarily or permanently. If the Forest uses pesticides no natural balance will ever be achieved. The gypmo infestation will continue

Letter 2665

Your entire gypsy moth program and salvage sale is flawed and misrepresented The EIS notes detrimental impacts on birds, fish, mammals and gypsy moth predators (EIS, 3-44-47). Treatments delay the collapse of gypsy moth populations (EIS, 3-40). The gypsy moth itself is much less a threat (EIS, 1-5) to the forest than is the gypsy moth program itself (EIS, 3-44). The clearcutting/salvage program does not preserve the oak component. A "no action" alternative would minimize long-term gypsy moth effects in the forest (EIS, 3-110), the closest alternative which is Alternative #3 (Plan C-46). There is no evidence to suggest that oak might regenerate on sites of higher relative mortality

Response

The gypsy moth is becoming a naturalized part of the hardwood forest ecosystem of the Forest. Forest managers recognize that the Forest will change as a result of the gypsy moth These changes will play out over several generations of trees. Forest change will be a long-term process The Revised Plan and FEIS recognize the importance of ecosystem processes in the changing landscape of the hardwood forest following the appearance of gypsy moth

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Letter 1546

The amount of pesticide residues will build up in animals, in the soil, the waters, and throughout the surrounding ecosystem. The pesticide to be used will not be as selective and kill only the gypmo. It will kill all leaf-chewing arthropods and butterflies and moths in the areas to which it will be applied. That can not help but disrupt many food chains in the ecosystem, especially birds Alt. 8 proposes to apply the pesticides to 530,886 ac The application of pesticide to that large an area may have potentially devastating effects

Response

The adverse impacts of insecticide use are documented in the FEIS Although all acres may be considered for treatment, the George Washington National Forest typically treats between 2,000 and 8,000 acres annually The majority of these acres are associated with recreation areas or are associated with experimental studies to evaluate the impact of gypsy moth on national forest resources and to evaluate the effectiveness of various gypsy moth control tactics

Letter 1821 There are no effective silvicultural treatments presently available once gypsy moth has infested an area. Dimilin has proven to be the most effective control for gypmo and is also safe when used around animals and humans. Therefore, I encourage you to use this effective tool, at least for the short term, until an acceptable silvicultural control is developed. I find it deplorable that you suggest setting aside remote areas so they can be devastated by an introduced exotic insect such as gypmo

Letter 2265 I strongly support the use of dimilin spraying program similar to programs instituted by State of Va. mandate Not to follow such a course of action would be to waste much-needed State funds by allowing Va's and WV's NFs to become unimpeded breeding grounds for the gypsy moth.

Letter 2727 Gypsy moth needs better control efforts than all the alternatives listed. BT spraying is a waste of time. Use Dimilin.

Letter 3705 Emphasis for pest management should be based on protection of high value, common recreation/scenic or biological areas Chemical pesticide should be minimized.

Response The revision of the Forest Plan does not identify specific treatments for gypsy moth. Such a decision requires site-specific analysis and disclosure. As such, it is beyond the programmatic analysis supporting the Revised Plan.

The protocol for the treatment of gypsy moth populations has evolved under the Appalachian Integrated Pest Management (AIPM) – Gypsy Moth Demonstration Project Decisions on the specific treatments are made annually based on Forest health evaluations by professional entomologists, economic analysis and site-specific environmental analysis tiered to the environmental disclosure in the *Final Environmental Impact Statement — Appalachian Integrated Pest Management (AIPM) — Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 — USDA Gypsy Moth Suppression and Eradication Projects.*

Those gypsy moth treatments which are evaluated in the *Final Environmental Impact Statement — Appalachian Integrated Pest Management (AIPM) — Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 — USDA Gypsy Moth Suppression and Eradication Projects* may be considered to manage gypsy moth populations on the George Washington National Forest.

Treatment of defoliating populations of gypsy moth are based on sound biological evaluations and compelling economic analysis. Treatments to prevent gypsy moth defoliation are not justified where the benefits of treatment are less than the cost.

Letter 2664 The Forest as we know it today will change drastically over the next 20 years due to the impact of the gypsy moth The VWTF believes that the GWNF must make an increased effort to preserve the oak component of the Forest Currently the only spraying done on the forest to control the gypsy moth is to protect high-use recreation areas, highways and a small research area. The VWTF strongly recommends that the GWNF select stands of oak over the entire forest that can be sprayed and protected

Response There are no data that suggest that turkey populations will be adversely affected by the gypsy moth However, if adverse impacts are documented, Alternative 8 permits the consideration of treatment to manage gypsy moth populations in management areas associated with timber and wildlife

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Letter 3840 No suppression of gypsy moth activities allowed in Little River, Mount Pleasant, Management Areas 9 or 13B.

Response Alternative 8A has been formulated to include changes in the management area write-ups and allocations Except for the three roadless areas recommended for wilderness study, the remaining 24 roadless areas may be considered for treatment

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Letter 2608 We have some deep concerns about Gypsy Moth and both the short term and long term effects on the forest. Apparently the alternatives call for control only on areas to be managed for timber with controls being, for the most part, silvicultural We believe that old growth areas should be protected to prevent ultimate devastation. It would seem that aerial applications of effective pesticides is the only way this can be done

Response

The application of insecticides to stands with old growth characteristics would result in the possible elimination of many different species of insects that may only occur in these stands. Treatments may result in a reduction of the biological diversity of these stands At present, the ID Team has no evidence to suggest that old growth stands are more susceptible to damage from repeated gypsy moth defoliation than are other stands.

Letter 3537

The loss of oak and other species that produce hard mast in the region should be a great concern in maintaining ecosystem diversity The gypsy moth and other forest stresses threaten to reduce the oak component of the region's forest. The Wilderness Society recognizes the profound management dilemma this situation presents We urge the Forest Service to monitor the impact of gypsy moth defoliation on the oak component of the forest.

Response

The gypsy moth is becoming a naturalized part of the hardwood forest ecosystem of the Forest. The Forest will change as a result of the gypsy moth. These changes will play out over several generations of trees Forest change will be a long-term process The Revised Plan recognizes the importance of ecosystem processes and diversity in the changing landscape of the hardwood forest following the appearance and establishment of the gypsy moth

There is concern about the effects of gypsy moth mortality on the oak component, and indirectly on many wildlife species. Repeated gypsy moth defoliation may severely damage the oaks in some stands and may reduce the density of oaks in other stands However, most of the oaks are not being destroyed in gypsy moth impacted areas Forest change is inevitable now that the gypsy moth is spreading throughout the Forest. The gypsy moth will initiate a long process of forest change and adaptation, where weakened trees die and are replaced by new vegetation Trees surviving gypsy moth impacts will continue to grow and provide resources for wildlife

On areas of the Forest that receive heavy gypsy moth defoliation and subsequent mortality, compositional shifts in vegetation patterns and species dominance are anticipated The Revised Plan includes provisions for monitoring the oak component of the forest, along with other species, in order to evaluate the impact of gypsy moth defoliation

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Letter 3894

All chemical herbicides and pesticides are unsafe and should be banned Most importantly, Dimilin or similar chemical compounds should not be sprayed when other safer Gypsy Moth controls are available such as Bt and Gypcheck

Response

Alternative 3 explores the question of prohibiting the use of pesticides and other chemicals in the management of the Forest Such a decision would entail changing existing national and regional policies established in previous decisions by the Chief and the Regional Forester

The Revised Plan does not make any decision to use herbicides, insecticides, defoliants or other pesticides It merely permits their use in accomplishing any project Prior to the use of any pesticide, a site-specific environmental analysis must be performed and the environmental consequences of utilizing any particular pesticide in a project must be disclosed Any site-specific environmental analysis on the use of pesticides will be "tiered" to the environmental disclosure in one or more of the following environmental impact statements· *Final Environmental Impact Statement -- Appalachian Integrated Pest Management (AIPM) -- Gypsy Moth Demonstration Project*; *Final Environmental Impact Statement as Supplemented [in] 1985 -- USDA Gypsy Moth Suppression and Eradication Projects*; and *Final Environmental Impact Statement for Vegetation Management in the Appalachian Mountains*

The Forest Service reserves the right to use chemicals approved by the Environmental Protection Agency and listed in the three environmental impact statements when they can be correctly applied and when they are deemed appropriate by the deciding officer The Revised Plan contains standards that must be used whenever a decision is made to employ pesticides in a project designed to achieve the goals and objectives of the Revised Plan

Letter 145 Silvicultural control of the gypsy moth will be ignored or limited over a high percentage of the forest Clearcuts ahead of the moth's invasion can assure adequate oak regeneration with both seedlings and sprouts.

Letters 145, 374, 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 985, 991, 992, 993, 1194, 1195, 1196, 1428, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2379, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091
Forest managers must be able to prescribe timber harvests before infestations take place in order to preserve tree species diversity

Letter 490 Alt. 12 will allow more of the forest to remain in a healthy growing condition and should moderate the effects of pests like the gypsy moth which attack older weakened forests Maintain biological diversity through harvesting is an accepted and essential method of protecting the forest from this foreign pest Left in a natural, unmanaged state, much of the oak component of this forest will be destroyed and wasted, losing wood, rec, and visual values

Letter 502 Oak trees should be harvested in advance of gypsy moth infestation

Letter 704 The Plan will put my timberland at risk by not managing intensively enough to lessen the effects of gypsy moth

Letter 749 I would encourage the utilization of silvicultural alts to control the effect of Gypsy Moth infestations I feel a program of spraying to control the spread of Gypsy Moth, and planned harvesting, in advance of the infestation, is desirable

Letter 1446 *With no clearcutting, how do you propose to realistically check, control, or eliminate the gypsy moth?*

Letter 1470 I disagree with Alt 8 This will not keep the forest in good health and with the infection of the gypmo the mature timber is at great risk of bad damage with no young timber ready to take its place

Letter 1858 The George Washington National Forest is being threatened by impending gypsy moth infestation. In order to prepare for this pest, silvicultural prescriptions must be made to preserve the oak component and vitality of the forest

Letter 2253 I urge you to look more favorably on 12 The gypsy moth has begun to damage our forests and we will need to remove those trees for the protection of the other trees before infestations from other insects destroys what is left In using alternative 12 effective use of pesticides will be allowed

Letter 2256 Alternative 8 does not provide for the sale of enough timber from the forest or adequately address the Gypsy Moth threat

Letter 2257 Alt 8 will continue to allow the spread of the gypsy moths and kill 25% to 30% of the NF which will reduce oak and other mast-producing trees By allowing this to happen, you have reduced the value of your oak stands dramatically, not to mention the impact this would have on the people who rely on timber harvesting as a way of life

Letter 2258 I understand this plan would reduce timber harvesting and allow the gypsy moth to spread through the forest Both of these aspects of the plan would have an adverse effect on a valuable resource.

Letter 2275 [Alternative 12 would] help control the gypsy moth by removing trees using them in a more efficient way

Letter 2316 [Alternative 12] allows parts of the forest to remain in healthy growing condition This will moderate the effects of the gypsy moth rather than leave the forest to grow old, weakened and subject to devastation by the gypsy moth

Letter 2538 Gypsy moth control would be greatly enhanced by harvesting stands of high value sawtimber species when they become susceptible to defoliation

Letter 2616	Silvicultural control of the Gypsy Moth will be ignored or limited over a high percentage of the forest [under Alternative 12]
Letter 2664	Silviculture treatment is the most cost effective long-term way to regenerate new oak stands Entire stands of oak are being eliminated from the Forest due to gypsy moth mortality It is essential that the GWNF put more emphasis on the impact of the gypsy moth on the long term health of the Forest ecosystem.
Letter 2679	Gypsy moth infestation will destroy much of the oak component of the forest, and I now understand, much of the sprout regeneration that it was assumed would replace the mature trees that die I support, and believe, that Alternative 12 will accommodate the use of effective pesticides to combat the spread of the moths In lieu of pesticides, specified timber harvest are an absolutely essential tool Prescribe timber harvest before infestations take place in order to preserve tree species diversity
Letter 3637	Consideration should be given to cutting high value hardwood timber in advance of the Gypsy moth to capture the value and assure regeneration of Oak species
Letter 3659	The gypsy moth is moving into this area. The timber harvest should not be decreased because every tree destroyed by the gypsy moth is value lost, which could have been an asset if harvested Most of the trees killed by the gypsy moth will also destroy the root system, however, trees cut for harvest will sprout from the root system
Letter 3660	Silvicultural treatments should be used (not considered) to reduce gypsy moth susceptability
Letter 3660	Must cut high value stands in front of the gypsy moth
Letter 3831	Harvest high quality sites ahead of the Gypsy Moth
Letter 3929	The fact that a stand of white oak will die due to heavy gypmo damage does not necessarily justify its harvest--especially thru clearcutting
Letter 3963	Virginia Review (Clifton Forge), 13 Mar 1992 The Forest Service should also take into consideration the impact the gypsy moth will have It makes more sense to harvest timber before it is destroyed by the insect.
Letter 4048	I am not buying into the smokescreen that the best way to control gypsy moth infestation, is to clearcut vast tracts of forest acres in advance of infestation
Response	Silvicultural practices will not control gypsy moth populations Alternative 8A has been formulated with an ASQ of 330 MMBF to permit the Forest Service to regenerate stands in eminent danger from gypsy moth mortality on lands suitable for timber production Some amount of mortality is unavoidable Chapter 2 of the Revised Plan under "ISSUE 11 -- GYPSY MOTH" discusses the use of silvicultural practices to reduce the susceptibility and vulnerability of forest stands New standards are included in Chapter 3 of the Revised Plan that provide for silvicultural practices to establish regeneration in advance of infestations on lands suitable for timber production Standards also allow for limited intervention to delay the impacts of gypsy moth defoliation before timber harvesting can be completed and the stand successfully regenerated
Letter 487	Alternative #5 is the only one (besides #14) that addresses the gypsy moth It reasonably aspires to harvest high value sawtimber prior to gypsy moth attacks
Response	Alternative 8A now contains a common standard that allows salvage of dead, dying or degrading trees to utilize high value products.
Letter 2696	Alternative 14 provides for slightly higher timber harvest levels With the future increased level of gypsy moth defoliation and resulting mortality, it is up to the forest to take the lead in harvesting valuable sawtimber before mortality With the increased concern for above cost timber sales, this would seem to be the logical and prudent method to maximize returns

Response	As displayed in Table 3-29, Alternative 8A regenerates almost as much acreage as Alternative 14
Letter 1980	- Because of the possible effect of gypsy moths on our hardwoods, we need to keep all of our options open in protecting our NF
Response	All reasonable options for the management of gypsy moth populations and their impacts are available under Alternative 8A. The use of any of these options must be based on sound biological evaluations and compelling economic analysis.
Letter 1300	Gypsy moth does not bother 30 year old or less stands of Oak as bad, so if you would cut more of your mature stands that are high in Oak composition you will be better off in the long run. Alternative 12 fits that bill the best.
Letter 1854	With Alternative 12 it should be possible to aggressively grow strong healthy trees, by regenerating clearcutting with seedlings and sprouts. Such young trees should be better able to resist the deadly Gypsy Moth.
Letter 2542	Everything practical should be done to minimize the negative impacts of the gypsy moth Also, as much of the dead and dying material as possible should be salvaged Clearcutting 30 to 40 acre stands of oak in advance of gypsy moth defoliation may help preserve the oak component from loss to the gypsy moth Whereas shelterwood, group selection and individual tree selection harvests will not be as effective
Letter 2616	Clearcuts ahead of the moth's invasion can assure adequate oak regeneration with both seedlings and sprouts
Letter 2913	Of the 259,036 acres deemed suitable, only 1% is to be harvested annually The only acceptable method of regenerating hardwood is by clearcutting This regeneration process is to be restricted to 300 acres per year. The balance of the 2,300 acres is designed to "set the table" for gypsy moth thereby increasing tree mortality be the insect As the insect moves into these areas, it will have few trees to feed on so all will be defoliated and thrown into stress, especially if cutting or release has occurred within the past 5 years.
Letter 2913	Since gypsy moth will feed on over 300 species, we can expect the meager 2,600 acres to be destroyed because forestry is not to be practiced Clearcutting the dead trees will be for salvage and of no value
Response	Preliminary observations seem to show that recently regenerated seedling/sapling stands are not defoliated as severely as older stands of pole timber and sawtimber size trees Also seedling/sapling stands have been observed to refoliate more completely and have less subsequent mortality Whether or not this observation could be repeated fot stands regenerated by shelterwood or modified shelterwood is unknown Not enough is known to say alternative 12 provides a better solution because it allows more clearcutting
Letter 2379	Forest managers must be able to prescribe timber harvests before infestations take place in order to preserve tree species diversity.
Response	The Revised Plan provides standards that allow silvicultural treatments in advance of gypsy moth infestations.
Letter 3537	Decisions to log should consider the importance that coarse woody debris and uneven-aged conditions provide to the structural diversity of the site Management decisions to salvage timber should evaluate whether logging will produce the desired future composition of the stand better than natural regeneration following gypsy moth-induced mortality Funds should be budgeted to initiate and continue a detailed study of the impacts that timber management and gypsy moth have on stand structure and composition (including herbaceous component) Gypsy moth defoliation on the 150+ year old oak-dominated stands should be studied immediately in order to assess the impacts of this pest on the structure and species composition of potential old-growth forest.
Response	The Revised Plan recognizes the importance of uneven-aged management as a silvicultural system. However there are concerns on how such a system can be applied to a large forest ownership, already of an even-aged character, comprised mostly of intolerant species. Portions of some management areas seemed suited to uneven-aged management based on several criteria developed by the ID Team The effects of gypsy moth and other agents will be observed and studied throughout the plan period as they affect all parts of the forest.

Letter 3728	The gypsy moth is and will be a dominant factor in its effect on the desired future condition of the GWNF. It is our recommendation that the oak/hickory forest type be maintained to the extent practical
Response	The Revised Plan includes standards that allow for silvicultural treatments to maintain as much oak/hickory forest type as is compatible with other resource needs

Letter 57	How determine gypsy moth highly susceptible stands? How regenerate? All this sounds good but is very vague.
Response	The Forest would use research to develop stand susceptibility guides. Based on site-specific analysis, regeneration would be by planting hardwood or pine seedlings when natural regeneration of desirable species was not adequate

GYPSY MOTHS AND OTHER PESTS: Other Pests

Letter 57	Avoid non-natural actions as a means of avoiding the natural pests of insects fungi, etc. This can usually be done on an individual tree basis and do not worry about openings large enough for regeneration values if such trees happen to be in groups.
Response	The Revised Plan and FEIS recognizes the role that natural enemies play in the regulation of pest populations To the extent possible, pest populations will be permitted to follow a natural course

Letter 2542	With the majority of the oak stands on the Forest being in the older age classes and having been subjected to extended periods of drought stress during the 1980's, there is already a high incidence of oak decline With the gypsy moth added to the picture, the negative impacts, which include severe tree mortality, are significant
Response	The oak stands on the Forest are aging. As they age, mortality from oak decline, gypsy moth and other natural causes is anticipated One of the assumptions inherent in the ecosystem management policy is the understanding that a naturally evolving ecosystem is one of the values that the public wants on the George Washington National Forest This value has to be balanced against the other values, products, conditions and uses needed and wanted by the public

Letter 3981	EIS: 3-47, paragraph 6 - A more balanced review of oak decline is necessary - (see Zohner)
Response	The discussion of oak decline failed to mention the significance of the ecological processes of nutrient cycling, forest succession, and stand dynamics as it relates to oak decline. This section has been rewritten to emphasize these ecological processes.

Letter 2913	The secondary organisms that actually kill the trees root systems preventing sprouting are. two-lined chestnut borer (agrilus bilineatus and shoestring root-rot carmillaria mellea), which you don't mention
Response	These organisms are mentioned on page 3-38 of the Draft Environmental Impact Statement

Letter 2232 — It will be prohibitively expensive to attempt to control the gypsy moth. We believe the focus should be on the salvage policy of timber killed by repeated defoliation Experience on salvage gained over the last 3 years need to be written into the Plan in more detail The research of Dr. Kurt Gottschalk should be included in the salvage policy.

Letter 2665 — Salvage sale areas are determined by access alone, i e. no biological standards for determining salvage suitability. This applies to all management areas and is a travesty, allowing clearcutting in all areas not afforded wilderness designation. All roadless areas, sensitive biological areas, and riparian areas should be protected from logging of all kinds

Letter 3567 — We oppose the salvage of timber in areas which are not being managed for timber. Management areas 9, 14, 15, and riparian areas are places which we feel should not be entered for this purpose. The simple existence of timber which has suffered insect or other damage is not enough reason to enter these areas for salvage, and, unless fulfilling some wildlife needs, these areas should not be cut for salvage

Response — The Revised Plan anticipates that most salvage operations will occur on lands suitable for timber production Most salvage will occur on suitable lands, and primarily along existing roads Occasionally salvage may occur on unsuitable lands and away from roads, as recently done on the Lee Ranger District using helicopter logging. The Revised Plan contains standards limiting the locations of salvage on unsuitable land to where it helps meet the desired future condition and provides for public safety

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Letter 2861 — If the moths leave a lot of dead oaks, etc., then by all means allow these to be selectively cut and removed.

Response — Part of the salvage operations will involve the removal of dead, dying or damaged trees that have usefulness as high value products

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Letter 2929 — Since the Gypsy Moth infestation may produce significant numbers of dead trees, the Forest Plan should describe specific criteria/guidelines for salvage cuts. Only dead trees--not adjacent trees or trees that may die--should be cut The timber harvested in salvage cuts should be included as part of the annual allowable timber yield from the Forest

Response — Salvage includes harvest of stands of trees dead, dying and, in some cases, damaged trees from causes including fire, wind, ice or snowstorm· and insect or disease attack Forest management is practiced on a stand basis, not an individual tree basis Repeated entries to salvage trees as they die would be disturbing to other resource values Salvage from unsuitable land is not part of ASQ, but will be part of the Timber Sale Program Quantity shown in the Revised Plan.

Letter 981 — The Plan is vague regarding salvage cutting it should describe specific guidelines for such cutting In the case of gypsy moth damage, only dead trees should be cut.

Letter 3705 — Salvage sales need to be spelled out more clearly - when, where and how.

Letter 3710 — We strongly object to the assumption that, if mortality from the gypsy moth does occur, it will be appropriate to conduct "salvage" harvests of affected stands Where stumpage has significant commercial value, the salvage concept may have some merit; value could be lost if the trees are subjected to the natural process of decay

Response — One of the justifications for salvage is to utilize high value products before that value is lost to decay Other reasons are to provide for public safety, provide for scenic rehabilitation, or meet demand for fuelwood.

Letter 3710 — Given the complete lack of any supporting data to justify the viability, costs, or benefits from gypsy moth harvesting, reference to this practice should be deleted from the George Washington's management scheme.

Response	The Revised Plan provides standards that allow salvage of dead, dying, and, in some cases, damaged, trees to utilize high value products, provide for public safety, provide for scenic rehabilitation, and meet demand for fuelwood
Letter 3814	Alternative 8 calls for some salvage cutting to take place after an area has been killed by Gypsy Moth This is no better than shutting the barn door after the horse has gotten out After timber has died, its commercial value drops drastically because of defects Its value will also be lower because the market will be flooded when everyone tries to sell their dead and dying timber at once Loggers do not like harvesting this timber because of the increased danger of the operation and the lower product value
Response	The Revised Forest Plan provides for a combination of salvage before mortality begins as well as after it has occurred
Letter 4262	Alt 8 puts no restriction on logging due to current gypmo defoliation and "potential" areas of gypmo defoliation, thus leaving timber available for salvage sales
Response	Repeated gypsy moth defoliation may severely damage the oaks in some stands and may reduce the density of oaks in many other stands However, most of the oaks are not being destroyed in gypsy moth impacted areas Forest managers recognize that forest change is inevitable now that the gypsy moth is spreading across the Forest The gypsy moth will initiate a long process of forest change and adaptation, where weakened trees die and are replaced by new vegetation The Revised Plan will display the Timber Sale Program Quantity which includes additional volume not included in the ASQ
Letter 4226	Given the biological richness of Laurel Fork, I encourage the GWNF to take preventive measures in an effort to preserve habitat for ETS and other species This follows [Standard] 17 for SBAs and 271 for Remote Highlands Such steps should precede harvesting live oak trees for salvage Only if preventive steps fail, should a carefully thought out salvage plan be undertaken
Letter 4226	The Warm Springs District Ranger is reported in The Recorder of April 17, 1992, to have predicted "salvage cuts of high grade older trees in Laurel Fork before too long," precipitated by gypsy moth destruction
Response	Laurel Fork has been designated as a special management area and is unsuitable for timber production Salvage, in all likelihood will not take place within the core of the area Any salvage would take place along existing roads, and would be carried out in an environmentally sensitive manner so as not to disrupt habitats for ETS species.

Letter 3685 — Failure to discuss the indirect effects of the alternatives (also required by NEPA and CEQ implementing regulations) This is especially important with respect to the road construction activities that accompany almost every alternative (as well as any construction activities associated with new recreational or other facilities). No mention was made of the effects of the actual construction of the roads (dust, noise, other disturbances caused by heavy machinery, etc.) or any efforts to mitigate those effects The EIS also did not discuss the secondary effects of increased access to more remote areas of the forest.

Letter 3685 — Failure to discuss at least the more predictable indirect effects, such as those associated with construction activities, may also lead to challenges to the statement's adequacy

Response — The Revised Plan is a programmatic document that establishes program direction and policy on the management of the Forest. Any projects discussed in the Revised Plan or FEIS are only proposals The Forest will be making subsequent decisions on the construction or expansion of any developed recreation sites and the construction or reconstruction of any roads based on site-specific analysis and disclosure.

Letter 3685 — Another major deficiency of the EIS was its failure to discuss mitigation measures for adverse impacts as required by NEPA and by the CEO implementing regulations Nowhere in the statement were mitigation measures discussed in any detail; often the EIS simply stated that such measures would be undertaken to the extent practical The statement should discuss possible mitigation measures in enough detail for the reader to evaluate which ones are practical. Failure to discuss mitigation in the EIS itself may give rise to future challenges to the statement's adequacy.

Response — The Council on Environmental Quality (CEQ) implementing regulations in 40 CFR 1502 14(f) state that the section of the EIS that contains the alternatives shall "include appropriate mitigation measures not already included in the proposed action or alternatives " It states in 40 CFR 1502.6(h) that the environmental consequences section shall include discussions of "means to mitigate adverse environmental impacts (if not fully covered under 1502.14(f)) " The last sentence of each write up of the alternatives in EIS Chapter 2 indicates that planning records contain details of Forest standards and management area standards that set forth the mitigating measures associated with each alternative. In addition, the standards -- and thus, the mitigating measures -- for the preferred alternative are disclosed in detail in Chapter 3 of the Revised Plan. This disclosure complies with the National Environmental Policy Act and the CEQ implementing regulations concerning mitigation measures

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Letter 3933 — Present undesirable condition of forest not described or addressed

Response — The environmental disclosure in Chapter 3 of the FEIS needs to be an objective description of the present condition of the environment and the anticipated environmental effects from implementing the alternatives. The ID Team has attempted to avoid value judgements such as describing the present condition of the Forest as "undesirable".

Letter 3933 — Benefits of gypsy moth defoliation not addressed (snags-dentrees-nurse logs-soil nutrients to mitigate soil drying from increased wind/sun)

Response — On page 3-38 of the DEIS, it is stated that forest insect and disease organisms contribute to many ecological processes of forests including nutrient cycling, plant succession, and forest dynamics Page 3-46 mentions the benefit of snags to wildlife.

Letter 3933 — Effects of herbicides and pesticides on non-target species not addressed

Response — The effect of insecticides on non-target species is poorly known Sufficient research results regarding the impact of gypsy moth suppression techniques are still a number of years away What is known at this time is presented in the FEIS

Letter 3933 — Costs of herbicides/pesticides not addressed

Response — The revision of the Forest Plan does not identify specific treatments for gypsy moth Such a decision requires site-specific analysis and disclosure As such, it is beyond the programmatic analysis supporting the Revised Plan

The protocol for the treatment of gypsy moth populations has evolved under the Appalachian Integrated Pest Management (AIPM) -- Gypsy Moth Demonstration Project. Decisions on the specific treatments are made annually based on Forest health evaluations by professional entomologists, economic analysis and site-specific environmental analysis tiered to the environmental disclosure in the *Final Environmental Impact Statement -- Appalachian Integrated Pest Management (AIPM) -- Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 -- USDA Gypsy Moth Suppression and Eradication Projects*.

Those gypsy moth treatments which are evaluated in the *Final Environmental Impact Statement -- Appalachian Integrated Pest Management (AIPM) -- Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 -- USDA Gypsy Moth Suppression and Eradication Projects* **may** be considered to manage gypsy moth populations on the George Washington National Forest.

Treatment of defoliating populations of gypsy moth are based on sound biological evaluations and compelling economic analysis. Treatments to prevent gypsy moth defoliation are not justified where the benefits of treatment are less than the cost

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Letter 3933 — "Effects on the human environment" not addressed

Response — All of the disclosure in Chapter 3 of the FEIS discusses the impacts of the alternatives on the "human environment"

Letter 3933 — Effects on the tourist industry not addressed

Response — There is no way to quantify what affect any alternative would have on the "tourist industry" Tourism can involve a variety of recreation users ranging from ATV or 4-wheel drive enthusiasts to wilderness backpackers. Chapter 3 contains a description of the effects of the alternatives on the many factors that affect tourism including the estimated changes in employment and income.

Letter 3933 — Effects of ASQ on forest ecology by using mill output as determining factor not addressed.

Response — Since the ID Team did not use mill capacity as the measurement for timber demand, this comment appears moot.

Letter 3933 — Effects and costs of not mining, timbering, roading, vegetation manipulation, "playing" not addressed

Response — Alternative 3 permits no mineral development, timber harvesting or vegetation manipulation It also minimizes opportunities for motorized recreation The effects and costs of Alternative 3 are disclosed in Chapter 3 of the FEIS.

Letter 3933 — Effects of damn dams on native aqua-fauna not addressed

Response — None of the alternatives include proposals to construct dams, so such disclosure is outside the scope of the revision

Letter 3933	The effects of "grazing" on wildlife was not addressed - how about 250 acres around caves
Response	Grazing is only allowed on 250 acres that are open and fenced, and the effects on forest wildlife is negligible Maintaining these lands open provides habitats for species preferring "edge" and open habitats Grazing does not occur around caves

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Letter 3933	Cost of "maintaining quality viewsheds" on forest from hiding (sightseers) timber operations from "SENSITIVE ROADS" to "openings" along "SENSITIVE ROADS" - not addressed.
Letter 3933	Benefits on wildlife from ROAD CLOSURES not addressed
Letter 3933	The effects of ATV-ORV on wildlife were not addressed.
Letter 3933	The effects of roads on wildlife were not addressed.
Letter 3933	Effects of "game management" on PETS not addressed
Letter 3933	Effects of anthropogenic trash on wildlife not addressed
Letter 3933	Cost of "WILDLIFE OPENINGS" not addressed
Letter 3933	Effects of "WILDLIFE OPENINGS" on forest ecology not addressed
Letter 3933	Effects on the human environment known - being told by FS agents that there are at least 240 species on the *brink RIGHT HERE ON THE GWNF not addressed*
Letter 3933	*Vision (of effects) for long-term motorized recreation on forest ecology not addressed (FS. 100 yrs - 1992* - ATV/ORV, hanggliders, autos, etc)
Response	The disclosure of environmental effects in Chapter 3 of the FEIS is for the entire alternative, not for specific *management practices or the effect of one environmental element on another. Thus, specific disclosures on the* effects of wildlife openings or motorized recreation are not discussed Instead, the changes to the different *environmental resources* from all of the management practices and activities associated with any alternative are discussed

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Letter 3933	Effects of 240 species on GLOBAL ECOLOGY not addressed
Response	This specific point is beyond the scope of the revision

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Letter 3933	The effects on PETS under Alt #3 not addressed
Response	All threatened, endangered, and sensitive species are managed to maintain or enhance their habitat in all alternatives This is a legal requirement that does not vary between alternatives

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Letter 3933	Ecological effects on waterways from developed recreation sites not addressed.
Response	Such effects will be discussed in environmental assessment completed for each project. Effects on watersheds are considered in all alternatives in all management areas

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Letter 3981	EIS 3-19 - Table 3-3 - An estimation of the RN Capacity in Alternative 3 is inaccurate Merely basing this number on the amount of RN acreage does not take into account the fact that developed recreation sites are left open, nor does it consider which roads remain open - all federal state and county roads are still in place, as are most FS roads Of great importance is exactly which roads are closed under Alternative 3, and whether these are presently open or closed to the public This information must be determined, displayed, and considered in the EIS

Response — The roaded natural recreation opportunity spectrum acreage displayed in the FEIS for Alternative 3 was calculated to a high degree of accuracy. The ID Team mapped all of the acreage within 1/2 mile of open roads, not proposed for closure in Alternative 3, on quadrangle sheets and calculated the acreage in the Geographic Information System This calculation involved not only open Forest Service system roads but also state and federal highways

A specific disclosure of the roads removed from the inventory doesn't improve the ENVIRONMENTAL disclosure in Chapter 3 of the FEIS. The present disclosure enables the reviewer to determine the relative degree of motorized access on the Forest associated with each alternative This disclosure is consistent with the concern for motorized access on the Forest.

Furthermore, the status of the Forest Service Transportation System is ephemeral in nature. Roads are added or deleted from the system on an annual basis Decisions to open or close system roads are also made on a recurrent basis. A discussion of the miles of open or closed roads removed from the Transportation System would only be valid in terms of the existing inventory at the time of the calculation

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Letter 3981 — EIS 2-9, paragraph 8 - "Wildlife" is so nebulous a term as to be virtually worthless Change to "Manipulations to favor game may occur on approximately 95% of the Forest". This 39% figure is false - the majority of MAs are going to habitat alterations "

Response — This paragraph has been changed

Letter 3981 — EIS. 3-26, paragraph 2 - With logging in riparian areas, ATVs in Special Biological Areas, roads in "Remote Highlands," and game management everywhere, Alt 8 does not emphasize PETS or unfragmented habitat

Response — The Revised Plan emphasizes TES species wherever they occur with the use of appropriate management areas and standards The Revised Plan does not allow for ATVs in Special Biological Areas, new roads in Remote Highlands, nor will game management occur on every acre forestwide. Some timber harvest will be allowed in riparian areas on a highly regulated basis. Extensive areas of unfragmented habitat will be provided for in Management Areas 4, 5, 6, 7, 8, 9, 10, 13, 18, and 21 along with the remote portions of Management Areas 14 and 15 while providing for multiple-use benefits in other Management Areas

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Letter 3981 — EIS: 3-26, paragraph 2 - With a "roaded natural" acreage of 649,179 acres, nor does [Alt. 8] favor non-motorized recreation. Change the wording of this paragraph to reflect the true nature of Alternative 8

Letter 3981 — EIS· 3-74, paragraph 1 - By fragmenting the forest with roads, timber sales and game management, and encouraging the harassment of wildlife with internal combustion engines (such as ATVs), the first sentence is patently false. Alternative 8 does not provide "unfragmented habitat," nor is it "optimum" for PETS - Say so

Response — It is the professional judgement of the Forest ID Planning Team that Alternative 8 emphasizes threatened, endangered and sensitive species and unfragmented habitat among the many other multiple uses on the Forest

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Letter 3981 — EIS· 2-31 - Graphs of "Land Available for OG Conditions" and "Potential Late Successional Habitat" - Alternative 6 contains prescriptions for an intensive amount of vegetational suppression and regulation for the benefit of game killers - The two figures for this Alternative are totally inaccurate This information as presented diminishes and misrepresents Alternative 3 by inference

Response — Refer to Chapter 2 and Chapter 3 of the FEIS for additional information related to this issue

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Letter 3981 — EIS. 3-37, paragraph 4 - Change "habitat improvement" to "habitat alteration" Strike "improvement" from entire EIS and replace this loaded term with "habitat alterations"

Response — "Improvement" is correct in the context that it helps achieve the Desired Future Condition

Letter 3981 EIS: 3-44, paragraph 4 - Change "will" in 3rd sentence to "could" and strike "adverse" - these biased words misinform. Add "Conversely, impacted patches may be favored by some recreationists who prefer woody openings, such as bird watchers and hunters."

Response Changed "will" to "may". Recreationists aversion to certain aspects of gypsy moth biology have been documented in developed recreation areas. To clarify statement, the word "developed" was added before areas in paragraph 4.

Letter 3981 EIS: 3-45, paragraph 1 - Add "However, such patches of released vegetation are a natural part of a self-sustaining wild (old growth) forest."

Response The point here is that vegetation regenerating in gypsy moth damaged patches may support species of invertebrates that are not found in a closed forest, it by no way implies that this is in any way different from the vegetation found in patches of forest where agents, be they biological or physical, have opened a hole in closed stands.

Letter 3981 EIS: 3-45, paragraph 3 - Add "Wildlife/fish also benefit from the increased coarse wood debris that falls to the forest floor and from the creation of snags." As it now reads, this paragraph is very undeveloped - more information please.

Response This sentence was added.

Letter 3981 EIS· 3-46, paragraph 1 - Add to end of sentence 2 - "such as also occurs from road construction and clearcutting." Paragraph 3 - Information needed on the benefits to these creatures of CWD What about food sources - caterpillars directly; new vegetation favored by other insects and turtles themselves? Sunning spots for reptiles As written, the paragraph misrepresents Alt. 3 by only telling of adverse impacts.

Response The entire sentence stating "This may occur. or sub-surface flow" has been removed from the FEIS. While there are references to gypsy moth caterpillars as food, new vegetation as an important resource for invertebrates and the like, the wording in this section has been revised to reflect your request to balance adverse and beneficial impacts.

Letter 3981 EIS· 3-100, paragraph 6 - The statement that Alt 3 results in "a reduction of the current mosaic of successional stages" is false *Natural disturbance processes operating in big wilderness areas are known to maintain a* shifting mosaic of habitat types and successional stages. This misrepresentation of Alt 3 needs to be stricken *and more substance added to this discussion. (see Noss 1991)*

Response *Natural disturbance processes will maintain a shifting mosaic of habitat types and successional stages. This* discussion has been changed to say that Alternative 3 implementation would result in a change of the current *mosaic of successional stages.*

Letter 3981 EIS: 3-108, paragraph 8 - Substitute "less disruption from man" for "less disturbance" Under Alternative 3 the natural progression of forest disturbances is allowed

Response This sentence has been changed to read: ".. with less human disturbance ..."

Letter 3981 EIS. 3-111, paragraph 2 - It is stated that "harvests will further decrease the chance of catastrophic disturbance from gypsy moth." Yet earlier (3-95) we are told how few acres have been devastated in the Forest ("only 158,000 acres"). So then how can such a small amount of logging ever hope to impact a plague of the magnitude of the gypsy moth (which we have been led to believe is a plague)? Explain this contradiction or strike it from the record It appears to be an incredibly lame rationalization for logging.

Response — The cited reference is to the discussion of the Red Oak-Red Maple type group which is not likely to experience extensive defoliation and mortality because the varied species composition contains fewer species favored by the moth The additional benefit of producing young seedling/sapling stands in this type group, will further reduce the chance for harmful levels of the moth to develop in the Red Oak- Red Maple type group

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Letter 3981 — EIS· 3-132, paragraph 1 - It is written that "Little is known" of invertebrates on the forest Tell us what is know, particularly the importance of litter detritovores (see Christman).

Respoonse — The FEIS discloses additional information on invertebrates

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Letter 3981 — Plan 2-15, MA 9 lists 220,952 unsuitable acres, whereas pg 2-62 states this entire area to be 196,502 acres ? MA 13 lists 27,072 acres, pg 2-101 states 49,244 acres ? Tallys for MA 15 do not equal the figures listed on 2-109 ?

Response — A one page paper entitled "ERRATA PAGES" was mailed in February 1992 to everyone who had requested a copy of the DEIS and Draft Revised Forest Plan. This paper corrected the acreages in Table 2-16.

Letter 2665 — No where are the cumulative effects and environmental impacts accessed of any proposed management activities (EIS, 3-1) Ozone depletion, acidification of air and soil and the results of past management and activities on the forest must all be considered in NEPA documentation

Letter 4268 — Although EPA believes that the range of alternatives is sufficient, the potential for adverse environmental impacts to aquatic and terrestrial resources remains a concern to us We are concerned by the lack of sufficient information regarding direct, indirect, and cumulative impacts to surface waters, riparian habitat and overall biodiversity We believe that as a programmatic document, the Plan and the accompanying DEIS, are well suited for landscape level analyses and with the advent of Geographic Information Systems (GIS), the ease at which spatial and temporal cumulative impacts can be assessed, is greatly enhanced We encourage the Forest Service to utilize these tools so that activities which occur on the Forest can be evaluated within the context of the landscape and thus, decrease the potential for long-term, cumulative impacts to terrestrial and aquatic resources, as well as biodiversity

Letter 4268 — DEIS - Some of the areas in which EPA believes sufficient disclosure of direct, indirect or cumulative impacts has not been documented and/or evaluated

Response — It is important to understand that there are two levels of decisionmaking in the Forest Service The Forest Plan represents only the first level of decisionmaking about the management of the Forest Site-specific, project planning to implement the goals and objectives of the Forest Plan is the second level of decisionmaking

"Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions ." (40 CFR 1508 7) Cumulative impacts are among the effects (40 CFR 1508 8) that must be included in considering the environmental consequences of actions (40 CFR 1502 16).

The "action" represented by a Forest Plan is the selection of a programmatic framework to guide future decisionmaking on the forest, using Forest Plan management direction as a gateway to compliance with environmental laws at the project and activity level A Forest Plan is not an aggregation of 10 to 15 years of individual project decisions The EIS for a Forest Plan is, therefore, programmatic in nature Compliance with NEPA is required at the point of an "irreversible and irretrievable commitment of resources." In most cases, this commitment takes place at the specific project/activity decision point. Therefore, the EIS for a Forest Plan commonly does not contain site-specific data or disclose site-specific environmental effects, project alternatives, or the *cumulative effects* of individual projects/activities that have not yet been scheduled

The courts have recognized that the kind of impact statement required depends on the kind of Federal action being taken (*Aberdeen & Rockfish R. Co. v SCRAP*, 422 U.S 289, 322 (1975)) The Ninth Circuit discussed this concept stating "[t]he critical inquiry in considering the adequacy of an EIS prepared for a large scale, multi-step project is not whether the project's site-specific impact should be evaluated in detail, but when such detailed evaluation should occur" (*California v Block*, 690 F 2d 753, 761 (9th Cir 1983))

The court went on to find that the point in time when this site-specific analysis is to occur is "when, as a practical *matter, the agency proposes to make an 'irreversible and irretrievable commitment of the availability of re-*sources' to a project at a particular site " *Id* The view that the multiple use management prescriptions in the Forest Plan are not an irreversible and irretrievable commitment of resources has been confirmed by the Ninth Circuit in *City of Tenakee Springs v Block*, 778 F 2d 1402 (1986) The scope of the action being considered does not involve an irretrievable commitment of resources

During the Plan implementation period, specific activities and projects will be proposed, and site-specific evaluation for each activity or project, or group of activities or projects made The evaluation will include whatever additional environmental analysis, including cumulative effects analysis, is needed to comply fully with NEPA and other environmental laws and regulations. Further, each project or activity must comply with environmental protection requirements established in NFMA and its implementing regulations (16 USC 1604(g) and 36 CFR 219 27) Each project or activity must also be consistent with the Forest Plan (16 USC 1604(i)).

The FEIS complies with NEPA (40 CFR 1502 14) by examining a broad range of reasonable alternatives and *disclosing those cumulative effects to permit the Forest Service to make a "reasoned choice " Effects for some* resources were similar across many of the alternatives. The FEIS, chapter 3, discloses the significant effects of each alternative Some effects discussions have been revised in the FEIS

Discussion of the alternatives' effects on ozone depletion and acidification of air and soil are considered to be outside the scope of the analysis, since they were not identified as significant issues (40 CFR 1501 7) that needed to be addressed in order to make a reasoned decision NEPA also states that "documents must concentrate on the issues that are truly significant to the action in question, rather than on amassing needless detail" (40 CFR 1500 1) A discussion of these effects is not significant to the action in question

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Letter 1546 — The unique geological features of the area such as waterfalls or rock formations were not discussed extensively

Response — The ID Team identified the geological areas that are worthy of consideration as Geological Areas and allocated them to Management Area 4 None of the management practices in any of the alternatives would have an appreciable effect on waterfalls or rock formations, so no specific disclosure was necessary

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Letter 1546 — There is little discussion of the land's forest productivity The EIS does not discuss how many bd ft are sustainable as an annual yield or what the Forest's set goal for bd ft is There seems to be little or no discussion of induced land changes occasioned by the different Mgt Alts What will timber harvest do to adjacent lands? Will it increase erosion or cause population to go up? Will the roads built to harvest timber induce land use changes within the Forest? Why are some alts recommending larger or smaller areas for Wilderness Study? What are the land use effects of not designating land as Wilderness Areas?

Response — The FEIS is a programmatic document that discloses the environmental effects of alternative land and resource management plans As such, the environmental disclosure deals with the effects of all management practices and the consequences of management area allocations, not every management practice or management area allocation. Nor does the disclosure contain site-specific analysis such as the effects of specific roads and timber sales on the environment including adjacent ownerships and roadless areas

Chapter 3 of the FEIS contains additional disclosure under the heading of "Timber" that displays the allowable sale quantity for the alternatives as well as the maximum timber benchmark

The ID Team determined that the alternatives would have no direct or measurable effects on the population of humans residing in the Commonwealth of Virginia or the State of West Virginia Therefore, there is no disclosure on population changes in the FEIS

Letter 4268 — DEIS - Several alternatives include provisions for the collection of firewood Impacts to human health and the contribution to air pollution from wood smoke should be included in the FEIS

Response — Such an analysis is beyond the scope of the FEIS

Letter 2665 — "Prescribed burning releases nutrients" (EIS 3-106) only in the short term and most are leached away and not accessible to vegetation; prescribed burns should be eliminated except in extreme conditions to protect rare, threatened or endangered species

Response — The *Final Environmental Impact Statement — Vegetative Management in the Appalachian Mountains* concluded that leaching of nitrogen is minimized when burns are kept light, and that loses of other, less mobile nutrients are negligible Standards in the Revised Plan are designed to keep burns light and to exclude burns from severely eroded soils

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Letter 1546 — The discussion of rare species and the impacts of the different alts under them were not well considered The impacts on game species were well considered, but not the impacts on the pileated woodpecker and other such sensitive species which need old growth forest and lots of it All of the edge habitat created by Alt 8 cannot be good for such a species I do not understand when you make a blanket and conclusory statement that no alts will have an impact on these species Have you decided that 6 pileated woodpeckers for one forest is enough or some arbitrary figure like that? Alt 3 would probably have lots of habitat for such rare species but their enhancement by some alts did not seem to be well discussed.

Response — Most alternatives were originally developed with the participation of private citizens, who took advantage of the opportunity to promote their vision of how the Forest should be managed. The Forest ID Team, charged with finalizing them into into viable options to be considered for selection as the preferred alternative, realized that most of these alternatives were very weak in addressing the needs of threatened, endangered and sensitive species Therefore, each one was strengthened. The draft version of Alternative 8 was deemed to have the best approach to managing and protecting these species Therefore, Management Area 4 (Special Biological Areas) as delineated in the draft version of Alternative 8 was applied to all alternatives that were weak in managing for rare species In this way, all alternatives provide for the management and protection of threatened, endangered, and sensitive species.

Between the draft and final, further refinements and additions were made to Management Area 4, which resulted in increased acreage in this category for the Revised Plan.

The National Forest Management Act directs the Forest to ensure that habitats are available for all native and desired non-native species inhabiting the Forest, and in such quantities and spatial arrangements that the species can be well distributed throughout the Forest

To facilitate this, the Act instructs that the Forest select Management Indicator Species The Forest selected several Management Indicator Species (including the pileated woodpecker) and determined minimum habitat requirements that each alternative must provide to maintain these species habitats and in such quantities that the species can be well represented throughout the Forest All alternatives were determined to adequately provide for these habitats.

A more detailed explanation is contained in Chapter 3 A process paper "Incorporation of the NFMA Requirements for Diversity Into the Revision of the George Washington Forest Plan" provides additional information Chapter 3 contains information on the wildlife species inhabiting the Forest, including the threatened, endangered and sensitive species, forest fragmentation, edge effect, and biological diversity

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Letter 3779 — On p 3-132 Robins, et al, 1989 are quoted "Several species of neo-tropical migrants (winter in Latin America/ nest on the Forest) are considered to be area-sensitive, requiring large blocks of relatively undisturbed forest habitat" And on p 3-138 "Estimated acreage of unfragmented habitat needed to maintain optimum populations of area sensitive neotropical migrants is 7,400+ acres Suggested minimum area requirements to maintain the presence of these species are 15 acres for the ovenbird, 370 acres for the worm eating warbler, and 400 acres for the pileated woodpecker "

Letter 3779 — (Could not find how many tracts of 7,400+ acres would be maintained nor was anything mentioned in MA8 about maintaining tracts of this size, approximately 11 square miles, in wilderness areas)

Letter 3981 EIS· 3-95, paragraph 4 - How many acres have been disturbed by road construction and salvage sales? How *many acres and openings have been disturbed by wildlife management? How many acres in total are dominat*ed by edge effects? What's their distribution? What is the average size of intact forest fragments on the GWNF? What has been the trend in fragment size and road construction and edge effects over the last 50 years? Projected into the next 50? I want these issues regarding vegetation on the forest to be documented - numbers and patterns.

Letter 3981 EIS. 3-136, paragraph 3 - This discussion of fragmentation and wildlife corridors is extremely deficient. As it now reads, the DEIS makes all alternatives seem the same. Yet the provisions of Alternative 3 as regards reversing forest fragmentation are far different from the measures taken in the other Alternatives (including 8). The impacts of fragmentation at site, local, ecosystem, and regional levels needs to be fully discussed An elucidation of the differences between Alternatives as regards this subject is absolutely necessary

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Letter 3981 EIS: The role of the GWNF in maintaining regional biodiversity is ignored, as are the effects of the various alternatives *Biodiversity is given a very superficial and localized emphasis in the DEIS.*

Letter 3981 EIS· Edge effects and fragmentation at all scales receive little attention. All of these deficiencies must be addressed in the Final EIS

Letter 4268 DEIS - Table 3-32 indicates the edge effect associated with timber production and associated roadbuilding programs This analysis would benefit from inclusion of past such activities and the addition of (current and proposed) wildlife management activities, ATV/OHV trails, powerline corridors, pipeline right-of-ways, etc. all of which contribute to edge.

Response Paragraph 3 of page 3-136 of the DEIS is not meant to be all inclusive in environmental disclosures regarding forest fragmentation and related issues It is one paragraph in a lengthy discussion of wildlife and biodiversity in general. Other sections within this chapter specifically deal with other issues that have been raised

The Draft Revised Plan and DEIS made specific disclosures estimating the effects that implementing each alternative would have on fragmentation (and related issues). The Revised Plan and FEIS provide additional information

The FEIS includes a programmatic analysis that does not include the identification of site-specific projects within management areas Table 3-38 displays the amount of "relatively fragmented" and "relatively unfragmented" habitat in each of the fourteen alternatives This disclosure is based on portions of the Forest where regeneration harvests, road construction, and public motorized vehicular access are permitted or not permitted It is an overview of where fragmentation is likely or not likely Further analysis of fragmentation on specific areas of the *Forest would need to be accomplished during implementation of the Revised Plan.*

Regarding fragmentation over the last 50 years, this Forest was purchased starting about 75 years ago to protect previously ravaged watersheds Purchasing records show that the mountain lands comprising the Forest were almost totally denuded of trees, and were burned, and much of the native understory vegetation was heavily grazed Under the management of the Forest Service, the forests have been nurtured back to maturity Past and current management of this forest has contributed greatly to maintaining "unfragmented" forest habitats.

It is an insurmountable task to make an accurate prediction of the effects of all previous and current activities *on forest fragmentation Many roads, pipelines and powerlines parallel each other quite closely, so their effects* may not be as great as if measured separately Some are quite wide, and some are narrow Many Forest roads have a closed forest canopy overhead and their effects on fragmentation are quite different from that of a major highway. ATV/OHV trail development will not essentially change the overstory character of the forest area in which they are located and it is unlikely that this use will contribute to forest fragmentation Wildlife habitat management activities, similarly, will have little impact on forest fragmentation There is an almost endless variety of activities that may affect fragmentation such as flood control reservoirs, campground and picnic grounds, and parking lots

The effect of gypsy moths killing trees on large tracts and isolated pockets of the forest overstory may have a much more significant effect on fragmentation than the above mentioned activities

To make accurate predictions of the impacts that these and other activities have on forest fragmentation is not possible without a considerable amount of additional inventory and analysis

It is easiest and most accurate to measure unfragmented habitats. Unfragmented habitats, such as provided in Management Areas 4, 5, 6, 8, 9, 21, and portions of several other management areas are described in Chapters 2 and 3 of the Revised Plan Their locations and spatial arrangements over the landscape are depicted on the Revised Plan map

Table 3-37 displays a number of factors that are related to fragmentation As with Table 3-38, these factors provide an overview of the magnitude of disturbance

Table 3-39 displays the estimated carrying capacity for black bear, wild turkey, and white-tailed deer for the fourteen alternatives. Wildlife management techniques used are described in Chapter 3 of the FEIS and Chapters 2 and 3 of the Revised Plan The amount of disturbance depends on techniques used and the objective of the individual project Each one may vary and their disturbances are disclosed through the NEPA process

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Letter 3981

EIS 2-56 - Wildlife - The descriptive paragraph and graph are a total travesty. Wildlife is the totality of flora, fauna, and microbes, not just game animals (or other MIS) The best indication of managing for wildlife is not the amount of acreage open to descriptive habitat manipulations Alternative 3 truly emphasizes and provides for wildlife on around 1,000,000 acres of the GWNF This graph (Fig 2-46) should show this

Response

This graph is very simplistic in nature and was meant to be used as a quick reference In this context, the graph can be helpful to the reader Figure 2-46 of the DEIS compares, between alternatives, the various land allocations that allow wildlife habitat management to occur It does not describe how much wildlife habitat management will occur for each alternative

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Letter 3981

EIS 2-26 - MA 15 paragraph - Again is the word "enhance" - change to "alter habitat to favor some wildlife while destroying habitat for others " We don't need disinformation

Response

This paragraph continues to clarify what the enhancement is for As written, it is correct

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Letter 3981

EIS Page 5 - paragraph 7 - Alternative 8 does not emphasize large areas of unfragmented habitat This sentence needs to be changed to reflect the fragmenting nature of the proposed management under this alternative (see harvest, burning, and fragmented land on pg 8)

Response

Alternative 8 does emphasize large areas of unfragmented habitats It does not maximize unfragmented habitats such as Alternative 3 Alternative 8 provides for multiple use within the framework of protecting the Forest's biological values Alternative 8 recognizes the values of unfragmented habitats and makes ample provisions to maintain them

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Letter 3981

Plan· The constant use of "enhance habitat for wildlife needs to be changed to reflect the truth When management proposes to "alter habitat for the benefit of game killers" Say so

Response

The Revised Plan provides for enhancement of habitats for a wide variety of species, not just game species Refer to Chapters 2 and 3 of the Revised Plan

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Letter 3981

Plan· 2-105, paragraph 1, MA 14 - Either rid this MA of these highly disruptive activities or change the opening paragraph on page 2-105 to reflect the reality of the situation· "In this 85,687 acre management area wildlife habitat will be altered with a variety of highly site disturbing timber harvesting and game management activities"

Response

Refer to Chapter 3 of the Revised Plan which better describes the desired future condition of this management area

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Letter 4268

DEIS - Two reports (page 3-139) are cited which indicate that "increase forest (timber) management and addition of edge effect created by increased mileages of roads benefit the flicker and cowbird" Is it the intent of the Forest Service to use the brown-headed cowbird as a positive management indicator?

Response — Inclusion of the brown-headed cowbird as an indicator species is to help assess fragmentation, and parasitism of "song birds" by the cowbird it is not the intent of the Forest to make this species a "positive management indicator "

Letter 4268 — DEIS - The discussion of management indicators make assumptions which should be clarified and/or reevaluated Table 3-34 shows carrying capacities for three (commercially important) management species Is similar information available for the other management species?

Response — Management Indicators are described in chapter 3 of the FEIS A more detailed description of habitats and populations are contained in the process paper "Incorporation of the NFMA Requirements for Diversity into the Revision of the Land and Resource Management Plan for the George Washington National Forest"

Letter 1884 — The draft plan does not consider effects on nearby Shenandoah National Park, a national recreational and biological treasure What will continued timber production, habitat fragmentation, edge creation, and lack of wilderness protection do to the ecosystems that intermesh with the park, and to the biological corridors which are needed for continued genetic interchange?

Response — The Forest and Park are geographically separated and do not share common boundaries. Lands separating the two are privately owned and are not within the Forest's proclamation boundary The Forest has no jurisdiction over these areas and is not authorized to purchase or exchange lands within these areas in order to link the two federal properties Implementation of the Revised Plan will not have measurable effects on these privately owned lands that "intermesh" the Forest and the park Implementation of the Revised Plan will not have a measurable effect on the Shenandoah National Park

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Letter 2060 — No place did I see the mention of island biogeography theory in the EIS No place did I see an analysis of the impact of continued edge creation and fragmentation on the future ecological health of Shenandoah National Park For these reasons alone, I believe your EIS is flawed

Response — Maintaining the biological diversity on the Forest is a major goal of the Revised Plan Biological diversity, or biodiversity, is the variety of life and its many processes in an area Depending on scale it can be viewed as the maintenance of the variety of genes, species, biological communities, or ecosystems of particular areas

The Forest Service views the conservation of biodiversity as a multiple-use issue, not simply a land preservation scheme Management actions are designed and implemented which conserve specific elements of biodiversity. Efforts will increase in developing knowledge, implementing conservation measures, and demonstrating land and resource management approaches that conserve biodiversity as an integral part of sustaining overall multiple-use objectives while achieving a desired future condition These efforts will be based in large part on the science of conservation biology including the principles of island biogeography, population biology, and ecosystem functioning Cumulative effects resulting from landscape fragmentation and water runoff are analyzed and monitored as part of project implementation

Further explanation of how the Revised Plan provides for biodiversity is provided in Chapter 2 under "ISSUE 1 — BIODIVERSITY " Chapter 3 of the FEIS contains information on biodiversity and how it is affected by the various alternatives

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Letter 3981 — EIS Cumulative impacts of the management activities of the various alternatives are ignored The lands of the GWNF are treated as an isolated island (except when it comes to economic issues) The environmental context of the GWNF must be addressed, its affects on lands outside its boundaries and the affects of these lands upon it

Response — Such analysis is outside the scope of the revision Moreover, there is no data for any but the most general assessment

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Letter 279 — Insufficient attention has been given to ECOLOGICAL values in the plan and the emphasis on multiple use of the forest does not properly weigh the long-term impact of the various proposed uses

Letter 970 — The plan as it currently exists does not adequately protect or manage the forest.

Letter 1275 — The revised draft is inadequate in addressing the ecological health of the GWNF

Letter 3981 — Overall, the DEIS misrepresents and inadequately details the environmental liabilities associated with logging and other silvicultural practices, road construction, game habitat alterations, and ATV use Detrimental effects on biodiversity at all scales (microsite organisms to regional ecosystems) receives scant attention. Restoration ecology activities are ignored, as is the necessity for big wilderness and watershed protection

Response — The FEIS describes the overall environmental effects of implementing the Preferred Alternative The Revised Plan is formulated in such a way that it meets NFMA requirements relating to biodiversity and wildlife It provides for multiple use management within the framework of maintaining the Forest's biological values.

The Revised Plan and FEIS are programmatic documents, and as such, do not provide infinite detail Implementation of the Revised Plan consists of interlinking site specific projects Each project is evaluated and additional environmental disclosures are made in NEPA documentation

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Letter 15 — I'm struck by your continuing fear that the Forest will be taken over by more tolerant species such as Red Maple unless you are allowed to "manage" It won't happen

Response — It is predicted that red maple and other tolerant species will increase over time Lack of timber cutting throughout much of the Forest results in natural succession, which will favor an increase of species such as red maple Also, red maple is not a preferred gypsy moth caterpillar food, so it may survive in areas where oak trees are killed. In some areas of the Forest, it is a management goal to regenerate oaks and other valuable intolerant species specifically to maintain the hard mast component and to produce valuable trees Red maple has been identified as a Management Indicator Species so that the management, or lack of management, can be assessed in relation to the potential shifting from tolerant to intolerant tree species

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Letter 3981 — EIS 3-48, paragraph 3 - "Red maple may not necessarily increase as it is outcompeted on dry poor soils" - Say so Paragraph 2 - Add "So the diversity of the Forest may increase by these conditions that lead to a more complex structure and species composition " As it now reads, this paragraph is incomplete and biased

Response — The reference to red maple has been deleted from paragraph 3 on page 3-48 of the DEIS Words suggesting increased diversity and complexity of impacted stands have been added to the FEIS

Letter 53 — The draft revised "plan" does not adequately address the problem of the huge deer population which is devastating the young forest growth and hurting the habitat of the other consumptive and the non-consumptive wildlife of the Forest

Letter 3981 — EIS· 3-106, paragraph 10 - Add "However, providing more browse areas for deer will serve to increase the deer herd, which in turn will increase the browse pressure, which will need to be dispersed, and on and on in a vicious expanding spiral, until eventually the entire forest may have to be clearcut " I want the effects of even-age management deer populations addressed I want the detrimental edge effects associated with logging discussed (effects on both plant and animal life and on physical characteristics I want the importance of site placement for vegetative manipulation discussed (in the interior or perimeter, next to roads or not, bisecting watersheds, etc) - nowhere are these affects adequately discussed in this DEIS

Response — The FEIS addresses the potential deer populations for each alternative The Revised Plan does not project increases in the deer herd, but maintains it at current levels This equates to a theoretical carrying capacity of about 24 deer per square mile Experts from state wildlife agencies estimate that 25 deer per square mile is appropriate for the Forest Some alternatives probably produce more deer, and some alternatives produce less deer Control of the deer population is a function of the appropriate state wildlife agency

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Letter 3981 — Plan 2-19, paragraph 2 - The last sentence of this paragraph needs to be changed to "Emphasis is placed on providing for the desires of a tiny segment of the public (hunters) who like to create dead animals Some management through alteration and disturbance of habitat is the greatest priority"

Letter 3981

Plan· In the Management Direction for all Management Areas under the Wildlife sections are the ubiquitous words "wildlife habitat improvements". Improvement is a loaded and specious term Modern ecological studies *are indicating over and over that these game improvements are liabilities for a great many creatures. Change* the word "improvements" to one that reflects the true reality of the situation "disruptions" or "alterations".

Letter 3981

EIS· We need a lot more information on how the various alternatives will affect non-game animals. There are a lot of individuals and entities to be consulted on this matter outside of the Virginia Department of Game.

Response

The Revised Plan provides for the management of both non-game and game species. Management for game *species is met through direct habitat management and timber management Non-game management is focused* on "watchable" wildlife within recreation areas and Management Area 22. Sensitive, threatened, and endangered species are managed, and their locations are designated as Management Area 4 (Biological Areas). More detailed descriptions of how the Revised Plan provides for both are included in Chapter 2 of the Revised Plan under "ISSUE 1 — BIODIVERSITY", and "ISSUE 8 — VEGETATION MANAGEMENT" (Featured Species subissue) Chapter 3 provides detailed descriptions of forest management activities, both game and non-game for each management area.

A variety of management indicator species were selected and standards provided to ensure that the habitats for all native species would be met.

Letter 3981

EIS 3-90, paragraph 1 - Strike "Grouse depend on early seral forest stages and quality habitat is the result of active forest management " Grouse survival for eons without forest management Habitat they may prefer (early *seral stages) occurs is a result of the gap dynamic of natural forest disturbance - Say so*

Response

Grouse do survive in forested areas unaltered by man, but it is well known that grouse, and many other species' populations are higher in early successional habitats, such as blow-downs, revegetated forest fire areas, and in harvested areas Within the context of the paragraph which is in reference to grouse as a game species, the statement and the one that follows, is an accurate statement for reviewers to compare alternatives

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Letter 4268

DEIS - A more comprehensive analysis should be included in the FEIS which address the potential air quality impacts associated with increased ATV/OHV's use on the Forest, in addition to other motorized vehicle use on scenic byways, etc

Response

There is no measurable difference in air quality under the different alternatives

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Letter 4268

DEIS - A description of how Virginia's new water quality standards and criteria may influence forest activities should be included in the FEIS

Response

A review of Virginia's new water quality standards and criteria indicates that they will require no change in management activities. Common Standards in Chapter 3 of the Revised Plan will ensure that water quality will meet or exceed state standards and criteria

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Letter 2665

"Catastrophic disturbances ..have impacts similar to clearcutting" (EIS, 3-105) This statement is not biologically *substantiated, no natural disturbances result in the removal of wood fiber and detritus-producing organisms for* the natural biological regeneration of nutrients

Response

The cited reference states that the affects on forest vegetation from catastrophic disturbances are similar to clearcutting in regards to secondary recession that occurs afterwards Severe wildfire consumes much of the wood fiber and detritus-producing organisms

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Letter 2665

"When cutting practices or prescribed burns are used, a mix of intolerant and tolerant species is maintained .." (EIS, 3-105) This statement is not scientifically based Natural disturbances guarantee the continued existence of early-successional biological diversity in natural mosaic patterns

Response

When viewed from the time-scale of succession and the spatial scale of landscapes, as the Revised Plan does, even-aged timber management can readily enhance biological diversity

Letter 2665

"The regeneration from harvest methods will make this type-group less likely to experience catastrophic gypsy moth defoliation and mortality " (EIS, 3-114) This is a fallacious assumption Removal of all trees in the area also removes those stronger dominants that would be more resistant to future defoliations. This cutting method eliminates this genetic diversity and, therefore, will reduce the future percentage of oak component of the forest. See EIS A-26 for lack of substantiation.

Response

The cited reference states that, because of mixed species composition of the forest type which already contains species resistant to gypsy moth defoliation, catastrophic defoliation and mortality will not occur and the forest vegetation resource can be sustained through normal regeneration harvests

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Letter 3779

Alt. 8 has more potential than 2, 6, 7, 11 and 13 for soil from earth-disturbing activities to reach streams p. 11

Response

In the FEIS, estimated roading needs for the preferred alternative are reduced to 5 to 8 miles per year, which in turn considerably reduces estimated erosion and human-caused sedimentation. See Chapter 3 of the FEIS for details

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Letter 3981

Plan 2-1, paragraph 2 - Change to " allows use of natural features through management practices that alter the Forest's essential character and ecological values to varying degrees "

Response

The second paragraph on page 2-1 of the Draft Revised Plan has been removed from the Final Revised Plan

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Letter 3939

Prepare an Appendix similar to Appendix "H" that is in the FEIS of the 1986 LMP [to] deal with Forest Management Systems, associated harvest cutting methods, and tree species needs It would also show how the various management systems affect various species of trees and wildlife [and] the appropriate and best harvest system in the management of timber and other resources The determination of "optimum" and "appropriate" system would be left to the site specific analysis of individual projects as required by law.

Letter 3951

Add an appendix similar to Appendix "H" of the 1986 Plan This would eliminate having to repeat material dealing with harvest systems and tree species in future individual project EA's

Response

Appendix H of the Revised Plan contains much of the information requested by the commenter

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Letter 4268

DEIS - Impacts to fisheries are primarily focused on sport fisheries, Information and potential impacts regarding other components of aquatic ecosystems such as benthic populations and native fisheries (given the stocking program) should be included in the FEIS

Response

Canopy, acid rain, sedimentation and sources of large woody debris can have the most effects on aquatic ecosystems on the Forests These effects have been documented primarily for brook trout, an important game and management indicator species. Monitoring of brook trout and other management species is an indicator of the entire aquatic ecosystem The 14 alternatives handled environmental effects differently but all met, at a minimum, the Clean Water Act and State BMP's Where necessary, mitigation measures through standards are implemented in all alternatives

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Letter 3981

EIS. 2-9, paragraph 2 - This paragraph is inaccurate and a misrepresentation Change to. "The Forest Service preferred alternative considers biodiversity to be another multiple-use output" PETS, unfragmented habitat, nature viewing and studies are all emphasized much more in Alternative 3 - Say so.

Response

Alternative 8A is the Forest Service preferred alternative in the FEIS The description on page 2-9 of the DEIS has been rewritten to reflect the emphasis on ecosystem management

The Revised Plan provides for biodiversity in a multiple use context. Providing biodiversity is not the sole mission of the agency Instead, desired goods and services are provided in a manner that sustains the diversity and productivity of ecosystems

Letter 3981 EIS Rigorously examine the use of specious and prejudicial terms and concepts (e.g culmination of mean annual increment, decadent forests, wildlife management, no significant impact, diversity of age classes, etc).

Response Our intent was to remove subjective terms We also attempted to remove easily misunderstood terms from all narrative or to include explanations/definitions

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Letter 3981 EIS A thorough examination of cumulative impacts and the precepts of conservation biology must be emphasized in the EIS At present the DEIS is very deficient in its treatment of the environmental affects of road closures as proposed under Alternative 3

Response Using the principles of conservation biology, many issues, including those which result from cumulative impacts and the environmental affects of road closures, are addressed on the FEIS

Letter 4268 DEIS - Infrastructure changes associated with new construction and/or expansion activities of developed recreation sites should be included in the FEIS. Air and water quality impacts associated with construction, maintenance and use of these sites such as wastewater treatment, surface runoff from impervious surfaces and access roads, etc should be considered

Response These effects are site-specific and cannot be adequately evaluated in a programmatic environmental analysis Such effects will be assessed when site-specific projects are proposed

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Letter 4268 DEIS - Impact associated with roadbuilding and maintenance, and other facility construction/maintenance should include the following contribution of non-point source pollution including heavy metals and the potential for lowering water quality, additional fragmentation of the landscape and impacts to biodiversity - this represents an opportunity for the Forest Service to consider cumulative impacts based on existing, proposed new construction and foreseeable future construction; impact associated with the proposed Corridor H highway originating in West Virginia.

Response These effects are site-specific and cannot be adequately evaluated in a programmatic environmental analysis Such effects will be assessed when site-specific projects are proposed

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Letter 4268 DEIS - A list of priority watersheds for improvement activities should be included in the FEIS

Response Watershed improvement needs are listed and prioritized in a watershed improvement needs inventory Because project areas are constantly being added to the list as they are identified and deleted after they are treated, it is impractical to include this inventory in the Revised Plan These watershed improvement needs are generally localized, and do not involve entire watersheds Little River, the one watershed that has been identified as being in a degraded condition, is designated as a special management area

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Letter 4268 DEIS - Impacts to water supplies should be evaluated and included in the FEIS

Response Impacts to the quality and quantity of water resources are evaluated in the FEIS Impacts to specific water supplies cannot, however, be separated out in this programmatic analysis Standards are designed to protect the beneficial uses of water Management Area 18C provides special protection for riparian areas bordering and upstream from municipal water supply reservoirs

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Letter 3981 EIS· 3-14 - Motorized - Add "With the escalating ecological and economic costs associated with oil dependency, driving for pleasure may severely decrease in the future "

Response This is not expected to occur in the next ten to fifteen years Oil dependency is, of course, a world wide concern. Nevertheless, it is outside of the scope of the planning revision process People are expected to drive for pleasure, whether using oil, hydrogen, electricity, LP gasses, or other alternative fuels

Letter 3981 EIS 3-111, paragraph 1 - It is stated " cutting practices will help maintain species diversity " Abundant studies demonstrate otherwise What about the homogenization of regional biodiversity? The effects on microsites and microclimates edge effects? Soil and litter inhabitants? There is an extreme paucity of conservation biology research in this DEIS and this section shows it The effects on diversity of native vegetation by Alternatives with logging, road and game mgmt practices needs to be thoroughly researched and presented to the public in the final EIS What about site invasion by striped maple?

Response The correct statement is that "disturbance to vegetation as a result of cutting practices will help maintain diversity". This statement is in agreement with research referenced in the EIS

ADEQUACY OF THE REVISION: Range of Alternatives

Letter 186 The Alternatives being considered in the draft management plan revision for the GWNF do not adequately address the management of our only "renewable natural resource", timber

Letter 487 I am concerned that none of the alternatives adequately emphasize timber management and production.

Letter 749 I do not believe the 13 alts presented in the draft Revised LRMP for the GWNF provide for sufficient use of the timber resource,

Letter 893 The 13 Alts considered in the draft mgt plan revisions for the GWNF leave much to be desired. Little consideration is given to managing our only "renewable natural resource," timber

Letter 942 The 13 alts considered in the draft mgmt plan revisions for the GWNF give little consideration to managing the only renewable natural resource, timber

Letter 1355, 1373

The 13 alts leave much to be desired

Letter 1825, 4020

The 13 alts leave much to be desired Little consideration is given to managing our only "renewable natural resource," timber

Response It is uncertain why the commenter believes that the alternatives do not adequately address the management of timber

A land and resource management plan generally makes two decisions regarding the management of timber: lands suitable for timber production and allowable sale quantity The fourteen alternatives considered in detail in the FEIS offer a wide range of lands suitable for timber production and a wide range of allowable sale quantities

Under the requirements of NFMA, site-specific analysis and disclosure is needed to support any decision on clearcutting as being "optimum" or other even-aged regeneration methods as being "appropriate" Many of the alternatives do, however, limit the use of certain even-aged or uneven-aged regeneration methods where the use of such methods would not achieve the objectives of the management areas within those alternatives

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Letter 3643 The Forest Service has selected Alternative 8 as the Preferred Alternative in the DEIS and developed a separate document entitled, "Revised Land and Resource Management Plan" to support their decision We believe the early identification and documentation justifying a specific alternative, before receiving formal input to the DEIS, strongly biased the decision in favor of this alternative

Response The NFMA Regulations under 36 CFR 219 12(i) state

> "The Forest Supervisor shall review the interdisciplinary team's evaluation and shall recommend a preferred alternative to be identified in the draft environmental impact statement and displayed as the proposed plan "

Alternative 8 was identified as the "Forest Service preferred alternative" and the Draft Revised Plan was provided for public comment to comply with this requirement.

Letter 3613 — The DEIS does not consider any alt in which portions of the Forest are assigned no Recreation classification (ROS class). Assignment of ROS classes and associated standards have a significant adverse impact on the cost, practicality, and even whether the activity will be allowed at all As a result, the deck has been stacked against reasonable evaluation of potential commodity production Thus the DEIS fails to provide any Alts. which are in the part of the range in which the maximum resource potential for commodities are considered As a result, the DEIS fails to consider the opportunity costs that are associated with the alts which were considered in the DEIS. I recommend 3 Alts be developed in which the % of the Forest with no Recreation classification is 10%, 40% and 80% respectively

Response — The recreation opportunity spectrum classes (with their associated standards) are incorporated in the different management areas to comply with NFMA and the NFMA regulations. These regulations are discussed in Appendix G of the FEIS

Letter 1256 — None of the 13 alts proposed are good, but Alt 8 is the worst one of all

Response — The ID Team is uncertain of the rationale for this comment.

Letter 3489 — The various alternatives limit in every respect the capability of this forest to produce

Response — *The fourteen alternatives considered in detail in the FEIS explore a range of allowable sale quantities from 0 to* 680 MMBF Based on historic use, the total annual cut has never exceeded 50 MMBF on the Forest So while the Forest may be capable of producing more wood products, there is little point in doing so if the market place can't absorb it.

Letter 146 — The EIS looked at 13 alternatives to look at different ways to meet the issues identified by the public, the concerns of management, and the opportunities inherent in the resources We support this general approach. However, it may be appropriate to drop some of the alternatives which are more like benchmarks than full multiple-use alternatives in order to save on publishing costs in the final EIS and maps.

Letter 4043 — *Since the DEIS does not clearly develop and produce scientific data to support all key elements of the* alternatives, and since the alternatives overlap in several areas, the DEIS exhibits significant deficiencies in the range of alternatives presented.

Letter 4043 — The brief overview of the alternatives suggest that several of the alternatives overlap For instance, of the 13 alternatives, 8 provide for an increase in new road construction. Other areas where the alternatives overlap include acreage set aside for prescribed burning, areas that do not provide migration corridors for connecting wilderness areas, and, acreage set aside for development and for dispersed recreation

Letter 4044 — The drafters of the EIS should combine several of the alternatives so as to significantly add to the documents clarity and promote competent public comment by limiting the excessive amount of information that they must *peruse*

Letter 4044 — The alternative courses of action being considered involve a great deal of overlapping information that could more properly be categorized into fewer alternatives so as to enhance clarity

Response — It is important to remember that these are alternative land and resource management plans They emphasize different mixtures of uses, values, products and conditions

There is no requirement in NFMA or NEPA for every alternative to differ in all respects from other alternatives The overall themes of the alternatives are quite different The similarities between the alternatives are defensible given the themes of the alternatives Examples of this are given in the next two responses

The ID Team worked with various individuals, organizations and agencies to formulate fourteen alternatives that provide a wide response to the thirteen issues While it is theoretically possible to reduce the number of alternatives, such an action may be a bad faith effort.

Based on public comments, many of these alternatives have been modified, one of them has been dropped from further consideration and one new alternative has been added in the FEIS

Letter 4044 — Alternatives nine, six, and three are all strikingly similar

Response — Alternatives 3, 6 and 9 in the DEIS provide strong responses to environmental concerns.

Alternative 3 was formulated to address issues and concerns about biodiversity, ecosystem management, conservation biology and landscape ecology. It is predicated on the assumption that the primary role of the George Washington National Forest should be to provide ecosystems not available on private land

Alternative 6 was formulated to provide a strong response to concerns about below-cost timber sales. It uses non-timber management practices to provide wildlife benefits in an environmentally sensitive manner. This alternative is needed to respond to NFMA requirements on below-cost sales (specifically the *USDA Decision on Review of Administrative Decision by Chief of the Forest Service Related to the Administrative Appeals of the Forest Plans and EISs for the San Juan National Forest and the Grand Mesa, Uncompahgre, and Gunnison National Forests* of July 31, 1985)

Alternative 9 explores an alternative with all roadless areas being recommended for wilderness study All other areas qualifying as semi-primitive motorized or non-motorized recreation are managed as semi-primitive non-motorized in the recreation opportunity spectrum

Alternative 9 also explores the use of a combination of uneven-aged regeneration methods and non-timber management practices to meet wildlife objectives

Within these general themes, there are bound to be some similarities between the alternatives Each of these alternatives, however, serves a needed role in the responses to issues

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Letter 4044 — Alternatives five, seven, and twelve also considerably overlap

Response — Alternatives 5, 7 and 12 in the DEIS use timber management to accomplish timber and/or wildlife (particularly game) objectives. They also contain no areas recommended for wilderness study since such recommendations are inconsistent with the themes of these alternatives Alternatives 5, 7 and 12 have been reformulated to explore a wider range of allowable sale quantities in the FEIS The ASQ for each alternative is repectively 680, 520 and 450 MMBF

Alternative 5 was formulated to explore the use of management area prescriptions that emphasize timber management to provide a strong response to concerns over the role of the Forest in the local timber market and the health of the Forest if the allowable sale quantity were at least equal to the timber mortality

Alternative 7 was formulated to explore the use of management area prescriptions that emphasize wildlife management to achieve a high, if not optimum, level of wildlife (particularly game) benefits Although timber management is used to provide many of these benefits, the management area prescriptions contain longer rotations, smaller openings, and greater dispersion of openings than management area prescriptions that emphasize timber management.

Alternative 12 was formulated to explore a traditional mixture of multiple uses Management area prescriptions emphasizing timber and wildlife (particularly game) management are both used to create a management program which approximates the resource yields in the 1986 Forest Plan before it was amended

The ID Team has continuously reviewed the need for keeping all alternatives since they were formulated After reviewing public comments on the DEIS, there still appears to be a need to have these three alternatives or similar alternatives

Letter 2254 None of the alternatives are the optimum for multiple-use forest management

Response In the record of decision for the FEIS, the Regional Forester will select the alternative that maximizes net public benefits This alternative will have the optimum mixture of uses, values, products and services from the George Washington National Forest

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Letter 1060 Under Section 219 (f) (6), "At least one alternative shall be developed which responds to and incorporates the RPA Program tentative resource objectives for each forest displayed in the regional guide " This alternative has not been thoroughly developed in the DEIS The only mention of an RPA alternative is found in Alternative 14, where the forest is managed to "(1) provide a mixture of emphases based on local issues and conditions, (2) provide goods and services to local constituents, .. and (4) achieve a multiple-use program in light of the 1990 Resources Planning Act Assessment " There is no further discussion in Alternative 14 or any other alternative of opportunities to incorporate the RPA program objective.

Letter 3660 You need to make sure you have an RPA alternative

Response The 1982 NFMA Regulations were designed to provide for interaction between the Resource Planning Act (RPA) Program tentative resource objectives and local significant public issues, management concerns, and resource opportunities in formulation of alternatives for the Forest Plan The planning regulations require not only an alternative that displays the RPA Program tentative resource objectives, but other alternatives as well [36 CFR 219.12(f)].

Previous RPA Programs emphasized resource production targets and funding required to achieve them over time (1990 RPA Program, page 2-4) RPA was formulated where production targets were assigned to each Region, which then disaggregated the targets to each Forest. The 1990 RPA program is different. It provides broad national guidance for program emphases and trends, rather than specific, quantified output targets for individual Forest Service programs (1990 RPA Summary, page S-7). The 1990 RPA program incorporated information from the first round of National Forest Plans This broad guidance has been incorporated into Alternative 8A

Compliance with this direction has occurred by formulating alternatives for a range of resource objectives, including Alternative 8A that responds to the 1990 RPA Program Alternative 8A was developed to respond to all four major themes of the 1990 Resources Planning Act Assessment. But more importantly, each alternative provides for one or more of the four major themes in the 1990 RPA program

As part of the 1990 RPA program, the Southern Region has a target of 1212 7 MMBF of timber for the midpoint of the 1991-2000 decade (1990 RPA Program, Table E 8), down from 1600 0 MMBF in the 1980 RPA Program for the same time period Disaggregating this volume to the Forest using the same percentage share as that in the Southern Regional Guide (2.75%), the Forest's share of the 1990 RPA timber resource targets would be 33 3 MMBF per year (or an allowable sale quantity of 333 MMBF) for the decade 1991-2000 Alternatives 2, 4, 5, 7, 8A, 12 and 14 respond to the Forest's share of the 1990 RPA program for timber with allowable sale quantities of 380, 400, 680, 520, 330, 450 and 350 MMBF respectively

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Letter 146 In order to further explore the decision space around the draft proposal, it may be desirable to create additional alternatives, especially to more fully carry out the basic philosophy underlying Alternative 8

Response The ID Team has formulated one new alternative and modified two alternatives to explore the suggested modifications to Alternative 8

Letter 4043 The major problem with the presentation of the 13 alternatives is that the description of all but the preferred Alternative 8 is very brief Although the DEIS instructs interested parties to write for a copy of the process paper for a particular alternative, a reviewer cannot tell from the information in the DEIS whether a particular alternative should be preferred over Alternative 8. Conversely, the Forest Service provides an entire book outlining the preferred Alternative 8 The information appears biased in favor of the agency preferred alternative.

Response — Thirteen alternatives were formulated in order to provide the "broad range" requested by the public and the Chief of the Forest Service But publishing and distributing a plan-version of each would be costly. We felt that making the information available to those who request it was a responsible procedure. We are not required to choose and publish a preferred alternative in the draft documents. However, with the ongoing and successful involvement of the public in the formulation of the alternatives, we felt the time was right to begin to choose a direction and yet remain open to public and agency comment. More than 4,000 letters were received in response to the draft documents, yet we had relatively few requests for the process papers. Each letter was given individual attention and our responses are published either in this document or in documents referenced

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Letter 3660 — A full range of alternatives is not presented All alternatives have a slant Need a balanced alternative.

Response — The ID Team believes that the FEIS contains a reasonable range of alternatives This does not mean that there has to be an alternative included that is completely satisfactory to every individual, organization or agency.

Letter 4043 — The range of alternatives presented offer extreme choices that are not likely to be adopted Alternative 3 discusses an environment unaffected by man's activities Management activities are prohibited except for low-visual-impact recreation facilities and habitat improvement for threatened, endangered, and sensitive species Openings in the forest created by timber harvesting, roadbuilding, and other management activities would gradually close and blend with the natural environment By contrast, Alternative 5 provides an uninterrupted flow of marketable goods and services Management for the protection or enhancement of the visual resources of the forest becomes subordinate to timber and wildlife objectives Realistically, neither Alternative 3 nor 5 would be adopted.

Response — Those alternatives on the outer end of the range of alternatives have a lower likelihood of being selected as the Forest Service preferred alternative This does not mean, however, that they should be eliminated from detail study in the FEIS. Both Alternatives 3 and 5 provide strong responses to issues representing widely divergent viewpoints. The public deserves to see the advantages and disadvantages of managing the George Washington National Forest under these scenarios.

Letter 1060 — It is unclear whether the 1986 benchmark is still applicable At a minimum the 1992 revision should explain whether the previous benchmark analysis is still relevant and whether changes in the land base or other variables will require adjustments to the benchmark results If changes are required they must be described and explained

Letter 1060 — Without the proper benchmark analysis, the agency itself can not assure the public that it has provided a "broad range of reasonable alternatives" (36 CFR Section 219 (f)) which are "distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable, the full range of major commodity and environmental resource uses and values that could be produced from the forest " (36 CFR Section 219 (f) (1))

Response — Benchmarks have been done as required by 36 CFR section 219 12(E) (1) The results can be found in Appendix B of the FEIS.

Letter 4043 — In discussing the alternatives, the DEIS makes several statements but does not provide evidence in support of those statements The DEIS claims that no alternative results in nutrient loss or nutrient cycle disruption severe enough to lower productivity over the short or long term The DEIS states that "since forest management practices do not measurably impact the ground water resource, impacts do not vary measurably by each alternative " However, a comparison of the alternatives shows that they range from maintaining a primitive, wilderness area to providing an uninterrupted flow of marketable goods and services, i e a high level of timber and a habitat favorable to huntable wildlife The long-term effects of logging, new road construction, and heavy traffic on the ground water resource cannot compare with the effects of managing the forest at a primitive level

Response — The discussion on nutrient losses and nutrient cycling is expanded in the FEIS As stated in the EIS, groundwater aquifers on the Forest are generally of limited extent, having little influence on deeper regionally important aquifers Limestone aquifers are protected by standards that include buffers around drainages into caves, sinkholes, and cave collapse areas

Letter 188

The no action alternative should show no decrease in SPNM acreage. In alternative 2, which purports to model the current plan as modified by interim guidelines, the SPNM acreage declines. This must be corrected so that no decline in SPNM is shown

Response

Alternative 2 has been reformulated so that there is no change in the existing recreation opportunity spectra

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Letter 145

1,800 people are employed by the timber and wood industry in the area of the GWNF. This number is basically flawed because certain viable businesses were excluded, either in part or in whole, from the economic impact review

Response

The ID Team acknowledges that this number does not include the employees in the pulpwood and furniture industries This information has been removed from the FEIS

Letter 2665

The Annual harvest is determined to be 8550 acres/year, (2000 even-aged + 6550 uneven-aged) of 259,036 acres suitable for timber harvest (Plan, 2-15). Dividing this by 8550 acres per year = year average rotation. .this results in a perpetual young forest; averaging 3 clearcuts per century will destroy the capacity of these areas to "produce" healthy timber on a sustainable basis.

Response

By its nature, uneven-aged management has no rotation length The 6,550 acres listed in the DEIS for Alternative 8 was the TOTAL acreage where uneven-aged management would be practiced, NOT the average annual acreage harvested in terms of the sum of the acreage in each "group" of group selection. For planning purposes, the ID Team assumed that 10% of this acreage would be harvested every decade. It is important to remember that uneven-aged management is regulated by volume controls rather than acreage controls.

Letters 134, 4034

This section of the DEIS (p 3-38 - 3-47) is confused and garbled It is stated that approximately 30% of the Forest has already been defoliated (p 3-39) certainly a gross exaggeration! Indeed this conclusion doesn't at all check with the defoliation map on p 3-41.

Response

The defoliation map displays the history of gypsy moth defoliation through 1990 only. It does not include 128,384 acres defoliated in 1991 The percentage of the National Forest defoliated by gypsy moth represents the acreage through 1991. In addition, it is important to recognize that the National Forest boundary marked on the map is the Proclamation Boundary of the National Forest, within the Proclamation Boundary are large holdings of private property

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Letter 2665

Alternative #3 is severely misrepresented. At no time was closing of Crabtree Falls proposed, your proposal significantly reduces user days as a result

Response

When the ID Team was formulating Alternative 3, they assumed that the objective of maintaining Crabtree Falls as a "Special Biological Area" required the removal of the Crabtree Falls Observation Site Alternative 3 has been reformulated in the FEIS so that the Crabtree Falls Observation Site would remain open to public use

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Letter 3988

Normally in a DEIS it is possible to ferret out the cost/benefit of timber management and recreation management. I found it impossible in this DEIS. I would expect that a reduction in the 27 MMBF harvest level in Alternative 8 might result in a reduced budget and greater PNV Is this correct?

Response

A reduction in timber volume from current would not necessarily reduce the total budget While the timber program in some alternatives was reduced from current management in the DEIS, this reduction was typically offset by increases in other program costs, such as those for threatened and endangered species, developed recreation, and visual resource management Present net value is one of the criteria used to determine net public benefits Other benefits of public land management cannot be measured using dollar values

Letter 500 — Table B-16 in the EIS lists alternative 6 as a "Maximum Wildlife" practical benchmark. This is an error It does not attempt to maximize wildlife values

Response — There was a typing error in Table B-18 in the DEIS. Alternative 7, not 6, can serve as a "practical" wildlife benchmark In the FEIS, the ID Team has displayed information from the maximum resource benchmarks, including wildlife, rather than considering different alternatives to be "practical" benchmarks.

Letter 500 — According to information supplied by Westvaco Public Affairs office, wood chips are trucked to the Covington mill from distances up to 200 miles The assumption that mills generally draw from only 50 miles (EIS p B-25) may be inaccurate for the Westvaco facilities in Covington and Luke (MD)

Letter 2636 — With reference to our letter of 3/8/91, we repeat our skepticism of using a blanket 50 mile radius for determining market area for different wood products

Letter 2636 — Under Market Area the economists assume that in the GW area pulpmills generally draw from an area within a 50 mile radius of the processing facility These economists apparently have not understanding of the operations of the Westvaco mills at Covington, VA and Luke, Maryland The assumption of a 50 mile radius is not valid, and it totally invalidates the identification of the market area for pulpwood and especially the table showing "the percentage of timber harvested by product and species on the GWNF as it relates to the total market area "

Response — The mill at Covington (and presumably the other pulp mills) can obtain chips from longer distances than 50 miles The impact analysis, however, deals with the relative abundance of the wood products in the influence zone of the Forest. The wood products from the Forest are an appreciable component of the total wood supply of the impact area identified in Appendix B of the FEIS Beyond this zone, they play no appreciable role in the local economies

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Letter 990 — According to table A-3, the stage two suitability analysis is based on harvesting by clearcutting However, the plan is based on an assumption that less than 300 acres of clearcutting would be carried out The stage two analysis should be conducted with assumptions about harvesting methods used for the construction of the preferred alternative.

Response — The stage 2 timber suitability information displayed in Table A-3 of the DEIS was a summary of information in the stage 2 suitability analysis Since this information appears to have caused more confusion and disagreement than enlightenment, this information has been removed from Appendix A of the FEIS

As part of this analysis, the Planner/Analyst calculated the economic values for each of the regeneration harvest methods for each analysis area This information is extremely voluminous and not easily displayed. Generally, the most efficient timber harvest cutting methods in descending order were clearcutting, modified shelterwood, two-stage shelterwood, group selection and individual tree selection

Stage 2 timber suitability analysis is not meant to be a "hard screen" that classifies lands as unsuitable for timber production The ID Team considered this information in formulating alternatives In the case of the Forest Service preferred alternative, the ID Team improved the projected net revenue to the extent possible in light of other multiple use objectives

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Letter 134 — Effects on Employment - Despite the claim that the Plan documents provide all information on employment effects, this is not true The claim on p 2-51 of the DEIS that adoption of Alternative 3, the Conservation Biology alternative, would result in joblessness is unsubstantiated It is likely that jobs lost through cessation of all logging on national forest land would be quickly compensated by job creation on private forest Furthermore the lifting of competition from federally subsidized timber would likely benefit private growers Unfortunately this aspect of employment is not even mentioned in the Plan documents

Letter 2665 — Effects on jobs are misrepresented [for Alternative 3].

Letter 3941 — To suggest that jobs will be lost as a result of the draft plan, as indicated in the "social/economic setting" section of the DEIS (pp III, 82-84), is misleading The lower timber volumes proposed in the preferred alt would be offset by higher levels of harvest from other lands--particularly private lands--in the market area As a result, there would be NO loss of timber industry jobs in the region The projected rise in other jobs (in tourism,

recreation, and wildlife-oriented industries and within the FS itself) would represent a net GAIN of jobs in the region, because these jobs are tied to resources that can only be supplied on NF lands. The final analysis needs to deemphasize outputs that can be supplied from other sources in the region and emphasize outputs that only can be supplied from our public lands.

Response — The discussion on employment and income effects are based on the relative changes that would occur IF there were no off-setting effects in other parts of the local economies. There is no information that substantiates the assumption that all of the wood products from the Forest can be substituted with wood products from private lands with no economic effects

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Letter 989 — One of the failures of the planning of the George Washington National Forest is the deliberate failure to adequately assess user needs in conjunction with the facilities and opportunities provided in the plan. This has led to unbalanced provisions for some uses where some uses of public land are provided with more opportunities than needed and some are provided with very little.

Response — Alternative 8A is designed to provide for a wider array of uses, values, products and conditions that traditionally recognized as multiple uses In deciding on the appropriate mixture of multiple uses, the ID Team considered values and environmental conditions which cannot be measured in terms of "demand". To conclude that portions of the Forest should not be allocated to Management Areas 4, 5, 6, 7, 8, 9 or 21 simply because they are not needed to meet the demand for "primitive, non-motorized" recreation ignores the fact that these areas are also providing biological values and conditions desired by the public and that development of these areas would require extensive roading that cannot be economically justified on a Forest with a below-cost timber program

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Letter 4219 — The CTF has provided substantial comment on yield tables, demand studies, and stage 1/2/3 analyses We request that you review the correspondence with us on these items and that they be entered into the record for the preparation of the LRMP

Response — The ID Team responded to correspondence related to the draft documents and received during the 3-month-long comment period To track CTF correspondence and its impacts, see the how-to section in the first few pages of this appendix

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Letter 78 — The analysis (EIS B-55) states that 40% of the volume in the first decade must be by clearcutting and 40% by shelterwood This contradicts the analysis (EIS 2-45) which shows that only 300 acres per year is expected to be clearcut and 1700 acres cut by shelterwood.

Response — The ID Team corrected this error in the FEIS

Letter 3981 — EIS 3-88, paragraph 1 - "Significant increases are projected " By whom? Hunting is decreasing daily in the United States I want independent objective studies to be consulted in rewriting the "Wildlife" section

Letter 3981 — EIS 3-88, Table 3-17 - The huge majority of visitors to the GWNF are noncomsumptive recreationists. What they are viewing while there is the full gamut of wildlife So how can such a tiny special use group (hunters in the GW are 1/2 of 1/5 of 1/15 of the population) be said to be of greater "demand" importance? This table needs revision or should be tossed out

Letter 3981 — EIS. 3-89 - Table 3-19 is similarly misleading and based on such tenuous data that it is virtually worthless. Are the overall rankings handicapped according to biomass, the cost of licenses, or what? Studies have even shown deer to prefer old growth fragmented forests (see Schoen, et al) Bear achieve their highest total in Alternative 3, not 3, 6, and 9 (see pg 3-141) Revise or drop this table

Letter 3981 — EIS 3-89 - Table 3-18 is misleading Demand is somehow construed to be equal to some projected number of carrying capacity This is a concept that misrepresents the presumed numbers of animals each Alternative provides for The suppositions are so nebulous that this table should be revised or stricken

Response — Table 3-18, on page 3-90 of the draft EIS is not well titled. It does show, for relative comparisons among alternatives, the potential populations of deer, bear and turkey Demand is based on hunting demand.

Letter 3981 — EIS: 3-111, paragraph 1 - The 4th sentence in this paragraph implies that without cutting in the forest a less broad mix of ages will result. This is ridiculous and needs to be stricken. A wild old forest contains the broadest mix of ages They are distributed differently than in a managed forest. A J curve instead of a bell shaped or even line distribution of artificially manipulated patches of even-aged trees.

Response — The sentence implies that the cutting and regenerating of some parts of the forest, in addition to allowing natural succession to take place on most of the forest provides for more age classes of trees than just natural succession Within the scope of a large unsuitable land base, this is an accurate statement

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Letter 2060 — The "Wildlife Benefits from Timber Sales" graph (Fig.2-5) on page 2-35 of the EIS is grossly misleading What wildlife? White-tailed deer and related species that thrive on edge and open habitat? In your analysis, Alternative #3 has no value to wildlife presumably because no timber is cut under this alternative. This is misleading since this graph as well as your analysis does not consider the harmful effects of timber harvesting on interior-dwelling species, and the beneficial effect of no harvest. If you cannot readily assign an economic value to such creatures, it is because the appropriate research has not been done and your data base is not complete This graph is therefore of no use in evaluating alternatives

Response — Figure 2-5 in the DEIS has been dropped from the FEIS

Letter 3742 — The Virginia Department of Game and Inland Fisheries estimates an annual decrease in hunters of 2% per year to the year 2000 This estimate should be used when calculating hunting over the life of the LRMP

Response — Between the Draft and Final EIS, a new wildlife demand was made Original projections of increased demand were in error New projections were made based on actual trends of National Forest "stamps", and sales are declining -- reflecting the national trend National Forest "stamps" are showing less than a one percent annual decline

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Letter 188 — The modeling to show the economic performance of the timber program is purported to mirror TSPIRS methodology, and therefore should mirror TSPIRS results However, the alternative 2 figures are approximately $200,000 more favorable than the TSPIRS report 1 figures for FY 90 The modeling should be changed to show dollar figures not significantly different than the average for the last three years

Letter 3939 — Display in the Final EIS the cost and benefits derived from an active timber management program This would show a more accurate picture than the cash flow process used

Letter 3962 — The EIS shows a loss of $754,000 in the model of the forest as it is managed today In actuality, the GWNF has lost between $1 1 and 1 2 million on timber sales each year for the past several years. The model is showing a 46% error in projected net revenue The proposed Alternative 8 cut of 27 MM board feet in the Plan has projected loss of $1 05 million If the model error is consistent, this number would jump to $1.5 million While the GNWF has been slightly reducing the losses each year, increased losses will not be accepted by the public.

Letter 3840 — Chart on 2-34 shows incorrect current revenue levels as per TSPIRS report

Response — The assumptions in TSPIRS and in estimating projected net revenue by alternative are related but not exactly the same. TSPIRS estimates the actual receipts received from the timber program minus the actual timber expenditures for a given year with certain costs like roads pooled Projected net revenue is based on a five year average for the value of stumpage sold from the forest (1987 - 1991) and the average timber costs from 1988 - 1989 These estimates are adjusted to 1989$ in the FORPLAN model with projected net revenue calculated by subtracting timber costs from the stumpage value by alternative. Since these two procedures are completely different it would be surprising if the numbers were the same However, projected net revenue is considered a good relative indicator of how each alternative responds to the below cost issue

Letter 278	The following information may be helpful in verifying or revising economic data and analysis for value from recreational use:
Letter 278	The 1988 Virginia Outdoors Plan states that Virginia park visitors spend the following average amounts. $16 per day for day-use visitors and $55 per day for overnight visitors. About $80 million per year in economic revenues was generated by day-use and overnight visitors to state parks.
Letter 278	A recent Water Resources Bulletin reported on the economic effects of river recreation on local economies where three conservation and recreation areas were established.
Letter 278	The "total value added" for the three areas studied are $6.2 million at Upper Delaware Scenic River, $1.7 million at Delaware Water Gap Recreation Area, and $1.4 million at New River National River Total new jobs created ranged from 60 to 292
Letter 278	A 1990 study by Southern Illinois University documented 63 net new jobs created by establishing the Cypress Creek National Wildlife Refuge in rural southern Illinois. The study indicated positive economic effects by a shift from agricultural production to wildlife-recreational activities.
Letter 278	A recent study conducted at Cape May, New Jersey showed that approximately 35,000 people visit Cape May each year.
Letter 278	The total amount spent by just those individuals who visit Cape May for bird watching activities was $5,728,700 per year.
Letter 3939	The Planner cannot state what the wildlife jobs are or where they will be located The Plan does not consider the negative impacts on indirect jobs in the Forest's zone of influence due to a reduction in the timber program
Response	The importance of wildlife and recreation produced on the Forest and the effects these outputs have on jobs and income in the 19 county impact area surrounding the Forest are recognized. Total income and job estimates by alternative include these two outputs as well as timber, forest service expenditures and county returns

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Letter 500	The economic analysis should utilize a supply/demand study in which unit price is used to determine the supply and demand This would allow for better analysis of the likely substitution of production from private land if production from public land is reduced The current study does not measure demand for products from public lands, it merely measures the amount which would be produced if the sales from the national forest remains a constant market share
Response	The assumption is made in our analysis that stumpage offered from the Forest will have very little, if any, effect on price This is known as the horizontal demand assumption A process paper titled *The Concept of Demand* explains the rationale for this assumption. This paper was prepared by a Forest Service economist and concludes that "studies that attempt to address local market demand elasticities are generally very time *consuming and have not proven useful in explaining past stumpage demands nor predicting future ones It is* for these reasons that assuming a horizontal demand on a specified range is recommended "

Letter 744	Accounting procedures to assess the cost of the road have been placed in the same calendar year for the total value of the road's use Though now dispersed somewhat over time, the cost could easily be spread over the life of the road or a longer period than currently in use, and the cost could be dispersed to all users of the road.
Response	In our analysis by alternative, the assumption is made that when a timber stand is harvested a road is built The entire cost of the road to assessed at that time

Letter 744

The draft forest plan has now viewed the future economic needs of the affected communities as individual governmental entities and economic spheres Though the Forest Service cannot be responsible for being informed about all economic trends and community requirements in every county, some fact finding and a cursory examination of economic conditions is advised

Response

To better reflect the local effects of the timber program on the local economy, a paper titled "An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area" has been prepared This paper addresses impacts by county within the 19-county impact area.

Letter 940

We would like to know if the Forest Service has any data on the economic impact of leaving a 200-foot wide riparian zone free of timber cutting

Response

In terms of jobs and income that would be produced in the 19-county impact area, the effect will be very small This is based on the assumption that there are about 28,000 acres in riparian zones and only a small proportion of the ASQ is cut from these areas

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Letter 990

According to table A-3, the stage two economic analysis also assumes that only variable costs are used in the calculation of costs Since fixed costs are also real costs, they should be included in the determination of costs

Letter 2636

The stage two economic analysis should be redone to include fixed costs in addition to variable costs Because of the importance of the below-cost issue on the GWNF, the location of the stage two results should be mapped and made available for public comment

Response

Stage 2 (financial analysis) timber resource land suitability analysis is disclosed in much more detail in the process paper *Incorporation of the NFMA Requirements for Timber Resource Land Suitability into the Revision of the Land and Resource Management Plan for the George Washington National Forest*

The Stage 2 financial analysis includes direct benefits and direct costs as defined in 36 CFR 219 14(b)(1) & (2). For the purposes of our analysis these direct costs were defined as variable costs Fixed costs included overhead and assessment costs and were determined based on 36 CFR 219 4b(b)(1) & (2) to be inappropriate to use

The question of mapping the Stage 2 financial analysis is one of what to map and who could effectively use the information The financial analysis shows the cash flow for each timber management prescription that is applied to each FORPLAN analysis area These analysis areas are combinations of stands within similar physical and biological characteristics Depending upon what type of analysis is desired, the information could be mapped dozens of different ways It is highly debatable whether this information would be particularly helpful to members of the public wishing to comment on the draft documents

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Letter 990

Table A-4 projects the growth rates from the suitable acres for 10 periods 1-5, 10, and 14 The growth projection for period 1 is a modest 20 MMBF The future decades show growth rates which appear to be extremely optimistic The rationale for these optimistic growth rates should be given in the EIS, with supporting documentation for these rates

Response

The growth rates are based on yield tables developed by G Luther Schnur in his publication "Yield, Stand, and Volume Tables for Even-aged Upland Oak Forests "

Letter 1060

Council members and other local industry representatives are concerned that the agency's demand analysis underestimates the demand picture. In the DEIS, (page 3-91) the agency identifies the current (1989) demand at 38 million board feet per year and 45 5 million board feet per year in the year 2000 However, the agency did not consider planned mill expansions but rather relied on historical figures The Council recommends that these concerns must be addressed and that further analysis of the demand must be undertaken with involvement from industry, state and local officials familiar with actual and potential future timber needs

Letter 1369 The DEIS states "A change in FS timber harvests could be offset by a change in the amount harvested by non-industrial private landowners and should not have an adverse effect" This assumption is completely wrong! This is unrealistic either at national level or state level or even on the local level. "With growth exceeding removals by a factor of 3 " Clearly the potential is there to sustain almost any timber demands Local industry reps are concerned that the GW's demand analysis underestimates the demand picture. Further analysis of the demand must be undertaken with involvement from industry, state and local officials familiar with actual and potential timber needs in the future. The analysis did not consider the direct impact reduced log supplies will have on the 4 paper mills in the area The impact of sawmills who purchase logs from loggers and to the paper industry who rely on pulpwood from the NFs or chips from sawmills using NF sawtimber must be included in the assessment of the direct job impacts

Letter 2636 Under Summary and Conclusions the Regional economists said, "For the purposes of this study it was determined that the appropriate assumption should be one of maintaining the current market share." We could not see a discussion in the paper which showed how the authors decided that this assumption was appropriate

Letter 2636 Our letter of March 9, 1991 raised questions about the "Timber Supply and Demand Analysis". We have attached this letter, and we request that it be made part of our comments As we stated in that letter, we were skeptical of the assumption that the GW should maintain a constant market share We requested that you send us any further information available on why maintenance of market share is a reasonable assumption of the GWNF Your response on July 8, 1991 stated that this questions can be addressed best through a detailed evaluation of the alternatives considered in detail in the draft EIS You said that different responses to this question of market share need to be weighed against the other benefits and the costs of providing those other benefits The EIS and Plan are deficient in addressing this question

We did not find the "detailed evaluation" which you had promised on this point. The average reader would find it difficult to understand that the determination of "demand" is based on an assumption of maintaining a constant market share We saw no discussion as to the importance or benefits of maintaining a constant market share when the program is below-cost The final EIS and Plan should fully discuss this topic and provide full documentation as to the benefits of such an assumption We suggest that equal treatment be given to a discussion of substantially decreasing market share as well as increasing market share

Letter 2938 The demand for timber in the future is going to be greater than what you have allowed for in any of your alternatives.

Letter 3939 We believe that the [timber] demand is much higher than the Forest Planner estimated Alternative 8 states that this short fall can be easily made up from other sources without any analysis that shows it would be possible to do so We do not believe that this is possible

Letter 3939 It appears that the data, for the mountain zone, from the continuous inventory of timber plots (remeasured every ten years and last released in 1986) was not used or given consideration by the Regional Economists or Forest Planner. It appears that the economists used State wide information which skewed their results They should have only used information from the Forest zone of influence We feel that the demand for timber products from the Forest is higher than estimated in the Draft Revised Plan We also do not believe that the difference between demand and that supplied from the Forest can be made up from private and industry forest land into the foreseeable future There is no analysis in the documents provided that shows that this is possible No consideration was given to the amount of forest land that is under other ownership such as National Parks, State Park, Regional Parks, State Game lands, wooded private subdivisions, etc where the timber is not available for harvest The unemployment figures for the counties in which the Forest is located were ignored, even though the majority exceed the State and National figure and have for several years

Letter 3951 The analysis of demand for timber products from the area is badly flawed There is nothing displayed in the Plan, EIS, or process papers to back up the claim that the difference between demand and the 27 mmbf/year can be easily obtained from private and industry owned land in fact there is no total demand figure displayed for the total area I feel that the figure displayed as demand (45 5 mmbf/year) was pulled out of the air I would not be surprised that the total demand for the area exceeds 400 mmbf/year

Letter 3981 EIS 3-91 - Timber - "Demand for forest products is expected to grow " Is the "Anticipated Demand" actually a demand, or merely what the GW management would like to supply? Appendix B makes the latter appear to be the case This section needs further clarification and development

Letter 4044

According to the Forest Service's own economists the timber supply demand projections are estimated to increase from the current 39 million board feet to 45 5 million board feet by the year 2000 and eventually to an astronomical 60 million board feet by the year 2040. These unsubstantiated figures strike me as being extraordinarily high considering the fact that this forest has historically averaged about 24 million board feet and the strong public support and comments in favor of recreation activities which maintain the forest's natural environment also indicate a decrease in demand

Response

Historically the Forest has provided a small share of the timber demand in the 19-county market area, applicable to this Forest (between 5 and 9 percent from 1977-1989) We estimate the Forest's contribution to this demand as being between 15 MMBF and 31 MMBF Our projections in the demand analysis of the Forest are predicated upon the historical trend of timber stumpage delivered by the Forest FIA data for our market area indicates that forest industry and non-industrial private land comprise 72 percent of the land within this area, while the National Forest comprises 26 percent But the productive capability of the Forest and management objectives on public lands has influenced historic production levels It is inappropriate to infer that the National Forest should produce 26 percent of the market area volume With these statistics in mind, we believe that there is an adequate supply of timber available from non-NF sources that could take up any shortfall if the Forest's annual timber offer was marginally reduced from its 39 MMBF current level Stumpage price adjustments may be needed to induce other owners to increase supply of timber, but we feel these adjustments would be minimal

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Letter 1060

The social and economic impacts presented in the DEIS is also inadequate Specific comments center around the impact on jobs and that the agency considered only those jobs directly effected actual purchases of timber sales The analysis ignored the direct impact reduced log supplies will have on the 4 paper mills in the area In addition, the analysis neglected to include the downstream sawmills who rely on national forest timber but do not directly purchase timber from the national forest The impact to sawmills who purchase logs from loggers and to the pulp and paper industry who rely on pulpwood from the national forests or chips from sawmills using national forest saw timber must be included in the assessment of direct job impacts

Letter 2576

The Forest Service did not adequately assess the impact to jobs The analysis ignored the direct impact reduced log supplies would have on the 4 paper mills in the area The analysis neglected to include the downstream sawmills who rely on national forest timber but do not directly purchase timber from the national forest

Letter 3963

Virginia Review (Clifton Forge), 13 Mar 1992 The Forest Service did not include employment at Westvaco when it calculated the number of jobs that will be affected by its management plan

Response

This analysis includes the effects of selling stumpage from the Forest on direct and indirect income and employment within sectors 160, 161 and 162 in the IMPLAN model These sectors include independent loggers and local sawmill operators. The direct and indirect effects on the pulp and paper industry are not included in the model. At present only 5 percent of the volume needed by this industry comes from the Forest The ID Team thus assumes that the impact of selling Forest stumpage on jobs and income in the pulp and paper industry is very small at best However, to better respond to this question, a sensitivity analysis was performed using the IMPLAN model and including the pulp and paper industry Based on data supplied by Westvaco and assuming the pulp could not be obtained anywhere else, the following multipliers were developed for every 1 MMBF of hardwood roundwood sold by the Forest (up to 15 MMBF) 31 73 jobs and $1 119 million would be generated throughout the impact area. This compares with 4 08 jobs and $0 07433 million not including this sector Refer to Appendix B of the FEIS for more information

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Letter 1060

The DEIS does not comply with the requirement at 36 CFR Section 219 12 (e) to include a benchmark analysis of the management situation as it defines the capabilities of the forest and the range within which alternatives can be constructed Without the proper benchmark analysis, the agency lacks the ability to identify and measure the multiple-use tradeoffs it accepts when it decides to manage at less than the maximum production potential Because the DEIS lacks this analysis, it does not identify the true multiple-use tradeoffs necessary to make decisions In Appendix B of the DEIS (page B-37), the agency indicates "rather than perform a mechanical exercise of producing benchmarks with little or no relevance to the issues, the ID Team used some of the alternatives themselves to serve as 'practical' benchmarks." This indiscriminate action by the agency is unacceptable and is a clear violation of the agency's own regulations to implement the National Forest Management Act ("NFMA").

Letter 1060 — The inadequacy of the "practical" benchmark documentation severely restricts the agency's ability to present to *the public and its own decision makers the "maximum physical and biological production potentials of significant individual goods and services "*

Letter 1060 — Unfortunately, the agency chose to restrict the analysis of the forest's "maximum timber potential" by developing "practical" benchmarks Defining the "benchmark" as "practical" infers that the identification of the "maximum timber potential" was a political or "public pressure" identified level This process results in an understatement of the production capabilities in the selection of Alternative 8

Letter 1369 — There is some question in the analysis part of the process How are tradeoffs selected when the decision to manage is made with less than maximum production potential? The lack of "practical" guidelines limits the Forest's ability to present the "maximum physical and biological production potentials of important goods and services We don't know what the true physical and biological potential of the GWNF is Without this info, we cannot evaluate any alt properly

Letter 3660 — *No Benchmark Analysis is done for timber output. Since net growth is over 100 mmbf/year, why isn't this used* as the benchmark.

Letter 3939 — The law requires a benchmark analysis be developed and displayed in the DEIS and final EIS. Such analysis is crucial to the analysis of the management situation since it defines the capabilities of the Forest and the range for development of alternatives Without proper benchmark analysis the Forest Planner lacks the ability to identify and measure the multiple-use tradeoffs he makes in the Plan In Appendix "B" of the DEIS (page B-37) the Planner states "rather than perform a mechanical exercise of producing benchmarks with little or no relevance to the issues, the ID Team used some of the alternatives themselves to serve as 'practical' benchmarks". Without development of true benchmarks then true alternatives cannot be developed.

Letter 3939 — Develop and display the various benchmarks required by NFMA. Then use those benchmarks in the final development and analysis of various alternatives. As a minimum use those developed for the 1986 Plan with an update to present situation

Letter 3951 — This 1992 Plan does not show any Benchmark analysis that can be used for a comparison of alternatives with needs or demand.

Response — Benchmarks have been done as required by 36 CFR section 219 12(e)(1). The results can be found in Appendix B of the FEIS

Letter 1850 — Your process paper assumed that a reduction in timber offered would affect three sectors. Sawmills 1,278 jobs; *Logging 474 jobs; Hardwood Dimension 50 jobs, Total 1,802 jobs This same process paper stated that there* are a total of 8,920 jobs that depend on an adequate supply of wood to operate their business. Your team completely disregarded the needs of 7,118 people in the impact area In Alleghany County about 2,000 persons are dependent on forest products for a living. The George Washington controls 59.8% of the forest land in the county I think that the George Washington should supply 59 8% of the wood harvested in the county. The team should have presented all pertinent data Indirect users are also directly affected by a lack of raw material You have no way to insure that any industry can obtain stumpage from private land or from areas outside the George Washington influence area In any and all directions in the United States there is a demand for forest products. We are unable to import wood from other parts of the world.

Response — The question in the impact analysis is what economic activity within a specified impact area would be expected to change as a direct result of changes in our harvest level? This is much different than what are the impacts of the timber-related industry on the U S ? The three sectors selected for the timber impact analysis are based on the first question. The Forest recognizes that Alleghany County is impacted by the sale of timber from the George Washington National Forest and may have difficulty finding volume from other sources (refer to the process paper *An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area*)

Letter 3988 — The recreation analysis is seriously flawed as there is no indication of the demand for the various types of recreation settings Thus, there appears to be no basis upon which to judge the various alternatives abilities to meet the public desires How was such judgment made? Are there surpluses of one setting and shortages of another?

Response — During the formulation and analyses of alternatives, the ID Team referred to the Process Paper *Dispersed Recreation Demand Analysis — George Washington National Forest* Demand for developed recreation has been determined by amount of use of existing areas and contacts by the public requesting additional areas In many situations user groups display demand by volunteering to help construct and maintain recreation facilities such as horse camps, rifle ranges, hang gliding sites and trails The surplus and/or shortage of specific types of recreation depends on which alternative is selected by the Regional Forester Alternative 9 emphasizes dispersed recreation in semi-primitive settings. Alternatives 8A, 10 and 12 offer the most opportunities for highly developed recreation.

Letter 3988 — The visual resource section was seriously flawed in that there was no "starting line" defined. Apparently there was no inventory of the existing condition of the landscape Thus, it is impossible to display any meaningful effect of an alternative. The figures on page 15 of the DEIS are completely misleading to the readers in light of the above Similarly, the figures on "Inventory" in Table 3-26 are misleading.

Letter 3988 — The inventoried Visual Quality Objectives do not constitute a base line or "starting line". They have no relation to what the current condition of the landscape is--they only reflect the variety class, the sensitivity level and the distance zones

Response — The VQO inventory was developed using national guidelines set forth in USDA Handbook Number 462 "The Visual Management System" It provides consideration of both physical and social characteristics of the landscape Although considered in assigning a variety class, the VQO inventory does not provide information about the specific type of landscape setting. Project analysis provides that information The purpose of the inventory is to provide objectives for the visual quality, that is specifying the degree of acceptable alteration to the natural landscape

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Letter 2665 — The EIS defines supply by mill capacity, which is, in economic terms, a supply factor (EIS B-25, 3-82, 3-89, 3-91) Defining demand in terms of supply bastardizes the entire economic analysis and flaws the findings. The entire demand/supply analysis is incorrect.

Response — For the purposes of our analysis supply is defined as the amount of a given output (i e , timber, recreation, wildlife) that the Forest has the physical capability to produce Demand is defined as the level of output the public will consume at a given price. Demand is equal to consumption

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Letter 2886 — Your economic data does not fully represent the negative impact of Alternative #8 With the projected loss of total jobs and timber related jobs total income will naturally fall as opposed to the Forest Service's projection of no change

Response — Total income does fall, but only by $95,000 To round to the nearest million dollars, this becomes $0

Letter 989 — In the public response to the plan, over 1/4 [of the] responses called for increased opportunities for recreational four-wheeling The Forest Service response to all this input was to sharply reduce the opportunities of four-wheeling because they stated there was no significant demand The data shows a pressing need for a sharp increase in four-wheeling opportunities to better satisfy the current needs The facilities for 4WD use have grown less while demand has increased by 8% The Draft refuses to acknowledge a significant demand while only discussing the "concerns" over the use

Letter 3537 — Tables 3-20 and 3-21 in the EIS display the demand and supply (as a percentage of demand) which justify the building of the three new OHV/ORV complexes It has been explained that the semi-primitive motorized recreation demand figures in table 3-20 are actually "expected" demand if the new complexes were available. These figures are misleading and have little substance Therefore they should be removed from the EIS unless an actual current demand can be calculated If these numbers do reflect the expected demand of ATV use, it would seem that the Forest Service feels it must create a demand for an already controversial matter An increased demand would certainly increase user conflict which directly contradicts Executive Order 11644

Letter 3685 — The section on economic effects also did not estimate the revenue generated by off-road vehicle use in the forest

Letter 3939 We believe that the estimate of demand for 4-wheel drive and ATV recreation use derived by the Forest Planner is low based on information presented by the Commonwealth of Virginia in their "Outdoor Recreation Plan"

Letter 4013 *Why is not the needs of the four wheel drive recreationist taken into consideration in the planning process?*

Letter 3982 Figure 2-34, "Change in Employment" and Figure 2-35 "Change in Income" show a decline in both for Alternative 4, where motorized recreation is emphasized

Letter 3982 Yet table 3-21, "Supply (as a percent of demand) of Recreation" shows most alternatives exceeding the demand for semi-primitive motorized recreation In light of the admission in the issues discussion, these figures are clearly fantasy.

Letter 4035 The FEIS fails to adequately present data for motorized rec use and economic impact - Fig 2-34, "Change in Employment" and Fig 2-35 "Change in Income" show a decline in both for Alt. 4, where motorized rec is emphasized. *Yet the issues discussion states a potential but undocumented large demand which could result* in a rise in local income and employment This rise has been demonstrated elsewhere, where OHV rec has been emphasized. The figures are clearly in error The issues discussion also states, "There is unquestionably a larger demand for ATV use opportunities than the Forest has been providing. The exact magnitude of this demand is unknown " Yet Table 3-21 "Supply (as a % of Demand) of Rec" shows most alts exceeding the demand for SPM rec In light of the admission in the issues discussion, these figures are clearly fantasy

Letter 4035 Better information is needed to project the demand for and economic benefits of motorized rec.

Response The question of motorized recreation supply and demand has been revisited in preparing the FEIS. An improved discussion on the supply and demand for off-highway vehicles (OHVs) is included in Chapter 3 of the FEIS under "Dispersed Recreation"

The EIS estimates income generated by RVD's produced within the SPM ROS class up to demand. This income estimate is based on multipliers developed in the IMPLAN model No specific analysis has been done on the demand for or revenue generated by off-road vehicle use. However, the Forest concedes that for this use demand is greater than areas or routes the Forest can supply

Alternative 4 increases the timber outputs and decreases wildlife RVDs when compared to current management. The decrease in wildlife RVDs is more than the increase in timber resulting in a net loss of jobs and income

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Letter 3614 Regarding the Draft Plan: By what methodology has the GWNF determined the demand for ORV recreational opportunities pursuant to Section 2355 03 (policy) of the Forest Service Manual (hereinafter "FSM") and what were the results of this analysis?

Letter 3614 What coordination activities have been, or will be, implemented by the GWNF pursuant to FSM 2355 15 to coordinate ORV use with both governmental and ORV interest group organizations?

Response The Forest Service Manual 2355.03 provides for motorized recreational opportunities when, among other conditions, there is a demonstrated demand Several documents were reviewed in considering demand for ORV recreational opportunities. First, we looked at current Statewide Comprehensive Outdoor Recreation Plans (SCORP) for Virginia and West Virginia These documents are available for review in the Forest Supervisor's Office as well as most public libraries in the both Virginia and West Virginia Each of the documents should be reviewed for details.

A discussion of the procedure to estimate the demand for licensed and unlicensed OHV opportunities is included in Appendix B of the FEIS

Letter 3710 The same faulty reasoning that produced misleading conclusions concerning the likely impact of the draft plan on timber demand has produced equally misleading -- but more inflammatory -- conclusions about its impact on timber industry employment By greatly exaggerating potential job losses in the industry, the planning documents distort the public policy debate over the future of the forest

Letter 3710 The planning team simply assumed that any management regime that harvested less than the amount of timber presently harvested would result in proportional jobs lost in logging, sawmills and planing mills, and hardwood

dimension For every job projected to be lost in the named sectors, at least one more job was projected to be lost in the larger regional economy due to a multiplier effect As a result, the draft plan is projected to cause the loss of 67 timber industry jobs, offset by 46 jobs created by recreation management and Forest Service expenditures, for a total loss of 20 jobs

Letter 3710

This is nonsense There is no real evidence that modest changes in timber volume such as those proposed for the GWNF would have any significant employment consequences The most likely scenario is that private suppliers would increase their participation in the marketplace to meet any demand that is not met from federal land. Such increased economic activity in the private sector would maintain employment subjected to less support from the public sector

Response

The IMPLAN model utilized for estimating employment and income affects assumes no substitution will occur Realistically, some increase in private supplies will occur but how much is not known However, for comparison of alternatives, the numbers are considered valid

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Letter 3742

From the attached figure prepared by Steve Richards of the Rockbridge Area Conservation Council, it appears that the preferred alternative and alternative 12 exceed the growth rate on suitable lands in the Allowable Sale Quantity proposed To be fully consistent with the concept of sustained yield forestry, the ASQ should not exceed the growth rate on the suitable acres

Response

The Forest is under no obligation to cut less than growth in every decade This only occurred in Decade 1 and all future decades show growth to exceed the ASQ We are initially harvesting mature stands with very slow growth As they become regenerated the growth rates increase The only obligation the Forest has is to never harvest more than long-term sustained yield and nondeclining yield

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Letter 3939

Recreation (developed and dispersed) use data was obtained from the RIM Reports prepared by the Districts This information is nothing more than a guess of what the Ranger feels the use is each year in each category There is no reliable basis for these use figures since they are not based on actual counts or statistical methods of determining such use However, this same flaw was used for all alternatives and therefore may be accurate enough for comparison purposes for some use categories But they are not reliable enough to be used in any demand trend estimates In addition the use of this data is flawed in that it doesn't take into account the facilities provided by National Parks, State Parks, Corps of Engineers, County and Regional Parks, or private facilities and their use

Response

The Forest agrees RIM data is far from perfect However, it is the only data available for estimating how many RVD's are currently produced on the Forest. The demand projections are based on 1990 RPA indices Refer to process paper, *Dispersed Recreation Demand Analysis, GWNF* for more information

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Letter 3939

The Plan doesn't take into consideration the capacity provided by National Parks, State Parks, County and Regional Parks, Private Parks and State Game lands for such activities as developed and dispersed recreation, hiking, and other categories in the Forest zone of impact If this has been done then the capacity in the Forest zone of impact (for developed and dispersed recreation) would exceed demand by many additional percentage points

Response

The capacity estimates are based on land owned by the Forest, not the Forest zone of impact For more information see the process record, "Estimates of Recreation Capacity for Forest Land Management Planning on the GWNF "

Letter 3939

For supply of timber, other land ownership (within the Forest boundary) and for an area 50 miles outside the Forest boundary was used in an attempt to show little need for timber harvest on the Forest Why was this procedure not used for all the resources and uses? Even with this enlarged area, for the timber analysis, it shows that demand exceeds the volume offered by 41 percent and wildlife capacity varies from 4% to 33% under demand depending on species of wildlife under consideration OHV and ATV demand also exceed that which is offered in Alternative 8 but the Plan does not give sufficient information to determine what the demand or supply may be at this time

Response

There is only one impact area defined for all the resources and uses including timber. The Forest impact area is defined slightly differently than the area used in the Timber Supply Demand paper This was necessary to estimate the income and employment effects from all outputs produced by the Forest (i.e., wildlife, recreation, timber) The timber demand estimates, as well as wildlife and recreation, were developed based on the public's need for these outputs from the Forest and are not necessarily directly related to the Forest impact area.

Letter 3939

A study done by the Virginia Department of Forestry in 1984 and updated in 1988 showed that every $1.00 spent by a logger on stumpage had an add on value of $28 41 by the time the finished product reached the consumer Of this approximately $14.00 stays in the area where the tree was cut. This shows how important National Forest timber sales are to the local economy It also shows the relationship between direct and indirect timber industry related employment This factor appears not to have been considered in the economic analysis performed for the development of this plan.

Letter 3951

No consideration was given to the indirect jobs created by the timber program.

Response

The Forest does estimate the change in income by alternative for the 19-county impact area. This estimate is based on the income multipliers developed by the IMPLAN model The income multipliers in IMPLAN are less than the $28 41 generated by $1 of stumpage. This is primarily because the impact area is much smaller and only the indirect and induced effects within the impact area are measured by IMPLAN. The $28 41 includes effects outside the impact area and value-added estimates for secondary processing, transportation, construction and marketing.

Letter 3941

Although the Draft EIS indicates that the draft plan (Alt 8) will fall short of supplying 100% of the "demand" for other products, such as deer and timber, the analysis used in the draft plan does not accurately represent the supply of and demand for these products from all sources in the market area Rather, these projections represent an extension of past trends for supply of products from the GWNF, based upon an assumption that the GWNF will contribute a constant percentage of the total output of these products in the region No analysis is provided in the DEIS to estimate the total demand of timber in the market area or the total supply of timber available from all sources in the region. Based on our long-term involvement with this issue, it is our contention that more than 100% of the entire demand for timber from the region, both present and projected, could be supplied from privately owned lands with no participation whatsoever by the GWNF

Response

Two process papers address the supply situation in the impact area These are *Timber Supply and Demand Analysis for the GWNF* and *An Analysis of the Potential Geographic Impacts of Volume Changes in Timber Harvest on the George Washington National Forest Market Area* The Forest agrees that privately owned land should be able to meet some of the timber demand presently being met by the Forest. How much is uncertain.

Letter 3951

A cost vs benefit should be used and not a cash flow analysis This should be done for all the programs and not just timber.

Response

Present Net Value (Discounted Benefits minus Discounted Costs) includes all costs and benefits discounted to the present. The output is displayed for every alternative in the FEIS

Letter 3951

Tourism and recreation doesn't provide much of a positive impact for these rural counties Tourism and recreation only provide seasonal jobs at minimum pay The Plan is also flawed in its analysis of this area of management. Why were the recreation facilities of other Federal, State, Local, and Private areas not included to show true demand, supply, and use? Why was the same area used for determination of data for timber not used for recreation aspects of the Plan? The Plan relies heavily on RIM data which is nothing but a rough estimate There is reference material available from the State of Virginia that would help in the development of the analysis of demand and capacity for timber and recreation Evidently none of this information was obtained or used

Response

There is only one impact area defined for all the resources and uses including timber The Forest impact area is defined slightly differently than the area used in the Timber Supply Demand paper This was necessary to estimate the income and employment effects from all outputs produced by the Forest (i.e., wildlife, recreation, timber) The timber demand estimates, as well as wildlife and recreation, were developed based on the public's need for these outputs from the Forest and are not necessarily directly related to the Forest impact area

Historically the GW has provided a small share of the timber demand in the 24-county market area, applicable to this Forest (between 5 and 9 percent from 1977-1989) We estimate the Forest's contribution to this demand as being between 15 MMBF and 31 MMBF Our projections in the demand analysis of the GW are predicated upon the historical trend of timber stumpage delivered by the Forest. FIA data indicates growth to removal rates are at a 2 7 to 1 ratio for all species, and therefore an adequate supply of timber exists in this area FIA data for our market area indicates that forest industry and non-industrial private land comprise 72 percent of the land within this area, while the National Forest comprises 26 percent But the productive capability of the Forest and management objectives on public lands has influenced historic production levels It is inappropriate to infer that the National Forest should produce 26 percent of the Market area volume

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Letter 3988

Page B-20 The $4 56 per acre cost for Visual Resource Coordination reflects too low an emphasis on this resource It should not be expected that scenic beauty can be maintained with little or no cost

Response

The cost reflects the amount spent on this category from 1988 to 1989

Letter 4043

How can the alternatives be compared according to PNV (Present Net Volume) when different alternatives were subject to different constraints and objectives? It is not possible to quantify the objectives of Alternative 4 with Alternative 5, subject each alternative to a set of "common" constraints, then subject each alternative to any individual constraints, and come up with a figure that accurately reflects the net benefit of that alternative to the public The preferred alternative is selected largely because of an analytical value that may or may not represent the value of that alternative to the public The only possible solution to this problem is to recognize the flaws in attempting to quantify certain resource "benefits" and to devise a method that balances economic considerations with subjective values The entire Forest Plan cannot be designed by inputting data into a FORPLAN model and arriving at a "magic" number.

Response

Table 2-14 in Chapter 2 of the FEIS displays a breakdown of present net values for each alternative Both the present net benefits and present net costs are divided into four resource categories.

The preferred alternative maximizes net public benefit Net public benefit by definition includes quantifiable as well as subjective values PNV is just one factor that provides information for selecting the preferred alternative

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Letter 3742

The fishing stream inventory map dated 3/31/92 should be distributed to the public for comment This would assist in verification of the information

Response

The stream inventory map is a sensitive data base shared with the Virginia Department of Game and Inland Fisheries. This data, particularly the wild trout stream inventory, is generally not made available to the public The inventory is dynamic and being updated continuously and is not a legal document that will determine management practices On the ground, site-specific analysis of streams will dictate management practices For example, if the inventory lists a stream as cool-water and site-specific analysis finds it to be a wild trout stream or potential wild trout stream, the standards for wild trout streams would apply

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Letter 3840

Original formulation of Alt #8 with 21 MBF should be explored as to the economics. As roads hurt the economics, reduction of roads relative to 21 MBF consideration should prove more financially balanced. Increase from 21 MBF to 27 MBF created a greater net loss

Response

Alternative 11 was reformulated in the FEIS to address these concerns

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Letter 78

The analysis shows that nearly one quarter of the timber harvest volume will be produced by uneven aged management The analysis also shows that only 6550 acres of the forest is to be managed by uneven aged management An annual volume of 7 MMBF cannot be sustained from management of 6650 acres It is likely to take an acreage approximately 10 times as large

Response

Table A-7 of the Revised Plan contains the Timber Sale Schedule In the first decade, the Revised Plan estimates that 120,000 cubic feet (or 8 MMBF) of timber would be harvested off 9,000 acres

Letter 3939 Do not just concentrate the timber harvest program on the south half of the Forest. Have an even distribution of timber sales (commercial, wildlife and salvage) over the entire Forest.

Response The allocation of volume to each ranger district is based on existing and expected markets, and amount of suitable land and expected timber yield from that land

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Letter 3614 What methodology was used by the GWNF to classify each management area under each Alternative Draft Plan to authorize, restrict or prohibit ORV use pursuant to the requirements of 36 CFR 219 21(g) and what were the results of this analysis?

Letter 3614 What were the results of the analysis pursuant to 36 CFR 295 2(a) by which the GWNF was required to analyze the specified objective impacts of ORV use in each management area under the Draft Plan?

Response This information is contained in the process paper *Incorporation of the NFMA Requirements for Off-Road Vehicle Use into the Revision of the Land and Resource Management Plan for the George Washington National Forest.*

Letter 3729 When Recreation visits are recorded (Visitor Days), is there any breakdown of the number of separate individuals who use the Forest? My concern is that you may have only a few thousand individual users, but many of them are counted numerous times because they are frequent visitors, perhaps living within the boundary, thus running up the visitor day count by perhaps 20-100 units each Such a figure would be very misleading in terms of the proportion of the public served

Response One recreation visitor day (RVD) represents 12 hours of use on the Forest, be it 12 hours by one person or 1 hour each for 12 persons There are national and regional guidelines that are used to convert this to number of visits or trips by activity based on regional and national research

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Letter 3981 EIS 3-91 - Table 3-21 - How were these Supply-Demand figures calculated? This section on "Recreation" is vague overall - based on ambiguous and incomplete data

Response Table 3-21 in the DEIS indicates how each alternative meets the demand that is anticipated for dispersed recreation as indicated in Table 3-20 The figures in 3-20 were developed by R8 economists and may be reviewed in the Draft Working Paper "Dispersed Recreation Demand Analysis, George Washington National Forest" dated May 17, 1989 Future demand estimates were developed through professional judgement supported by quantitative analysis of current and historic use The data is complete and unambiguous

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Letter 3939 No detailed information is provided on what short and long term impacts alternative 8 will have on grouse, a major bird for hunters in the area, which requires young vegetation It is also recognized by wildlife biologists that recent clearcuts can benefit quail and rabbits, both important small game species This is not recognized in the DEIS or Plan.

Response Population estimates were not made for the ruffed grouse, a species that prefers young forest areas, but there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives probably do provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate Grouse hunting accounts for approximately five percent of the hunting days on this Forest. In light of a below cost timber program, it is economically hard to justify an increased timber program to increase ruffed grouse hunting success rates

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Letter 3939 An example of poor analysis and indepth thinking in this Plan is how Road Density will be determined. All Forest Service roads, State Roads, Park Roads, and private roads are counted and used However, the Forest Service has control over only its own roads Therefore if some roads must be closed, to use by the public, it will have to be the Forest Service roads This will result in a reduction in access and use of these public lands by hunters and other users. If the Forest Service has no control over an event or item then it should not be used or counted under a Standard & Guide Only Forest Service roads that are in the interior of a Management Area should be used in the determination of road density Roads on the boundary of a Management Area should not be counted or used regardless of who owns or controls those roads In addition Traffic Service Level "D" roads that are closed or will be closed after use should not be counted

Response — There are a variety of ways to determine road densities in a particular management area, each having its own merit Allowable open road densities identified in the Draft Revised Plan have been reduced (see new standards for Management Areas 14 and 15). Measures for determining densities are contained in Chapter 3 of the Revised Plan Actual road densities for each discreet area with a road density guideline will be determined and monitored

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Letter 3710 — By assuming that the forest's market share should continue at the current level through the year 2040, the *planning team projected a "demand for GWNF timber" that amounted to 45.5 MMBF per year through the year* 2000 Since the draft plan's annual timber harvest of 27 4 MMBF falls short of the 45 5 MMBF, it has been characterized as falling short of meeting demand.

Letter 3710 — This is misleading The same analysis offered as the basis for the "Anticipated Demand for GWNF Timber" (DEIS, 3-91) also concludes, correctly, that the use of such terminology is erroneous

Response — What the 45 5 MMBF represents is the Forest's historical market share of timber demand projected to the year 2000 You are correct in quoting the Timber Supply and Demand Study which states "This reference is inappropriate in that demand is for stumpage in a specified market, as defined in this study, and not for any particular land ownership group within the market area " We have corrected this misleading statement in the FEIS

Letter 2636 — *Under Annual Removals the economists say, "Sawtimber's percentage of the Forest's timber mix (27%) re*mained unchanged from 1977 to 1989 " This contradicts the Timber Staff Officer's announcement connected with the 1990 TSPIRS Report that sawtimber was 20% of the total volume harvested in 1989 What is the source for the Regional economists' figures?

Response — The source for information in the report is the Region 8 "Timber cut and Sold" reports The regional economists used the sold volume in their analysis and TSPIRS is based on cut volume The "timber cut and sold" reports only have a sawtimber breakdown for the sold volume in 1977 For any given year there is a difference between cut and sold volumes but over time they tend to even out The point in the report is that sawtimber was essentially a constant percentage of total volume over the last 10-12 year period. This conclusion is appropriately made

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Letter 2636 — Table 5, "Projected Future Forest Volumes for FLMP", does not identify the volume units What do the numbers represent? This table also used the following unidentified abbreviations SWST, SWRW, HWST, and HWRW Please identify the meaning of these abbreviations

Response — The volume units are reflected in the row "----MCF----" which refers to thousand cubic feet The product abbreviations are as follows: SWST - softwood sawtimber, SWRW - softwood roundwood, HWST - hardwood sawtimber, HWRW - hardwood roundwood

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Letter 3685 — The economics section of the EIS did not contain a clear cost-benefit analysis It appears from the charts on page 3-84 of the EIS that the timber industry generates a relatively small percentage of the area's total income Although the EIS does estimate the changes in total area income for each alternative, it does not break income *changes down by industry, and therefore does not give the estimated changes in revenue caused by the* different logging activities contained in the alternatives

Response — Income was estimated by alternative using an Input/Output model known as IMPLAN The information displayed on page 3-84 of the DEIS is an aggregation of over 250 industries within the 19 county impact area The IMPLAN model does estimate income for each of these sectors but it was not displayed in the DEIS It is not clear how this additional information would better display the changes in revenue caused by different logging activities by alternative than the information presently shown.

Letter 3946 There should be a clear statement of current FS standards for economic evaluation stated in the EIS and/or Plan. Little in the Plan or EIS makes clear to the reader what these standards are or how the development of the Plan relate to those standards. Even though the economic analysis in the EIS is scant, it shows that no timber program has receipts greater than the costs, using TSPIRS methodology. (Figure 2-4) If timber is to be harvested for purposes other than timber values, the analysis should clearly show that the benefits of timber harvesting for those other purposes exceed the cost Such a program should be administered by the program for which the harvesting is conducted. The costs of any such program should be charged to the relevant functional group, such as wildlife, watershed, landscape architecture, or engineering.

Response The Forest is in compliance with all regulations stated in 36 CFR 219 concerning economic analysis in the FEIS and Forest Plan. At present there is no national policy on how to address "Below Cost Timber Sales" in the FEIS and Forest Plan. It would therefore be inappropriate to define Forest Service standards at this time. However the Forest has responded to this issue in many ways. A few examples are the following. 1) In the formulation of alternatives the high quality timber sites were allocated to the most economically efficient management prescriptions based on the theme of the alternative. 2) In estimating effects by alternative projected net revenue, wildlife benefits from timber sales, and marginal timber and wildlife benefits from timber sales are displayed by alternative For more information see the process record "Addressing Issues and Concerns in the Revision of the Land and Resource Management Plan for the George Washington National Forest". Chapter 2 of the Revised Plan, under "ISSUE 2 — BELOW-COST TIMBER SALES" describes how this issue was addressed by the preferred alternative.

ADEQUACY OF THE REVISION: Omissions, Discrepancies

Letter 16 Usually there are three or four very different sets of management prescriptions possible under the rubric of a general number It is necessary to map these subareas as soon as possible so the public can review and comment on these maps We want to emphasize that this information needs to be made available for public comment during the draft stage, not just for the final plan

Letter 1546 The agency did not provide a rationale for why some alts were rejected and why Alt 8 was preferred. It would be nice if the FS ranked the alts , or narrowed them down to those which were more realistic, again with an explanation for the ranking Which alt came in second?

Letter 3840 Very little opportunity to work with actual maps showing breakdown of Management Areas into subgroups which display far more critical management aspects than what has previously been available.

Response This rationale is provided in the record of decision for the FEIS

Letter 2824 On January 11, 1992 we wrote to you asking for circulation of maps showing subareas of each management area We requested that these be made available for public comment during the draft stage. We have not received a map for review After these maps are distributed, we request a reasonable time to review and comment

Response The actual location of management area prescriptions requires a mapping exercise similar to "ground truthing". Certain management area prescriptions (those involving acres suitable for timber production) require some interpretation based on the FORPLAN solution for any alternative At the time the DEIS was issued, this exercise had not been undertaken Normally in land and resource management planning, such an exercise is only undertaken for the alternative selected as the Revised Plan

Based on this comment and similar verbal requests from the public and the District Rangers, a series of quad-sized overlays were prepared that displayed a "preliminary" allocation of management area prescriptions These overlays were available for public inspection and review at each of the district open houses during the comment period for the Draft Revised Plan and DEIS

The ID Team found that only a few knowledgeable individuals or organizations were able to effectively review and comment on this detail of information A major commitment of time and effort is required to comprehend and effectively review the management area prescription allocations Generally, only those individuals who have actively participated in the revision process can be effective at this detailed level of land and resource management planning

The type and amount of maps to public display depends on the nature of the action, public issues, and the scope of the anticipated actions affected by the decision to be made NEPA (40 CFR 1500 4) states that agencies should emphasize portions of an EIS that are useful to decision makers and the public and reduce emphasis on background material.

Letter 82 — On page 2-154 of the Plan, the term "overmature" is used We looked for a glossary in which this term might be defined, but none could be found. We suggest addition of a glossary

Response — The glossary at the end of the draft environmental impact statement is intended to serve both documents "Overmature" has been replaced with "mature " See glossary for definition

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Letter 87 — The bar graphs should be enlarged to make them more readable.

Response — The bar graphs have been enlarged in Chapter 2 of the FEIS.

Letter 92 — EIS Glossary, Page 1 – Add Administrative Purposes This term needs to be defined explicitly

Response — The term administrative purposes is now defined in the glossary

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Letter 1060 — The Council first requests correction of a significant error in the draft plan's description of the Forest Service mission We are disturbed by the description in the first few pages of the Draft Plan (Chapter 2, page 1), which incorrectly states "The Forest, with its roots in the early years of the conservation movement in the U S , was chartered specifically for the protection of watersheds." This incomplete statement misrepresents the original purpose of the national forest to the public

Letter 1060 — The 1897 Organic Act specifically, described for the following mission· "No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States.. (emphasis added). These purposes were reaffirmed by Congress in 1960 when it declared that the purposes of the Multiple-Use Sustained-Yield Act were "supplemental to, but not in derogation of, the purposes for which the national forests were established as set forth in section 475 of this title " (16 U.S.C Section 528) The Multiple-Use Sustained-Yield Act declared that national forests "shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes."

Letter 3660 — National Forests were chartered to protect water and to supply timber You should not mislead the public by printing half truths.

Letter 3689 — To paraphrase the 1887 Organic Act, the Forest should first and foremost provide favorable conditions for waterflow and furnish a continuous supply of timber

Letter 3939 — The reasons for the establishment of the National Forests, including the George Washington National Forest, were for watershed protection and supplying timber and not just watershed protection as the author of the Draft documents would have you believe

Letter 3951 — These National Forests were established for both watershed and timber management not just watershed protection as written in the Draft Plan

Response — The statement in Chapter 2, page 1, of the Draft Revised Plan is correct Although the authority to cut timber (the Organic Act of 1897) was in place when the Forest was chartered (1918), timber was not a driving force behind the creation of the Forest From "The Lands Nobody Wanted" by Shands and Healy· " Land for these forests, which would later be combined to form the George Washington National Forest, was acquired by the authority of the Weeks Act In order to be considered, the land had to have a direct impact on a watershed " And, paraphrased from "Impacts of National Forests on the Forest Resources of the South" by Young and Mustian This damage to the watersheds led to the creation of the Act of March 1, 1911 – most commonly known as the Weeks Act This act helped solve two problems it allowed land which was under private ownership to be purchased by the government, it also gave the government the authority to acquire land specifically for the purpose of watershed protection Paraphrased from page 30, "Origins of the National Forests" edited by Steen

The first Weeks Law forest was established in 1916 Through 1923, ten more forests were established all justified on their value as protectors of water flows In 1924, the Clarke McNary Act added "the production of timber" as a purpose for forest acquisition, thus permitting the purchase of land beyond the headwaters of navigable streams

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Letter 1546

It would have been helpful if you provided references not only to outside sources when you don't wish to enter into detailed explanations, but to also provide cross-references to other parts of the document which refer to similar or related topics, or which more thoroughly discuss a topic which is only casually mentioned in the section at hand Nothing in the EIS was referenced

Response

An index that lists key words and their locations in the text is an aid in tracking topics through lengthy documents The index in the DEIS was incomplete The index included in our final documents should be more useful

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Letter 82

The numbers in Figure 2-38, which show the percentage change in SPNM acres, do not agree with Table 3-3, particularly for alternatives 8 and 14

Response

The numbers in DEIS Table 3-3 (page 3-19) are correct, in DEIS Figure 2-38 (page 2-53), change percentages for Alternatives 8 and 14 to agree with Table 3-3

Letter 1546

Much of the terminology was technical and offered without any explanation, and acronyms for recreational use especially confusing SPNM, for example Another difficulty was understanding what was meant by your Visual Mgt terms Many technical terms are used without explanation A short definition, or some background paragraphs on nutrient recycling, the rationale behind using large woody debris to improve fish habitat in streams, or the different types of timber harvesting would be very helpful

Response

Glossary entries were at a bare minimum in the draft documents Recreation terminology was explained in Appendix G of the DEIS; visual management terms were not defined but have been added to the glossary and to the text of the final documents Nutrient cycling and timber harvest types are in the glossary The rationale for use of large woody debris is in the final glossary.

Letter 1546

There was some unnecessary duplication Some sections could have been condensed, e.g., during the gypsy moth discussion the effects were broken down according to the different dominant forest types present in the mgt area Perhaps only the effects which differed significantly from forest type to forest type could have been discussed, or some of the types such as white oak and red oak could have been combined and discussed as a group where effects from the moth were similar

Response

We've attempted to minimize duplication, but some duplication is necessary to meet legal requirements and to make the documents readable

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Letter 1546

Charts and Mgt Standards would have been more helpful if, instead of being grouped all together in one area of the document, they were distributed in the text in the sections where they would be relevant to the discussion

Response

We assume this comment refers to DEIS Chapters 2 and 3. The intent of Chapter 2 of the DEIS is to display comparisons, each alternative with the others, in a variety of aspects. We feel a comparison is more sharply defined by the format in DEIS Chapters 2 and 3 than if grouped· comparison by narrative, by acres allocated to each management area, by the measurable differences in effects on the environment if implemented

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Letter 2665

The glossary misdefines terms by giving scientific terms with common meanings definitions that are scientifically and ecologically incorrect; this document is a misrepresentation of scientific, biological and ecological reality and therefore cannot be applied to a "natural" system which a forest ecosystem is.

Response

The Forest was directed to produce "documents more readily understood by the public and agency professionals than the existing Plan documents " The "common meanings definitions" are intended for the portion of our target audience who would not benefit from definitions that contain still more natural resource terminology We

communicate with natural resource professionals as well as professionals in other disciplines and with lay audiences Natural resource professionals do not need the glossary. The glossary is an attempt to make the documents reader-friendly to those outside the natural resource fields It should not be considered a guage of the "scientific, biological, and ecological reality" of the documents as a whole

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Letter 3685

The EIS made numerous references to information contained in external documents that were not included in the EIS package Instead of merely citing the source, it would be helpful to provide a short summary of its *contents and conclusions This was especially troublesome with respect to the explanation of the thirteen* alternatives

Response

Early in the process, a decision was made to reference all material that was available-upon-request by the reader. Our goal was to not lengthen an already lengthy document by including information that is available elsewhere

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Letter 1546

On page 3 - 9 of the Draft EIS the Service stated that, "Currently 1,544 ac or 0 146% of the Forest is devoted to recreation facilities " What does this mean? Is the area referred to the actual acreage occupied by structures or does it include all land affected or disturbed by recreational use?

Response

The 1,544 acres contain the existing developed recreation areas They include the "developed" area, including open space, that contains the recreation developments This acreage does not include any buffers or "influence *zones*"

Letter 2665

"Clearcutting is used only after site-specific, project-level analysis has determined that other silvicultural methods will not achieve the desired results." There is no definition of "desired results" (Plan 2-15)

Response

Added narrative gives examples of the specific desired results being referred to on page 2-15 of the Draft Revised Plan (now found in Chapter 3 of the Revised Plan) See the glossary for a general definition of "desired future condition."

Letter 78

A review of the agencies, organizations, and individuals sent the draft EIS/Plan revealed some omissions. U.S. Fish & Wildlife Service, U.S. Park Service, Blue Ridge Parkway, VA Department of Conservation and Recreation, VA Natural Heritage, Natural Resources Defense Council, Defenders of Wildlife, Conservation Council of Virginia, and Cowpasture River Preservation Association Please review the list for omission of other parties which have been active in commenting in the past.

Response

All of these agencies, organizations and individuals were provided with copies of the draft documents Chapter 5 of the FEIS has been corrected to add the names of these agencies, organizations and individuals

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Letter 500

The summary table 3 in the EIS contains an error on page 13 The line "Changes in Total Income" is given in Billions of Dollars; the line should read Millions of Dollars

Response

In a letter dated March 11, 1992, the Forest Supervisor mailed a correction notice to everyone receiving the draft documents correcting this error

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Letter 82

The Plan states (2-65) that the North Fork of the Shenandoah River qualifies for Recreational designation However, the North Fork of the Shenandoah River is omitted from the list of Recreational rivers on page 2-75 This discrepancy should be corrected

Response

There were no "Lands Suitable for Timber Production" in the corridor of the North Fork of the Shenandoah River, so it was not included in the text of page 2-75 of the Draft Revised Plan

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Letter 2273

The old FAA beacon and powerline have been abandoned and are now being put up for salvage bidding 3/82 beacon removed powerline ??

Response — The powerline is still in place, but it is de-energized

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Letter 3728 — The guidelines for mineral exploration and development are not consistent in some MA desired future conditions

Response — *The Desired Future Condition of each management area has been re-written so that the standards are consistent.*

Letter 3940 — Plan· Page 2-4, Paragraph 3. Clarify the meaning of this statement

Response — The "Desired Future Condition" discussion on pages 2-3 through 2-21 of the Draft Revised Plan has been moved to a new Chapter 2 entitled "How the Revised Forest Plan Responds to Your Issues" The third paragraph on page 2-4 of the Draft Revised Plan has been rewritten under the discussion of "ISSUE 9 -- RESOURCE SUSTAINABILITY" to state. "Wildfires are suppressed (either confined, contained or controlled) using the least cost methods commensurate with the resource values at risk, the potential for human injury, the management area suppression objectives and the availability of manpower and equipment." This paragraph represents a statement of the national policy on wildfire suppression A specific determination on each of these factors needs to be made by the persons responsible for the suppression of any wildfire Because of the volatile nature and potential for injury to persons and property, as well as natural resource values, each wildfire must be individually evaluated in a relatively short period of time, following ignition, by professionals trained to accomplish this task.

Letter 16 — Because of the theme of the preferred alternative, it is important to define and map the old growth areas If no definition is possible at this time, a map of the 130 year (and older) stands should be distributed for public comment

Letter 2824 — On January 11, 1992 we wrote to you asking for circulation of maps showing old growth areas, or maps of stands 130 years or older We requested that these maps be available for public comment We have not received a map for review After these maps are distributed, we request a reasonable time to review and comment.

Letter 17 — The location of OHV routes should be shown on maps. These maps should be distributed for public comment before the final plan is issued.

Letter 17 — Areas which contain rare plants and/or animals and which have not been mapped previously in MA 4 should be shown on maps These maps should be distributed for public comment before the final plan is issued.

Letter 2824 — On January 13, 1992 we wrote to you asking for circulation of maps showing the areas containing rare plants and/or animals These areas have been identified as special biological areas We requested that these be made available for public comment during the draft stage We have not received a map for review After these maps are distributed, we request a reasonable time to review and comment

Letter 17 — The location of hiking trails, horse trails, and mountain bike trails should be shown on maps These maps should be distributed for public comment before the final plan is issued.

Letter 2824 — On January 13, 1992 we wrote to you asking for circulation of maps showing the location of hiking trails, horse trails, and mountain bike trails We requested that these be made available for public comment during the draft stage We received a copy for review, but the inventory remains filled with errors We have not received a corrected map for review After these maps are distributed, we request a reasonable time to review and comment

Letter 3957 — Distribute maps of the locations of such things as trails and roads for each type of use, wilderness areas, special areas, etc , for public comment before you finalize them

Response — Many of the maps requested were available for review at the Supervisor's Office Maps with information such as OHV routes and ROS classes were displayed for public review at public meetings before the DEIS was issued and at open houses held during the comment period on the DEIS The type and amount of maps to publicly display depends on the nature of the action, public issues, and the scope of anticipated actions affected by the decision to be made NEPA (40 CFR 1500 4) states that agencies should emphasize portions of an EIS that are

useful to decision makers and the public and reduce emphasis on background material Most inventory maps fall into the category of background material The maps did not need to be distributed for public comment because they were not essential in helping the public identify a reasoned choice among the alternatives presented in the DEIS What was important were the management area allocations by alternative and these were provided on maps for public comment.

Letter 17

The location of open roads, closed roads, and restricted roads should be shown on maps. These maps should be distributed for public comment before the final plan is issued.

Letter 2824

On January 13, 1992 we wrote to you asking for circulation of maps showing the location of open roads, closed roads, and restricted roads We requested that these be made available for public comment during the draft stage We have received a copy for review, but the inventory remains filled with errors We have not received a corrected map for review. After these maps are distributed, we request a reasonable time to review and comment.

Letter 3962

EIS 3-14 A system road map is needed showing the 800 miles open year round, the 250 open seasonally, and the 800 closed to public access The roads in Table 3-1 should also be shown Each of these 4 systems should be identified on the map

Letter 3962

An inventory map of forest roads is needed in the Plan and should be available for public comment. All roads should be shown, their symbol should represent their class (A, B, C, D, primitive for OHV), their availability for use (open year round or seasonally), and if for administrative purposed only

Response

That information is available in database format for review in the Supervisor's Office A map accompanying the Revised Plan contains a graphic display of this information

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Letter 17

The location of wild trout streams, put-and-take trout streams, cool water streams, and warm water streams and ponds should be shown on maps. These maps should be distributed for public comment before the final plan is issued.

Letter 2824

On January 13, 1992 we wrote to you asking for circulation of maps showing the location of wild trout streams, put-and-take trout streams, cool water streams, and warm water streams and pond. We received maps dated March 31, 1992, which contained some of this information However, you said this information was unverified We believe verification of this information is important Circulation of these maps to key individuals and groups may assist in verification of this inventory data We request that these maps be distributed to key individuals and groups for review and comment

Letter 3840

The location of wild trout streams, put & take trout streams, cool water and warm water streams and ponds should be mapped relative to management areas so complete picture is visable to the public.

Response

The stream inventory map is a sensitive data base shared with the Virginia Department of Game and Inland Fisheries This data, particularly the wild trout stream inventory, is generally not made available to the public The inventory is dynamic and being updated continuously and is not a legal document that will determine management practices. On the ground, site-specific analysis of streams will dictate management practices. For example, if the inventory lists a stream as cool-water and site-specific analysis finds it to be a wild trout stream or potential wild trout stream, the standards for wild trout streams would apply

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Letter 1449

DEIS, p 3-54 As everything is related to Forest Districts, you need to show them on this map It was very frustrating trying to refer to a map without Districts defined

Response

The map, which depicts natural gas and oil potential, has been revised in the Minerals section of FEIS Chapter 3 to show Ranger District boundaries

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Letter 3734

When the final new plan is completed a published study is needed giving the projected total dollar expenditure and dollar returns of each segment of the plan for the GW National Forest for tax payer review.

Response — As stated in the Revised Plan, Chapter 5, two reports will be prepared as part of the monitoring program Annual reports will summarize monitoring activities, including budget expenditure and return information The five-year evaluation report will summarize findings of all long-term monitoring activities, and include a comprehensive review of Plan implementation

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Letter 3742 — Your 3/27/92 OHV map appeared to show only segments on the lands in national forest ownership The segments which are on non-national forest lands should also be shown. Obviously, it is necessary to use these segments to reach segments on national forest lands. The EIS and Plan do not contain an analysis of why each segment should be highlighted for OHV use This is necessary to show what the environmental impacts of use will be. Under NEPA, these impacts must be analyzed in the Plan if the decision to designate the routes is made there

Response — We agree that analysis of impacts must occur before a decision is made No decision is being made on the list of OHV roads listed in the DEIS because they already exist They were highlighted because they feature a challenging driving experience for the public and address the issue on use of four-wheel drive vehicles. A decision to open or close any road to motorized use requires site-specific analysis and disclosure.

Letter 4242 — The Forest should begin to consider long-term contingency planning for influences beyond its boundaries, such as changing regional land patterns and the possible effects of climate change As a minimum practice, identification of these influences on the forest ecosystem is necessary to better inform the short term decisions of the 10 year plan

Response — Forest Plans are meant to be viable, flexible documents that respond to changing local, regional, national, or global conditions Indeed, during the planning process, the Forest recognized some influences outside the Forest boundaries that affected the forest's ecosystem. These included acid deposition and changing ownership patterns on private land adjacent to the Forest We continue to look ahead to identify and prepare for influences that will affect the Forest For instance, the Forest participates in a two-prong contingency planning effort to minimize the threat of forest fires in the wildland/urban interface First, contingency planning is identifying areas of high risk and preparing initial attack forces Secondly, this planning is involving citizens, county governments, developers, planners, fire departments and other groups to minimize future "designs for disaster" for houses in this interface area

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Letter 82 — The Plan calls for the development of 23 areas at a relatively primitive level (2-87) However, 24 areas are listed This discrepancy should be resolved

Response — The discrepancy is resolved in the final documents

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Letter 82 — Figure 2-42 in the DEIS omitted the numbers associated with the acres allocated to the Roaded Natural ROS class.

Response — Numbers are included on all bar graphs in the final documents

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Letter 87 — *The "Future of the Forest", outlined in Chapter 2 of the Plan, should be rewritten to make clearer the philosophical underpinnings for the preferred alternative*

Response — The Future of the Forest -- now in Chapter 3 of the Revised Plan -- introduces the principles behind the selection of the preferred alternative The remainder of Revised Plan Chapter 3 provides guidelines for applying the principles The environmental impact statement presents the analyses behind the selection of the preferred alternative.

Letter 92 — Table 1, Appendix D, page 34 -- I suggest you add a total by type found eligible at the bottom of the page (Wild = 4 60, Scenic = 58 68, Recreational = 190 27, Total = 253 55)

Letter 92 — EIS, Page 3-129, First Paragraph – When I compare the 342 55 miles of eligible rivers with Table 1 on page D-34 I get 253 55 as eligible and 120 64 ineligible for a total of 374 19 miles Table 3-30 also adds to 253 55 Adding totals to tables would help point out errors

Response — Totals have been added to FEIS Wild and Scenic Rivers tables.

Letter 92 — Table 2, Appendix D, page 35 -- When comparing Table 1 and Table 2 there is an obvious error in length on Segment B of the Cowpasture River This, plus the fact that the ownership on segments of North River and St. Mary's are unknown, makes it impossible to determine how much total NF ownership exists.

Response — The mileage error will be corrected in the FEIS National Forest ownership is entire on Segment B of the North River and Segment A of St Mary's Other segments with mileage to be determined are ineligible for designation.

Letter 87 — Although the G W LRMP applies only to lands administered by the Forest Service, much useful information regarding the management of these lands could be gained from mapping the land use of surrounding non-GWNF lands GWNF management should be closely coordinated with the management of the Jefferson and the Monongahela National Forests, with the Blue Ridge Parkway, with the Shenandoah National Park; with the U S Naval Reservation, with any other federal land holdings in the area with management of lands administered by Virginia and West Virginia agencies such as state parks, state forests, state wildlife management areas, state waysides and boat launch sites, and other state properties should be coordinated with the management of county and municipal parks, water supply reservoirs, and other lands The G W lands should be managed with attention given to the management of large blocks of land in private ownership such as holdings by timber products industries, by resorts, by camps run for churches, youth organizations, charitable/fraternal organizations, and for-profit organizations, farms We suggest mapping the known uses of these lands with the management area numbers closest to the uses

Response — In formulating Alternative 8A, the ID Team considered the adjoining management areas on the Monongahela and Jefferson National Forests and the Blue Ridge Parkway The George Washington National Forest does not directly adjoin the Shenandoah National Park The ID Team has also carefully considered suggestions from Virginia and West Virginia agencies, County Boards of Supervisors, city governments and other elected officials and bodies Many of the suggested areas of concern have known locations and were carefully considered in allocating lands to different management areas It is not possible, however, to perform the level of coordination suggested by this comment at this time The Forest Service has no information on the ownership of most private lands Once a Geographic Information System is available with such information on a county or regional scale, such coordination might be feasible

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Letter 3728 — The standards for each MA are incomplete and, in some cases at least, are inconsistent between subjects and desired future condition Also, the subjects (Aesthetics, Fire, Wildlife, etc) were not recognized and addressed in each MA

Response — In the Revised Plan Chapter 3, you will find management area write ups that contain standards pertinent to that management area alone No attempt was made to deal with all subjects (Aesthetics, Fire, etc.) in all management areas If a subject is missing from a write up, either it is covered by the Common Standards at the end of Chapter 3, or the ID Team determined that direction is not needed. Inconsistencies between subjects and DFCs should be resolved in these final documents

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Letter 3742 — The Draft Plan and EIS contained only the description of the management areas used in the Plan The public should be given an opportunity to review all of the management areas so that the public can comment on the alternative management prescriptions, which were used for other alternatives.

Response — Appendix B of the final EIS contains a discussion of the different management area prescriptions used in formulating alternatives

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Letter 87 — The map for Alternative 5 shows almost all of the forest in MA 17 The EIS text says that some acres are in MA 14 The acres should be shown on the map or further explanation should be given in the EIS

Response — In the FEIS, Alternative 5 contains no lands allocated to Management Area 14

Letter 3733 — We are puzzled by the statement (3-131) "The amount of wilderness on the Forest does not differ among the alternatives." Alternative 8 appears to add only three small tracts of wilderness, while Alternative 3 creates an extensive wilderness system

Response — The DEIS separated the discussion on existing wilderness (on page 3-131) from the discussion on roadless *areas (on pages 3-65 through 3-77) The discussion on page 3-131 only dealt with existing wilderness.*

Letter 3981 — EIS· Page 9 - Returns to counties should include PILT.

Response — As discussed in Chapter 3 of the DEIS, counties receive funds from the Forest Service 25 Percent Fund and Payments-in-Lieu-of-Taxes (PILT) The "Estimated Change in 25 Percent Fund" in Table 3-16 is supplemented by corresponding changes in PILT Therefore, all of the alternatives should provide the same funding to the counties

In light of this fact, a decision has been made to remove the "Returns to Counties (M$)" in Table 1 (Page 9 of the DEIS) from the FEIS. The discussion under "Money Returned to Counties" on pages 3-85 and 3-86 of the DEIS has been supplemented in the FEIS to document this finding

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Letter 4226 — In your final draft, consider writing county-by-county descriptions of GWNF's plans. Such descriptions would make access to the GWNF's Plan far easier

Response — The maps that accompany the Revised Plan and EIS show county boundaries and management area allocations. That info affords a plan-level understanding of the types of management allocated, county-by-county

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Letter 2665 — The interpretive program is totally devoid of forest ecology, conservation biology, island biogeography and restoration ecology principles. The FS has an educational responsibility and should not be purely an agent of misrepresentation

Response — "Foundations", found in Appendix C, is a collection of proposals for interpretive programs The intent is that this will be a dynamic, evolving document in which material is added or deleted as new ideas are presented and considered (Pg. C-12) There will be further opportunities for public involvement and comment at the project level for the various interpretive facilities and programs

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Letter 3779 — Note that "water yield" on p. 14 may merely mean runoff in streams that ends up in the Chesapeake and not aquifer regeneration.

Response — Water yield refers to flow leaving the Forest in stream channels Higher yields reflect localized areas of reduced evapotranspiration and thus increases in both soil moisture and streamflow However, differences in water yields between alternatives are small.

Letter 3981 — EIS. 3-128, Table 3-29 - The 16% figure for Alternative 8 does not jibe with the information Comparing the figure on page A-2 of the DRLRMP with the numbers on page 3-126 of the DEIS reveals that the percentage is actually around 50% - Say so

Response — The acreage of suitable riparian area was recalculated in the FEIS

Letter 82 — Figure 2-4 shows projected net revenue from timber sales Figure 2-5 shows wildlife benefits from timber sales Figure 2-6 shows the marginal timber and wildlife benefits attributable to the timber sale program, which appears to be the combination of Figures 2-4 and 2-5 However, the figures do not compute An explanation should be given about the relationship of the three Figures, and adjustments made in numbers if necessary

Response — Marginal timber and wildlife benefits are equal to wildlife benefits plus projected net revenue. The numbers are in error and are corrected in the FEIS

Letter 990 — Alternative 2 should model current management direction. With respect to even-aged timber harvest methods, Alternative 2 does not model current direction As modeled, Alternative 2 shows no acres harvested by even-aged methods other than clearcutting. (EIS, p 2-45) This does not model current direction Alternative 2 shows only 86 acres per year harvested under uneven-aged management. This does not reflect current direction Alternative 2 should be remodeled to reflect current direction

Response — Alternative 2 is now modeled based on a four-year average from 1988-1991 of regeneration harvest methods. This average is· 83 percent of volume by clearcutting, seed tree and removal, 13 percent modified shelterwood, 1 percent two-stage shelterwood, and 3 percent group selection.

Letter 2665 — Even though "even-aged openings can range in size up to 40 acres..." (Plan, 2-119, 2-176) "These size limits may be exceeded after 60-day public notice and review by regional forester" (Plan, 2-176) This means that there is no limit to the size of clearcuts allowed in the GW.

Response — This allowance in size limitation is provided for in NFMA There would have to be substantial justification for the 40 acre limit to be exceeded Except for salvage sales, which are not subject to size limitations or the 60 day notice, there is little likelihood the size limitations would ever be exceeded

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Letter 3940 — Plan. Page 2-3, Paragraph 1. The first sentence is pretty presumptuous. Do all visitors want to see an "unbroken forest canopy"???

Response — Thank you for bringing this to our attention The sentence has been modified in the Revised Plan.

Letter 3959 — [Appendix C, pages C-78 and C-82 of the DEIS], Little Alleghany Roadless Area 10,130 ac There is a 14,434 ac. classification as suitable for timber mgt Something is wrong here

Response — Thank you for bringing this discrepancy to our attention. The erroneous figure for acres suitable for timber production has been corrected

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Letter 3982 — I strongly protest the interpretive concept cited in "Highlands Scenic Tour Forest Management". It states, "The task of managing a forest to benefit both man and nature is very difficult. Efforts to utilize some natural resources while improving other aspects of the environment are complex and, difficult to achieve. This negative approach to managing resources and multiple use has no place in an organization which has been given this mandate

Response — The intention was not to take a negative approach to Forest management. The sentence the commenter refers to has been clarified in Appendix C The fact is that the Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

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Letter 2665 — "Clearcutting may help to preserve oak-component" (EIS 3-106) This statement is refuted in the EIS pg A-26, "Research has not reached a stage where there is clear and irrefutable evidence that certain silvicultural practices are beneficial in reducing damage or mortality to tree species"

Response — The concern over such a significant impact as gypsy moth can't wait for clear and irrefutable evidence before proceeding with an action Based on observations over the past several years, there is a good chance some clearcutting will help to maintain the oak-component

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Letter 3981 — EIS 2-46 - The graph (figure 2-27) does not jibe with the numbers on pgs 2-15 and 2-16 of the Draft Plan - 6,550 acres of uneven-aged management, not 600

Response — The graph is in error and will be corrected

Letter 3981 — EIS 2-51 - Figures 2-34 and 2-35 inaccurately represent the implementation of Alternative 3 Changes in employment due to the vast amount of work in restoration ecology activities and increased recreational attractiveness that big wilderness supplies are not included here These economic ramifications of Alt 3 must be taken into account and displayed.

Response — Alternative 3 was not formulated with funding for "vast amounts of restoration ecology". One of the advantages of this alternative is that it contains the smallest budget.

The contention that the "increased recreational attractiveness that big wilderness supplies" should be included in the calculation of socio-economic effects is not based on any reasonable assumptions. Since the purpose of Alternative 3 is too reduce the presence of man in the ecosystem, such an eventuality would be contrary to one of the major goals of this alternative

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Letter 3962 — Page 2-1, Future of the Forest This section needs to state the philosophy behind the plan. The section on biological diversity in the Highlights of the Draft Plan needs to be included in this section of the Plan

Response — See the Future of the Forest in the final version of the Revised Plan, Chapter 3

Letter 3981 — EIS Page 5 - paragraph 1 - The opening sentence is not entirely accurate [Change to] "Alternative 3 is designed *to emphasize the conservation of biological diversity at all scales Implementation of such a biocentric goal* requires changing a number of Forest Service policies and tendencies Some of these policy changes .."

Letter 3981 — EIS Page 5 - paragraph 2 - Change "minimal level of management" to "minimal level of manipulation" Alternative 3 requires a great deal of management - of the mitigative, restorative, and protective type, not manipulative

Letter 3981 — EIS 2-4, paragraph 1 - Inaccurate, change to "Alternative 3 is designed to mitigate, nullify and cease human disruption of native biodiversity. Some policy changes needed to implement this new direction may technically lie outside the "decision space" of the Regional Forester "

Letter 3981 — EIS. 2-4, paragraph 2 - Change "minimal level of management" to "minimal level of manipulation" and strike "and services"

Letter 3981 — EIS· 3-96, paragraph 2 - Substitute "disruption" for disturbance Alternative 3 provides for lots of disturbance - due to natural processes Anthropogenic disruption of natural disturbance regimes is, however, minimized

Response — These changes have been made in the text of the FEIS

Letter 3933 — Definition of "desired future condition" needs clarification.

Response — The definition is included in Chapter 3 of the Revised Plan, and in the EIS Glossary Desired Future Condition *A summary of anticipated Forest physical condition and biological condition that are the result of the planned* production of forest products and services for periods of 10 years, 50 years, or beyond, as appropriate. The guidelines that determine the desired future condition of the Forest are set by Forest Service policies, federal and state laws and regulations, and by Forest Service responses to public issues

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Letter 2942 — There is no mention of the book Deciduous Forests of Eastern North America by E Lucy Braun If this book is accepted as the leading authority on what was in the forest before our current culture began to change if it seems to me it should be a major reference for any plan for this forest.

Response — Braun's work was not referenced directly but much of her work is recognized indirectly through other references especially that of Barnett in "Regional Silviculture of the U S "

Letter 6728 — The FS proposes to spend almost nothing to protect and enhance the fisheries resource No other recreational activity has been so ignored by the Plan The term "native fisheries resources" should be defined. The definition must include the rainbow and brown trout since these species play such a major role in providing trout fishing opportunity

Response — In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan All alternatives give protection to fisheries resources through standards and other mitigation measures Economic efficiencies and costs of the fisheries program will be considered This recommendation has been considered and the concern has been incorporated the concept into the preferred alternative Stocking and special regulations are not under the Forest Service's authority but are recommended and set by the VDGIF The Forest Service manages habitat under its authority and consults with State biologists on projects affecting fisheries resources.

Letter 3962 — Timber harvesting methods need to be defined in the plan We need to know what the GWNF call clearcuts, shelterwood cuts, seed tree cuts, removal cutting, thinning, and salvage cuts

Response — The Revised Forest Plan includes definitions of the terms listed by the commenter

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Letter 135 — I did not see adequate projections about increased demand upon the wilderness areas because of further population growth in the region, and this appears to be a deficiency in the EIS

Response — Population growth is considered in the RPA figures that are used in determining wilderness demand

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Letter 1449 — Plan, p D-1. Evaluation of Caves 1) What rating values determine cutoff for Class 1, 2, & 3? and 2) WHO assigns the rate values?

Response — The rating values to determine the cave classification will be developed by Forest professionals with the experience and training necessary to appropriately assign values. These include archaeologists, botanists, biologists, and hydrologists as a minimum and will include professionals from other appropriate resource areas as necessary

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Letter 3933 — Incomplete inventories of flora and fauna (native)

Response — The Revised Plan recognizes that resource inventories, especially those related to flora and fauna, are an important foundation for planning and management The Forest will continue to include inventories of biological resources among its ongoing work activities

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Letter 3728 — Adopt the following language: "The FS will coordinate with the VDGIF and the WVDNR on mgmt plans affecting wildlife habitat on the Forest Based on this Plan, the Forest will contribute suggestions and comments concerning population objectives and specific annual project plans (PS&E) Wildlife and fish habitat will be managed, in cooperation with the State agencies, to be compatible with the specific Mgmt Areas "

The specific wording in this paragraph is a violation of NFMA. The Forest cannot prepare separate "management plans" Instead, the Forest Wildlife Biologist and other professionals will coordinate with representatives of VDGIF and WVDNR during implementation to ensure that wildlife and fish objectives described under the "Desired Future" for any management area are being met by projects

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Letter 3728 — Traditional wildlife habitat improvement activities (waterholes, permanent openings, etc) should be used in the discussion of DFC of the Forest rather than considering only newly purchased tracts and small impoundments.

Letter 3728 — Wildlife habitat improvements that would generally occur Forest-wide must be addressed in this section [pages 2-19 and 22-20 of the Draft Revised Forest Plan]

Letter 3728 — All other MA's (except Management Areas 8, 14, 15 and 16) have some effect on wildlife resources and should be addressed in this [Wildlife] section of the Plan

Response — Chapter 2 of the Revised Plan under "ISSUE 8 — VEGETATION MANIPULATION", the subheading "Featured Species", discusses wildlife habitat management for Management Areas 5, 6, 8, 9, 12, 13, 14, 15, 16, 17, 18, 21 and 22 The following statement concludes the discussion under this subheading. "Many different habitat management practices to benefit both game and non-game species are utilized to improve habitats throughout the Forest "

Letter 3728 — This Plan does not address hunting and associated wildlife activities in proportion to the role played by these forest uses.

Response — Hunting on this Forest is documented to equal just under 44% of the recreational use Large portions of the Forest are managed to maximize hunting values, specifically Management Areas 14, 15, 16 and 22.

Letter 3770 — Furbearer mgt. or trapping as a use of the Forest is not mentioned This is somewhat of a surprise, especially *since you generate revenue by selling a special stamp to hunt, fish and trap on NF System lands in VA. I suggest* that the plan be modified to include furbearer mgt and trapping in appropriate sections.

Response — Hunting, fishing and trapping regulations are set by the VGIF The Forest will follow VDGIF trapping regulations Impacts to wildlife populations are addressed in the "Wildlife" effects section of Chapter 3 of the FEIS

Letter 82 — *In addition to showing the carrying capacity of the forest for deer, bear, and turkey (DEIS Table 2-22), the EIS* should include numbers of deer, bear, and turkey estimated to exist on the forest If substantial differences between actual numbers of animals and the habitat carrying capacity are found, the EIS should explain why additional investments in improving habitat should be made.

Response — The FEIS displays "carrying capacity" since this factor represents the habitat that is being provided by each alternative. The actual number of animals on the Forest depends on a number of factors besides carrying *capacity. Many of these factors, such as hunting pressure, are outside the control of the Forest Service. The* Forest will cooperate with VDGIF and WVDNR to ensure that the appropriate amount of habitat is being provided during implementation of the Revised Plan.

Letter 3981 — Plan. How were the standards in 1024-28 determined? Where in the EIS are the ecological, economic, and social criteria use to come up with these figures? Where is this subject of age classes of trees and forest fragmentation *discussed in the LRMP?*

Response — Standards 1024 — 1028 in the Draft Revised Plan were some of the standards used to achieve management requirements. In the Revised Plan, these standards have been removed. Instead, the ID Team is ensuring that viable populations of management indicator species are being provided through specific monitoring items in Chapter 5 of the Revised Plan The analysis supporting the maintenance of viable populations is contained in Appendix J.

Fragmentation is discussed in Chapter 2 of the Revised Plan under "ISSUE 1 — BIODIVERSITY".

The age class of trees is a concern on lands suitable for timber production Each management area in Chapter 3 of the Revised Plan containing lands suitable for timber production contains standards controlling the rotation ages of stands, as well as the size and dispersion of even-aged openings These standards control the age class of stands and their relative distribution

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Letter 3981 — EIS. Page 13 - Percent of Demand for big game hunting is totally skewed - since when does "demand" equal *to carrying capacity*

Response — The "carrying capacity" displayed in Table 2 of the Summary of the FEIS is an indication of the habitat capability. It is not a measurement of the demand for the species.

Letter 1449 — DEIS, p 3-64 - Last paragraph I do not understand this paragraph Confusion in using. mineral resources, *natural gas resource and gas producible Whole paragraph seems poorly written.*

Response	The entire disclosure of environmental effects associated with leasing oil and natural gas in the Alleghany Front Lease Area has been rewritten in the FEIS
Letter 3613	DEIS, Table 3 shows 530,886 ac of suitable timber land for Alt. 8 The Revised Plan, Table 2-6 shows only 259,036 ac as suitable
Response	In DEIS Table 3, the heading "Suitable Timberland" should be "Acres that may be Considered for Insecticide Treatment "
Letter 3840	All mention of open roads should say open system roads.
Response	Unless stated otherwise, when Forest roads are discussed in the Revised Plan, the reference is to roads that are part of the Forest Transportation Inventory System. Other types of roads are temporary roads and roads under other jurisdictions, such as state roads
Letter 3779	"TIMBER" [is] not mentioned in the table of contents for the E I S document Is the F.S trying to avert attention from a controversial area?
Letter 3933	"TIMBERING" and "LOGGING" should be listed in the table of contents - its omission misleads the "casual forest user" and thus "effects the human environment"
Response	In the FEIS, a TIMBER section is added to Chapter 3, the Affected Environment
Letter 3933	Definitions lacking: old growth, riparian areas, clearcutting vs shelterwood and modified shelterwood and seed tree and overstory removal. WE DO NOT NEED fabricated forest gap dynamics
Response	See GLOSSARY in the FEIS
Letter 3840	Far more philosophical framework for Alternative #8 is contained in the "Highlights" booklet on page 2 under biodiversity than in the "Draft" overview. This framework is critical to the Alternative #8 theme and should be reproduced and further strengthened so the real intent of biological value recognition and protection and biodiversity is understood and it is obvious how the rest of the plan should follow and fit into it
Response	The section is rewritten in the final documents.
Letter 2273	Cultural Resources - There are no identified significant archaeological sites in Big Schloss Several small lithic scatters of transient campsites have been discovered during general cultural inventories of Big Schloss Southern Massanutten Roadless Area Appendix C
Response	The meaning of this comment is not clear. It merely restates the information contained in Appendix C of the DEIS.
Letter 2523	The plan fails to consider the recently passed legislation calling for development of motorized trails on public lands By overly restricting the area dedicated to motorized trails, the plan ignores a congressional mandate.
Response	We are unaware of any recently passed legislation calling for development of motorized trails
Letter 3742	Alternative 8 shows approximately 584 acres in MA 18A This appears to be an error The correct number is in the neighborhood of 4000 acres Alternatives 6 and 7 give contradictory numbers for the acres in MA 19A, 19B, and 3B These errors should be corrected

Response The numbers have been corrected in Chapter 2 of the FEIS.

Letters 18, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 39, 41, 42, 43, 44
Effects of non-natives (weedy/exotics) on forest ecology not addressed

Response The Forest Service recognizes the effects of "biological pollution" specifically the introduction, establishment, and spread of plant and animal species which were introduced to this region within the recent past and are now considered pests These exotic species, now naturalized, are an unfortunate component of the ecosystem.

Letter 3728 We caution the FS in the creation of ROS subclasses, in that they are not available in the ROS handbook Their definitions, including permitted mgmt activities, should be clearly stated to avoid misinterpretations of these subclasses at a later date

Response The ROS Handbook allows for sub-class development Appendix G in the FEIS contains ROS definitions.

Letter 3981 EIS. 2-53 - Figures 2-37 and 2-38 don't jibe with information on pg A-16 - SPNM listed as 159,525 acres at present, and 250,978 acres in the "old" Plan These graphs show 132,106 acres, and a 24.3% increase

Response The correct figures will be used in the final document.

Letter 81 EIS 3-22, paragraph 1 - Driving for pleasure is not limited to just these roads Under Alt 3, FDR roads remain open. Say so

Response An FDR is a federal road Driving for pleasure may occur on federal roads that remain open

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Letter 2665 "Each management area prescription contains an assumed (emphasis theirs) mixture of either even-aged or uneven-aged timber harvest cutting methods" (EIS, A-20) Note that MA 17 is totally even-aged

Response Management Area 17 now contains some lands meeting the criteria for uneven-aged management.

Letter 990 The description of MA 17 states, "Additional costs for improvements to other resources are not acceptable if the improvements are to be paid for by the timber program." This provision is beyond the scope of the LRMP

Response This statement has been deleted

Letter 3933 Nothing that addresses the incidences of faulty, inadequate records (presently) under NEPA regs such as regeneration (species) occurring near Signal Corps Knob and east of FDR 396

Response The regeneration records for this area properly portray the situation on the ground.

Letter 3962 I cannot find a Forest Standard for timbering on slopes in the Plan There should be one in all areas suitable for timber production similar to #368, and the standard should include both even-aged and uneven-aged cutting methods

Response The following Common Standard in Chapter 3 of the Revised Plan under "SOIL AND WATER" is meant to address this concern·

> "Project plans and their environmental analyses which plan to conventionally harvest timber recognize and specifically analyze conditions and situations where soil productivity may be impaired long term These conditions are listed as· soils less than 20 inches to bedrock, extremely stony surfaces, and conditions established by the soil inventory where K-value (soil erodability factor) and continuous slope indicates the T-Factor (allowable soil loss) is exceeded."

This standard must be met when any regeneration harvest method is selected during implementation of the Revised Plan

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ADEQUACY OF THE REVISION: Not Responsive to Public Opinion

Letter 179 — The West Virginia Off-Highway Vehicle Association (WVOHVA) wishes to request that an additional public meeting be scheduled in Pendleton or Hardy County, West Virginia to satisfy the regulatory requirement The agency is required to "hold or sponsor public hearings or public meetings whenever appropriate" when there is "substantial interest in holding the hearing"

Letter 294 — We were shocked to learn that your schedule for public meetings for input and reaction to the Draft Revised Land and Resource Management Plan for the George Washington National Forest did not include a West Virginia location We would urge you to schedule a public meeting in West Virginia Far distant and inconvenient meeting locations do not meet the spirit of 40 CFR 1506 6 (a) and (c)

Response — Although the ID Team believes that the CEQ Regulations should not be defined so narrowly, the Forest decided that it would be appropriate to hold two "open houses" in Pendleton and Hardy Counties (Reference Appendix A of the FEIS)

Letter 3921 — You have made progress in establishing dialogue with your constituents Selection of Alternative 8 as the preferred alternative reflects commitment to those publics which have committed time and energy to build a plan with you

Response — The FEIS has identified Alternative 8A as the Forest Service preferred alternative. This alternative was formulated to respond to suggestions and concerns made about Alternative 8

Letter 4043 — Appendix B discusses the constraints set for the size of created openings and dispersion. The DEIS states that the constraints insure that individual cuts created by application of even-aged silviculture will conform to the Regional Guide direction on dispersion of openings and maximum size limits for areas to be cut in one harvest operation. The constraint helps limit the size of timber harvest units and also limits clearcut timber harvest sizes in certain wildlife and recreation prescriptions Exceptions are not modeled in FORPLAN. This requirement/ constraint is preset for all alternatives The DEIS leaves no room for discussion of the issue By setting the constraint without assessing alternatives, the Forest Service fails to consider all possible management practices. The public is not participating in a key element of the Forest Plan

Letter 4043 — Another example of the arbitrary use of minimum management requirements is the constraint that of all the acres in the Forest, no more than 11% can be in 0-10 year age class (OPEN) for hardwoods and 17% for pines under TMBEAM, BWSTIM, and MOTEAM prescriptions The stated purpose for setting this constraint is simply "Minimum Management Requirement for dispersion " Dispersion limits the size and separation of timber harvest openings and limits the acreage that can be cut in a defined geographic area Dispersion results in faster elimination of old growth forests because, although harvest is dispersed, more acres are needed to yield the same volume The dispersion limit for this DEIS requires that, for EACH alternative, no more than 11% of the total acreage (whether or not suitable for timber production) of the Forest can be in the 0-10 year age class for hardwoods The dispersion objective can have a great negative effect on timber production, yet the issue is not open to public participation Dispersal of harvest units falls under the multiple-use objectives of each alternative By setting arbitrary constraints across the board for all alternatives, the Forest Service effectively violates the NFMA provisions that require public participation in the development of forest plans

Response — As discussed in the process paper *Incorporation of the NFMA Requirements for Even-Aged Management into the Revision of the Land and Resource Management Plan for the George Washington National Forest*, the *Regional Guide for the South* provides specific direction on the maximum size, dispersion and duration of even-aged openings needed to comply with the requirements in Section 6(g)(3)(F) of NMFA and 36 CFR 219 27(d) of the NFMA Regulations The ID Team formulated Standards 1005 thru 1014 in the Draft Revised Plan to meet the NFMA requirements for maximum size, dispersion and duration of even-aged openings Some of the management areas (especially Management Areas 14, 15 and 16) require smaller openings and wider dispersion

Timber harvesting can be more concentrated through the use of uneven-aged management regeneration harvest methods which essentially have no dispersion requirements Also, most of the requests for less dispersion of harvesting (usually in the form of "no new roads") also favor a higher percentage of uneven-aged management. Rather than formulate alternatives that contain modifications of the management requirements, increased use of uneven-aged management timber harvest cutting methods was a more effective solution to this concern.

Letter 1153 — The new plan clearly reflects the Forest Service's attempt to exclude citizen input

Letter 1275 — The revised draft contains language that would virtually eliminate the process of public participation Any language that would lessen public participation must be eliminated from the plan

Letter 1292 — I am aware that the new plan seeks to exclude public participation All such language must be eliminated from the plan.

Letter 3861 — Considered in the light of the Forest Service's proposed changes to the National Environmental Policy Act, Alt 8 seems to confirm the apparent desire of the Forest Service to restrict citizen (taxpayer/owner) input into the management of our National Forests by keeping the majority of its operations hidden from all but a very few diligent taxpayers who would monitor the Forest operations closely under the Freedom of Information Act. That position is not permissible in a free Society!

Response — There is no language in the Draft Revised Plan that would eliminate or exclude public involvement Indeed, Chapter 5 of the Revised Plan states "The public will have opportunities to be involved in decisions about specific projects"

Letter 14 — Please reject the phony, surrogate issues such as biological diversity, habitat fragmentation, and wildlife corridors.

Letter 35 — Reject the phony issues of biological diversity, habitat fragmentation and wildlife corridors inherent in special area designations

Letter 4256 — Reject the phony surrogate issues such as biological diversity, habitat fragmentation and wildlife corridors

Response — The issues of biological diversity, habitat fragmentation and wildlife corridors are legitimate, albeit there is a good deal of disagreement over the appropriate response.

Letter 1163 — Why was wildlife habitat/mgt. not listed under the issues guiding development of the plan?

Response — There were several different wildlife related issues and the public (as with many issues) had a wide range of opinions for "wildlife mgmt" Therefore, wildlife and associated issues were addressed under "ISSUE 1 — BIODIVERSITY", "ISSUE 8 — VEGETATION MANIPULATION", and "ISSUE 13 — THE MIX OF GOODS AND SERVICES"

Letter 4043 — The RPA/NFMA do not set minimum management requirements The Forest Service has interpreted regulation 36 C F R Section 219 27 as authority for setting minimum management requirements that act as a common constraint on all forest plan alternatives. By setting those inflexible baseline conditions for ALL forest plans without inviting public participation, the Forest Service violates the letter and the spirit of the NFMA

Letter 4043 — The DEIS for the George Washington National Forest, Appendix B, The Analysis Process, outlines the constraints common to all alternatives, as well as constraints associated with each alternative. The public does not participate in setting the minimum management requirements for the Forest Plan The MMR's are imposed in all alternatives and override the attainment of other multiple-use objectives, thereby violating the NFMA.

Response — The management requirements included in the NFMA Regulations (36 CFR 219 27) contain most of the substantive requirements from the National Forest Management Act The process paper *Management Requirements* details the relationship of these regulations with the law

The standards forming the management requirements are the **minimum** requirements needed to comply with NFMA For this reason, all alternatives AT LEAST comply with management requirements Most alternatives include more stringent standards which are consistent with the objectives of those alternatives

The ID Team has the latitude to formulate one or more alternatives that explore less stringent standards or even require a change in the regulations or the law if needed to respond to the issues In analyzing the thirteen issues, a need to formulate an alternative which varied the management requirements was not identified.

The public was afforded an opportunity to review and comment on process papers during the revision Such an opportunity was given for the process paper *Management Requirements* as well as other process papers that include a more in-depth analysis of the rationale leading to the identification of the standards used to comply with the management requirements A number of individuals and organizations took advantage of this opportunity and requested copies of these papers

The public has also been afforded an opportunity to review and comment on the standards during the review of the Draft Revised Plan and DEIS This comment is one example of such an opportunity

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Letter 134 — Public mandates are not reflected in the preferred alternative treatment

Response — The term "public mandate" is a misnomer in this context Any such mandates are in the form of federal laws, direction from the administration (executive orders), or Department of Agriculture policy The fact that some members of the public disagree with the defined agency mission does NOT constitute a public mandate

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Letter 138 — In the plan development process, a proposal was made to develop trails parallel to existing roads forming corridors for motorized recreation with minimal impact on roadless areas This proposal was ignored in the selected plan

Response — The parallel trail concept has been incorporated into reformulated versions of Alternatives 4, 5, and 12 in the FEIS One of these alternatives could be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2665 — The ecological concepts that drive Alternative #3 are totally missing from the preferred alternative; Alternative #3 is the only alternative approach that has been totally ignored by the preferred alternative This approach is essential to a healthy forest ecosystem that is truly dedicated to protection of natural native biological diversity It is important that the concepts presented in Alternative #3 are incorporated into the final plan

Response — Alternatives 3 and 8A are significantly different. Throughout the FEIS these differences are compared. Alternative 8A does protect the biological values of the Forest while still providing for a broad range of multiple use activities Alternative 3 provides for the maximum attainable amount of unfragmented habitats but severely limits multiple use activities. Alternative 8A was selected as the preferred because it protects biological values, and provides for a greater amount of multiple-use activities Chapters 2 and 3 of the Revised Plan provide more detailed information on protecting the Forest's biological values

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Letter 3728 — The draft revision must consider wildlife as one of the major issues, not just a part of several of the issues.

Response — The public identified many issues which were categorized for analysis purposes under 13 broad issue headings Many of the wildlife issues were very different in nature Therefore different facets of "wildlife" issues appear under different headings in Chapter 2 of the Revised Plan The biodiversity issue umbrella covers habitat fragmentation, old growth, riparian areas, threatened, endangered, and sensitive species, and unique biological values The vegetation manipulation umbrella covers forest management practices and includes the Featured Species issue which relates to wildlife habitat management, and, in particular, game management

"Wildlife" was considered a central theme to build on in Draft Revised Plan, The Revised Plan, derived from Alternative 8A, provides a well balanced, and strong response to the many facets of "wildlife" Chapter 3 of the Revised Plan describes each management area and its contribution to "wildlife" The accompanying map delineates these management areas and their juxtaposition

Letter 3822 — I am not certain how the U S Forest Service selected Alternative 8 but I feel there must have been a flaw in the process If the USFS relied on groups or people attending the public meetings that were held up and down the Valley over the past two years, then indeed, the selection process is in error Many people who use the forest or receive benefits from it simply did not have the time to go to these night meetings and make certain their views were represented Instead the process favors special interest groups whose members lives center around meetings and planning

Response — The identification of Alternative 8 as the Forest Service preferred alternative in the DEIS was based on a number of factors including its response to the thirteen public issues, the environmental analysis of alternatives, the resource capabilities of the Forest and national and regional Forest Service policies The attendees at the public meetings and other individuals, organizations and agencies assisted in clarifying the issues and providing ideas on possible resolution of issues that were incorporated into many alternatives In particular, these people helped the ID Team to provide a wider range of alternatives than the Forest Service would have developed in a vacuum The concerns and viewpoints of the attendees at these public meetings, however, were not given special consideration in the selection of the Forest Service preferred alternative in the DEIS

Letter 3933 — Restoration was not given "Issue" status

Response — Concerns about restoration are included under "ISSUE 9 — RESOURCE SUSTAINABILITY" as described in Appendix A of the FEIS Alternative 3 provides a strong response to concerns on restoration

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ADEQUACY OF THE REVISION: Management Areas/Management Prescriptions

Letters 1081, 1094, 1169, 1310, 1314, 1982, 3553, 3827
Prescription 9, remote highlands, needs to be tightened to protect wild character of its roadless character

Letter 3640 — The guidelines for management of remote highlands should be amended to prohibit any logging, use by motorized vehicles, and game species management

Letter 3744 — Make the "Remote Highland" category better protected

Letters 3998, 4012
PATC urges that the guidelines for Remote Highlands be amended to disallow any logging, use by motorized vehicles, and game species enhancement

Response — Management Area 9 contains two management area prescriptions which could be applied to roadless areas to retain their roadless characteristics Management area prescription 9A is used in Alternatives 6, 9, 11 and 13 This management area prescription contains standards similar to those applied to roadless areas recommended for wilderness study

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Letter 16 — Because of the intermingling of "suitable" and "unsuitable" lands, it will be necessary to cross "unsuitable" lands to access "suitable" areas MA 1 does not allow for the construction of roads, and therefore would prevent the accessing of MA 16 or 17 areas which are surrounded by MA 1 lands. This technical problem can be solved by creating MA 16 and 17 subclasses which are unsuitable for timber harvesting but allow for investment to access "suitable" lands in MA 16 or 17 These "unsuitable" subclasses should be mapped and distributed for comment as soon as possible

Response — In the FEIS, lands unsuitable for timber production in areas mapped as Management Areas 16 and 17 on the alternative maps will be part of Management Areas 16 or 17 and not assigned to Management Area 1.

Letter 87 — The amount of timber harvesting in MA 10 appears excessive considering the expressed ecological purpose of the plan

Response — In the Revised Plan, Management Area 10 contains no lands suitable for timber production

Letter 2313	My choice. MA-1 Alt. 14 8,178 acres MA-2 Alt 5/12 none MA-3 Alt 5/12 8,474 MA-4 Alt. 5/12 53,299 acres MA-6 Alt 5/12 12,667 acres MA-8 Alt 5/12 32,269 acres MA-7 Alt. 5/12 none MA-20 Alt. 5/12 4,021 acres MA-19 Alt. 5/12 none MA-18 Alt 12 17,031 acres MA-17 Alt. 5 652,804 acres MA-16 Alt 12 118,251 acres MA-15 Alt. 5 68,093 acres MA-14 Alt. 12 113,835 acres MA-13 Alt. 5/12 13,378 acres MA-12 Alt. 5/12 1,619 acres MA-11 Alt 12 86,514 acres MA-10 Alt. 5/12 14,337 acres MA-9 Alt 5 8,414 acres MA-5 Alt. 5/12 none
Response	This comment appears to be in favor of a modified version of Alternative 12 which incorporates management allocations from Alternatives 5 and 14 from the Draft Environmental Impact Statement. Frankly, it is impossible to formulate this recommended alternative The management area acreage adds up to 1,213,184 acres which is more acreage than is on the Forest
Letter 146	The use of a large number of management areas in the draft plan is a great improvement over the use of only a few management areas which covered most of the forest in the discredited 1986 plan.
Letter 3939	Leave MA-17 as is. Retain the name "Manage for Timber Production".
Letter 3939	Leave MA-4 as is Retain the name "Manage Special Interest Areas".
Letter 3939	If Management Areas are grouped into fewer areas, as recommended, then the acres will have to be adjusted for each of the areas
Letter 3939	Leave MA-8 as is. Retain the name "Manage Wilderness and Wilderness Study Areas"
Letter 3939	Leave MA-20 as is Retain the name "Manage for Administrative Sites, Utility Corridors, and Communication Sites"
Letter 3939	Leave MA-6 as is. Retain the name "Manage the Appalachian Trail"
Letter 3939	Leave MA-10 as is Retain the name "Manage Scenic and Recreation Rivers"
Response	NO RESPONSE REQUIRED
Letter 3728	Management Area 18 Integrated Pest Management 626 - Change to "Control of insect and disease outbreaks may be considered to prevent adverse impacts to the desired future condition of riparian areas Consultation with appropriate State and federal biologists required "
Response	Requested wording change is incorporated as stated.
Letter 4219	Standard 1024 states that at least 1% of the forest should be maintained as openings. In addition to openings on G W N F lands, openings on adjacent private lands should be included in habitat calculations

Response — Standard 1024 in the Draft Revised Plan represented the minimum standard required to maintain viable populations of Common Flicker, one of the management indicator species. The ID Team assumed that no special action beyond the maintenance of existing clearings on the George Washington National Forest would be needed to meet this requirement

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Letter 4038 — Change Standard 17 on page 2-28 of the Draft Revised Forest Plan to read: "Forest insect and disease outbreaks of native pest species will not be controlled except where proposed or listed endangered, threatened, or sensitive species may be adversely impacted by a gypsy moth outbreak. If control actions are deemed necessary, biological control measures should be considered as the preferred method of control. Gypsy moth control efforts often directly or indirectly threaten the existence of rare, E&T, or sensitive species "

Response — This suggested rewording of Standard 17 in the Draft Revised Plan would be too restrictive. The Revised Plan permits the use of gypsy moth treatments which are evaluated in the *Final Environmental Impact Statement – Appalachian Integrated Pest Management (AIPM) – Gypsy Moth Demonstration Project* and *Final Environmental Impact Statement as Supplemented [in] 1985 – USDA Gypsy Moth Suppression and Eradication Projects*

In Management Area 4, insect and disease outbreaks are not controlled except where proposed, threatened, endangered or sensitive species may be adversely impacted. Given that these are special biological areas, great concern and regard would be afforded any proposed intervention activity. Adverse impacts of treatments against non-target organisms would be considered. The selection of a method would favor species-specific intervention tactics, in the case of gypsy moth this would be the gypsy moth-specific virus insecticide, Gypchek.

Letter 4038 — Change Standard 852 on page 2-154 of the Draft Revised Forest Plan to read. "Silvicultural treatments will be used to reduce the susceptibility and vulnerability of forest stands ahead of gypsy moth defoliation and to maintain the predominant oak/hickory forest type on which many wildlife species depend."

Response — There should not be such a loss of oak that extensive regeneration of all or most oak stands is necessary. Standard 852 in the Draft Revised Plan is adequate as written

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Letter 4038 — Delete Standard 62 on page 2-34 of the Draft Revised Forest Plan

Response — Standard 62 in the Draft Revised Plan is required by law and by direction from the Chief of the Forest Service

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Letter 16 — In areas where trade or purchase is likely to change private to public ownership during the plan period, it is important that the current MA assignment reflect the desired future use.

Letter 72 — Isolated tracts which are on the list for trading should be placed in MA 1.

Letter 87 — On the James River RD, Potts Creek and Alleghany quads, it is recommended that Management Area 17 be changed to Management Area 1 for those isolated parcels of NFS land east of State Route 18 from Mt. Olivet Church north to Boiling Springs because they have no access

Letter 87 — On the James River RD, Callaghan quad, it is recommended that Management Area 17 be changed to Management Area 1 for the Forest land north of Interstate 64, just east of Humpback Bridge because that is what this area is in alternative 14.

Letter 87 — On the James River RD, Falling Springs quad, it is recommended that Management Area 17 be changed to Management Area 1 south of Broad Tree Run to the Jackson River because that is what this area is in alternative 14.

Letter 87 — On the Deerfield RD, McDowell quad, it is recommended that Management Area 15 be changed to Management Area 1 for that inaccessible Forest land south of U S. Highway #250 and west of State Route #616

Letter 87 — On the Dry River RD, Rawley Springs quad, it is recommended that Management Area 14 be changed to Management Area 1 for that Forest land east of FDR #502 because that is what this area is in alternative 14

Letter 87	On the Lee RD, Wolf Gap quad, it is recommended that Management Area 17 be changed to Management Area 1 for that inaccessible land north of State Route #691 and south of State Route #717.
Letter 87	On the West Virginia portion of the Dry River, Milam quad, it is recommended that Management Area 15 be changed to Management Area 1 from Ant Knob north to the forest boundary because that is what this area is in alternative 14
Letter 87	On the Lee RD, Toms Brook and Woodstock quads, it is recommended that Management Area 15 be changed to Management Area 1 for that choppy Forest land north of Fetzer Gap along Little North Mountain because the area has low site indices and that is what this area is in alternative 14
Letter 87	On the Lee RD, Wardensville quad, it is recommended that Management Area 16 be changed to Management Area 1 for that isolated Forest land between Harness Run and Sine Run
Letter 87	On the Dry River RD in West Virginia, Palo Alto quad, it is recommended that Management Area 15 be changed to Management Area 1 for that inaccessible Forest land just west of Brushy Fork Church.
Letter 87	On the Deerfield RD, Goshen quad, it is recommended that Management Area 17 be changed to Management Area 1 for the inaccessible Forest land just north of Goshen and west of State Route #42.
Letter 2929	The lands classified under Management Area #1 have no clear management direction These areas should be reclassified under Management Area #15.
Letter 3660	There should be no management area 1 This is unnecessary and inefficient Distribute these acres to other MA's
Letter 3728	This management area [#1] designation of 10 percent of the Forest cannot be justified, especially since 60,000 acres of this area have not been mapped
Letter 3875	I respectfully request that the Management Area 15, from Camp Run, North Branch, North to Hardy Co. line, and from the Rockingham Co Va line in the National Forest in a westerly direction to the private property lines aja State #7 be included in your Management Area #1. This particular area that I have referred to now has only limited access on foot and no motorized access at all, except across private property It is my opinion that this area is frequented by the American Bald Eagle as I have seen seven (7) within a radius of two (2) miles of this area Remoteness Visitors would be approx , a thirty (30) minute walk from any motorized travelway. Social Encounters It would be unlikely to encounter more than one or two persons within this area Visitor Management There are no on-site visitor controls present or none within sixteen (16) miles of this area, *(Brandywine)*. Facilities and Site Management· None exist Naturalness These lands provide a high degree of naturalness with little no evidence of human made changes to the environment A very high tension power line traverses this area, However· This does not mean that we should relinquish the remaining area to the other whims of man I feel that the foregoing reasons should weigh heavily on the side of preservation of this area to at least, Management area #1
Letter 3962	MA 1 [Standard] 2 Include standard 768-770 & 825-831 since prescribed fire may be used.
Letter 4038	Delete the first two paragraphs under Management Area 1 on page 2-23 of the Draft Revised Forest Plan and *replace with the following paragraph "This ____ acre management area contains lands that are too small to* allow for or benefit from active management Other lands are either inaccessible or disjunct from the major areas of the Forest, making control and management difficult The majority of these lands are considered for exchange of lands that are either 1) desirable inholdings, or 2) needed to access other parts of the forest, or 3) provide PETS species habitat, or 4) have high recreation value, or 5) are lands needed to meet management objectives in other areas of the Forest Management of these lands is limited to that needed to protect the public's investment "
Letter 4038	Management Area 1 - Comment Lands allocated to this management area should only be those lands that meet the above criteria We recommend several of the MA #1 lands identified in the Draft Plan be allocated to other appropriate management areas (see attached maps submitted with these comments)

Letter 4038

Management Area 1 - Under Desired Future Condition on page 2-23, add the following second paragraph "Over time the goal is to remove all lands from this Management Area designation, through land exchange or assignment to other Management Areas "

Response

No lands have been allocated to Management Area 1 in the preferred alternative The ID Team considered allocating isolated tracts without access to Management Area 1, but found that the amount of acreage was essentially too small and scattered to justify a separate management area A high percentage of these isolated tracts have been identified in the Land Adjustment Plan as desirable for exchange and would be disposed of as opportunities arise Lands unsuitable for timber production will be part of Management Areas 7, 10, 11, 13, 14, 15, 16, and 17 This area is unsuitable on that map See Revised Plan map for distribution of areas of interest

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Letter 2060

I recommend the following redistributions of acreage MA 11 - 0, MA 17 - 0, MA 16 - 0, MA 15 - 0, MA 2 - increase, MA 3 - increase, MA 8 - increase to minimum of 263,000 acres, MA 9 - increase.

Response

No alternative meets all of these requirements. The Forest Service is finding that people need and want a wide variety of uses, values, products and conditions from the Forest. The commenter's recommendation effectively eliminates management for timber and early successional wildlife. Alternative 3 comes closest to meeting the commenter's recommendations with no acreage being allocated to management areas 11, 15, 16 and 17 and a large number of acres being allocated to Management Area 8. If this alternative is identified as the one which maximizes net public benefits, it will be selected by the Regional Forester to serve as the Revised Plan

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Letter 2366

I would like to see MA13 managed for dispersed recreation. As Virginia's population increases, the demand for dispersed recreation is mushrooming

Response

Management Area 13 is managed to emphasize dispersed recreation

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Letter 3942

In the prescription for Management Area 13, please make the following changes Standard 510. Change to "Prescribed fire may not be used". Standard 511 Change to "Suppression of gypsy moth is not considered". Some of the areas in MA 13 are unspoiled watersheds, spraying chemicals in these areas could alter the natural balance. Standard 519 I would prefer to have all roads closed, but if this is not possible, change third sentence to "Existing system roads may continue to be used". Standard 522. Change second sentence to "No salvage of dead or dying timber will be done" Standard 523 Change second sentence to "No additional wildlife habitat improvements will be permitted".

Response

Rather than changing management area prescription 13C, standards comparable to those recommended in this comment are included in management area prescription 9A

Letters 2334, 3684

MA11 should not permit recreation use of all-terrain vehicles (ATVs) because of incompatibility with soil and water conservation and other objectives

Response

Management Area 11 was formulated to emphasize motorized recreation It is inappropriate to modify Management Area 11 to prohibit the use of all-terrain vehicles There is, however, no requirement that Management Area 11 be allocated to any particular part of the George Washington National Forest or even used at all

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Letter 82

The plan states (2-65) that segment B of the Jackson River is allocated to Management Area 13 The map for the preferred alternative, however, shows that it is allocated to MA 10. This discrepancy should be resolved

Response

The map of the Forest Service preferred alternative has been changed so that the portion of Segment B of the Jackson River that lies within Hidden Valley is allocated to Management Area 13 while the remainder is allocated to Management Area 10

Letter 142

As you are well aware, wilderness advocates strongly believe that Management Area 8, carrying with it a recommendation for wilderness status under the Wilderness Act, is the right and deserved classification for the entire Mount Pleasant area of approximately 8,500 acres It continues to be our preference, beyond question

Response

While there are roadless area characteristics in Mount Pleasant which should be protected by eliminating the application of inappropriate management practices, another wilderness on the Pedlar Ranger District (beyond the three roadless areas recommended for wilderness study) is not needed during the ten to fifteen years that the Revised Plan will be in effect This concern can, however, be revisited in future revisions of the Forest Plan

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Letter 142

While the specifics of the Management Area 9 prescription are less protective of wilderness qualities than is the Wilderness Act of 1964 and they lack the permanence of wilderness designation under the Wilderness Act, they come nearer to conforming to Wilderness Act status, in the opinion of the Virginia Wilderness Committee, than any other of the draft Management Area prescriptions It is to be noted that the existing physical and biological condition of the Mount Pleasant area is consistent with the objectives of Management Area 9

Response

Mount Pleasant, Little River, Laurel Fork and Big Schloss have been assigned to Management Area 21 ("Special Management Areas") in the Revised Plan Management Area 21 provides specific management direction for these areas Management practices will be limited to those which will not reduce the roadless area values of these areas Permissible management practices will be applied in a manner that is sensitive to the roadless area values Mount Pleasant, Little River, Laurel Fork and Big Schloss will not, however, be managed SOLELY for the preservation of these management area values

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Letter 142

Little River is presently placed in Management Area 13 for the most part, with a minor portion near the top in Management Area 4 Everything written above in this letter about Mount Pleasant is equally applicable to the Little River area For the record, the Virginia Wilderness Committee recommends that all that part of Little River presently assigned to Management Area 13 be reclassified and assigned to Management Area 9 (Remote Highlands), that portion presently assigned to Management Area 4 to so remain

Letter 3840

Little River is more appropriate for wilderness status or a MA 9 designation

Letter 3962

MA 13 2-103, Little River - Desired future conditions On 2-101 you are managing to retain their roadless characteristics, yet in future conditions existing roads may be open all year or seasonally The roads should be closed to make this a roadless area

Response

The Little River Roadless Area has been assigned to Management Area 21 ("Special Management Areas") in the Revised Plan. Management Area 21 provides specific management direction for Little River Permissible management practices will be applied in a manner that is sensitive to the roadless area values Little River will not, however, be managed SOLELY for the preservation of these roadless area values

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Letter 2636

We have received a draft planning paper dated 4/6/92 which shows a revised list of acreage for management areas in alternative 8, with special reference to MAs 1, 16, 17, and 18 The changes in all alternatives, including an increase in 50% in MA 16 and 76% in MA 17 for Alternative 8, should be brought to the attention of the public for additional comments Moreover, the intermixture of suitable and unsuitable lands in MA 16 and MA 17 will change the calculation of wildlife habitat These changes should also be brought to the attention of the public for further comment

Response

There are limits to the degree that the public can be actively involved in the modifications to the Forest Service Preferred Alternative between the comment period on the Draft Revised Plan and the completion of the Revised Plan There are also limitations on the amount of "public review" that is either practical and/or legally acceptable without issuing a supplement to the DEIS and another Draft Revised Plan

After the public comments period on the Draft Revised Plan, the ID Team developed management area prescriptions for Management Areas 16 and 17 that could be applied to lands unsuitable for timber production instead of assigning such lands to Management Area 1 Acreages within the fourteen alternatives considered in detail in the FEIS were appropriately adjusted

Any changes in the alternatives between the DEIS and the FEIS have a probability of changing at least some of the information displayed within these documents It requires a judgement call by the Deciding Officer (in this case the Regional Forester) if the magnitude of changes merit further public review and scrutiny Based on recommendations by the ID Team, the Regional Forester concluded that the magnitude of changes between the DEIS and FEIS did not require further public review

Letter 3660 Do not provide for visual restrictions in MA's 14, 15, 16 & 17

Response The aesthetic standards in Management Areas 14, 15, 16 and 17 have been incorporated to comply with NFMA and NFMA Regulations These regulations are discussed in Appendix G of the FEIS.

Letter 3728 Management Area 18· Fire 640 - Change to. "Firelines which expose mineral soil are not located within riparian areas unless tying into lakes, streams, or wetlands as firebreaks at designated points."

Response The ID Team considered a similarly worded standard early in the revision It is not included in the Revised Plan because the adverse effects of a low intensity fire in a riparian areas are less than those of the extra firelines needed to comply with the suggested standard

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Letter 3728 Management Area 18· Fire 639a - Add the following new standard· "Prescribed fire is not permitted in riparian areas unless done to benefit riparian dependent resources."

Letter 4038 Add the following new standard (tentatively numbered 639a) on page 2-124 of the Draft Revised Forest Plan under "Fire". "Prescribed fire is not permitted in riparian areas unless done to benefit riparian dependent resources "

Response Standards, as written, call for special measures to protect water quality and wetlands. There is a need for management flexibility that is included in the existing standards for Management Area 18

Letter 3728 Management Area 15· Fire 564 - Presently, prescribed fire is allowed only on those lands where even-aged management is applied and unsuitable lands in this management area Prescribed fire should be allowed throughout this management area to achieve wildlife objectives

Response Prescribed fire is inconsistent with the area managed under uneven-aged silvicultural systems in Management Area 15 Standards are included in the Revised Plan that permit prescribed fire in the remainder of the management area

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Letter 3962 MA 10 [Standard] 329 There are no existing grazing permits along the proposed Scenic Rivers I would think that Scenic Rivers status would be restrictive Lets keep the cows away from the river in the GWNF

Response Uses described in Standard 329 do exist along the Shenandoah River and on Cedar Creek This standard is to address those uses and require revalidation of the use upon expiration

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Letter 3962 MA 10 [Standards] 330 & 343 Delete "Where no reasonable alternative exists" Additional or new facilities should be restricted to existing rights-of-way

Response Due to the unknown nature of future utility demands, it is not possible to totally eliminate opportunities for new corridors

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Letter 4038 Add a new standard (tentatively numbered 15a) to page 2-28 of the Draft Revised Forest Plan under the heading of "Fire"· "A wildlife contingency plan should be prepared for each Special Interest Area. Suppression techniques that can be used to minimize damage to the rare species and natural communities at the site should be documented. Actions should be outlined that would minimize risk of catastrophic wildfires "

Response Specific management area direction for fire will be added to the Fire Management Section of the Fire Management Action Plan as it is developed. This implementation guide provides flexibility for incorporating "special conditions" that really cannot be addressed as a standard in the Revised Plan.

Letter 4038	Add a new standard (tentatively numbered 15b) to page 2-28 of the Draft Revised Forest Plan under the heading of "Fire": "The suppression response will be control where life, public safety, public or private property is threatened "
Response	Standard 59 under *COMMON STANDARDS* is applicable to this management area prescription in the Revised Plan.
Letter 4038	Change Standard 16 on page 2-28 of the Draft Revised Forest Plan to read. "Prescribed burning is encouraged to meet the resource management objectives for rare species and natural community management "
Response	Standard 16 has not been reworded The existing standard is sufficient.
Letter 4038	Add the following new standard (tentatively numbered 30b) to page 2-29 of the Draft Revised Forest Plan under the heading "Utility Corridors" "Vegetation within existing utility corridors shall be maintained by means other than herbicides."
Response	All utility corridors, which allow herbicide use, are located in Management Area 20
Letter 4038	Change Standard 269 on page 2-63 of the Draft Revised Forest Plan to read "Prescribed fire may be used to provide habitat for wildlife species and create early successional habitat that historically existed
Response	The recommended change is inconsistent with the intent of Management Area 9 The phrase "create early successional habitat that historically existed" is too open to interpretation The standard remains unchanged
Letter 4038	Delete Standard 156 on page 2-47 of the Draft Revised Forest Plan.
Response	Standard 156 has been combined with Standard 124 to apply to all of Management Area 7
Letter 4038	Add the following new standard (tentatively numbered 76c) to page 2-35 of the Draft Revised Forest Plan under the heading "Utility Corridors" "Vegetation within existing utility corridors shall be maintained by means other than herbicides "
Response	Utility Corridors are allocated to Management Area 20. Technically, there are no utility corridors within Management Area 4 There is only one existing utility corridor that passes through Management Area 4 on the east side of Shenandoah Mountain (in habitat for Cow Knob Salamander)
Letter 4038	Add the following new standard (tentatively numbered 30a) to page 2-29 of the Draft Revised Forest Plan under the heading "Utility Corridors". "New powerline, gasoline, communication, or other utility corridors shall not be sited within Special Interest Areas "
Letter 4038	Add the following new standard (tentatively numbered 76b) to page 2-35 of the Draft Revised Forest Plan under the heading "Utility Corridors" "New powerline, gas, communication or other utility corridors shall not be sited within Special Interest Areas."
Response	The following new standard has been added to Management Area 4 under each category of "Special Interest Areas -- Biological" "New utility corridors are located outside this management area if at all possible "
Letter 4038	Standards 827, 828, 829 and 830 on page 2-151 of the Draft Revised Forest Plan COMMENT: Seems very restrictive, paints all conditions on the ground with a broad brush Wildlife habitat objectives for the management areas should determine when and where burning can occur, not ambiguous guidelines generally set for timber management

Response

Standards 827, 828, 829 and 830 in the Draft Revised Plan were derived from "Method Specific Management Requirements and Mitigation Measures" 2, 3, 4 and 5 in the *Final Environmental Impact Statement for Vegetation Management in the Appalachian Mountains* Based on discussions with the leader of the ID Team that prepared this FEIS, these standards were meant to be applied to lands suitable for timber production Therefore, Standards 64 through 67 are under *COMMON STANDARDS* in the Revised Plan·

"On lands suitable for timber production, underburns in shortleaf, pitch, and table mountain pine stands are not done until pines are 10 to 15 feet tall or 3 to 4 inches in diameter at ground level

On lands suitable for timber production, underburns are not done in commercial pine-hardwood stands, and inclusions until hardwood stems reach 5 to 6 inches in diameter at ground level Only low intensity, dormant season fires with flame lengths of 2 feet or less are allowed

On lands suitable for timber production, underburns are not done in commercial hardwood-pine or hardwood stands, and inclusions until hardwood stems reach 8 to 10 inches in diameter at ground level Only low intensity, dormant season backing fires with flame lengths of 2 feet or less are allowed

On lands suitable for timber production, underburns are not done in commercial white or Virginia pine stands until they have formed a thick, corky bark Only low intensity, dormant season backing fires with flame lengths of 2 feet or less are allowed.

When the objectives for a given management area or part of a management area do NOT include the production of commercially valuable tree species or stems, then prescribed burning can be accomplished under broader parameters to meet multiple use resource objectives "

Letter 4038

Standard 770 of the Draft Revised Forest Plan. COMMENT Specify level of humidity, realizing that not much burning can be done when really high. The present statement could be interpreted that any level of humidity could stop prescribed burning "

Response

Standard 770 in the Draft Revised Plan was derived from "Method Specific Management Requirements and Mitigation Measure" 15 in the *Final Environmental Impact Statement for Vegetation Management in the Appalachian Mountains* The Regional Forester decided in the record of decision for that FEIS that each Forest could use more restrictive but not less restrictive standards

This standard should not be interpreted to mean that any level of humidity could stop prescribed burning The Forest Prescribed Burning Handbook establishes burning parameters, such as relative humidity, that are applicable to types of burns

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Letter 4038

Add a new standard (tentatively numbered 15c) to page 2-28 of the Draft Revised Forest Plan under the heading of "Fire". "The role of fire as a natural process in the maintenance of rare species and natural community occurrences should be evaluated Fire histories should be prepared for individual sites where that information will contribute to effective management of the Special Interest Area "

Response

As worded, the suggested text is not a standard Instead of rewriting it as a standard, this paragraph has been added to the Desired Future Condition for "Special Interest Areas — Biological".

Letter 4038

Change Standard 18 on page 2-28 of the Draft Revised Forest Plan to read "Privately held inholdings within Special Interest Areas shall be ranked for protection priority Strong protection techniques such as fee-simple acquisition or acquisition of a conservation easement should be used Assistance with land acquisitions should be sought from private conservation organizations "

Response

The Forest annually prepares a proposed funding request for Land Acquisition Rare and Endangered, Threatened Sensitive rankings are used to request funds The Forest also uses several private partners on acquisition efforts Existing process satisfies request to change standard.

Letter 4038 — Add the following new standard (tentatively numbered 61c) to page 2-34 of the Draft Revised Forest Plan under the heading "Fire" "The role of fire as a natural process in the maintenance of rare species and natural community occurrences should be evaluated "

Response — The suggested wording in this proposed standard has been added to the Desired Future Condition for "Special Interest Areas — Research Natural Areas"

Letter 4038 — Add the following new standard (tentatively numbered 61e) to page 2-34 of the Draft Revised Forest Plan under the heading "Land Exchange and Acquisition" "Privately held inholdings within an RNA boundary shall be identified and prioritized for protection through fee-simple acquisition of a conservation easement Assistance with this acquisition work should be sought from private conservation organizations "

Response — There are no private inholdings in the Little Laurel Run Research Natural Area, so this standard is unnecessary If other RNAs are established by the Chief and subsequently allocated to this management area prescription, this standard could be added at that time

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Letter 4038 — Repeat Standard 544 under "Prescribed Fire" on page 2-151 of the Draft Revised Forest Plan "Prescribed burning is allowed to achieve specific wildlife objectives "

Response — Standard 544 in the Draft Revised Plan applies to a specific management area It is inappropriate to place this standard in Common Standards

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Letter 3939 — Combine MA-14, MA-15, MA-16 Rename as "Emphasize Wildlife Habitat Management"

Response — The ID Team worked with wildlife biologists of both the West Virginia and Virginia state agencies to develop Management Areas 14, 15 and 16 There are distinct differences in the desired future conditions and standards that apply to these management areas that would be lost if they were combined

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Letter 4038 — Add the following new standard (tentatively numbered 61d) to page 3-34 of the Draft Revised Forest Plan under the heading "Fire" "Prescribed burning is permitted and often encouraged to meet the resource management objectives for rare species and natural community management "

Response — This new standard has been incorporated into the Revised Plan

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Letter 4038 — Add the following new standard (tentatively numbered 61a) to page 2-34 of the Draft Revised Forest Plan under the heading "Fire" "The suppression response may be confinement, containment, or control for intensity level fires A suppression plan should be prepared that identifies techniques that would minimize damage to the rare species and natural communities Actions should be outlined that would minimize risk of catastrophic wildfires "

Letter 4038 — Add the following new standard (tentatively numbered 61b) to page 2-34 of the Draft Revised Forest Plan under the heading "Fire" "The suppression response will be control where life, public safety, public or private property is threatened "

Response — Common Standards 820 thru 824 in the Draft Revised Plan contain various wildfire suppression policies that may be applied to different management areas The first paragraph under **Standards** on page 2-34 of the Draft Revised Plan incorporated these standards by reference There is no need to repeat them in most management area descriptions, thereby greatly increasing the size of the Revised Plan

The Fire Staff Officer maintains a Fire Management Action Plan which includes the specifics of the fire management policy for each management area on the Forest There is no advantage to list the preparation of such an implementation guide as a standard in the Revised Plan

Letter 171 Won't MAs 16 & 17 (that southern sacrifice zone) discredit the philosophy of the Pedlar?

Response Alternatives 3, 4, 6, 11 and 13 examine a range of management area allocations for the Pedlar Ranger District which do not include Management Areas 16 or 17 The maps attached to this FEIS show the allocation of management areas for each alternative See also FEIS, Chapter 2, for the Forestwide acreage in management areas by alternative The Revised Plan represents a philosophy of how the Forest, not individual Ranger Districts, will be managed. In the record of decision, the Regional Forester will discuss the rational for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Forest Plan However, no single factor, such as management area allocations, will lead to this selection

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Letter 3728 Many MA designations and their proposed boundaries should be changed prior to the Plan's decision

Response Management Areas are areas of the Forest "with similar management objectives and a common management prescription" (FSM 1905, WO Amendment 1900-91-3). The 1982 NFMA regulations define management prescriptions as practices permitted "on a specific area to attain multiple-use and other goals and objectives (36 CFR 219 3)" Forest Plans are required to contain "multiple-use prescriptions and associated standards and guidelines for each management area" [36 CFR 219 11(c)] In essence, Forest Plans establish management areas and associated direction (standards and guidelines) for particular areas of the Forest. For further discussion of management area prescriptions, the reader is encouraged to read FEIS Appendix B

The concept of multiple use recognizes that not every multiple use can necessarily be accommodated on the same tract of national forest land In working with various individuals, groups, organizations and agencies, 22 management areas which emphasize different mixtures of management practices that compliment or enhance compatible resource values have been developed These 22 management areas provided a broad range of prescriptions for the analysis.

Public input influenced land allocations to the 22 Management Areas These allocations vary greatly by alternative and strongly reflect public preferences The public was afforded the opportunity to provide information on potential management area allocations which offered the best resolution of issues within different alternatives As a result of this effort, the maps attached to this FEIS show each alternative's management area allocations. See also the FEIS, Chapter 2, for the acreage in management areas by alternative

Based on public comments, some management area boundaries or allocations were revised in Alternatives 6, 7, 8A, 9, 11 and 12 Responses to specific recommendations for changing a management area boundary or allocation of an alternative are discussed under each specific comment.

In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan However, no single factor, such as management area allocations, will lead to this selection

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Letter 4038 Delete the third paragraph on page 2-14 of the Draft Revised Forest Plan

Response Since the paragraph was basically a redundant statement, the paragraph has been dropped in the Revised Plan

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Letter 4038 Comments on Chapter 4 - Tables 1, 2, and 3 must include monitoring and evaluation provisions that relate to biological diversity issues and actions, such as, number of rare species inventories, number of SIA management plans prepared, action implemented, etc These monitoring and evaluation objectives can be derived from the Standards presented in the draft plan; specific examples 1 Conduct biological evaluations to determine effects of land disturbance projects on PETS species; 2. Were recovery actions outlined in state or federal species recovery plans implemented? 3. Were Special Biological Area Management plans prepared? 4. Were significant cave management plans prepared? 5 Were inholdings within SIA and RNA boundaries acquired?"

Response Monitoring is an integral part of the total management process The Plan will be monitored to provide the quality control necessary to ensure it is implemented properly The monitoring program is not intended to depict all monitoring activities undertaken on the Forest To be able to rely on current work forces to complete needed monitoring, the Forest has to simplify and focus on what it felt was important We agree that it is important to have monitoring provisions related to biological diversity. The monitoring programs for caves, biological values,

timber, wildlife, fisheries, insect and disease, threatened, endangered and sensitive species, and water will help in this endeavor The monitoring program focuses on the standard that if violated, could have the greatest impact on the environment This program has been updated to incorporate the suggestions in this comment regarding recovery plans for PET species and management plans for areas with special biological values.

Letter 4038

Change the first paragraph under "Management Area 13" on page 2-101 of the Draft Revised Forest Plan to read. "This 49,244-acre management area contains the Crabtree Falls, Spy Rock Basin, Lake Moomaw and Hidden Valley–Jackson River management areas as described on pages IV-49, IV-52, IV-62, and IV-63 of the Forest Plan, and the Little River and Mount Pleasant areas, which are enlargements of the Special Management Area described on pages IV-44 and IV-64 of the 1986 Forest Plan These are areas that receive heavy dispersed recreation use "

Response

More areas have been allocated to Management Area 13 in the preferred alternative in the FEIS than in the DEIS. The description of Management Area 13 has been rewritten to more accurately describe where it occurs on the Forest

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Letter 4038

Replace the second paragraph on page 14 of the Draft Revised Forest Plan with the following. "The desired future condition involves continuing Forest contributions to the economic and social vitality of the Forest's rural neighbors. The Forest works with neighboring rural people and communities in developing natural-resource-based opportunities and enterprises within the biological capabilities of the Forest "

Response

We agree to reword the last sentence to read " . and enterprises within the capabilities of the resources." Use of the "biological" is not appropriate for some potential enterprises such as tourism. The word "Forest" is not appropriate because we may assist in the development of opportunities and enterprises outside of the National Forest.

Letter 4219

We recommend that the map for the final plan be color coded to improve understanding of the location of various management areas and facilities on the forest

Response

Two maps that accompany the Revised Plan use colors to highlight some features that are important in understanding the Plan.

Letter 87

The small portion of the Shawvers Run Wilderness area which is located in the James River Ranger District should be in MA 8.

Letter 87

On the Pedlar RD, Stuarts Draft, Big Levels, Sherando, and Vesuvius quads, it is recommended that Management Area 15 be changed to Management Area 16 known as Big Levels noth of the Coal Road because it is grouse management area under the current plan and because that is what this area is in alternative 14

Letter 87

On the James River RD, Longdale Furnace quad, it is recommended that the numerous Management Areas 1's be changed to Management Area 7 north of Interstate 64

Letter 87

On the James River RD, Longdale Furnace quad, it is recommended that Management Area 15 be changed to Management Area 13 around Longdale Recreation Area, including the loop trails

Letter 87

On the James River RD, Covington and Clifton Forge quads, it is recommended that Management Area 17 be changed to Management Area 15 on both the northwest and southwest sides of Fore Mountain and north of Smith Creek to Douthat State Park because that is what this area is in alternative 14

Letter 87

On the James River RD, Covington and Clifton Forge quads, it is recommended that Management Areas 17 and 14 be changed to Management Area 7 for the foreground VQO zone along Pounding Mill Run road FDR #125 and State Highway 606

Letter 87

On the James River RD, Alleghany and Glace quads, it is recommended that Management Area 15 be changed to Management Area 14 east of State Route 603 and the pipeline land south and west of State Route 311 because this area has bear management potential

Letter 87 On the James River RD, Callaghan, Jerrys Run, Alleghany, and Glace quads, it is recommended that Management Areas 11 and 15 be changed to Management Area 7 for the foreground VQO zone along the Amtrack rail line because that is what this area is in alternative 14

Letter 87 On the James River RD, Callaghan quads, it is recommended that Management Area 17 be changed to Management Area 16 south of Harmon Run, east of State Route 600 and north of Johns Run because that is what this area is in alternatives 7 and 14

Letter 87 On the James River RD, Jordan Mines quad, it is recommended that Management Area 17 be changed to Management Area 16 for that land north of State Route 613 and 616, east of State Route 18, and south of State Route 615 because that is what this area is in alternative 14.

Letter 87 On the Lee RD, Rileyville and Bentonville quads, it is recommended that Management Area 7 be changed to Management Area 9 around Veach Gap shelter

Letter 87 On the Lee RD, Hamburg and Luray quads, it is recommended that Management Area 7 be changed to Management Area 9 from Kennedy Peak on the north to Camp Roosevelt on the south

Letter 87 On the Lee RD, numerous quads, it is recommended that Management Areas 7 and 14 be changed to Management Area 5 on the west slope of Massanutten Mountain, Short Mountain, Powell Mountain and Three Top Mountain from Strasburg to Endless Caverns because that is what this area is in alternative 14

Letter 87 On the Lee RD, Wardensville and Mountain Falls quads, it is recommended that Management Area 15 be changed to Management Area 9 for that land east and north of State Route #93 around Jonnies Knob.

Letter 87 On the Lee RD, Wardensville quad, it is recommended that Management Areas 15 and 16 be changed to Management Area 9 along both the east and west slopes of Great North Mountain and north of the powerline

Letter 87 On the Lee RD, Baker, Wardensville, and Mountain Falls quads, it is recommended that Management Area 16 be changed to Management Area 15 in West Virginia because that is what this area is in alternative 7

Letter 87 On the Lee RD, Baker, Wardensville, and Mountain Falls quads, it is recommended that Management Area 16 be changed to Management Area 7 for the foreground VQO zone along State Route #55 because it is a sensitivity level 1 travel route and that is what this area is in alternative 6.

Letter 87 On the Lee RD, Wolf Gap and Lost City quads, it is recommended that Management Area 14 be changed to Management Area 13 around Trout Pond Recreation area.

Letter 87 On the Lee RD, Strasburg quad, it is recommended that Management Area 10 be changed to Management Area 13 around Elizabeth Furnace Recreation area

Letter 87 On the Lee RD, Strasburg quad, it is recommended that Management Area 13 be changed to Management Area 15 north of the private land which is north of trail FDR #405 because this is that this area is in alternative 14

Letter 87 On the Dry River RD, Reddish Knob and Briery Branch quads, it is recommended that Management Area 15 be changed to Management Area 7 for the foreground VQO zone along Reddish Knob State Road #924 because that is what this area is in alternative 14 and it is a sensitivity level 1 road

Letter 87 On the Dry River RD, Stokesville quad, it is recommended that Management Area 15 be changed to Management Area 13 south and east of FDR #95, in the Trimble Mountain area

Letter 87 On the Deerfield RD, numerous quads, it is recommended that Management Area 11 be changed to Management Area 14 above a certain contour level for that area west of FDR #382 to the top of Great North Mountain because that is what this area is in alternative 14.

Letter 87 On the Deerfield RD, Craigsville and Augusta Springs quads, it is recommended that Management Area 17 be changed to Management Area 14 above a certain contour level for that area west of FDR #382 to the top of Great North Mountain because that is what this area is in alternative 14

Letter 87 On the Deerfield RD, Craigsville quad, it is recommended that Management Area 1 be changed to Management Area 15 on the west slope of Great North Mountain because that is what this area is in alternative 14.

Letter 87 On the Deerfield RD, Green Valley and Williamsville quads, it is recommended that Management Area 1 be changed to Management Area 15 from Scotchtown Draft Road #627 on the northeast to State Route #678 on the southwest because that is what this area is in alternative 14

Letter 87 On the Deerfield RD, Green Valley quad, it is recommended that Management Area 1 be changed to Management Area 15 for the area northeast of State Route #633, southeast of State Route #629 and west of State Route #640

Letter 87 On the Warm Springs RD, Paddy Knob quad, it is recommended that Management Area 15 be changed to Management Area 14 west of State Route 600 from the Pumped Back Storage area north to the forest boundary because the existing ROS in the area is SPNM, the area is steep, and because the area is adjacent to Management Area 6.1 on the Monongahela N.F.

Letter 87 On the Dry River RD, numerous quads, it is recommended that Management Area 15 be changed to Management Area 14 for the Forest Land. (1) following and above the 2600 foot contour level from State Route #33 in West Virginia to State Route 3/1 , (2) west of a line between White Grass Knob, Third Point, and Broad Top; (3) north of Carr Run, (4) and west of a line between Fulk Mountain and Kretchie Mountain because that is what this area is in alternative 14

Letter 87 On the Dry River RD, Singers Glen quad, it is recommended that Management Area 1 be changed to either Management Area 15 or 16 for that Forest land east of State Route #612 to the top of Little North Mountain.

Letter 87 On the Dry River RD in West Virginia, Brandywine quads, it is recommended that Management Areas 14 and 15 be changed to Management Area 13 around Brandywine Lake Recreation Area because that is what this area is in alternative 14.

Letter 87 On the Dry River RD in West Virginia, Sugar Grove and Brandywine quads, it is recommended that Management Area 16 be changed to Management Area 15 because that is what the area is in alternative 7 and 14.

Letter 87 On the Dry River RD, Reddish Knob and Briery Branch quads, it is recommended that Management Area 9 and 15 be changed to Management Area 13 around Hone Quarry Recreation Area because it is what this area is in alternative 14.

Letter 87 On the Warm Springs RD, numerous quads, it is recommended that Management Area 15 be changed to Management Area 7 for the foregoing VQO zone along U S Highway 220 north of Warm Springs because the highway is a sensitivity level 1 road and that is what the area is in alternative 14.

Letter 87 On the Warm Springs RD, Bath Alum and Warm Springs quads, it is recommended that Management Area 14 boundary be expanded to include the SPNM ROS land on Little Mountain.

Letter 87 On the Warm Springs RD, Bath Alum quad, it is recommended that Management Area 7 be changed to Management Area 15 for that isolated Forest land north of Mill Creek and east of State Route #629 because that is what this area is in alternatives 7 and 14

Letter 87 On the Warm Springs RD, Healing Springs quad, it is recommended that Management Area 7 be changed to Management Area 15 east of State Route #629 and south and west of Hickman Draft Road #361

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 1 and 10 be changed to Management Area 13 for the area known as the Walton Tract

Letter 87 On the Warm Springs RD, Millboro quad, it is recommended that Management Area 1 be changed to Management Area 15 for that isolated Forest land west of Mill Mountain and east of State Route #633 because that is what this area is in alternative 14

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 9 be changed to Management Area 14 below a contour-level from Pads Creek to the end of FDR #1923 to the end of FDR #362, then due west to the South Fork Lick Run

Letter 87 On the James River RD, Longdale Furnace quad, it is recommended that Management Area 17 be changed to Management Area 15 on the west slope of North Mountain because the area is within the middleground and

background zones as seen from the Forest's Scenic Byway, thus having an existing VQO inventory of Partial Retention whereas Management Area 17 adopts a VQO of Modification.

Letter 87 On the James River RD, Jordan Mines quad, it is recommended that Management Area 17 be changed to Management Area 13 around the National Childrens Forest

Letter 87 On the Pedlar RD, Montebello and Massies Mill Quads, it is recommended that Management Area 1 be changed to Management Area 13 north of the Nelson/Amherst County Line, east of the Appalachian Trail and Mill Creek, south of South Fork of the Tye River and west of Crabtree Falls because future trails are desired by Appalachian Trail clubs in this area and because that is what this area is in alternative 14.

Letter 87 On the Pedlar RD, Glasgow quad, it is recommended that Management Area 15 be changed to Management Area 7 along U.S. Highway 501 because this highway is a sensitivity level 1 travel route.

Letter 87 On the James River RD, Potts Creek quad, it is recommended that Management Area 17 be changed to Management Area 8 for the area of the Shawvers Run Wilderness that is on the Forest.

Letter 87 On the James River RD, Potts Creek, New Castle and Jordon Mines quad, it is recommended that Management Area 17 be changed to Management Area 14 from an unknown contour interval east of the Forest boundary along the west slope of Potts Mountain

Letter 87 On the Pedlar RD, Buena Vista quad, it is recommended that Management Area 15 be changed to Management Area 13 east of FDR #315 and west of FDR #39 along the Pedlar River because that is what some of this area is in alternative 14

Letter 87 On the Pedlar RD, Sherando quad, it is recommended that Management Area 15 be changed to Management Area 13 around the Sherando Lake Recreation complex because that is what the area is in alternative 14.

Letter 2609 All of Blacks Run should be included in Management Area 9 Letter 2609 The Piney River drainage should be placed in Management Area 13

Letter 3537 The preferred alternative does a good job of locating the management areas for intensive timber production to avoid fragmenting larger tracts of relatively undisturbed forest However, one exception that deserves amendment is located adjacent to two wilderness areas on the Jefferson National Forest We urge that the portion of Management Area 17, covering the entire west slope of Potts Mountain north to the National Childrens Forest (connecting the Shawvers Run and Barbours Creek Wildernesses), be changed to a management area designation that would provide compatible buffer All other wilderness areas on the GW are treated in this manner, and this sound planning concept should be extended to protect significant areas on the adjacent national forest.

Letter 3728 On the West Va. portion of the Dry River RD, Brandywine quad, it is recommended that Mgmt. Area 14 be changed to Mgmt Area 15 below the 2800-foot contour level from the Rt 33 corridor on the north to Miller Run on the south.

Letter 3728 On the West Va portion of the Dry River RD, Brandywine and Reddish Knob quads, it is recommended that Mgmt. Area 9 be changed to Mgmt Area 15 below the 2800-foot contour level from the Rt. 33 corridor on the north to Miller Run on the south, thence continuing on the 3000-foot contour level south to its intersection with FDR #25

Letter 3728 On the West Va. portion of the Dry River RD, Sugar Grove & Palo Alto quads, it is recommended that Mgmt Area 15 be changed to Mgmt Area 16 south of FDR #25 and west of FDR #61

Letter 3728 On the West Va portion of the Lee RD, Yellow Spring, Mt Falls, Wardensville & Baker quads, it is recommended that Mgmt. Area 16 (except for a small portion of National Forest System land south of Harness Run) be changed to Mgmt Area 15

Letter 3728 On the West Va portion of the Lee RD, Wolf Gap quad, it is recommended that Mgmt Area 15 be changed to Mgmt Area 14 along the east and west sides of Long Mountain following numerous elevation changes between 2300 and 2600-foot contours.

Letter 3728 On the West Va portion of the Lee RD, Wardensville quad, it is recommended that Mgmt. Area 9 (Big Schloss) be changed to Mgmt Area 15 following and below the 2100-foot contour level from the powerline on the north

to about the intersection with Trail #1013 on the west side of Great North Mountain, thence using the 1800-foot contour level until private land in Wilson Cove is reached, then due north to the 2200-foot contour level and following that elevation north to the boundary with the Commonwealth of Va

Letter 3728 — On the West Va portion of the Lee RD, Wolf Gap, Lost City, & Orkney Springs quads, it is recommended that Mgmt Area 15 be changed to Mgmt. Area 14 along the west side of Great North Mountain above the 2500-foot contour level and the private land boundaries until just north of Hunkerson Gap

Letter 3728 — On the West Va portion of the Dry River RD, Sugar Grove & Palo Alto quads, it is recommended that Mgmt. Area 14 be changed to Mgmt Area 15 east of FDR #61 but below the approximately 3,000-foot contour level

Letter 3728 — On the West Va. portion of the Dry River RD, Branywine and Sugar Grove quads, it is recommended that Mgmt. Area 16 be changed to Mgmt Area 15 north of FDR #25.

Letter 3941 — The area designated as Management Area #1 that lies below (or north of) the Ravens Roost relocation, and the area on the south-facing slope of Torry Ridge that is designated Management Area #15 should be designated as Management Area #13, as proposed in Alternative #14.

Letter 3941 — The current designation of these lands as Management Area #1 basically identifies these lands as lands without an obvious role, but these lands clearly have a role to play in enhancing the Appalachian Trail. Area A, which is in the middleground viewshed of the Appalachian Trail as seen from the spectacular rock outcrops of the Cedar Bluffs area, should be recognized for these visual-resource values and managed as such Area B, which surrounds the popular Sherando Lake developed-recreation area, contains an extensive trails network and is the focal viewpoint for extensive sections of the Blue Ridge Parkway and the Appalachian Trail These lands are currently designated for turkey-habitat management (Management Area #15) Designation of Area B as Management Area #13 would recognize the important aesthetic and recreational values of this area and provide a more appropriate focus for management of the area

Letter 3962 — On the Deerfield RD, Deerfield and Craigsville quads, it is recommended that MA1 be changed to mgt Rx 14A east of FDR 381 and south of Trail 491.

Letter 3962 — On the Lee RD, Orkney Springs, Timberville & Lost City quads, it is recommended that Mgmt Rx 15A be changed to Mgmt Rx 14A

Letter 3962 — On the Lee RD, Strasburg quad, it is recommended that mgmt Rx 7C be changed to Mgmt Rx 13C from Strasburg Reservoir east to Passage Creek

Letter 3962 — On the Dry River RD, Briery Branch and Rawley Springs quads, it is recommended that MA's 7 be changed to MA's 7C along State Route 33 in Virginia only

Letter 3962 — On the Warm Springs RD, Millboro quad, it is recommended that MA15 east of the Bath-Rockbridge County line be changed to mgt Rx 15B

Letter 4038 — On the Lee RD, numerous quads, it is recommended that MA 7 be changed to MA 9 east of Passage Creek from Camp Roosevelt to Elizabeth Furnace

Letter 4038 — On the Lee RD, Luray, Rileyville, Bentonville & Strasburg quads, it is recommended that MA 13 be changed to MA 15 next to the South Fork of the Shenandoah River from Kennedy Peak to Shawl Gap

Letter 4038 — On the Lee RD, Mountain Falls and Wardensville quads, it is recommended that MA 15 be changed to MA 9 east and north of FDR #93 and along the crest of Great North Mountain, north of the powerline to State Rt 55

Letter 4038 — On the Lee RD, Orkney Springs, Lost City and Wolf Gap quads, it is recommended that MA 15 be changed to MA 14 from West Va boundary east to about FDR #252 as it parallels the contours of Great North Mtn.

Letter 4038 — On the Dry River RD, Singers Glen quad, it is recommended that MA 1 be changed to MA 15.

Letter 4038 — On the Deerfield RD, Williamsville & Deerfield quads, it is recommended that MA 1 be changed to MA 15 west of FDR #394

Letter 4038	On the Deerfield RD, West Augusta & Stokesville quads, it is recommended that MA 15 be changed to MA 16 east of Ramseys Draft Addition and north of the road corridor along U.S. Hwy 250
Letter 4038	On the James River RD, Callaghan quad, it is recommended that MA 17 be changed to MA 7 north of Interstate 64
Letter 4038	On the James River RD, Glace and Alleghany quads, it is recommended that MA 15 be changed to MA 14 east of Big Ridge and south and west of State Rt 311
Letter 4038	On the James River RD, Jerrys Run quad, it is recommended that MA 11 be changed to MA 15.
Letter 4038	On the James River RD, Rucker Gap quad, it is recommended that MA 1 be changed to MA 14 west of Johnsons Creek.
Letter 4038	On the Warm Springs RD, Millboro quad, it is recommended that MA 1 be changed to MA 15 south of State Rt 39
Letter 4038	On the Warm Springs RD, Healing Spring and Nimrod Hall quads, it is recommended that MA 7 be changed to MA 15 north of Douthat State Park to and including the Hickman Draft area, and south of Mill Creek
Letter 4038	On the Warm Springs RD, Healing Springs quad, it is recommended that MA 14 be changed to MA 15 east of FDR 125 to the border with Douthat State Park and east of Brushy Ridge to Mill Creek
Letter 4038	On the Warm Springs RD, Healing Springs & Falling Spring quad, it is recommended that MA 7 be changed to MA 15 for the Forest land bounded by Cascades Creek on the south, State Rt 605 on the west, State Rt 615 on the north, and U S Hwy 220 on the east
Letter 4038	On the Pedlar RD, Buena Vista quad, it is recommended that MA 15 be changed to MA 13 along the South Pedlar River, west of FDR #315 and east of FDR #39
Letter 4038	On the Pedlar RD, Montebello & Forks of Buffalo quads, it is recommended that MA 1 be changed to MA 15 south of the Amherst/Nelson County line, east of the Appalachian Trail zone and east of the Mt Pleasant area to the Forest boundary
Letter 4038	On the Pedlar RD, Massies Mill quad, it is recommended that MA 1 be changed to MA 13 from the Amherst/ Nelson County line on the south to Mill Creek on the west to the South Fork of the Tye River on the north to Crabtree Falls on the east
Letter 4038	On the Pedlar RD, Sherando & Big Levels quads, it is recommended that MA 15 be changed to MA 13 around the Sherando Lake Rec Complex.
Letter 4038	On the Pedlar RD, Sherando, Stuarts Draft, Big Levels and Vesuvius quads, it is recommended that MA 15 be changed to MA 16 in the area known as Big Levels along the Coal Road
Letter 4038	On the Pedlar RD, Waynesboro West and Sherando quads, it is recommended that MA 16 be changed to MA 15 from Tom's Branch on the south, Rt. 664 on the west to the Blue Ridge Parkway on the east
Letter 4038	On the James River RD, Jordan Mines, New Castle, and Potts Creek quads, it is recommended that MA 17 be changed to MA 14 from State Rt 617 on the north, Still Run on the south, then proceeding south along an unknown contour interval on the west slope of Potts Mt to the boundary
Letter 4038	On the James River RD, Longdale Furnace quad, it is recommended that MA 15 be changed to MA 13 around the Longdale Rec Area and its associated loop trail system
Letter 4038	On the James River RD, Longdale Furnace quad, it is recommended that numerous MA 1's be changed to MA 7's north of Interstate 64.
Letter 4038	On the James River RD, Covington & Clifton Forge quads, it is recommended that MA 17 be changed to MA 15 on Fore Mountain

Letter 4038	On the James River RD, Callaghan quad, it is recommended that MA 17 be changed to MA 16 from Harmon Run on the north to State Rt. 600 on the west to Johns Run on the south
Letter 4038	On the Warm Springs RD, Paddy Knob & Sunrise quads, it is recommended that MA 15 be changed to MA 14 from Big Ridge on the north to the Bath Co Pumped Storage area on the south, but west of State Rt 600.
Letter 4038	On the Warm Springs RD, Hightown & Mustoe quads, it is recommended that MA 15 be changed to MA 14 from about the Sues Draft drainage on the south to the Forest boundary.
Letter 4038	On the Warm Springs RD, Warm Springs quad, it is recommended that MA 7 be changed to MA 15 for the Forest land bounded by State Rt 618 on the south, State Rt. 687 on the west, Rt 39 on the north, and Rt 220 on the east
Letter 4038	On the Warm Springs RD, Minnehaha Springs & Mountain Grove quads, it is recommended that MA 1 be changed to MA 15 north of State Rt. 39 and west of State Rt 601; and in the T M. Gathwright Wildlife Mgt. Area
Letter 4038	On the Deerfield RD, Green Valley & Bath Alum quads, it is recommended that MA 1 be changed to MA 15 north of State Rt. 39 and east of the Cowpasture River
Letter 4038	On the Deerfield RD, Craigsville & Green Valley quads, it is recommended that MA 11 above the 2200 to 2600-foot contour interval be changed to MA 14
Letter 4038	On the Deerfield RD, Craigsville & Green Valley quads, it is recommended that MA 17 be changed to MA 14 above the 2200-to-2400-foot contour interval from FDR 82 on the north to State Rt. 687 on the south
Letter 4038	On the Deerfield RD, Deerfield & Craigsville quads, it is recommended that MA 1 be changed to MA 14 from FDR #381 on the north to State Rt. 614 on the south.
Letter 4038	On the Deerfield RD, Deerfield quad, it is recommended that MA 1 be changed to MA 15 west of FDR #381 and west of State Route #629.
Letter 4038	On the Dry River, Fulks Run quad, it is recommended that MA 1 be changed to MA 15 west of State Rt. #259.
Letter 4038	On the Lee RD, Wardensville quad, it is recommended that MA 9 (part of Big Schloss) be changed to MA 15 in Cove Run and Vances Cove drainages
Letter 4038	On the Lee RD, Strasburg quad, it is recommended that MA 10 in and around Elizabeth Furnace be changed to MA 13
Letter 4241	The portion of Management Area 17, covering the entire west slope of Potts Mountain north to the National Childrens Forest (connecting the Shawvers Run and Barbours Creek Wildernesses), be changed to a management area designation that would provide compatible buffer. All other wilderness areas on the GW are treated in this manner, and this sound planning concept should be extended to protect significant areas on the adjacent national forests.
Response	Your recommendation is consistent with the overall theme of the preferred alternative The management area is changed in the preferred alternative to correspond with your recommendation

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Letter 1081	*At a minimum, Little River & Mt Pleasant should be removed from Prescription 13 and placed in 4*
Letter 1094	We note that 2 of the best areas proposed, Little River and Mt Pleasant, have been put in MA13, a category which emphasizes recreational over biological values
Letter 2308	Mount Pleasant and the Little River Areas [should] be removed from Management Area 13 as inappropriate for the natural character and prevailing use of these two areas. Management Area 9 is proposed as appropriate and consistent with their natural character and prevailing use (the Appalachian Trail in the Mount Pleasant Area to remain in Management Area 6) This proposal is made only in the event that wilderness recommendation is not achieved in the Final Plan

Letter 2755	Both Little River and Mt Pleasant, two of our most outstanding candidates, have been placed in Management Area 13C, which emphasizes recreational values We oppose any development of these areas
Response	Little River and Mount Pleasant have been allocated to Management Area 21 ("Special Management Areas") in the Revised Plan.

Letter 3962	On the Pedlar RD, Snowden and Big Island quads, it is recommended that MA11 (S. Pedlar ATV Area) should be changed to Mgt. Prescrip. 13C.
Letter 3962	On the Dry River RD, West Augusta, Palo Alto, and Stokesville quads, it is recommended that MA13 be changed to Mgmt Rx 13A along the North River corridor.
Letter 3962	On the Lee RD, Elkton West quad, it is recommended that MA16 be changed to MA9 west of the First Mt. ridgetop to Cub Run.
Letter 3962	On the Dry River RD, Reddish Knob & Briery Branch quads, it is recommended that MA16 be changed to Mgmt Rx 7C along Narrowback Mt.
Letter 3962	On the Dry River RD, Reddish Knob quad, it is recommended that MA15 be changed to Mgmt Rx 14A north of Reddish Knob Road and south of Hone Quarry Run.
Letter 3962	On the Dry River RD, Palo Alto quad, it is recommended that MA14 be changed to Mgmt Rx 14A.
Letter 3962	On the Dry River RD, Palo Alto & Sugar Grove quads, it is recommended that MA15 be changed to Mgmt Rx 15B south of State Route 25
Letter 3962	On the Dry River RD, numerous quads, it is recommended that Little River Roadless Area, including parts of MA4, be changed from MA13 to Mgmt Rx 8B
Letter 3962	On the Lee RD, Tenth Legion quad, it is recommended that MA 14 be changed to MA9 for the Cub Run Road corridor south of Pitt Spring Rd
Letter 3962	On the Lee RD, Tenth Legion and Stanley quads, it is recommended that MA14 be changed to Mgmt Rx 14A north of Pitt Spring Rd
Letter 3962	On the Dry River RD, Singers Glen & Rawley Springs quads, it is recommended that MA1 be changed to Mgmt Rx 13C from Hogpen Lake to Slate Lick Lake & west of State Rt 612
Letter 3962	On the Dry River RD, Rawley Springs quad, it is recommended that MA14 be changed to Mgmt Rx 14A north of State Rt 33 and northwest of Rocky Run ATV area.
Letter 3962	On the Dry River, Rawley Springs quad, it is recommended that Mgmt Rx 11A be changed to Mgmt Rx 14A (Rocky Run ATV area).
Letter 3962	On the Dry River RD, Brandywine quad, it is recommended that Skidmore Roadless Area, including parts of MA4, be changed from MA9 to Mgmt Rx 8B
Letter 3962	On the Dry River RD, Brandywine quad, it is recommended that MA14 be changed to Mgmt Rx 14B south of State Route 33.
Letter 3962	On the Dry River RD, Brandwine quad, it is recommended that MA14 be changed to mgt Rx 14A north of State Route 33.
Letter 3962	On the Dry River RD, Brandywine quad, it is recommended that MA15 be changed to mgmt. Rx 15B north of State Rt 33
Letter 3962	On the Warm Springs RD, Millboro & Nimrod Hall quads, it is recommended that MA14 around Bubbling Springs be changed to mgmt. Rx 14A

Letter 3962	On the Warm Springs RD, Millboro quad, it is recommended that MA15 west of the Bath-Rockbridge County line be changed to mgmt. Rx 14A.
Letter 3962	On the Deerfield RD, Millboro quad, it is recommended that MA17 be changed to mgt. Rx 17A for the NFS land just south of State Rt. 42 accessed by FDR 1303
Letter 3962	On the Deerfield RD, Craigsville & Augusta Springs quads, it is recommended that MA17 be changed to mgt. Rx 15B
Letter 3962	On the Deerfield RD, Craigsville & Augusta Springs quads, it is recommended that MA11 be changed to mgt Rx 14A
Letter 3962	On the Deerfield RD, Craigsville & Augusta Springs quads, it is recommended that mgt. Rx 11A be changed to mgt Rx 14A
Letter 3962	On the Deerfield RD, Craigsville quad, it is recommended that mgt Rx 17F be changed to mgt. Rx 14A.
Letter 3962	On the Warm Springs RD, Bath Alum quad, it is recommended that existing SPNM area in and around the Warm Springs Trail #451 be retained
Letter 3962	On the Deerfield RD, Elliott Knob quad, it is recommended that MA14 be changed to mgt. Rx 14A west of Elliott Knob
Letter 3962	On the Deerfield RD, Elliott Knob quad, it is recommended that MA17 be changed to mgt. Rx 15B everywhere on quad
Letter 3962	On the Deerfield RD, Deerfield & Elliott Knob quads, it is recommended that MA15 be changed to mgt. Rx 14A from State Rt. 629 northwest of Deerfield Work Center
Letter 3962	On the Deerfield RD, Deerfield, Green Valley, & Craigsville quads, it is recommended that MA15 be changed to mgt Rx 15A for the large Walker Mt. to Sideling Hill area.
Letter 3962	On the Deerfield RD, Deerfield quad, it is recommended that MA1 be changed to mgt Rx 15A east of State Route 600 but west of FDR 381
Letter 3962	On the Warm Springs RD, Williamsville quad, (the Campbell Run area north of Browns Pond), it is recommended that MA17 be changed to mgt Rx 1
Letter 3962	On the Deerfield RD, numerous quads, it is recommended that Ramseys Draft Addition Roadless Area be changed to Mgt Rx 8B from MA9
Letter 3962	On the Pedlar RD, Waynesboro West & Sherando quads, it is recommended that MA16 be changed to mgt. Rx 7C
Letter 3962	On the Lee RD, Baker quad, it is recommended that Mgmt Rx 16E be changed to MA 1 for the isolated Forest land along the Lost River
Letter 3962	On the Lee RD, Baker quad, it is recommended that all MA 15 be changed to Mgmt Rx 15B.
Letter 3962	On the Lee RD, Wardensville quad, it is recommended that Mgmt Rx 16E be changed to MA 1 for the isolated Forest land between Harness and Sine Run
Letter 3962	On the Lee RD, Wardensville, Baker, Yellow Springs, Mountain Falls & Capon Springs quads, it is recommended that MA 16 be changed to Mgmt Rx 15B
Letter 3962	On the Lee RD, Wardensville & Baker quads, it is recommended that MA 15 be changed to Mgmt Rx 13C from the private land at the headwaters of Cove Run to Capon Furnace Rec Area
Letter 3962	On the Lee RD, Wardensville quad, it is recommended that MA 15 be changed to Mgmt Rx 13C south of the powerline which is near the Vances Cover Special Biological Area

Letter 3962	On the Lee RD, Mountain Falls and Wardensville quads, it is recommended that MA 15 be changed to Mgmt Rx 15B north of the powerline
Letter 3962	On the Lee RD, Wolf Gap quad, it is recommended that MA 15 be changed to Mgmt Rx 14 B northeast of Trout Pond and west of State Rt 23/10 and east of State Rt 259/5
Letter 3962	On the Lee RD, Woodstock & Wardensville quads, it is recommended that MA 15 be changed to Mgmt Rx 15B along the east-facing slope of Paddy Mountain.
Letter 3962	On the Lee RD, Woodstock quad, it is recommended that MA 15 be changed to Mgmt Rx 15A along the Forest boundary north of Trail #401
Letter 3962	On the Lee RD, numerous quads, it is recommended that the Big Schloss Roadless Area be changed from MA 9 to Mgmt Rx 13C.
Letter 3962	On the Dry River RD, Milam quad, it is recommended that Mgmt Rx 15A be changed to Mgmt Rx 14A
Letter 3962	On the Dry River RD, Bergton & Milam quads, it is recommended that Mgmt Area 15 be changed to Mgmt Rx 14A
Letter 3962	On the Lee RD, Orkney Springs quad, it is recommended that MA 15 be changed to Mgmt Rx 14A along the west side of the Forest boundary.
Letter 3962	On the Lee RD, Conicville & Wolf Gap quads, it is recommended that Mgmt Rx's 17 & 17F be changed to MA1
Letter 3962	On the Lee RD, Wolf Gap & Lost City quads, it is recommended that MA 14 be changed to Mgmt Rx 14B
Letter 3962	On the Lee RD, Hamburg, Rileyville, Toms Brook & Strasburg quads, it is recommended that MA 7 be changed to Mgmt Rx 7A west of Passage Creek from Crisman Hollow Road north to Powell's Fort
Letter 3962	On the Lee RD, Rileyville & Edinburg quads, it is recommended that the (Taskers Gap ATV) MA 11 and Rx 11A be changed to Mgmt Rx 14A.
Letter 3962	On the Dry River RD, Cow Knob quad, it is recommended that the Mgmt Rx 15A be changed to Mgmt Rx 14A
Letter 3962	On the Dry River RD, Fulks Run and Cow Knob quads, it is recommended that the MA 15 be changed to Mgmt Rx 14A to retain existing SPNM ROS area.
Letter 3962	On the Lee RD, Timberville & Fulks Run quads, it is recommended that MA 17 be changed to Mgmt Rx 15C.
Letter 3962	On the Lee RD, Timberville & Fulks Run quads, it is recommended that Mgmt Rx's 17F be changed to Mgmt Rx 1
Letter 3962	On the Lee RD, Hamburg quad, it is recommended that MA 14 be changed to Mgmt Rx 14A just north of U S Hwy 211
Letter 3962	On the Lee RD, Hamburg quad, it is recommended that Mgmt Rx 14A be changed to Mgmt Rx 13C from Strickler Knob to Camp Roosevelt east of Crisman Hollow Road to the Forest boundary.
Letter 3962	On the Lee RD, Hamburg quad, it is recommended that MA 14 be changed to Mgmt Rx 13C east of Crisman Hollow Road
Letter 3962	On the Lee RD, Luray, Rileyville & Bentonville quads, it is recommended that MA 13 be changed to Mgmt Rx 13A adjacent to the South Fork of the Shenandoah River to "protect the current level of wildness."
Letter 3962	On the Dry River RD, Stokesville quad, it is recommended that MA 15 be changed to Mgmt Rx 15A in the Trimble Mt. Trail area for North River watershed protection
Letter 3962	On the Deerfield RD, Stokesville quad, it is recommended that MA 16 be changed to Mgmt Rx 15B north of U S Hwy 250, south of Stokesville along the Forest boundary.

Letter 3962	On the Deerfield RD, Stokesville & Churchville quads, it is recommended that MA 14 be changed to Mgmt Rx 14B south of U S Hwy 250 and east of Mt Crawford Roadless Area to the Forest boundary.
Letter 3962	On the Dry River RD, West Augusta & Stokesville quads, it is recommended that MA15 be changed to Mgmt Rx 15A north of the Wild Oak National Rec Trail for North River watershed protection.
Letter 3962	On the Deerfield RD, West Augusta & Stokesville quads, it is recommended that Mgmt Area 15 be changed to Mgmt Rx 14A east of State Rt 715, north of U S Hwy 250, and south of the Wild Oak National Rec Trail
Letter 3962	On the Deerfield RD, West Augusta quad, it is recommended that MA15 be changed to Mgmt Rx 15B west of State Rt 715 and north of Braley Pond Rec Area and south of the Wild Oak National Recreational Trail.
Letter 3962	On the Pedlar RD, Big Levels quad, it is recommended that MA4 (Kelly Mt Roadless Area) be changed to mgt. Rx 8B
Letter 3962	On the Pedlar RD, Big Levels and Massies Mill quads, it is recommended that mgt prescrip 15 be changed to Mgt Rx 14E everywhere on these quads
Letter 3962	On the Pedlar RD, Buena Vista quad, it is recommended that MA15 be changed to mgmt. Rx 14E
Letter 3962	On the Pedlar RD, Forks of Buffalo quad, it is recommended that MAs 15 & 15A just south of Mt. Pleasant be changed to mgt Rx 14E
Letter 3962	On the Pedlar RD, Montebello & Forks of Buffalo quads, it is recommended that Mt Pleasant area be changed from MA13 to mgt Rx 8B
Letter 3962	On the Pedlar RD, Cornwall and partially on Montebello quad, it is recommended that MA15 be changed to Mgt Prescrip 15A from Rt 605 west from the South Pedlar River to the Blue Ridge Pkwy.
Letter 3962	On the Pedlar RD, numerous quads, it is recommended that all MA17's be changed to Mgt. Prescrip 14E on the south end of the District.
Response	Alternative 11 has been formulated to address these concerns and better respond to biological issues The management area allocation in Alternative 11 corresponds with this recommendation

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Letter 60	It is in fact our desire to see all of the mentioned OHV-suitable roads remain open year-round It too is favored by our group if you would reconsider the designation of the area I mentioned, even if it were to come under some kind of special variation to MA9.
Letter 83	The first problem in that areas around the Hone Quarry area are being classified as "Remote Highlands" Management Area nine but I don't see the area that way. There are many nice roads in that area and a lot of activity I do not see how this area can be considered remote
Letter 86	I hope that you can help us keep the existing roads around Hone Quarry open I was told that there may be some problems with Management Area 9 being that it doesn't allow for any new roads and limited repair of old ones I don't think that the term "Remote Highlands" fits this area.
Response	This is the area of the Gum Run and Oak Knob Roadless Areas as discussed in the FEIS. Roads mentioned in some of the comments form the boundaries of the areas and, for the most part, do not intrude into the areas. Where system roads intrude into the area, they will be closed to public access. The Forest recognizes that these areas, though essentially roadless on the interior, do not provide much opportunity for solitude and serenity due to the surrounding roads and other outside influences Under Alternatives 2, 4, 5, 7, 10 and 12, all or most of these areas are allocated to management areas that make them available for development and no longer held in a roadless area category To varying degrees, existing and newly constructed roads could be open for OHV use to the extent that concurrent management for other resources allow. One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it maximizes net public benefits

Letter 1081 Slate Lick Lake (Dry River District), given Prescription 1 in Alternative 8, is one of the only lakes not accessible to motorized vehicles. I strongly urge you to extend the nearby area of Prescription 15 to encompass Slate Lick Lake and its surroundings as a means of better protecting the uncommon isolated nature of this habitat.

Letter 3840 Slate Lick - Hog Pen Lakes Area is far more appropriate for a 13B designation

Response *This recommendation is consistent with the overall theme of the preferred alternative. The management area* has been changed in the preferred alternative to Management Area 22. This management area recognizes the uniqueness of areas such as Slate Lick Lake and the Wallace Tract. Management Area 22 provides direction for management of existing ponds, wetlands, fields and hedgerows for wildlife viewing, nature study, small game management, or combinations thereof.

Letter 1437 Two areas are place in MA 15, suitable for timber, that are particularly disturbing to me One is Trimble Mtn in the Dry River RD This mountain is just across the road from Todd Lake Rec Area The Trimble Mtn Trail is heavily used by Todd Lake campers. Please redesignate this mtn as unsuitable for timber Another area of concern is Section C of the Wild Oak National Rec Trail It traverses the crest of Hankey Mtn , which is also designated as suitable for timber. This area is an important recreational resource and is heavily used for hiking. Please change this area to unsuitable for timber

Response This recommendation is consistent with the overall theme of the preferred alternative. The management area has been changed in the preferred alternative to Management Area 13 This management area recognizes the uniqueness of trails such as the Trimble Mountain Trail and the Wild Oak National Recreation Trail. Within Management Area 13, land can be either unsuitable for timber production or suitable for timber production using uneven-age timber management However, the land is unsuitable for timber production around the Trimble Mountain Trail and the Wild Oak Trail along the crest of Hankey Mountain in the preferred alternative.

Letter 2609 The entire North Fork of Buffalo River should be included in Management Area 13

Letter 4251 We would like to indicate our support of the other recommendation of the Virginia Trout Unlimited Council, including the entire North Fork of the Buffalo River in Management Area 13

Response The Little River and Mount Pleasant Roadless Areas have been allocated to Management Area 21 in the Revised Plan A version of Standard 519 has been retained.

Letter 3840 As maps indicate (our maps) MA 13B is very appropriate for North River Recreation Area, Big Schloss, South Fork Shenandoah River Area, Elizabeth Furnace All these should be low key dispersed recreation areas A few may have a campground or two but no major concentration of facilities like Lake Moomaw which I consider 13A.

Response In the preferred alternative, Management Area 13 is allocated to heavy dispersed recreation use areas adjacent to developed recreation campgrounds Management Areas 13 provides for a dense concentration of recreation users with a high degree of motorized access Management Area 13 contains lands which are unsuitable for timber production and lands suitable for timber production which are managed under the uneven-aged silvicultural system.

For the North River and Elizabeth Furnace areas, the recommendations are consistent with the overall theme of the preferred alternative These two areas have been changed to correspond with the recommendations

The South Fork of the Shenandoah River is allocated to Management Area 13 in Alternative 11 While allocation to Management Area 13 is consistent with the overall theme, the preferred alternative allocates this area to *Management Areas 10, 13, 15 and 22 recognizing the many uses that can take place around this river*

Big Schloss has been assigned to Management Area 21 ("Special Management Areas") in the preferred alternative A specific management prescription has been developed for Big Schloss which includes objectives, a "desired future condition" and standards which are unique to this area.

Management Area 21 provides specific management direction for Big Schloss Management practices will be limited to those which will not reduce the roadless area values in Big Schloss Permissible management practices will be applied in a manner that is sensitive to the roadless area values Big Schloss will not, however, be managed SOLELY for the preservation of these roadless area values

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative that is chosen to serve as the Revised Plan However, no single factor, such as management area allocations, will lead to this decision.

Letter 3840

Elliotts Knob Area is MA 14 which makes perfect sense relative to the conditions in the field - the proposed Archer Run ATV Trail is in serious conflict with the common sense of the best use for this area

Response

The management area has been changed in the preferred alternative to correspond with the recommendation The boundary of Management Area 11 has been changed to a lower elevational level that corresponds with that of DEIS alternative 14.

Letter 3942

I would like to make some suggestions on where Management Area 13 should be applied: Little River - now in 13, should be in 8, Big Schloss - now in 9, should be in 13, Duncan Knob area (Massanutten) - now in 14, should be in 13, Slate Lick (Dry River RD) - now in 1, should be in 13, Mt Pleasant - now in 13, should be in 8 or 9

Letter 3942

Management Area 13 should be applied to areas that are already used heavily for primitive recreation. Big Schloss, and Duncan Knob are excellent candidates because they are close to the metropolitan area of Washington and are popular with hikers and backpackers from the city Slate Lick has a large pond and a number of trails, it would also be an ideal candidate Little River is currently not heavily used, except by hunters during season The emphasis there should not be on recreation Little River should be kept wild.

Response

Alternatives 3, 9, 11, and 13 examine a range of allocations to the Little River Roadless Area, including the recommended change to Management Area 8 While consistent with its overall theme, the preferred alternative allocates Little River to Management Area 21 ("Special Management Areas") Mount Pleasant and Big Schloss are also allocated to Management Area 21 Specific management prescriptions have been developed for Big Schloss, Little River and Mount Pleasant which include objectives, a "desired future condition" and standards which are unique to these areas. Management practices will be limited to those which will not reduce the roadless area values in these areas. Permissible management practices will be applied in a manner that is sensitive to the roadless area values Big Schloss, Little River and Mount Pleasant will not, however, be managed SOLELY for the preservation of these roadless area values.

The Slate Lick area has been allocated to Management Area 22 in the preferred alternative This management area recognizes the uniqueness of areas such as Slate Lick Lake or the Wallace Tract Management Area 22 provides direction for management of existing ponds, wetlands, fields, and hedgerows for wildlife viewing, nature study, small game management or combinations thereof

Alternatives 6, 9 and 13 allocate the Duncan Knob area to Management Area 9, which is similar to the recommended allocation to Management Area 13 The preferred alternative, however, allocates Duncan Knob to Management Area 14 because the area is heavily hunted for bear, deer and grouse This management area seems to provide a corridor from Southern Massanutten Roadless Area to the Northern Massanutten Roadless Area and allows the Forest to do some prescribed burning Trails are still there and the areas will be a great place to hike The public gets the benefits of both Management Areas 13 and 14 with this allocation

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Letter 989

Modify the management prescriptions of areas 1, 4, 7, 9, 11, 13, 15, 16 and 17 to allow for increases in open primitive roads emphasizing opening old forest roads but including construction of new primitive roads

Response

The road management policy for the Forest Service preferred alternative is discussed in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS"

Letter 4038

Add the following new paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan "Control of insect and disease outbreaks may be considered to meet the objectives of this Management Area "

Response — Standard 591 in the Draft Revised Plan has been moved to the description of the Desired Future Condition for *Management Area 17*

Letter 4038 — Change Standard 626 on page 2-122 of the Draft Revised Forest Plan to read· "Control of insect and disease outbreaks may be considered to prevent adverse impacts to the desired future condition of riparian areas. Consultation with appropriate state and federal biologists is required."

Response — The Forest has every intention of coordinating with the appropriate federal, state and local agencies on the implementation of the Revised Plan. A discussion on the need for coordination with other agencies has been added to the Desired Future Condition for Management Area 18 A discussion on the methods of coordination with federal, state and local agencies has been added to Chapter 4 of the Revised Plan

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Letter 4038 — Comment on Standard 862 on page 2-156 of the Draft Revised Forest Plan· "A minimum buffer of 100 feet should *be applied to these areas* "

Letter 4038 — Comment on Standard 866 on page 2-158 of the Draft Revised Forest Plan "These should have a larger buffer than 300 feet aerially and 60 feet ground application."

Letter 4038 — Comment on Standard 867 on page 2-158 of the Draft Revised Forest Plan "Add sinkholes and other karst recharge areas to this standard "

Response — Standards 862, 866 and 867 in the Draft Revised Plan are taken verbatim from the "Method-Specific Management Requirements and Mitigation Measures" on pages II-65-II-66 of the *Final Environmental Impact Statement — Vegetation Management in the Appalachian Mountains*. No further mitigation measures are needed

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Letter 4038 — Change Standard 847 on page 2-153 of the Draft Revised Forest Plan to read. "Insecticides known to have adverse impacts on aquatic ecosystems are not applied within 200 feet of perennial streams open bodies of water, wetlands spring seeps and sinkholes "

Response — The existing standard as worded in the Revised Plan provides adequate protection to water sources

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Letter 135 — Approximately 25% of the Forest is to be managed as Remote Highlands, where opportunities for primitive recreation and habitat management for species preferring isolation from humans are jointly emphasized. However, these two different and often competing utilizations may be mutually exclusive With more wilderness and less human disturbances in the Forest, there would be more room to manage the Forest with adequate consideration for both of these values.

Response — The Revised Plan is designed to permit compatible multiple use objectives in different management areas. Primitive, non-motorized recreation use is not incompatible with the management of remote wildlife species.

Letter 3728 — The dominant goal and desired future condition for each MA needs to be strengthened and clarified

Response — In Chapter 3 of the Revised Plan, the discussion of the objectives and desired future condition for each management area has been strengthened

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Letter 4038 — Replace the sixth paragraph on page 2-2 of the Draft Revised Forest Plan with the following: "The Forest is managed to provide a diversity of forest habitat types This includes a range of habitats from large blocks of mature forest to a mosaic of more intensively managed lands Remote highlands and wilderness areas provide for area sensitive species, and for those species that require freedom from frequent human disturbance. Wildlife viewing and nature study opportunities are increased on the forest "

Letter 4038 — Replace the second paragraph on page 2-2 of the Draft Revised Forest Plan with the following "Approximately _____% of the Forest is suitable for timber production The quantity of timber harvested is determined by the desired future condition of the Forest and accomplished in an environmentally sensitive manner. Even-age and uneven-age silvicultural practices are utilized to accomplish habitat management objectives."

Letter 4038 — Replace the third paragraph under The Future of the Forest on page 2-1 of the Draft Revised Forest Plan with the following "Opportunities are provided for dispersed recreation in both remote and easily accessed settings Recreation activities such as hiking, backpacking, horseback riding, mountain bicycling, hunting, wildlife viewing, and fishing are provided A well-developed trail network provides access to virtually all sections of the Forest. Accessibility to the Forest is increase for disabled visitors Remote highlands retain solitude and provide many of the opportunities for dispersed recreation "

Letter 4038 — Replace the fifth paragraph under The Future of the Forest on page 2-1 of the Draft Revised Forest Plan with the following "Three roadless areas in the Blue Ridge Mountains--a total of about 12,000 acres--are recommended for wilderness study Wilderness areas already under congressional designation on the Forest total 32,269 acres "

Letter 4038 — Drop the first paragraph on page 2-3 of the Draft Revised Forest Plan

Letter 4038 — Replace the fourth paragraph under The Future of the Forest on page 2-1 of the Draft Revised Forest Plan with the following "Developed recreation opportunities are offered consistent with the social and natural carrying capacity of the resource A range of amenities from more primitive sites to campgrounds with electrical and water hookups meet current and future needs "

Letter 4038 — Replace the seventh paragraph on page 2-2 of the Draft Revised Forest Plan with the following "The exotic gypsy moth has a profound effect on the Forest's vegetation causing heavy mortality, particularly in oak species. Regeneration of highly susceptible stands prior to insect and disease attack re-establishes healthy stands Other IPM techniques are also used to protect forest resources from gypsy moth induced mortality."

Letter 4038 — Drop the fifth paragraph on page 2-2 of the Draft Revised Forest Plan

Letter 4038 — Replace the third paragraph on page 2-2 of the Draft Revised Forest Plan with the following· "Timber harvesting, prescribed fire, and other direct habitat improvement methods are utilized to provide a diversity of habitats Many woodland species benefit from the temporary openings that timber removal creates Opportunities are provided for individuals to gather firewood, and for local loggers and the local timber industry to purchase a variety of wood products "

Response — The introduction to Chapter 2 of the Draft Revised Plan has been completely rewritten in Chapter 3 of the Revised Plan to reflect Alternative 8A, the Forest Service preferred alternative

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Letter 17 — All state open roads should be placed in MA 7 (a, b, or c) The foreground zone would define the width of the MA

Response — The purpose of Management Area 7 is to preserve and perhaps enhance viewsheds along visually sensitive routes such as interstates and certain US and State Routes where public concern for visual quality is demonstrably high This includes many routes to major recreation areas or historical points of interest. Based on the definition for the management area, it would be inappropriate to put all of the open State Routes into Management Area 7

Letter 188 — If the cost of administering MA 18 is higher than MA 19, MA 19 should be chosen as the preferred mgt area

Response — It is not anticipated that the cost of administering Management Area 18 will be higher than Management Area 19 However riparian areas are managed, they will need to be inventoried in accordance with the Region's riparian management strategy

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Letters 2334 3684

MA7 retention of visual quality, while superficially desirable, may be excessive where it interferes with other constructive use of the forest

Response — Management of scenic corridors is a constructive use of the Forest The USDA Forest Service is the largest provider of outdoor recreation in the world The scenic quality of National Forests is one of the primary attractions Lands allocated to Management Area 7 reflect corridors where public concern for visual quality is

demonstrably high While many management activities may occur within this management area, they are *carefully planned and executed in order to maintain a natural or near natural appearance.*

Letter 3660 — Forest Standard 970 should have chain saws exempted

Response — Forest Standard 970 in the Draft Revised Plan was not intended to include handtools. "Mechanical equipment" refers to heavy equipment such as tractors or dozers.

Letter 3939 — The Plan attempts to impose management strategies on areas without consideration of the site conditions or needs of the areas. The strategy selected for a Management Zone may or may not fit the Zone condition or needs. This problem will surface when a District attempts to plan for a project in a Zone. It will only work in those areas where a preservation mode of management is the strategy. The Plan sets up a very complicated system that will only lead to confusion, more project appeals, and added costs to the taxpayers The Zones are called Management Areas and the Plan contains too many. A large rural county may have 5 to 6 zones while this Plan has 20 Zones that may occur in a similar size area (Ranger District). No consideration is given to the need in the future to change Management Zones emphasis Even County and City Zoning laws provide for future changes as the need arises In addition and tied closely to the zoning concept is the Standard and Guides displayed in the Plan There are too many S&G's which will add to the confusion and leave little for the land manager to analyze according to site specific data and make good on the ground management decisions. There are over 1,000 Standard & Guides displayed in this proposed Plan The Land Manager on the ground has his/her hands tied and a blindfold covering the eyes. The local Ranger might as well have a computer to inform him/her of the management decision for any section of the District.

Letter 3951 — Management Areas - You have established too many of these zones. Lump areas of similar conditions and objectives together Take into consideration the resource needs of an area and permit adjustments in the future Place the better timber producing land in a Zone which permits timber management

Response — The Revised Plan provides management direction for the Forest In doing this, it establishes the desired future condition and the mitigation measures (in the form of standards) that need to be applied to any management practices that are planned for a given management area The ID Team has worked closely with the District Rangers and their staffs to ensure that this management direction is implementable The Regional Forester believes that this amount of management direction is appropriate

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Letter 3939 — Combine MA-3, MA-18, and MA-19 Rename to state "Manage and protect Watersheds/Riparian Areas".

Letter 3939 — *Combine MA-1, MA-2, and MA-9 Rename as "Manage at Minimal Level"*

Response — The Revised Plan contains no lands allocated to Management Areas 1, 2, 3 or 19 Therefore, neither of these two suggestions would clarify the Revised Plan

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Letter 3939 — Combine MA-11, MA-12, and MA-13. Rename as "Manage Developed and Dispersed Recreation"

Response — There are a great deal of differences between Management Areas 11, 12 and 13. Management Area 11 defines the location of ATV routes Management Area 12 is applied to developed recreation areas. Management Area 13 is applied to heavily-used dispersed recreation areas The desired future conditions and standards for these management areas are sufficiently different that there would be no advantage in combining them

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Letter 3939 — Combine MA-5 and MA-7 Rename as "Protect and Manage Viewsheds"

Response — Portions of the western face of Massanutten Mountain are allocated to Management Area 5 to emphasize the importance of this particular viewshed Visually sensitive corridors are allocated to Management Area 7

Letter 87 — On the Pedlar RD, Waynesboro West and Sherando quads, a question arose on whether Management Area 16 should be changed to Management Area 2 to provide a connection with Shenandoah National Park from Toms

Branch on the South, State Route 624 on the west, the Blue Ridge Parkway on the east, and the forest boundary on the north

Response — Alternatives 3, 6, 9, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 2. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 to provide a better habitat linkage with the Shenandoah National Park than the Management Area 16 allocation in the DEIS The preferred alternative does not use Management Area 2 anywhere on the Forest The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat for the movement of plants and animals. For example, Management Areas 14 and 15 can provide these linkages as well

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Letter 87 — On the James River RD, Alleghany, Jerrys Run, and Callaghan quads, it is recommended that Management Areas 17 and 15 be changed to Management Areas 7 for the foreground VQO zone along State Route 159 because it is a Virginia Byway

Letter 87 — On the James River RD, Covington, Strom, and Eagle Rock quads, it is recommended that Management Area 1 and 15 but not Management Area 9 be changed to Management Area 7 for the foreground VQO zone along State Route #621 and #616, because it is a Virginia Byway

Letter 4038 — On the James River RD, Millboro quad, it is recommended that MA 15 be changed to MA 7 in and around the town of Little California

Response — Alternatives 6, 9, 11, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 7 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because private land owners control the views seen from this road more so than the Forest Service Thus, the Forest Service has little influence on the scenery from this road, and therefore can do little toward managing the area to obtain the desired future condition for Management Area 7 While the Commonwealth has designated this route as a Virginia Byway, this designation will probably have little effect on public land uses for the same reason cited above

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Letter 87 — On the James River RD, Alleghany and Jordan Mines quads, it is recommended that all of Management Area 17 be changed to Management Area 15 because that is what this area is in alternatives 14 and 7.

Letter 4038 — On the James River RD, Allegheny, Jordan Mines, Callaghan & Strom quads, it is recommended that MA 17 be changed to MA 15 for that land which is east of State Rt 159, west of State Rt 600, and north of State Routes 614 and 615

Response — Alternatives 2, 6, 7, 9, 10, 11, 12, 13 and 14 examine a range of allocations for this particular area, including the recommended change to Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 17 because high concentrations of high quality timber exists in this area Managing these high quality sites helps the Forest address the below-cost timber sale issue The area also has an accessible, but broken public ownership pattern There are other areas more appropriate for a Management Area 15 designation. Nearby, the area at Millstone Run and along Mud Run Mountain was changed to Management Area 15 in response to this recommendation in the preferred alternative.

Letter 87 — On the James River RD, Jerrys Run quad, it is recommended that Management Area 11 be changed to Management Area 16 because of the ATV complex (Patterson) on the Jefferson N F

Response — Alternative 2 examines a range of allocations for this particular area, including the recommended change to Management Area 16 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because the area contains timber and wildlife values that outweigh its value for providing an ATV riding experience

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Letter 87 — On the James River RD, Ruckers Gap and Falling Spring quads, it is recommended that Management Area 14 be changed to Management Area 9 just southwest of Lake Moomaw to Ruckers Hollow because that is what this area is in alternative 14

Response — Alternatives 9, 11, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 13 because of the area's proximity to Lake Moomaw and its potential to develop a system of loop trails stemming from the developed recreation areas

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Letter 87 — On the James River RD, Ruckers Gap and Callaghan, Alvon, and Jerrys Run quad, it is recommended that Management Area 15 be changed to Management Area 14 north of FDR #600 and north of the ridge north of Thorny Branch because that is what this area is in alternative 14

Response — No alternative considers the recommended allocation for this area While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because it is more appropriate for the area's low elevation level and broken public ownership pattern

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Letter 87 — On the James River RD, Ruckers Gap quad, it is recommended that Management Area 1 be changed to Management Area 9 because that is what this area is in alternative 14 and because the area is adjacent to Management Area 6 2 on the Monongahela National Forest

Response — Alternative 6 examines a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because of its high elevation, its isolated nature, and its compatibility with Management Area 6 2 on the Monongahela National Forest

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Letter 87 — On the James River RD, Falling Springs quad, it is recommended that Management Area 17 be changed to Management Area 15 from the District boundary with the Warm Springs Ranger District on the north to Broad Tree Run on the south because that is what this area is in alternative 7

Letter 87 — On the Deerfield RD, Millboro quad, it is recommended that Management Area 17 be changed to Management Area 15 for the area north of Cold Sulphur Springs Branch and south of State Route 39/42 near Goshen

Letter 87 — On the Deerfield RD, Craigsville, Augusta Springs and Elliott Knob quads, it is recommended that Management Area 17 be changed to Management Area 15 below a certain contour level from Goshen on the south to Deerfield Work Center on the north

Letter 87 — On the Warm Springs RD, Williamsville, Bath Alum, and Burnsville quads, it is recommended that Management Area 17 be changed to Management Area 15 west of the Cowpasture River

Letter 4038 — On the Warm Springs RD, Williamsville quad, it is recommended that MA 17 be changed to MA 15 in the Campbell Run area north of the Brown's Pond biological area

Response — Alternatives 2, 6, 7, 11, 12, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 17 because high concentrations of high quality timber exist in this area Managing these high quality sites helps the Forest address the Nation-wide below-cost timber sale issue. There are other areas that are more appropriately managed with a Management Area 15 designation. Likewise, one of the aesthetic standards for Management Area 17 has been revised to include adopting a partial retention VQO in the foreground areas along sensitivity level 1 and 2 travel corridors

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Letter 3728 — Forest Standard 780. Change "avoided" to "prohibited"

Response — The wording has been changed to "prohibited"

Letter 4038 — Replace the fourth paragraph on page 2-13 of the Draft Revised Forest Plan with the following. "In order to manage and enhance riparian-dependent resources, most riparian areas are contained in Management Area 18 Exceptions are wilderness, roadless areas recommended for wilderness study, and developed recreation areas where legal or administrative mandates restrict activity Most riparian areas are actively managed to

provide self-sustaining habitats that attain and maintain the desired future condition for riparian dependent resources Intermittent streams are managed to protect or enhance downstream riparian-dependent resources."

Response — In the Revised Plan, Management Area 18 includes all riparian areas except existing wilderness, roadless areas recommended for wilderness, and the Little Laurel Run Research Natural Area

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Letter 4038 — Replace the third paragraph on page 2-18 of the Draft Revised Forest Plan with the following: "In any project, water quality is protected from nonpoint source pollution through the use of standards that meet or exceed preventive best management practices. Forest Standards 656 through 703 apply."

Response — This section has been entirely rewritten.

Letter 4038 — Change Standard 28 on page 2-29 of the Draft Revised Forest Plan to read. "New domestic or commercial uses of water within the natural area should not be permitted "

Letter 4038 — Change Standard 73 on page 2-35 of the Draft Revised Forest Plan to read "Except for existing municipal water supplies, domestic or commercial uses of water within the natural area should be prohibited."

Response — A standard was added, requiring that new special uses are issued only where there is an overriding demonstrated public need or benefit.

Letter 4038 — Change Standard 27 on page 2-29 of the Draft Revised Forest Plan to read "Develop and implement watershed improvement projects on areas where erosion is man-caused "

Response — The recommended rewording does not constitute a change to the standard.

Letter 4038 — Add the new standard (tentatively numbered 28a) to page 2-29 of the Draft Revised Forest Plan under the heading "Soil and Water"· "Temporary guaging stations and instrument shelters may be established."

Response — This standard is not needed. Monitoring installations are assumed permitted, unless specifically prohibited

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Letter 4038 — Add the following new standard (tentatively numbered 28b) to page 2-29 of the Draft Revised Forest Plan under the heading of "Soil and Water" "Monitoring activities may take place as necessary to establish a baseline for determining effects of land management on terrestrial or aquatic ecosystems."

Response — This standard is not needed. Monitoring is an integral part of management throughout the Forest.

Letter 4268 — *Plan - Standard 353 indicates that new road construction can be located along rivers qualifying for scenic river* designation EPA is concerned that the construction, use and maintenance of these roads could potentially lower water quality due to sedimentation and surface runoff of pollutants, in addition to destroying valuable riparian habitat.

Response — This standard says that new roads can parallel the river, but another standard requires that these roads be located outside the riparian area unless alternate routes have been reviewed and rejected as more environmentally damaging

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Letter 4268 — Plan - Management Area 18 EPA generally discourages the construction of impoundments Such activities *must be in compliance with the appropriate state and federal regulations.*

Response — Standards state that impoundments are allowed on a case-by-case site specific evaluation if 401 certification is obtained from the appropriate State Agency, that impoundments are discouraged on wild trout streams, and that construction of new flood control, hydroelectric, or water supply dams along rivers eligible for the National Wild and Scenic River System is discouraged

Letter 500	In MA 16, the standard (p 2-113) provides for entry cycles of 5 to 10 years Because of the wildlife species encouraged in this management area, we suggest no specification as to entry cycles.
Letter 1437	In MA15, the Draft Plan proposes to double the road density, please do not let the road density exceed one mile per thousand. This is perfectly adequate for turkey habitat. Line 554 suggests that areas now classified SPNM will become SPM Please keep these areas SPNM and do not change them to SPM. In line 555, the Draft Plan states that "Motorized use is allowed where it doesn't conflict with indicator species objectives." This would seem to condone use of nonsystem roads. Please restrict all public motorized use to open System roads
Letter 2664	The rotation ages for even-aged systems as listed in the Draft Plan for MAs 14 and 15 for lands suitable for timber production are unacceptable to the VWTF
Letter 2664	Rotation age is a factor in determining the amount of suitable acres and the Allowable Sale Quantity (ASQ) The low end of the rotation age range should be reduced to allow more opportunities for timber sales, wildlife habitat management and vegetative diversity
Letter 2664	The VWTF is pleased to see indications that water sources may be provided at 1/2 mile intervals where needed We recommend further that this standard be modified to. Four water sources will be provided per square mile, and that this standard be applied Forest wide except in Congressional designated wilderness areas.
Letter 2664	Spring seeps are extremely important to the wild turkey, other wildlife species, and vegetative diversity The standards and guidelines in the Draft Plan are not acceptable to the VWTF, and we recommend that the GWNF adapt the standards and guidelines used by the Monongahela National Forest.
Letter 2664	Standard 560. "Closed roads are seeded to preferred wildlife food." should be changed to say, "Closed roads are seeded with grasses, forbs and legumes to provide moderate herbaceous growth and associated insect populations. Fescue is not permitted."
Letter 2664	Standard 572 for MA 15 states, "The average size of openings is 10 acres, with a maximum of 15 acres " The VWTF believes this should be changed to an average of 15 acres and maximum of 25 acres. This will also influence suitability, ASQ, make sales more economical and benefit wildlife species that require early succession habitat. The 10-15 acres limitation is unnecessarily restrictive and the opportunities to provide larger cutting units, if desired, should be available.
Letter 2664	The VWTF recommends [that] standard [562] be amended to read; "At least one permanent opening (1-5) acres will be provided....., and maintained by the GWNF and VDGIF. The openings will be seeded with grasses, forbs and legumes to provide herbaceous growth and associated insect populations Fescue is not permitted " Existing permanent openings should be maintained and commitments to expand permanent wildlife openings should be made in this plan.
Letter 2665	Human treatments cannot restore any areas to a natural state, only to a human-manipulated state. (Plan, 2-27)
Letter 3660	Minimum clearcut size in MA 16 should be 10 acres Max should be 15-20 ac
Letter 3660	Forest Standard 1023 some insurance companies require all snags to be felled as a safety precaution
Letter 3728	Wildlife habitat improvement projects should be permitted in Management Area 1
Letter 3728	Add a new heading under Management Area 14 entitled "Purpose" with the following text "This Management Area will emphasize the following" Primary. - Remote quality habitat for black bear and other wildlife species intolerant of disturbance - A continuing supply of hard mast from older trees. Secondary" - A semi-primitive non-motorized recreational environment will be featured - Various silvicultural systems and other forms of vegetative manipulation are used to achieve wildlife objectives "
Letter 3728	Change the wording under "Desired Future Condition" in Management Area 14 to read as follows. "Emphasis in this Management Area will focus on manipulation of the natural occurring tree species composition to optimize hard mast production, age class distribution and ensure a continuous mast supply. Normal forest management activities will be used to achieve vegetative diversity that will enhance the habitat of black bear and such species as bobcat, fisher, rockvole, barred owl and blackcapped chickadee Bear populations will increase and stabilize Management activities will contribute to the Forest's timber goal Roads and trails will provide access into this Management Area for administrative and management purposes, including transporta-

tion of forest products Public motorized vehicle use will be controlled All permanent roads will be constructed to the lowest standard possible. Most roads will be seeded to wildlife foods when closed to vehicle traffic The even-aged silvicultural system is the accepted form of timber harvesting to achieve age class distribution and regenerate shade-tolerant mast tree species The uneven-age silvicultural system will be applied within 1/4 mile of open roads within or bordering this Mgmt Area All lands within this Mgmt. Area are considered suitable for habitat manipulation "

Letter 3728 Management Area 9. Roads 279 - Change to. "No new road construction is permitted except for mineral exploration & development & wildlife habitat development to achieve habitat objectives. Existing roads may continue to be used "

Letter 3728 Management Area 14 Forest Standard 1019 - Add this as a general standard for this entire Management Area

Letter 3728 Management Area 15 Wildlife 561 - Change to "Public vehicular access is controlled from April 15 to August 15 "

Letter 3728 Management Area 15 Roads 558 - This standard should be deleted.

Letter 3728 Management Area 15 Roads 557 - Reword as follows· "Open roads and vehicular trails are limited to no more than 1/2 mile per compartment or 1,000 acres, whichever is less This applies to FS specified roads listed on the transportation system All other roads are closed to all motorized vehicles except for administrative or emergency purposes."

Letter 3728 Management Area 16 Forest Standards 1005 & 1019, dealing with spacing of regeneration cuts and quiet time between major projects, are NOT NEEDED in this Management Area We therefore recommend deletion of these standards.

Letter 3728 Change the write-up under "Desired Future Condition" in Management Area 16 to read "This management area will be a mosaic of stands of predominately hardwood trees and understories that provide habitat for a variety of wildlife species Stands will vary in size, shape, height and species composition depending on the silvicultural system applied. Vegetation would average 70 to 120 years of age with a mosaic of small openings. Normal forest management activities will be used to improve vegetative diversity, which will enhance habitat for early successional wildlife Management activities will contribute to the Forest's timber goal Licensed motorized and nonmotorized recreation opportunities are provided Both even-aged and uneven-aged silvicultural systems may occur, with the uneven-aged system applied within 1/4 mile of open roads The even-age silvicultural system will predominate to achieve timber age class diversity and regenerate shade-intolerant mast tree species Roads will be constructed to the lowest std. possible and seeded to wildlife foods after activities are completed All lands within this MA are considered suitable for habitat manipulation "

Letter 3728 Add the following to Management Area 16 under the new heading "Purpose". "This Management Area will emphasize the following. Primary· - Enhance or maintain habitat for wildlife species that prefer early successional habitats and tolerant of disturbances, such as ruffed grouse and deer Secondary. - Rotations of 120 years or less with a mosaic of small openings - Hard and soft mast trees and shrubs for mast production, scenic and lumber attributes.

Letter 3728 Management Area 16· Timber 584 - We recommend rotation age changes as follows· Upland Hardwood - 60 to 120, Cove Hardwoods - 60 to 120, and Scarlet Oak 60+

Letter 3728 Management Area 16. Roads - Add another NEW standard [tentatively numbered 581b] "Roads are closed unless seasonal use is compatible with the habitat management objective "

Letter 3728 Management Area 18 Wildlife 707 - Change to "Management activities are conducted to enhance riparian-dependent species In riparian areas adjacent to intermittent streams, management activities can be conducted to benefit upland wildlife species if riparian resources are not impaired "

Letter 3728 Management Area 14 Standard 544 - Delete this standard

Letter 3728 Management Area 14 Standard 538 - Change to "Permanent wildlife openings may be created if needed to meet habitat management objectives "

Letter 3728	Management Area 14 Standard 533 - Change to "Closed roads are seeded to preferred wildlife foods."
Letter 3728	Management Area 14. Standard 532 - This should be deleted
Letter 3728	Management Area 14 Standards 536, 537, 539 - Retain these for the entire management area
Letter 3728	Management Area 14· Timber 546 - Add "scarlet oak 70+" to the list of rotation ages
Letter 3728	Management Area 14 Timber 543 (Grapevine Control) - Should be applied to the entire management area
Letter 3728	Management Area 17 Apply Forest Standard 1019 (Quiet Period) to this management area
Letter 3728	Management Area 16. Wildlife - Add the following NEW standard (tentatively numbered 588a) "Normal habitat development projects will be used to meet wildlife objectives in this management area "
Letter 3728	Management Area 16 Wildlife 588 - Delete and change to the following. "The Forest strives to maintain at least 5% of the area in grassy or herbaceous openings Clearings of early successional vegetation are provided with an abundance of grass, forbs and browse."
Letter 3728	Management Area 16. Wildlife 587 - Add "If needed to meet habitat objectives."
Letter 3728	Management Area 17· Wildlife - Add a new standard [tentatively numbered 610a]· "Normal habitat development projects will be used to meet wildlife objectives in this management area "
Letter 3728	Management Area 17. Wildlife 609 - Delete and replace with the following· "Clearings of early successional vegetation are provided with an abundance of grass, forbs and browse At least 5% of the management area will be maintained in permanent openings "
Letter 3728	Management Area 15· Forest Standard 1025 - Change 30% to 45% in order to achieve a 135-year rotation.
Letter 3728	Management Area 14· Standards not addressed in these comments should remain as they are stated in the Plan as long as they apply to the entire Management Area.
Letter 3728	Management Areas 14 and 15. Add a new standard [tentatively numbered 547b and 574a] which reads· "Conversion of hardwood stands to pine is not permitted "
Letter 3728	Management Areas 14 and 15 Add a new standard [tentatively numbered 547a and 573a] which reads: "Clearcuts can range in size up to 25 acres, usually averaging 20 acres."
Letter 3728	Management Areas 14 and 15 Add a new standard [tentatively numbered 546a and 571a] which reads: "The amount of area regeneration per entry will generally be 1/2% per year up to a maximum of 8% of the suitable land base for timber production in NF ownership within a compartment."
Letter 3728	Management Areas 14 and 15 Add a new standard [tentatively numbered 532b and 558b] which reads· "When any Forest Roads are opened to public vehicles, a seasonal closure of the period April 15 to August 15 will be enforced for such roads."
Letter 3728	Management Area 15· Recreation 556 - Replace with the following "Public motorized travel will be seasonally prohibited (April 15 through August 15) to protect wildlife habitat objectives "
Letter 3728	Management Area 16· Timber 585 - Change to the following. "Regeneration harvest cuts can range in size up to 30 ac, usually averaging 25 ac for deer and 15 ac or less for grouse. For clearcuts over 25 acres, maximize edge by irregularly shaping units."
Letter 3728	Management Area 15· Timber 571 - Add "scarlet oak 70+" to the list of rotation ages.
Letter 3728	Management Area 15· Wildlife 562 - Change to· "Permanent wildlife openings may be created, if needed, to meet habitat management objectives "
Letter 3728	Management Area 16· Roads - Add the following NEW standard [tentatively numbered 581a]· "Open roads and vehicular trails are limited to no more than 2 miles per compartment (approximately 1,000 acres)."

Letter 3728	Management Area 16 Roads 580 - Change "multiple use objectives" to wildlife management objectives.
Letter 3728	Management Area 16· Recreation 578 - Add semi-primitive subclass 2 as an option This option (subclass 2) gives the land manager an opportunity to close roads to meet particular wildlife habitat objectives.
Letter 3728	Management Area 15· Roads - Add the following NEW standard [tentatively numbered 558a] which reads. "Newly constructed roads are closed to the public unless seasonal access for hunting or fishing is needed; however, specified open road densities will be maintained at all times "
Letter 3728	Management Area 16 Forest Standards 993, 994 and 995 - Delete these 3 standards Add the following new Forest Standard. "The decision document for any project should determine the appropriate silvicultural method and method of cutting to meet the goals, objectives and desired future condition within this management area."
Letter 3728	Management Area 16· Forest Standard 1027 - This should be deleted from this management area if the suitable land base is being considered
Letter 3728	Management Area 16 Forest Standard 1024 - Change 1% to 8% of the suitable land base for this management area This conforms to a 120-year rotation with 10-year entry cycles.
Letter 3728	Add the following to Management Area 16 under the heading "Area Description" "Lands within this management area have the basic requirements of the habitat needs for deer, grouse, prairie warbler, chestnut-sided warbler and New England cottontail Both motorized and nonmotorized recreation opportunities may be provided. Only licensed motorized use will occur on open roads Any new or reconstructed roads will be the lowest TSL standard needed to accomplish wildlife objectives, while providing adequate protection to other resources "
Letter 3728	Management Area 15 Standard 573 - Change to "Regeneration openings can range in size up to 25 acres, usually averaging 20 acres "
Letter 3728	Management Area 15. Forest Standard 1019 - Add as a general standard for this entire Management Area
Letter 3728	Change the wording under "Desired Future Condition" in Management Area 15 to read· "Emphasis in this management area will focus on the manipulation of the natural occurring tree species to optimize hard mast production, age class distribution and ensure a continuous mast supply Normal forest management activities will be used to improve vegetative diversity which will enhance the habitat of the wild turkey Populations will increase and stabilize Management activities will contribute to the Forest's timber goal Roads and trails will provide access into this management area for administrative and management purposes including transportation of forest products Public motorized use will be controlled, but seasonal openings may occur depending upon management direction Roads will be constructed to the lowest standard possible and seeded to wildlife foods after activities are completed. Even-age and uneven-aged systems will be used, but the even-age system will predominate to achieve timber age class diversity and regenerate shade-intolerant mast tree species Uneven-age system will be used within 1/4 mile of open roads within or bordering this MA All lands within this MA are considered suitable for habitat manipulation."
Letter 3728	Add a new heading under Management Area 15 entitled "Area Description" which reads as follows· "Lands within this MA have the basic requirements of the habitat needs for wild turkey, squirrel and many other species requiring similar habitat Most roads are closed to public motorized traffic, but a few may be open seasonally to achieve mgt objectives A variety of non-motorized recreational activities will occur including hunting, fishing, hiking, dispersed camping and mountain biking Any new or reconstructed road will be the lowest TSL standard needed to accomplish wildlife objectives while providing adequate protection of other resources. Limited public motorized use will be seasonally allowed August 16 through April 14 to protect habitat during critical nesting and brook rearing periods "
Letter 3728	Add a new heading under Management Area 15 entitled "Purpose" which reads as follows "This Management Area will emphasize the following Primary - Remote quality habitat for wild turkey and such species as chipmunk, smoky shrew, bluejay and wood thrush, tolerant of infrequent disturbances and favoring an environment with small openings - Continuing supply of hard mast from a more mature forest with interspersed small herbaceous openings Secondary - A semi-primitive non-motorized or semi-primitive motorized (SPM2, SPM1) recreational environment will be featured depending on mgmt goals and objectives - Various silvicultural systems and other forms of vegetative manipulation are used to achieve wildlife objectives

Letter 3728	Management Areas 14 and 15: The vegetation diversity goal of 5% in permanent openings and 5% in old growth stands should be the DFC of this Management Area.
Letter 3728	Management Area 14· Roads 531 - Open roads and vehicular trails are limited to no more than 1/4 mile per compartment or 1000 ac, whichever is less This applies to FS specified roads listed on the transportation system. All other roads are closed to all motorized vehicles except for administrative or emergency purposes
Letter 3728	Management Area 9· Add another NEW standard [tentatively numbered 278a] as follows: "Public motorized use is not allowed on any new temporary or specified road built for mineral exploration and development and/or wildlife habitat developments "
Letter 3728	Management Area 9 Add a new standard [tentatively numbered 291b] as follows: "Waterholes and other water developments may be created at 1/2-mile intervals if needed "
Letter 3728	Add a new heading under Management Area 14 entitled "Area Description" to read as follows: "Lands within this Management Area have the basic requirements of the habitat needs for black bear, pileated woodpecker, and many other species requiring the same habitat. Most roads are closed to motorized travel by the public A variety of non-motorized recreational activities will occur such as hunting, fishing, hiking and dispersed camping. Any new or reconstructed roads will be of the lowest standard needed to accomplish wildlife objectives while providing adequate protection to other resources.
Letter 3728	Management Area 9. Wildlife - Add a NEW standard [tentatively numbered 291a]· "Normal habitat development projects will be used to meet wildlife objectives in this Mgmt. Area "
Letter 3728	Management Area 9· The following is a recommended "purpose" for this MA. The "description" and "desired future condition" should conform to this purpose statement "Purpose· This Mgmt Area will emphasize the following· Primary· - A semi-primitive non-motorized setting with a variety of dispersed recreational activities. - Wildlife species that prefer a minimum of disturbance and older vegetation. Secondary. - A largely natural, undisturbed, remote environment. - Old growth timber stands will be the normal environment throughout this Mgmt Area "
Letter 3779	"Regeneration openings can range in size up to twenty-five acres, usually averaging around 20 acres", p 2-108. This is too open-ended, allowing the FS to log desirable stands under the thinly veiled stated purpose of (managing) "to maintain or enhance wildlife habitat", p. 2-105
Letter 3779	"Permanent wildlife openings may be created - at least one 1 acre to 5 acre opening per 160 acre area" p. 2-107. [Suggested minimum area requirements to maintain the presence of these species are 15 acres for the ovenbird, 370 acres for the worm-eating warbler, and 400 acres for the pileated woodpecker]
Letter 3779	MA15· "timber harvesting" is not compatible with maintaining a more "mature forest environment" as stated in the purpose. p. 2-109
Letter 3840	Resurrect original road mileage densities at 1/4 mile per 1000 acres - "Bear" habitat 1 mile per 1000 acres - "Turkey" habitat There may be a technical means of correcting some problem areas relative to road densities by not running these MA boundaries all the way to the edge of a road This determination should be rendered by the forest ecologists and biologists so as not be abused
Letter 3840	Pg 2-110, [Standard] #558 - When open roads are in excess of 1 mile per thousand acres forest officers close roads to reduce the mileage of the open roads to bring area into compliance
Letter 3840	Pg 2-112, [Standard] #573 - The size of openings 15 - 10 acres maximum
Letter 3840	Pg 2-113, MA 16 - Road locations and densities should meet wildlife habitat needs. (Remove "timber access" wording)
Letter 3840	Pg 2-64, [Standard] #291 - No additional wildlife improvements that require roadbuilding or timber harvesting.
Letter 3840	Pg 2-115, [Standard] #588 - How does #588 at 2% openings compare with pg 2-113 second sentence - "The forest strives to maintain at least 5% in grassy or herbaceous openings."

Letter 3840	Pg 2-110, [Standard] #557 - Retain road densities at 1 mile per 1000 acres
Letter 3840	MA 14 - Road Density 1/4 mile per thousand acres - close existing roads to bring into compliance No commercial timbering operations All MA 14 lands unsuitable for timber production Change p. 2-107 #538 to read 1 to 5 acre clearing per 320 acres Change pg 2-107 #537 to. No herbicide treatments to be used to maintain wildlife openings If suitable lands are retained in MA 14 area change 2-108 #544 to· Can burn only for specific wildlife purposes not silvicultural purposes 2-108 #547 - regeneration openings can range in size up to 10 acres maximum (should be smaller than turkey).
Letter 3848	4 In area 8 the last paragraph on page 2-50 and the first paragraph on 2-51 could be construed as contrary to the interests of hunting and fishing, especially the wording that " the forces of natural selection and survival rather than human actions determine what numbers of wildlife species exist " We would like to see this modified to state that hunting and fishing are allowed within the appropriate regulations of Virginia (and West Virginia).
Letter 3940	Plan· Page 2-19, Paragraphs 5, 6, & 7· The habitat characteristics of these areas should be emphasized, rather than the wildlife species (e g., black bear, wild turkey, ruffed grouse) that use these areas For example, the desired future condition of a management area should be habitat-based and supports a variety of associated species Highlighting a single game species for an area (although used only as an example) does little to promote a biodiversity message.
Letter 3962	MA 4. [Standards] 48 & 58 Add - No commercial, salvage or game wildlife improvement, except for timber harvesting shall occur
Letter 3962	MA 9. [Standard] 291 Maintaining existing wildlife improvements and allowing additional improvements contradicts "allowing physical and biological processes to operate with minimum intervention."
Letter 3962	MA 14· [Standard] 531 You are emphasizing remote habitat for bear in this MA. Bears need areas with no or few roads to minimize disturbances. We need to keep 1/4 road mile/1000 acres
Letter 3962	MA 6 [Standard] 111 I question the need for wildlife clearings along the AT.
Letter 3962	MA 14. [Standards] 537 & 8 Permanent wildlife openings in bear habitat in the existing plan are not required We should keep the same standard Wildlife openings can be created (one 1-5 acre/160 acres) if there are not current openings in the form of right-of-ways, blowdowns, etc We need to recognize natural occurring opening.
Letter 3962	MA 15 [Standard] 557 You are emphasizing habitat for turkey in this MA We need to keep 1 road mile/100 acres 558 Road density as in 557 Instead of "look for opportunities to reduce the mileage of open roads", could you say "will reduce the mileage of open roads" 562 Include natural occurring events such as blowdowns as a source of 1-5 acre openings.
Letter 3962	MA 16. [Standard] 2-113 "Roads constructed for timber harvesting". This Management Area is wildlife driven, so why are we building roads for only timber harvesting?
Letter 3962	[Standards] 1026 & 1027 These percentages appear to be low for a minimum Maps showing the existing classes are needed and should be made available for public comment.
Letter 3962	[Forest Standard] 1019 Remove "located in MA 14, 15, & 16 " This should apply to any area suitable for cutting MA 17 has more suitable acres than 14 or 16
Letter 3962	Pg. 2-171 [Standard] 989 This [standard] should not be deleted from the plan.
Letter 3962	MA 15 [Standard] 573 Opening size limited to 5 acres Turkeys only need the openings for grasshopper during one stage of growth
Letter 3962	MA 14 [Standard] 547 Openings in bear habitat provide a place of thick growth for bears to attempt to hide from dogs. A 10-acre opening is a big thicket to hide in Delete the 25 acre openings.
Letter 4038	Replace the second paragraph under Management Area 16 on page 2-113 of the Draft Revised Forest Plan with "This area is characterized by a mosaic of habitat types ranging from mature stands to early successional habitat, with younger stages of vegetation being favored The Forest strives to maintain at least 2% of the area

in permanent grassy or herbaceous openings, at least 10-15% of the area in regeneration (0 to 10 year age class), at least 10-15% in saplings (11 to 20 year age class) and at least 10-15% in young polesized hardwoods (21 to 30 year age class)."

Letter 4038 Delete the third paragraph under Management Area 16 on page 2-113 of the Draft Revised Forest Plan

Letter 4038 Change Standard 539 on page 2-107 of the Draft Revised Forest Plan to read "Water sources are developed up to 4 per square mile, if needed to meet wildlife habitat objectives "

Letter 4038 Replace the third paragraph on page 2-19 of the Draft Revised Forest Plan with the following "Unfragmented habitat. The desired future condition is to retain wilderness and wilderness study areas as unfragmented habitat Additional unfragmented habitat can be found in Management Areas 4, 9, and 13. Forest managers are sensitive to opportunities for providing additional unfragmented habitats within the framework of the objectives of the adjoining management areas "

Letter 4038 Replace the sixth paragraph on page 2-19 of the Draft Revised Forest Plan with the following' "Management Area 15 emphasizes quality habitat for species that favor a more mature forest environment with small, herbaceous clearings and freedom from disturbance, such as summer tanager, northern parula, black-billed cuckoo, wild turkey, gray squirrel, raccoons, etc."

Letter 4038 Add a new eighth paragraph on page 2-19 of the Draft Revised Forest Plan "Management Area 17 emphasizes quality habitat for a diversity of wildlife species which benefit from a forest environment with various age classes distributed throughout, such as deer, wild turkey, ruffed grouse, whip-poor-will, great-crested flycatcher, gray squirrel, etc "

Letter 4038 Replace the seventh paragraph on page 2-19 of the Draft Revised Forest Plan with the following "Management Area 16 emphasizes quality habitat for wildlife species that prefer early successional habitats and can tolerate a moderate level of human disturbance, such as ruffed grouse, loggerhead shrike, bewick's wren, whip-poor-will, great crested flycatcher, golden-winged warbler, etc "

Letter 4038 Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the second paragraph under Desired Future Condition "Special Interest Areas are protected against activities that directly or indirectly modify natural processes. The establishment and maintenance of certain vegetative communities is permitted through prescribed burning or other proven means of controlling natural succession."

Letter 4038 Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the first paragraph under Desired Future Condition "The existence of exemplary examples of genetic, species, and landscape diversity, and the condition of the existing vegetation are the main reasons for designation of a site as a Biological or Zoological Special Interest Area. The existing ecosystem within a Special Interest Area will be the result of the maintenance or re-establishment of natural ecological processes Species which favor vegetation influenced by natural environmental and ecological processes will predominate in the areas where this management designation is applied "

Letter 4038 Management Area 4 - Change the fourth paragraph on page 2-27 of the Draft Revised Forest Plan to read. "Individual implementation schedules are developed for each of the Special Biological Areas. It is estimated that between 100 acres and 300 acres per year may need to be treated to maintain or restore these areas to a natural state The primary treatment method is prescribed burning Other treatments may include elimination, or control of exotic non-native species, selectively removing individual trees to provide light gaps to increase sunlight to the understory."

Letter 4038 Management Area 4 on page 2-25 of the Draft Revised Forest Plan. The stated acreage figure of 53,900 acres for lands within this management area category is too low The Division of Natural Heritage has nominated 60,665 acres on the national forest for SIA and RNA designation. This Management Area should also include candidate RNA's, as well as Special Interest Areas and existing RNA's The list on page 2-26 should include Craig Creek Shale Barren, Pines Chapel Pond, and Slabcamp/Bearwallow Change the name "The Knobs" on this list to "Sister Knobs"

Letter 4038 Replace the fourth paragraph on page 2-17 of the Draft Revised Forest Plan with the following. "Approximately ____% of the suitable land lies in three management areas (Management Area 14, 15, and 16) where timber harvesting is used to manipulate the habitat to benefit a diversity of species and where less public access is provided "

Letter 4038 Add a new fifth paragraph on page 2-20 of the Draft Revised Forest Plan· "Management and recovery plans for PETS species will be prepared and implemented In addition, site management plans for rare species habitats will be prepared and implemented. To develop a proactive approach for identifying and protecting the biological diversity of the forest, funding will be provided for the survey, research, monitoring, and management of species of concern."

Letter 4038 Replace the first paragraph on page 2-20 of the Draft Revised Forest Plan with the following· "A variety of treatment methods are utilized to create habitat for wildlife species. Quality hunting opportunities are provided in areas ranging from well accessed to remote "

Letter 4038 Replace the ninth paragraph on page 2-19 of the Draft Revised Forest Plan with the following tenth paragraph "Waterfowl habitat enhancement is emphasized in and around [Hidden Valley,] Lake Moomaw and other impoundments Nest opportunities for the wood duck are increased within riparian areas."

Letter 4038 Change Standard 65 on page 2-34 of the Draft Revised Forest Plan to read· "Limited non-motorized dispersed recreation use of an RNA is permissible, but should not be encouraged Any form of recreational use that interferes with the purposes for which the RNA was established should be prohibited Trail maintenance should be kept to a minimum necessary for safety and protection of the natural area "

Letter 4038 Change Standard 61 on page 2-34 of the Draft Revised Forest Plan to read. "Existing and candidate RNA's are managed to meet a visual quality objective of preservation "

Letter 4038 Change Standard 60 on page 2-34 of the Draft Revised Forest Plan to read "Research, study, observations, monitoring, management, and education activities that are generally nondestructive and generally nonmanipulative can occur Unmodified conditions and natural processes are maintained to illustrate for research and educational purposes the important forest types and natural communities "

Letter 4038 Add the third paragraph under "Desired Future Condition" on page 2-33 of the Draft Revised Forest Plan to read: "Visitors to a Research Natural Area could expect to see representative examples of the natural communities of the region Motorized access, roads, trails, signs, and fences may exist if they specifically contribute to the management objectives or protection of the area Exotic plants and animals should be removed to the extent practical."

Letter 4038 Replace the third paragraph on page 2-20 of the Draft Revised Forest Plan with the following· "The Forest increases wildlife viewing and environmental education/awareness programs. Nesting boxes, in and around recreation areas, along with short interpretive trails and small wildflower/wildlife viewing meadows will be developed This development takes place primarily in Management Areas 7, 12 and 13, but may take place within most management areas as opportunities occur "

Letter 4038 Remove the second paragraph on page 2-20 of the Draft Revised Forest Plan

Letter 4038 Move the Fisheries write-up on page 2-4, the Wildlife write-up on pages 2-19 and 2-20 and the Threatened, Endangered, or Sensitive Species write-up on pages 2-20 and 2-21 of the Draft Revised Forest Plan to page 2-3 under the new heading "Biological Resources" Refer to pages 3 thru 6 of the Commonwealth of Virginia comments for the correct ordering of the paragraphs.

Letter 4038 Change the second paragraph under "Desired Future Condition" on page 2-33 of the Draft Revised Forest Plan to read "Research Natural Areas may be manipulated if specifically prescribed in the Chief's RNA establishment report RNA's are protected against activities that directly or indirectly modify natural processes The establishment and maintenance of certain vegetative communities is permitted through prescribed grazing, burning or other proven means of controlling natural succession "

Letter 4038 Change the existing fourth paragraph on page 2-62 of the Draft Revised Forest Plan to a new sixth paragraph that reads "Little evidence of other users and low interaction between users occurs Facilities of a primitive nature may be present to protect the resource and safety of visitors Visitors could normally expect to view those species requiring old growth environments and low levels of disturbance Biological interests are the primary concern in this management area and conflicts between biological resources of the site and proposed management activities or user groups are resolved in favor of biological resources "

Letter 4038 Change the existing sixth paragraph to page 2-62 of the Draft Revised Forest Plan to a new fifth paragraph that reads "Stands of old growth forest types are not manipulated Biological diversity is maintained in portions of

this management area by ujse of limited wildlife management practices, such as prescribed burning and uneven-aged forest management, where necessary to achieve biological habitat objectives. The amount of management activity occurring at one time may not exceed what would naturally occur through fire, blow-downs, etc., generally acknowledged as 5%. Other portions of the management area, where management is not necessary to achieve biological objectives, remain in a natural condition, and provide migration corridors and other habitats."

Letter 4038 — Add the following new fourth paragraph to page 2-62 of the Draft Revised Forest Plan: "In order to maintain biological diversity and to provide for early successional habitats that historically occurred in this management area (through fire, blow-downs, disease, etc.), and that today are not allowed to occur naturally, minimal management is needed to provide for these habitats "

Letter 4038 — Change the third paragraph on page 2-62 of the Draft Revised Forest Plan to read· "The ecosystem is generally the result of natural succession and biological processes. Natural succession could eventually result in an older forest of predominately shade-tolerant vegetation in much of this area. Species preferring mature vegetation or the late successional stages of vegetation predominate in older age forests

Letter 4038 — Change the second paragraph on page 2-62 of the Draft Revised Forest Plan to read: "In these areas biological concerns predominate and other uses are subordinate to these concerns."

Letter 4038 — Change the first paragraph on page 2-62 of the Draft Revised Forest Plan to read. "This 196,502-acre management area contains some of the more remote areas on the Forest These "Remote Highlands" are managed to provide late successional stages of vegetation for species requiring mature habitat The environment can be maintained in a near-natural state where physical and biological processes predominate and minimal management occurs. These areas provide migration corridors for natural movement of species between habitat types and large blocks of undisturbed habitat In this management area recreationists can obtain a degree of solitude, however the degree of isolation from the sights and sounds of human activity is less than that associated with wilderness."

Letter 4038 — Delete Standard 149 on page 2-46 of the Draft Revised Forest Plan.

Letter 4038 — Change Standard 148 on page 2-46 of the Draft Revised Forest Plan to read· "Wildlife habitat improvement activities are performed to enhance viewing and fishing opportunities "Watchable" wildlife species habitat enhancement is performed in accordance with a visual quality appropriate for the demonstrated management practice "

Letter 4038 — Add the following new standard (tentatively numbered 507a) on page 2-103 of the Revised Draft Forest Plan under the heading "Wildlife"· "Open land habitats are very limited on the Forest These areas offer the primary opportunity for the Forest to manage for species preferring grassland type habitats, and therefore are critical areas for wildlife management. When current agricultural leases expire, future leases will provide for expanded wildlife habitat developments. These areas would add valuable habitat for numerous wildlife species, as well as increase the opportunities for watchable wildlife programs "

Letter 4038 — Replace Standard 507 under "Wildlife" on page 2-103 of the Draft Revised Forest Plan with· "Wildlife improvements may be maintained and migratory waterfowl management areas may be expanded at Hidden Valley."

Letter 4038 — Change the fourth paragraph under "Recreational Rivers" on page 2-71 of the Draft Revised Forest Plan to read· Grazing is maintained on some 240 acres and five pastures to enhance biological values "

Letter 4038 — Delete Standard 326 on page 2-69 of the Draft Revised Forest Plan

Letter 4038 — Add the following new standard (tentatively numbered 325a) on page 2-69 of the Draft Revised Forest Plan under the heading "Wildlife" "Shallow waterfowl impoundments will be permitted where they do not conflict with the criteria for National River candidacy "

Letter 4038 — Change Standard 232 on page 2-68 of the Draft Revised Forest Plan to read "Wildlife habitat improvement activities are performed to enhance viewing and hunting opportunities Waterfowl, woodcock, and "watchable" wildlife species habitat enhancement is performed in accordance with a visual quality objective of retention."

Letter 4038	Change Standard 322 on page 2-68 of the Draft Revised Forest Plan to read: "The corridor is managed in a way that provides habitat for waterfowl, "watchable" wildlife species, woodcock, and other riparian dependent species "
Letter 4038	Add the following new standard (tentatively numbered 29e) to page 2-64 of the Draft Revised Forest Plan under the heading "Wildlife": "Wildlife stand improvement (WSI) utilizing non-timber harvest methods is allowed to meet biological objectives "
Letter 4038	Add the following new standard (tentatively numbered 403s) on page 2-84 of the Draft Revised Forest Plan under "Wildlife" "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources Mast producing species may be planted in permanent wildlife clearing to increase mast diversity Non-invasive tree and shrub species will be used whenever practical "
Letter 4038	Add the following new standard (tentatively numbered 403r) on page 2-84 of the Draft Revised Forest Plan under "Wildlife" "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting Non-invasive tree and shrub species will be used whenever practical."
Letter 4038	Add the following new standard (tentatively numbered 403q) on page 2-84 of the Draft Revised Forest Plan under "Wildlife". "Grape arbors, old-home sites, grass savannahs and spring seeps are managed to key wildlife areas. Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas."
Letter 4038	Add the following new standard (tentatively numbered 403p) on page 2-84 of the Draft Revised Forest Plan under "Wildlife". "Prescribed burning should strive to create and maintain moderate herbaceous ground cover and abundant insect populations Burning should be conducted in but not limited to areas with slight slopes (<15%), moderate to high site indexes (60+), and low basal area (< or equal to 70) Controlled burning in suitable stands that have been thinned is preferred In areas that cannot be maintained by mowing or other methods, annual burning can be employed "
Letter 4038	Add the following new standard (tentatively numbered 403o) on page 2-84 of the Draft Revised Forest Plan under "Wildlife": "Prescribed burning is allowed to achieve wildlife objectives "
Letter 4038	Add the following new standard (tentatively numbered 403n) on page 2-84 of the Draft Revised Forest Plan under "Wildlife": "Grapevine control is not allowed "
Letter 4038	Add the following new standard (tentatively numbered 403m) on page 2-84 of the Draft Revised Forest Plan under "Wildlife": "Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards and spring seeps will be inventoried and documented in the Forest data base "
Letter 4038	Add the following new standard (tentatively numbered 403l) on page 2-84 of the Draft Revised Forest Plan under "Wildlife": "Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June) "
Letter 4038	Add the following new standard (tentatively numbered 534i) on page 2-106 of the Draft Revised Forest Plan under "Wildlife" "Grape arbors, old-home sites, grass savannahs, orchards and spring seeps are managed as key wildlife areas. Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas "
Letter 4038	Add the following new standard (tentatively numbered 534h) on page 2-106 of the Draft Management Plan under "Wildlife" Prescribed burning should strive to create and maintain moderate herbaceous ground cover and abundant insect populations Control burning in suitable stands that have been thinned is preferred In areas that cannot be maintained by mowing or other methods, annual burning can be employed "
Letter 4038	Add the following new standard (tentatively numbered 534g) on page 2-106 of the Draft Revised Forest Plan under "Wildlife". "Prescribed burning is allowed to achieve wildlife objectives "
Letter 4038	Add the following new standard (tentatively numbered 534f) on page 2-106 of the Draft Revised Forest Plan under "Wildlife": "Grapevine control is not allowed."
Letter 4038	Repeat Standard 563 (tentatively numbered 534e) under "Wildlife" on page 2-106 of the Draft Revised Forest Plan. "Four water sources per square mile will be provided, if possible."

Letter 4038 Add the following new standard (tentatively numbered 534d) on page 2-106 of the Draft Revised Forest Plan under "Wildlife": Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards, and spring seeps will be inventoried and documented in the Forest data base."

Letter 4038 Add the following new standard (tentatively numbered 534c) on page 2-106 of the Draft Revised Forest Plan under "Wildlife": Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June) "

Letter 4038 Add the following new standard (tentatively numbered 534b) on page 2-106 of the Draft Revised Forest Plan under "Wildlife" Permanent wildlife clearings will be maintained periodically "

Letter 4038 Change Standard 625 on page 2-122 of the Draft Revised Forest Plan to read "No grazing permits are issued without adequate fencing to protect riparian values "

Letter 4038 Repeat Standard 1027 (tentatively numbered 610e) under "Wildlife" on page 2-119 of the Draft Revised Forest Plan: "At least 5 percent of the Management Area should be maintained in the 135+ year class."

Letter 4038 Repeat Standard 1026 (tentatively numbered 610d) under "Wildlife" on page 2-119 of the Draft Revised Forest Plan. "At least 10 percent of the Management Area should be maintained in the 100+ year class."

Letter 4038 Add the following new standard (tentatively numbered 610c) on page 2-119 of the Draft Revised Forest Plan under "Wildlife". "At least 25 percent of the Management Area should be maintained in the 70+ year class "

Letter 4038 Add the following new standard (tentatively numbered 610b) on page 2-119 of the Draft Revised Forest Plan under "Wildlife" "At least 50 percent of the Management Area should be maintained in the 50+ year age class."

Letter 4038 Add the following new standard (tentatively numbered 610a) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "At least 5 percent of the Management Area should be maintained in the 1-10 year class which can occur as maintained openings, even-aged regeneration cut areas, or group selection cut areas "

Letter 4038 Replace Standard 610 on page 2-119 of the Draft Revised Forest Plan with: "Grapevines and grape arbors provide valuable wildlife food and cover and are usually associated with the better site index areas on the Forest Therefore, grapevine management is reviewed on a case-by-case basis and requires the approval of the appropriate State/USFS wildlife biologists Generally, control is only warranted when high quality timber will be significantly effected and when there is adequate grapevines and grape arbors present in surrounding stands "

Letter 4038 Add the following new standard (tentatively numbered 608l) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Firewood cutting in a closed timber sale cutting unit may be permitted for up to two years following the closure of the unit In these areas, cutting will only occur during the period of August 15 to April 15."

Letter 4038 Add the following new standard (tentatively numbered 608k) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources Mast producing species may be planted in permanent wildlife clearing to increase mast diversity. Non-invasive species are planted whenever practical."

Letter 4038 Add the following new standard (tentatively numbered 608j) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting Non-invasive species are planted whenever practical "

Letter 4038 Add the following new standard (tentatively numbered 608i) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Grape arbors, old-home sites, grass savannahs, orchards and spring seeps are managed as key wildlife areas Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas "

Letter 4038 Add the following new standard (tentatively numbered 608h) on page 2-119 of the Draft Revised Forest Plan under "Wildlife" "Prescribed burning should strive to create and maintain moderate herbaceous ground cover and abundant insect populations Burning should be conducted in, but is not limited to, areas with slight slopes (<15%), moderate to high site indexes (70+), and low basal area (< or equal to 70). Controlled burning in suitable stands that have been thinned is preferred In areas that cannot be maintained by mowing or other methods, annual burning can be employed "

Letter 4038	Repeat Standard 564 (tentatively numbered 608g) under "Wildlife" on page 2-119 of the Draft Revised Forest Plan. "Prescribed burning is allowed to achieve wildlife objectives "
Letter 4038	Add the following new standard (tentatively numbered 608f) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards and spring seeps will be inventoried and documented in the Forest data base."
Letter 4038	Add the following new standard (tentatively numbered 608e) on page 2-119 of the Draft Revised Forest Plan under "Wildlife", "Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June) "
Letter 4038	Add the following new standard (tentatively numbered 608d) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Permanent wildlife clearings will be maintained periodically "
Letter 4038	Add the following new standard (tentatively numbered 608c) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "All existing wildlife developments (permanent wildlife openings, waterholes, etc) are maintained "
Letter 4038	Add the following new standard (tentatively numbered 608b) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "When permanent wildlife openings are less than 5% of the compartment area, District Rangers look for opportunities to increase this area Considerations for new clearings should include. a Distribution - Areas without clearings or with poor distribution should be considered as priority sites b. Site Quality - Priority should be given, but is not limited to, areas with slight slopes (<15%) and high site indexes (>70) c. Spacing - Clearings should be scattered throughout the compartment rather than clumped. d Size and Shape - Linear clearings, 1-2 chains (66-132 feet) in width should be considered The area of the clearing can vary but should be at least 1 acre (66 feet x 660 feet) in size "
Letter 4038	Add the following new standard (tentatively numbered 608a) on page 2-119 of the Draft Revised Forest Plan under "Wildlife": "Ideally this management area will provide at least 5% of the compartment area in permanent wildlife openings Areas that are maintained by burning, road clearings, landings, fields, special uses and private lands with forest openings may contribute to this total Regeneration areas are not counted as permanent openings "
Letter 4038	Delete Standard 609 on page 2-119 of the Draft Revised Forest Plan
Letter 4038	Change Standard 608 on page 2-119 of the Draft Revised Forest Plan to read "Four water sources may be provided per square mile, if needed "
Letter 4038	Change Standard 594 on page 2-117 of the Draft Revised Forest Plan to read: "Roads constructed for timber harvesting may be left open, closed or closed seasonally to protect soil and water or to meet wildlife objectives "
Letter 4038	Repeat Standard 533 (tentatively numbered 593a) under "Roads" on page 2-117 of the Draft Revised Forest Plan "Closed roads are seeded with vegetation for wildlife species Fescue is not seeded for wildlife."
Letter 4038	Change the sixth paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan to read. "The Forest strives to maintain permanent herbaceous openings on at least 5% of this management area "
Letter 4038	Repeat Standard 1025 (tentatively numbered 587r) under "Wildlife" on page 2-115 of the Draft Revised Forest Plan. "At least 30 percent of the Management Area should be maintained in the 70+ year class "
Letter 4038	Add the following new standard (tentatively numbered 587q) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "At least 10 percent of the Management Area should be maintained in the 1-10 year class which can occur as even-aged regeneration cut areas or group selection cut areas "
Letter 4038	Add the following new standard (tentatively numbered 587p) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "Small (1/4 to 1/2 acre) plantings of native conifer species may be created for thermal cover in winter "
Letter 4038	Add the following new standard (tentatively numbered 587o) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "If natural drumming logs are not present at the desired rate of one per acre, after timber harvests are complete, the District Rangers strive to create potential drumming logs at this desired rate

Considerations for new drumming logs should include· a. Distribution - logs should be evenly distributed throughout the harvest unit at a rate of 1 per acre b. Location - logs should be located on relatively level ground since grouse require a relatively flat platform on which to display. On slopes (<20%) fell logs across the slope instead of downslope to create a level surface. c Size and Shape - potential drumming logs should be 10 inches DBH or more in diameter and at least 12 feet in length. Trees should be cut high, to provide a stump or snag 3-6 feet above the butt of the log. Long lasting species such as, locust, oak, hemlock are preferred."

Letter 4038 Add the following new standard (tentatively numbered 587n) on page 2-115 of the Draft Revised Forest Plan under "Wildlife": "Suitable drumming logs are considered critical and limiting to ruffed grouse associated with this management area Natural or potential drumming logs will be provided for, at a rate of one per acre, in any timber harvest cuts "

Letter 4038 Add the following new standard (tentatively numbered 587m) on page 2-115 of the Draft Revised Forest Plan under "Wildlife": "Firewood cutting in a closed timber sale cutting unit may be permitted for up to two years following the closure of the unit. In these areas, cutting will only occur during the period of June 15 to April 15."

Letter 4038 Add the following new standard (tentatively numbered 587l) on page 2-115 of the Draft Revised Forest Plan under "Wildlife"· "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources. Mast producing species may be planted in permanent wildlife clearings to increase mast diversity Non-invasive tree and shrub species will be used whenever practical."

Letter 4038 Add the following new standard (tentatively numbered 587k) on page 2-115 of the Draft Revised Forest Plan under "Wildlife": "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting Non-invasive tree and shrub species will be used whenever practical "

Letter 4038 Add the following new standard (tentatively numbered 587j) on page 2-115 of the Draft Revised Forest Plan under "Wildlife": "Grape arbors, old-home sites, grass savannahs, orchards and spring seeps are managed as key wildlife areas Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas."

Letter 4038 Add the following new standard (tentatively numbered 587i) on page 2-115 of the Draft Revised Forest Plan under "Wildlife"· "Prescribed burning should strive to create and maintain moderate herbaceous ground cover and abundant insect populations in savannah type habitats or enhance fruit and/or nut production in habitats such as blueberry or bear oak Priority should be given, but is not limited, to burning areas with slight slopes (<15%), moderate to high site indexes (60+), and low basal area (< or equal to 70). Controlled burning in suitable stands that have been thinned is preferred In areas that cannot be maintained by mowing or other methods, annual burning can be employed "

Letter 4038 Add the following new standard (tentatively numbered 587h) on page 2-115 of the Draft Revised Forest Plan under "Wildlife". "Prescribed burning is allowed to achieve wildlife objectives."

Letter 4038 Add the following new standard (tentatively numbered 587h) on page 2-115 of the Draft Revised Forest Plan under "Wildlife"· "Prescribed burning is allowed to achieve wildlife objectives."

Letter 4038 Add the following new standard (tentatively numbered 587g) on page 2-115 of the Draft Revised Forest Plan under "Wildlife"· "Grapevine control is not allowed."

Letter 4038 Add the following new standard (tentatively numbered 587f) on page 2-115 of the Draft Revised Forest Plan under "Wildlife": "Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards and spring seeps will be inventoried and documented in the Forest data base "

Letter 4038 Add the following new standard (tentatively numbered 587e) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June) "

Letter 4038 Add the following new standard (tentatively numbered 587d) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings will be maintained periodically "

Letter 4038	Add the following new standard (tentatively numbered 587c) on page 2-115 of the Draft Revised Forest Plan under "Wildlife". "All existing wildlife developments (permanent wildlife openings, waterholes, etc.) are maintained "
Letter 4038	Add the following new standard (tentatively numbered 587b) on page 2-115 of the Draft Revised Forest Plan under "Wildlife" "Considerations for new clearings should include a. Distribution - Areas without clearings or with poor distribution should be considered b. Site Quality - Priority should be given to areas with slight slopes (<15%) and high site indexes (>70) c Spacing - Clearings should be scattered out rather than clumped. d Size and Shape - Linear clearings, 1-2 chains (66-132 feet) in width should be considered. The area of the clearing can vary but should be at least 1 acre (66 feet x 660 feet) in size "
Letter 4038	Repeat Standard 562 (tentatively numbered 587a) under "Wildlife" on page 2-115 of the Draft Revised Forest Plan "Forest Officers strive to provide at least 2% of the compartment area (50 acres per 1,000 acres) in permanent wildlife openings Areas that are maintained by burning, road clearings, landings, fields, special uses and private lands with forest openings may contribute. Regeneration areas are not counted as permanent openings "
Letter 4038	Delete Standard 588 on page 2-115 of the Draft Revised Forest Plan.
Letter 4038	Replace Standard 587 on page 2-115 of the Draft Revised Forest Plan with. "Four water sources per square mile will be provided for, if possible "
Letter 4038	Repeat Standard 533 (tentatively numbered 579b) under "Roads" on page 2-114 of the Draft Revised Forest Plan "Closed roads are seeded with vegetation for wildlife species Fescue is not seeded for wildlife species "
Letter 4038	Repeat Standard 531 (tentatively numbered 579a) under "Roads" on page 2-114 of the Draft Revised Forest Plan· "District Rangers will reduce fulltime open road densities to less than 3 miles per 1,000 acres, and strive to reach a goal of 2 miles per 1,000 acres, within 5 years. Seasonally opened roads may exceed 3 miles per 1,000 acres to meet biological management objectives, if approved by the appropriate State/USFS biologists This includes both Forest Service roads and roads administered by other agencies or by individuals "
Letter 4038	Replace the fourth paragraph under Management Area 16 on page 2-113 of the Draft Revised Forest Plan with "Timber management, wildlife stand improvement (WSI) and prescribed burning are utilized to achieve wildlife objectives "
Letter 4038	Change the first paragraph under Management Area 16 on page 2-113 of the Draft Revised Forest Plan to read. "This 22,802-acre management area contains portions of the Forest that are managed to maintain or enhance habitat for wildlife species that prefer early successional habitats with dispersed permanent herbaceous clearings "
Letter 4038	Change Standard 573 on page 2-112 of the Draft Revised Forest Plan to read· "The average size of regeneration cuts in 20 acres, with a maximum of 25 acres "
Letter 4038	Change Standard 571 on page 2-112 of the Draft Revised Forest Plan to read "The Forest strives to attain an overall average rotation of even-aged stands of 125+ years. Rotation ages for even-age systems are varied between the following range. Upland Hardwoods - 90 to 200, Cove Hardwoods - 90 to 170, Scarlet/Black Oak - 80+, White Pine - 70+, Yellow Pine - 70+, Virginia Pine - 70+"
Letter 4038	Add the following new standard (tentatively numbered 567a) on page 2-112 of the Draft Revised Forest Plan under "Timber"· "Thinning will be designed to control the canopy in order to encourage brood range or desirable stand structure "
Letter 4038	Add the following new standard (tentatively numbered 562r) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "At least one designated walk-in spring gobbler hunting area is provided for each Ranger District "
Letter 4038	Add the following new standard (tentatively numbered 562q) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Firewood cutting in a closed timber sale cutting unit may be permitted for up to two years following the closure of the unit In these areas, cutting will only occur during the period of August 15 to April 15 "

Letter 4038 Add the following new standard (tentatively numbered 562p) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources Mast producing species may be planted in permanent wildlife clearing to increase mast diversity."

Letter 4038 Add the following new standard (tentatively numbered 562o) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting Non-invasive tree and shrub species will be used whenever practical "

Letter 4038 Add the following new standard (tentatively numbered 562n) on page 2-111 of the Draft Revised Forest Plan under "Wildlife". "Grape arbors, old-home sites, grass savannahs, orchards and spring seeps are managed as key wildlife areas Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas "

Letter 4038 Add the following new standard (tentatively numbered 562m) on page 2-111 of the Draft Revised Forest Plan under "Wildlife". "Prescribed burning should strive to create an open savannah type habitat and maintain moderate herbaceous ground cover and abundant insect populations Priority should be given, but is not limited, to burning areas with slight slopes (<15%), moderate to high site indexes (60+), and low basal area (< or equal to 70) Controlled burning in suitable stands that have been thinned is preferred. In areas that cannot be maintained by mowing or other methods, annual burning can be employed "

Letter 4038 Add the following new standard (tentatively numbered 562l) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Prescribed burning is allowed to achieve wildlife objectives "

Letter 4038 Add the following new standard (tentatively numbered 562k) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Grapevine control is not allowed "

Letter 4038 Add the following new standard (tentatively numbered 562j) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards and spring seeps will be inventoried and documented in the Forest data base "

Letter 4038 Add the following new standard (tentatively numbered 562i) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June) "

Letter 4038 Add the following new standard (tentatively numbered 562h) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings will be maintained periodically "

Letter 4038 Add the following new standard (tentatively numbered 562g) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "All existing wildlife developments (permanent wildlife openings, waterholes, etc) are maintained."

Letter 4038 Add the following new standard (tentatively numbered 562f) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "When permanent wildlife openings are less than 5% of the compartment area, Forest Officers look for opportunities to increase this area Considerations for new clearings should include. a Distribution - Areas without clearings or with poor distribution should be considered b. Site quality - Areas with slight slopes (<15%) and high site indexes (>70) should be considered. c. Spacing - Multiple clearings should be considered over a single clearing d Size and Shape - Linear clearings, 1-2 chains (66-132 feet) in width should be considered The area of the clearing can vary but should be at least 1 acre (66 feet x 660 feet) in size."

Letter 4038 Repeat Standard 1027 (tentatively numbered 562e) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "At least 5 percent of the Management Area should be maintained in the 135+ year class."

Letter 4038 Add the following new standard (tentatively numbered 562d) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" "At least 15 percent of the Management Area should be maintained in the 100+ year class "

Letter 4038 Add the following new standard (tentatively numbered 562c) on page 2-111 of the Draft Revised Forest Plan under "Wildlife". "At least 40 percent of the Management Area should be maintained in the 70+ year class."

Letter 4038 Add the following new standard (tentatively numbered 562b) on page 2-111 of the Draft Revised Forest Plan under "Wildlife" At least 60 percent of the Management Area should be maintained in the 50+ year age class "

Letter 4038 Repeat Standard 1024 (tentatively numbered 562a) on page 2-111 of the Draft Revised Forest Plan under "Wildlife": "At least 1 percent of the Management Area should be maintained in the 1-10 year class which can occur as rights-of-way, maintained openings, even-aged regeneration cut areas, or group selection cut areas "

Letter 4038 Change Standard 562 on page 2-111 of the Draft Revised Forest Plan to read· "Ideally, at least 5% of each compartment in this management area will be in permanent wildlife openings. Areas that are maintained by burning, road clearings, landings, fields, special uses and private lands with forest openings may contribute. Regenerate areas are not counted as permanent openings "

Letter 4038 Change Standard 561 on page 2-111 of the Draft Revised Forest Plan to read· "Public vehicle access is controlled from April 15 through August "

Letter 4038 Change Standard 560 on page 2-111 of the Draft Revised Forest Plan to read "Closed roads are seeded with grasses, forbs and legumes to provide moderate herbaceous growth and associated insect populations. Fescue is not permitted "

Letter 4038 Repeat Standard 939 (tentatively numbered 559a) on page 2-110 of the Draft Revised Forest Plan under "Roads". "New local roads are closed and managed as linear wildlife strips when the resource activity is completed, unless the road was constructed for recreation uses Areas adjacent roads are cleared and seeded for additional openings, if needed "

Letter 4038 Change Standard 557 on page 2-110 of the Draft Revised Forest Plan to read "District Rangers strive to minimize open road densities to less than one mile per 1,000 acres This includes both Forest Service roads and roads administered by other agencies or by individuals "

Letter 4038 Repeat Standard 533 (tentatively numbered 556a) under "Roads" on page 2-110 of the Draft Revised Forest Plan "Closed roads are seeded with vegetation for wildlife species Fescue is not seeded for wildlife species."

Letter 4038 Change the second paragraph under "Desired Future Condition" on page 2-109 of the Draft Revised Forest Plan to read. "Both Motorized (Subclass 2) and non-motorized recreation opportunities are provided. A variety of recreational activities can occur such as hiking, fishing, hunting, mountain biking, viewing scenery, and dispersed camping Public motorized travel may be seasonally prohibited (April through August) to protect physical and biological resources and wildlife habitat "

Letter 4038 Change the first paragraph under "Desired Future Condition" on page 2-109 of the Draft Revised Forest Plan to read· "Vegetation in this management area consists predominately of mature pine and hardwood stands providing habitat for a variety of wildlife species preferring permanent forest openings and hardwoods of mast-bearing age The area is managed to optimize hard and soft mast production and to provide a dispersed system of permanent forest openings Permanent forest openings and other suitable areas are managed to provide moderate herbaceous ground covers and abundant insect populations. Permanent wildlife openings are considered critical and limiting to the wildlife species associated with this Management Area. The transportation system is managed to minimize open road densities and impacts thereby providing for a great degree of isolation from motorized intrusion during wildlife reproductive seasons A sustained yield forest of balanced age classes with a minimum of 60% of the stands in mast bearing age is considered optimal "

Letter 4038 Change the third paragraph under Management Area 15 on page 2-109 of the Draft Revised Forest Plan to read· "Permanent wildlife forest openings will be provided and maintained to provide moderate herbaceous growths of grasses, forbs, and legumes "

Letter 4038 Change the first paragraph under Management Area 15 on page 2-109 of the Draft Revised Forest Plan to read "This 306,752-acre management area contains portions of the Forest that are managed to maintain or enhance habitat for wildlife favoring a more mature forest environment with permanent herbaceous clearings and freedom from disturbance during nesting and brood rearing seasons Vegetation characteristics and human activities are managed to provide high quality habitat for these species Development of high quality habitat and control of motorized access receive the highest considerations in relation to associated resources "

Letter 4038 Change Standard 546 on page 2-108 of the Draft Revised Forest Plan to read "The Forest strives to attain an overall average rotation of even-aged stands of 135+ years Rotation ages for even-age systems are varied

between the following range. Upland Hardwoods - 120 to 200, Cove Hardwoods - 120 to 170, Scarlet/Black Oak - 80+, White Pine - 80+, Yellow Pine - 80+, Virginia Pine - 80+"

Letter 4038 Add the following new standard (tentatively numbered 543a) on page 2-107 of the Draft Revised Forest Plan under "Timber": "Prescribed burning is allowed to achieve wildlife objectives (see 544) "

Letter 4038 Add the following new standard (tentatively numbered 534p) on page 2-106 of the Draft Revised Forest Plan under "Wildlife". At least 10 percent of the Management Area should be maintained in the 135+ year class "

Letter 4038 Add the following new standard (tentatively numbered 534o) on page 2-106 of the Draft Revised Forest Plan under "Wildlife": "At least 30 percent of the Management Area should be maintained in the 100+ year class."

Letter 4038 Add the following new standard (tentatively numbered 534n) on page 2-106 of the Draft Revised Forest Plan under "Wildlife". "At least 50 percent of the Management Area should be maintained in the 70+ year class."

Letter 4038 Add the following new standard (tentatively numbered 534m) on page 2-106 of the Draft Revised Forest Plan under "Wildlife": "At least 70 percent of the Management Area should be maintained in the 50+ year age class."

Letter 4038 Repeat Standard 1024 (tentatively numbered 534l) under "Wildlife" on page 2-106 of the Draft Revised Forest Plan: "At least 1 percent of the Management Area should be maintained in the 1-10 year class which can occur as rights-of-way , maintained openings, even-aged regeneration cut areas, or group selection cut areas."

Letter 4038 Add the following new standard (tentatively numbered 534k) on page 2-106 of the Draft Revised Forest Plan under "Wildlife" "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources. Mast producing species may be planted in permanent wildlife clearings to increase mast diversity "

Letter 4038 Add the following new standard (tentatively numbered 534j) on page 2-106 of the Draft Revised Forest Plan under "Wildlife" "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting. Non-invasive tree and shrub species are used whenever practical "

Letter 4038 Delete Standard 1028 on page 2-178 of the Draft Revised Forest Plan

Letter 4038 Add the following new standard (tentatively numbered 1023q) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "Firewood cutting in a closed timber sale cutting unit may be permitted for up to two years following the closure of the unit In these areas, cutting will only occur during the period of August 15 to April 15."

Letter 4038 Add the following new standard (tentatively numbered 1023p) on page 2-178 of the Draft Revised Forest Plan under "Wildlife" "Mast producing species will be planted when it is determined that natural regeneration will not provide adequate future mast sources Mast producing species may be planted in permanent wildlife clearing to increase mast diversity "

Letter 4038 Add the following new standard (tentatively numbered 1023o) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "Trees and shrubs with a high value for wildlife habitat will be encouraged and maintained by planting, release, pruning, fertilizing and grafting. Non-invasive tree and shrub species will be used whenever practical "

Letter 4038 Add the following new standard (tentatively numbered 1023n) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "Prescribed burning should strive to maintain grass/forb clearings or to create an open savannah type habitat and maintain moderate herbaceous ground cover and abundant insect populations. Priority should be given, but is not limited, to burning areas with slight slopes (<15%), moderate to high site indexes (60+), and low basal area (< or equal to 70) Control burning in suitable stands that have been thinned is preferred In areas that cannot be maintained by mowing or other methods, annual burning can be employed "

Letter 4038 Add the following new standard (tentatively numbered 1023m) on page 2-178 of the Draft Revised Forest Plan under "Wildlife" "Prescribed burning is allowed to achieve wildlife objectives "

Letter 4038 Add the following new standard (tentatively numbered 1023l) on page 2-178 of the Draft Revised Forest Plan under "Wildlife" "Grapevine control is not allowed "

Letter 4038 Add the following new standard (tentatively numbered 1023k) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "Four water sources per square mile will be provided, if possible "

Letter 4038 Add the following new standard (tentatively numbered 1023j) on page 2-178 of the Draft Revised Forest Plan under "Wildlife" "Grape arbors, old-home sites, grass savannahs, orchards, and spring seeps are managed as key wildlife areas Prescribed burning and WSI are available to maintain the vegetative characteristics of these areas."

Letter 4038 Add the following new standard (tentatively numbered 1023i) on page 2-178 of the Draft Revised Forest Plan under "Wildlife" "Permanent wildlife clearings, grape arbors, old-home sites, grass savannahs, orchards and spring seeps will be inventoried and documented in the Forest data base "

Letter 4038 Add the following new standard (tentatively numbered 1023h) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "Permanent wildlife clearings are not maintained by mechanical chemical or burning means during the nesting season (April-June).

Letter 4038 Add the following new standard (tentatively numbered 1023g) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "Permanent wildlife clearings will be maintained periodically "

Letter 4038 Add the following new standard (tentatively numbered 1023f) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "All existing wildlife developments (permanent wildlife openings, waterholes, etc) are maintained "

Letter 4038 Add the following new standard (tentatively numbered 1023e) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "When permanent wildlife openings are less than 1% of the compartment, District Rangers look for opportunities to increase this habitat Areas that are maintained by burning, road clearings, landings, fields, special uses and adjacent private open lands may contribute Regeneration areas are not counted as permanent openings. Considerations for new clearings should include. a Distribution - Areas without clearings or with poor distribution should be considered b. Site Quality - Areas with slight slopes (<15%) and high site indexes (>70) should be given priority c Spacing - Multiple clearings should be considered over a single clearing d Size and Shape - Linear clearings, 1-2 chains (66-132 feet) in width should be considered The area of the clearing can vary but should be at least 1 acre (66 feet x 660 feet) in size "

Letter 4038 Add the following new standard (tentatively numbered 1023d) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "Openland habitats are very limited on the Forest These areas offer the primary opportunity for the Forest to manage for species preferring grassland type habitats, and therefore are critical areas for wildlife management When current agricultural leases expire, future leases will provide for expanded wildlife habitat developments These areas would add valuable habitat for numerous wildlife species, as well as increase the opportunities for watchable wildlife programs "

Letter 4038 Add the following new standard (tentatively numbered 1023c) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "Grazing is not emphasized, except where prescribed by the appropriate Federal/State wildlife biologists as the most feasible method for meeting habitat objectives Emphasis is placed on maintenance of early successional vegetation for American woodcock, Regal Fritillary (butterfly), loggerhead shrike, and other early successional, open land species, instead of livestock production "

Letter 4038 Add the following new standard (tentatively numbered 1023b) on page 2-178 of the Draft Revised Forest Plan under "Wildlife". "During thinning or shelterwood harvests leave a variety of mast producing tree species (oaks, hickory, black gum, beech, ash, etc) as crop trees in the residual stand "

Letter 4038 Add the following new standard (tentatively numbered 1023a) on page 2-178 of the Draft Revised Forest Plan under "Wildlife": "During timber harvests and site preparation leave active and potential wildlife cavity trees (den trees) to provide critical habitat for cavity nesting birds and mammals. Leave a minimum of 3 cavity trees per acre. In addition, during TSI, WSI and site preparation, an average of 5 standing dead snags should be retained per acre, if present, in the form of large hardwood trees (greater than 12 inches DBH) for perch trees, potential cavity trees and feedings sites for insect foraging birds and mammals "

Letter 4038 Replace Standard 1023 on page 2-178 of the Draft Revised Forest Plan with "Wildlife leave areas should be left in regeneration harvests at a rate of one acre per twenty acres of cut. These leave clumps consist of selected groups of overstory and understory vegetation that are protected and managed to assure a variety of hard and soft mast, cover species and unique habitats or key wildlife areas, such as spring seeps Leave areas should be connected to the adjacent stand by an uncut corridor "

Letter 4038 Change Standard 1022 on page 2-177 of the Draft Revised Forest Plan to read. "For understory species WSI, proper management allows full sunlight on at least 30 percent of the forest floor For hardwood overstory WSI, thinning encourages full crown development, vigorous growth, and soft or hard mast production. When thinning stands older than 30 years, stems are favored which show positive indication of bearing soft or hard mast."

Letter 4038 Change Standard 1021 on page 2-177 of the Draft Revised Forest Plan to read "Wildlife stand improvement (WSI) seeks to encourage mast production, improve vegetation species composition in timber stands and to develop wildlife habitat areas for game and non-game species. A variety of wood and herbaceous species suited to site conditions and burning regime are maintained to assure year-round quality habitat. In all WSI, TSI and reforestation, shrubs beneficial to wildlife will be retained (ie dogwood, crabapple, hawthorn, witch hazel, black haw, American hornbeam, serviceberry, etc). Exceptions that may reduce plant species variety include treatments to improve habitat for PETS species "

Letter 4038 Change Standard 1020 on page 2-177 of the Draft Revised Forest Plan to read "Generally, underburns are not scheduled during the nesting season (April thru June) to avoid disrupting reproductive activities. Forest managers may, however, use burns to meet specific management objectives, such as enhancing habitat of threatened and endangered species, reestablishing natural ecosystems, and site preparation Burns are planned and executed to avoid damage to habitat of any PETS species "

Letter 4038 Change Standard 989 on page 2-171 of the Draft Revised Forest Plan to read. "Eagle and Peregrine falcon nests are protected Minimum buffers around nests are determined on a case-by-case basis by the appropriate Federal and State wildlife biologists."

Letter 4038 Change Standard 988 on page 2-171 of the Draft Revised Forest Plan to read. "In stands containing a red spruce component, that component is not available for harvesting, however, the remaining portion of the stand would be available in an effort to increase the red spruce component."

Letter 4038 Change Standard 985 on page 2-171 of the Draft Revised Forest Plan to read. "The Forest should determine priorities for preparation of management and monitoring plans for PETS species that are consistent with Federal and State recovery plants, but also for other rare species w/out formal recovery plans."

Letter 4038 Change Standard 939 on page 2-166 of the Draft Revised Forest Plan to read. "New local roads are closed and managed as linear wildlife strips when the resource activity is completed, unless the road was constructed for recreation uses Roads may be daylighted for maintenance purposes and road sides may be cleared and seeded for additional openings, if needed "

Letter 4038 Repeat Standard 533 (tentatively numbered 538a) on page 2-166 of the Draft Revised Forest Plan under "Roads". "Closed roads are seeded with vegetation for wildlife species Fescue is not seeded for wildlife species."

Letter 4038 Change Standard 707 on page 2-131 of the Draft Revised Forest Plan to read. "Management activities are conducted to enhance riparian dependent species In riparian areas adjacent to intermittent streams, management activities can be conducted to benefit upland wildlife species if riparian resources are not impaired "

Letter 4038 Add the following new standard (tentatively numbered 534A) on page 2-106 under "Wildlife" All existing wildlife developments (permanent wildlife openings, waterholes, etc) are maintained "

Letter 4038 Add a "Wildlife" section on page 2-106 of the Draft Revised Forest Plan

Letter 4038 Change Standard 533 on page 2-106 of the Draft Revised Forest Plan to read "Closed roads are seeded with vegetation for wildlife species Fescue is not seeded for wildlife species "

Letter 4038	Delete Standard 532 on page 2-106 of the Draft Revised Forest Plan.
Letter 4038	Change Standard 531 on page 2-106 of the Draft Revised Forest Plan to read. "District Rangers will reduce open road densities to less than 1/4 mile per 1,000 acres, wherever possible, within 5 years This includes both Forest Service roads and roads administered by other agencies or by individuals "
Letter 4038	Add the following new standard (tentatively numbered 403v) on page 2-84 of the Draft Revised Forest Plan under "Wildlife" "Small (1/4 to 1/2 acre) plantings of native conifer species may be created for thermal cover in winter "
Letter 4038	Add the following new standard (tentatively numbered 403u) on page 2-84 of the Draft Revised Forest Plan under "Wildlife" "If natural drumming logs are not present at the desired rate of one per acre, after timber harvests are complete, the Forest Officers strive to create potential drumming logs at this desired rate Considerations for new drumming logs should include a Distribution - logs should be evenly distributed throughout the harvest unit at a rate of 1 per acre b Location - logs should be located on relatively level ground since grouse require a relatively flat platform on which to display On slopes (<20%) fell logs across the slope instead of downslope to create a level surface c Size and shape - potential drumming logs should be 10 inches DBH or more in diameter and at least 12 feet in length. Trees should be cut high, to provide a stump or snag 3-6 feet above the butt of the log Long lasting species such as locust, oak, hemlock are preferred "
Letter 4038	Add the following new standard (tentatively numbered 403t) on page 2-84 of the Draft Revised Forest Plan under "Wildlife". "Firewood cutting in a closed timber sale cutting unit may be permitted for up to two years following the closure of the unit. In these areas, cutting will only occur during the period of June 15 to April 15 "
Letter 4038	Add the following new standard (tentatively numbered 403k) on page 2-84 of the Draft Revised Forest Plan under "Wildlife· "Permanent wildlife clearings will be maintained periodically "
Letter 4038	Add the following new standard (tentatively numbered 403j) on page 2-84 of the Draft Revised Forest Plan under "Wildlife"· "All existing wildlife developments (permanent wildlife openings, waterholes, etc) are maintained."
Letter 4038	Add the following new standard (tentatively numbered 403i) on page 2-84 of the Draft Revised Forest Plan under "Wildlife"· "When permanent wildlife openings are less than 5% of the compartment area, Forest Officers look for opportunities to increase this area Considerations for new clearings should include a Distribution - Areas without clearings or with poor distribution should be considered b Site Quality - Areas with slight slopes (<15%) and high site indexes (>70) should be considered c Spacing - Multiple clearings should be considered over a single clearing d Size and Shape - Linear clearings, 1-2 chains (66-132 feet) in width should be considered The area of the clearing can vary but should be at least 1 acre (66 feet x 660 feet) in size "
Letter 4038	Repeat Standard 562 (tentatively numbered 403h) under "Wildlife" on page 2-84 of the Draft Revised Forest Plan. "Forest Officers strive to provide at least 5% of the compartment area (50 acres per 1,000 acres) in permanent wildlife openings Areas that are maintained by burning, road clearings, landings, fields, special uses and private lands with forest openings may contribute Regeneration cut areas are not counted as permanent openings "
Letter 4038	Repeat Standard 587 (tentatively numbered 403g) under "Wildlife" on page 2-84 of the Draft Revised Forest Plan "Four water sources per square mile will be provided for, if possible "
Letter 4038	Add a "Wildlife" section in Management Area 11 on page 2-84 of the Draft Revised Forest Plan.
Letter 4038	Repeat Standard 586 (tentatively numbered 403f) under "Timber" on page 2-83 of the Draft Revised Forest Plan "Grapevine control is not allowed "
Letter 4038	Change Standard 523 on page 2-104 of the Draft Revised Forest Plan to read "Existing wildlife habitat improvements can be maintained Additional improvements are permitted so long as they achieve overall biological objectives "
Letter 4038	Add the following new standard (tentatively numbered 291d) to page 2-64 of the Draft Revised Forest Plan under the heading "Wildlife" "Identification of additional sites containing PETS or sensitive species within management area #9 are reviewed for addition to management area #4 "

Letter 4038 Add the following new standard (tentatively numbered 291c) to page 2-64 of the Draft Revised Forest Plan: "Management for PETS species may occur throughout the area."

Letter 4038 Add the following new standard (tentatively numbered 291b) to page 2-64 of the Draft Revised Forest Plan under the heading "Wildlife" "Prescribed burning is allowed to achieve biological objectives."

Letter 4038 Add the following new standard (tentatively numbered 291a) to page 2-64 of the Draft Revised Forest Plan under the heading "Wildlife" "Uneven-aged management is permitted if necessary to achieve overall biological objectives and maintain biological diversity, but is restricted to areas accessible from roads and trails."

Letter 4038 Add the following new standard (tentatively numbered 287a) to page 2-64 of the Draft Revised Forest Plan under the heading "Trails". "Mountain bike trails are acceptable when dispersed throughout the area if they do not conflict with biological values."

Letter 4038 Add the following new standard (tentatively numbered 279a) to page 2-63 of the Draft Revised Forest Plan under the heading "Roads". "Closed roads are seeded for wildlife species Fescue is not seeded for wildlife species "

Letter 4038 Change Standard 279 on page 2-63 of the Draft Revised Forest Plan to read: "No new road construction is permitted. Reconstruction of old roads and trails is limited to protection of biological values or to provide limited access for habitat management activities or to complete development of loop trails Existing roads will be maintained and continue to be used "

Letter 4038 Change the existing fifth paragraph on page 2-62 of the Draft Revised Forest Plan to a new seventh paragraph that reads "Opportunities are provided for primitive, dispersed recreation experiences, including hunting and fishing, that emphasize solitude and challenge. Human travel is principally on system trails, although some existing system roads may remain open or be opened seasonally Campsites may be designated and show evidence of repeated, but acceptable levels of use Trailheads, hunter and fisherman access and signing are provided "

Letter 4038 Change the first paragraph under "Desired Future Condition" on page 2-33 of the Draft Revised Forest Plan to read "The existence of exemplary examples of biological diversity and the condition of the existing vegetation are the main reasons for designation of a site as a Research Natural Area The existing ecosystem within a Research Natural Area will be the result of the maintenance or re-establishment of natural ecological processes Species which favor natural vegetation influenced by natural environmental and ecological processes will predominate in the areas where this management designation is applied "

Letter 4038 Change the third paragraph under "Research Natural Areas" on page 2-33 of the Draft Revised Forest Plan to read: "Little Laurel Research Natural Area is part of a national network of field ecological areas designated in perpetuity for research and education and to maintain biological diversity on National Forest lands The purpose of this management area is to protect the Little Laurel Research Natural Areas for future consideration for designation "

Letter 4038 Add a new introductory paragraph under "Research Natural Areas" on page 2-33 of the Draft Revised Forest Plan: "Research Natural Areas (RNA) are part of a national network of ecological areas designed for research and/or preservation of biological diversity on National Forest Lands The purpose of RNA establishment is to build a national system of areas encompassing a wide array of actual communities The designation and management of these areas contribute to the implementation of provisions of the Endangered Special Act and the National Forest Monitoring Act The Management Area category for Research Natural Areas shall include existing as well as candidate Research Natural Areas A candidate Research natural Area will be managed in accordance with the Standards for existing RNA's, until a formal decision is made against RNA designation for that area "

Letter 4038 Add the following new standard (tentatively numbered 32b) to page 2-29 of the Draft Revised Forest Plan under the heading "Wildlife" "The introduction of non-native plant or animal species to the areas shall be prohibited "

Letter 4038 Add the following new standard (tentatively numbered 32a) to page 2-29 of the Draft Revised Forest Plan under the heading "Wildlife" "New wildlife improvements may be constructed if these improvements are consistent with the management goals for a specific area "

Letter 4038 Change Standard 32 on page 2-29 of the Draft Revised Forest Plan to read "Existing wildlife improvements will be maintained if they do not conflict with the management goals for a specific area "

Letter 4038	Change Standard 31 on page 2-29 of the Draft Revised Forest Plan to read· "Wildlife habitat management practices are restricted to those necessary to protect populations of threatened, endangered, proposed, or sensitive species and exemplary natural communities."
Letter 4038	Add the following new standard (tentatively numbered 29b) to page 2-29 of the Draft Revised Forest Plan under the heading "Timber and Other Vegetation" "Localized tree cutting may occur if it is shown to be consistent with the special biological management objectives for the site."
Letter 4038	Change Standard 29 on page 2-29 of the Draft Revised Forest Plan to read· "Special Interest Areas are classified as unsuitable for timber production."
Letter 4038	Add the following new standard (tentatively numbered 26a) on page 2-29 of the Draft Revised Forest Plan under the heading "Roads" "New road construction is not permitted within a Special Interest Area unless that road will contribute to the biological management objectives for the site "
Letter 4038	Change Standard 24 on page 2-29 of the Draft Revised Forest Plan to read. "Limited non-motorized dispersed recreational use of a Special Interest Area is permissible, but should not be encouraged Any form of recreational use that interferes with the purposes for which the Special Interest Area was established should be prohibited "
Letter 4038	Change Standard 15 on page 2-28 of the Draft Revised Forest Plan to read. "Special Interest Areas will be managed to meet a visual quality objective of retention "
Letter 4038	Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the sixth paragraph under Desired Future Condition· "All proposed management activities within Special Interest Areas should be approved by the Virginia Natural Heritage Program "
Letter 4038	Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the fifth paragraph under Desired Future Condition. "All conflicts that develop between biological resource protection and existing or proposed activities within a Special Interest Area shall be resolved in favor of those activities that least impact the natural environment and are consistent with the special biological management objectives for the area "
Letter 4038	Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the fourth paragraph under Desired Future Condition "The continuance or reintroduction of natural processes is the most significant consideration when determining management activities for Special Interest Areas. Habitat is protected and managed for rare species and exemplary natural communities "
Letter 4038	Management Area 4 - Add the following paragraph to page 2-27 of the Draft Revised Forest Plan as the third paragraph under Desired Future Condition "Visitors to a Special Interest Area could expect to see representative examples of the natural communities of the region Limited primitive, non-motorized dispersed recreation opportunities are provided that do not conflict with the special biological values of the area "
Letter 4038	Add the following new standard (tentatively numbered 111b) to page 2-40 of the Draft Revised Forest Plan under the heading "Wildlife" "Management decisions should give preference to protecting natural heritage resources over other trail values when conflicts arise "
Letter 4038	Add the following new standard (tentatively numbered 111a) to page 2-40 of the Draft Revised Forest Plan under the heading "Wildlife" "Following completion of an inventory of natural heritage resources in the trail corridor, a monitoring and management plan will be developed and appropriate measures taken to insure competent management and monitoring of identified heritage resources "
Letter 4038	Add the following new standard (tentatively numbered 77b) to page 2-35 of the Draft Revised Forest Plan under the heading "Wildlife" "New improvements may be constructed if these improvements are consistent with the management goals for a specific area "
Letter 4038	Add the following new standard (tentatively numbered 77a) to page 2-35 of the Draft Revised Forest Plan under the heading "Wildlife" "The introduction of non-native plant or animal species to the areas shall be prohibited "

Letter 4038 Change Standard 77 on page 2-35 of the Draft Revised Forest Plan to read "Wildlife habitat management practices are restricted to those necessary to protect populations of threatened, endangered, proposed, or sensitive species and exemplary natural communities"

Letter 4038 Replace the eighth paragraph on page 2-19 of the Draft Revised Forest Plan with the following new ninth paragraph "Wildlife habitat management objectives on previously farmed tracts include maintaining the open, brushy field habitat type. This is accomplished using a variety of methods including controlled burning, mowing, discing and seeding preferred wildlife food and cover plants, maintaining orchards and arbors, and/or planting new fruit-bearing shrubs and trees Small impoundments and moist soil management areas for waterfowl may be developed where appropriate"

Letter 4038 Replace the fifth paragraph on page 2-19 of the Draft Revised Forest Plan with the following. "Management Area 14 emphasizes quality habitat for species favoring older vegetation and freedom from frequent human disturbance, such as cerulean warbler, worm-eating warbler, black-and-white warbler, acadian flycatcher, black bear, pileated woodpecker, gray squirrel, etc"

Letter 4038 Replace the second paragraph on page 2-19 of the Draft Revised Forest Plan with the following· "The desired future condition is a variety of habitats that meet the needs of all existing native flora and fauna Sixteen distinct management areas that range from wilderness and remote highlands to more intensively managed lands are used to create a blend of habitats Habitats are provided for plant and animal species associated with late successional communities and limited human disturbance"

Letter 4219 *In light of the biological rationale for management of the G.W in the preferred alternative, the biological aspect* of each management area prescriptions should be further developed and emphasized

Letter 4226 *Some uncertainty exists, it seems, as to whether [Standard] 756, is to be applied to SBAs. Assuming it does,* it is important to specify for public comment which practices listed on pp. 2-139 to 2-142 of the Plan are to be operational in both the SBAs and Remote Highlands in Laurel Fork Ron suggested that only salvage-removal *would likely apply to Laurel Fork's SBA*

Letter 4268 Plan - All construction activities should avoid nesting/spawning seasons of affected wildlife.

Letter 4268 Plan - Management Areas 14 and 15 describe standards to maintain or enhance wildlife habitat. EPA recommends that more stringent restrictions on roadbuilding be incorporated Motorized vehicular use should also be restricted Given the large number of road miles currently available, it seems unlikely that more of the Forest needs to be opened to this use Providing for dead, dying or snag trees be an active management tool Providing adequate numbers of these "microhabitats" has long-term wildlife and ecosystem benefits.

Response These letters contained numerous specific comments relating to suggested wording changes, deletions, additions, corrections, and clarifications in relation to wildlife. Most comments were directed towards Management Areas 4, 9, 14, 15, and 16, and to Common Standards

These comments were carefully analyzed, and revisions have been made Management Area 4 now contains 38 biological areas, the home range for the Cow Knob Salamander, the Little Laurel Run RNA, two geologic areas and ten historic sites Management Areas 4, 9, 14, 15, and 16 have been edited and reflect the input of the public comments In many cases there were conflicting recommendations For example, a variety of different opening size limits were recommended for Management Area 16. In Management Area 9, some publics wanted more management restrictions, some wanted less It is not possible to accommodate all recommendations. Therefore, revisions were based on the Revised Plan theme, management area emphasis, biological needs and compatibility, and implementability

To better accommodate the wishes of the public, a new management area was created Management Area 22 contains small portions of the Forest that are to be managed very intensively for wildlife

Chapter 3 of the Revised Plan presents the new descriptions for these management areas Common Standards as well as Management Area standards have been revised

Letter 3728	On the West Va portion of the Dry River RD, Milam, Cow Knob, Fort Seybert & Brandywine quads, it is recommended that Mgmt. Area 15 be changed to Mgmt Area 14 following and above the 2600-foot contour level from Camp Run Road (State Rt. 3/1) on the north to the Rt 33 corridor on the south
Response	Alternative 11 examines a range of allocations for this particular area, including the recommended change to Management Area 14. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because if allocated using the recommendation, only a very narrow strip of Management Area 14 would occur between Management Area 15 (below 2600 foot elevation) and Management Area 4 (above 3,000 foot elevation) It would be very difficult to manage such a narrow strip per the recommendation
Letter 3728	On the West Va portion of the Dry River RD, Brandywine quad, it is recommended that Mgmt. Area 14 be changed to Mgmt Area 15 from Trail #1023 on the north to the Rt 33 corridor on the south and below the 2600-foot contour level
Response	Alternative 13 examines a range of allocations for this particular area, including the recommended change to Management Area 15. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because the ID team believes this is the best location for Management Area 14 on the West Virginia portion of the Dry River Ranger District.
Letter 3728	On the West Va. portion of the Lee RD, Wardensville & Woodstock quads, it is recommended that Mgmt Area 9 (Big Schloss) be changed to Mgmt Area 15 from the boundary with the Commonwealth of Virginia south along the 2400-foot contour interval on the west side of Paddy Mountain, north of Sugar Knob to the top of Mill Mountain, then north along the crest until the private land in Wilson Cove is reached
Letter 3728	On the West Va portion of the Lee RD, Wardensville & Baker quads, it is recommended that Mgmt. Area 9 (Big Schloss) be changed to Mgmt Area 15 from the west side of the private land in Wilson Cove and south of State Rt 5/1 following numerous elevation changes between 1700 and 2400-foot contours until the private land southwest of Sandstone Spring is reached
Letter 3728	On the West Va portion of the Lee RD, Wolf Gap quad, it is recommended that Mgmt Area 9 (Big Schloss) be changed to Mgmt Area 14 from the private land southwest of Sandstone Spring south along the 2400-foot contour level to Wolf Gap.
Letter 4038	On the Lee RD, Wolf Gap quad, it is recommended that MA 9 (part of Big Schloss) be changed to MA 15 from Mill Creek on the north to FDR #675 on the south and from the boundary with West Virginia east to FDR #92
Response	Alternatives 2, 7, 10, and 12 allocate this particular area to a similar management area, namely Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 21 to maintain the integrity of the Big Schloss Roadless Area There are other areas that can be allocated to Management Area 15. The final decision regarding land allocations will consider the significant public involvement that has occurred. See the Record of Decision
Letter 3728	On the West Va. portion of the Lee RD, Wolf Gap & Lost City quads, it is recommended that Mgmt Area 14 be changed to Mgmt. Area 15 around Trout Pond Recreation Area.
Response	Alternatives 2, 7, 10, and 12 allocate this particular area to a similar management area, namely Management Area 14. While consistent with the overall theme, the preferred alternative allocates the Trout Pond area for to Management Area 13 where dispersed recreation is emphasized The main indicator species for Management Area 15 is the Wild Turkey Bailey and Rinell (1968) state that turkey populations are inversely proportional to human population densities Since a lot of people visit the Trout Pond area, It is not appropriate to use a Management Area 15 designation near this recreational area
Letter 3728	On the West Va portion of the Lee & Dry River RD's, numerous quads, it is recommended that Mgmt Area 4's, namely Camp Run Prairie, Trout Pond, South Buck, and North Buck Mountain Biological Areas, except for along Shenandoah Mt, be changed to Mgmt Area 15

Letter 4038 On the Pedlar RD, Big Levels quad, it is recommended that MA 4 be changed to MA 16 north of the Coal Road.

Response Alternative 7 has been changed. There are no "special biological areas" in this alternative. It allocates these particular areas to Management Areas other than Management Area 4. This recommendation is not consistent with the overall theme of the preferred alternative. The management area has not been changed in the preferred alternative because these areas are important as key components and concentrations of the Forest's biological diversity These areas typically include high quality representation of natural communities such as shale barrens, caves and karst features, wetlands, and habitat for threatened, endangered and sensitive species.

Letter 3840 Lee District - Sours Creek Area was originally a wildlife management area which was traded by the state. This area has been designated as MA 17 - what was originally deemed valuable enough to be managed as a wildlife management area should remain so and a MA 15 would be in keeping with its character and historic use.

Letter 4038 On the Lee RD, Timberville and Fulks Run quads, it is recommended that MA 17 be changed to MA 15 west of State Rt. 610.

Response Alternatives 2, 6, 7, 11, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 15. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 17 because of its high concentrations of high quality timber, it's highly roaded nature, and the fact that it consists of small, irregularly shaped public lands intermingled with private land. The area has been harvested in the past and the new forest needs nurturing through release work and thinnings Because of the small area, broken ownership pattern, existing amount of roads, and investments needed for the timber resource, the area is better managed under Management Area 17 than under Management Area 15.

Letter 3848 Forest Road 492 has been officially closed above the crossing of Black/Gum Run due to much of the road being obliterated by the 1985 flood. The map indicates this road as open We would like the perimeter of area 9 in this location moved down to the parking area at the FS gate near the forest boundary to include this closure.

Response Alternatives 3, 6, and 9 examine a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 to exclude this road from the Gum Run Roadless Area. The inventory boundary for the roadless area excludes FDR #492, thus allocating it and a small amount of land to the adjacent Management Area 15. It is more important to maintain consistency and use the roadless area boundary. In the site-specific decision which closed FDR #492, the District Ranger stated that the road closure would remain in effect until the internal road system can be improved to the point that motorized traffic will not cause unacceptable resource damage to the area.

Letter 87 On the James River RD, Clifton Forge quad, it is recommended that Management Area 17 be changed to Management Area 14 on the west slope of Middle Mountain from McGraw Gap to the boundary with the Warm Springs Ranger District

Response Alternative 6 examines a range of allocations for this particular area, including the recommended change to Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because low elevations exist in this area Management Area 14 was more appropriate for *the high elevations of Warm Springs Mountain just west of this area*

Letter 87 On the Warm Springs RD, Millboro and Nimrod Hall quads, it is recommended that Management Areas 9, 14 and 15 be changed to Management Area 7 for the foreground VQO zone along FDR #129, thus removing open roads from Management Areas 14 and 15

Response No alternative examines the recommended Management Area for the particular area. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because this road is neither a sensitivity level 1 travel route, a Virginia Byway, nor access to major recreational or interpretive facilities on or near the Forest

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 9 be changed to Management Area 15 west of FDR #362

Response Alternatives 7 and 12 examine a range of allocations for this particular area, including the recommended change to Management Area 15. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because the area contains 18 stands that have been harvested since 1981 These units are very evident to those recreationists seeking a primitive experience. Allocating Management Area 14 to this northern area also provides a habitat link for the movement of plants and animals between the Rich Hole and Rough Mountain Wildernesses Because of the area's presence between two wildernesses, Management Area 14 provides a better blend of compatible wildlife, recreation, and timber values than Management Area 15

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 14 be changed to Management Area 9 east of FDR #362 to the top of Mill Mountain

Letter 4038 On the James River RD, Longdale Furnace and Nimrod Hall quads, it is recommended that Mill Mt Roadless Area be changed to MA 15

Response Alternatives 7 and 12 partially examine a range of allocations for this area, including the recommended change to Management Area 15 Alternatives 2 and 10 allocate this area to a similar Management Area 14 Alternatives 6, 9, and 11 allocate this area to Management Area 9 or similar Management Area 8 The preferred alternative allocates Mill Mountain Roadless Area to two Management Areas· 9 and 14 The north part is allocated to Management Area 14 because the area contains 18 stands that have been harvested. These units are very evident to those recreationists seeking a primitive experience. Allocating Management Area 14 on the north also provides a habitat link for the movement of plants and animals between the Rich Hole and Rough Mt Wildernesses Because of the area's presence between two wildernesses, Management Area 14 provides a better blend of compatible wildlife, timber, and recreation values than Management Area 15. However, the northern part contains timber and wildlife values that outweighs its value as wilderness or providing primitive recreation experiences The southern part has been allocated to Management Area 9 in the preferred alternative The reader is encouraged to review the description of Mill Mountain Roadless Area in FEIS Appendix C.

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 14 be changed to Management Area 15 east of Lick Run and along a contour level west of Lick Run to leave the existing wildlife openings in Management Area 15

Response Alternatives 7 and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 15. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because it provides a habitat link for the movement of plants and animals between the Rich Hole and Rough Mountain Wildernesses. Because of the area's presence between two wildernesses, Management Area 14 provides a better blend of compatible wildlife, recreation, and timber values than Management Area 15.

Letter 87 On the Warm Springs RD, Nimrod Hall quad, it is recommended that Management Area 1 be changed to Management Area 9 north of Rough Mountain addition roadless area

Response Alternatives 6 and 9 examine a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because this area contains timber and wildlife values that outweigh its value for providing primitive recreation experiences The adjacent Rough Mountain Addition Roadless Area has also been changed in the preferred alternative to Management Area 14 because there has been no Congressional interest expressed in enacting legislation to expand the existing Rough Mountain Wilderness This roadless area contains timber and wildlife values that outweigh its value for wilderness. The reader is encouraged to review the description of the Rough Mountain Addition Roadless Area in FEIS Appendix C

Letter 87 On the Warm Springs RD, Healing Springs quad, it is recommended that Management Area 14 be changed to Management Area 7 for the foreground VQO zone along FDR #125

Letter 87 On the Warm Springs RD, numerous quads, it is recommended that Management Area 15 be changed to Management Area 7 for the foreground VQO zone along State Routes #600 and #84 from the Pumped Back Storage Area north to the forest boundary to remove the open roads from the wildlife management area

Response Alternatives 6, 11, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 7 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because this road is neither a sensitivity level 1 travel route, a Virginia Byway, nor access to major recreational or interpretive facilities on or near the Forest. Access to Douthat State Park is better provided from the north and south by State Route 629.

Letter 87 On the Warm Springs RD, Healing Springs quad, it is recommended that Management Area 7 be changed to Management Area 14 north of Douthat State Park, west of the State Road #629 MA.7 corridor and south of FDR 125

Response Alternatives 6 and 11 examine a range of allocations for this particular area including the recommended change to Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because Management Area 15 is more appropriate for the area's low elevation level

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Letter 87 On the Warm Springs RD, Healing Springs and Nimrod Hall quads, it is recommended that Management Area 7 be changed to Management Area 9 east of State Route #629 and north of Hickman Draft Road #361 to Mill Creek because that is what this area is in alternative 13.

Response Alternatives 6, 9, 11, and 13 partially examine a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates the area to Management Area 15 because of existing investments and past cutting in the area The area contains timber and wildlife values that outweigh its value for providing primitive recreation experiences

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Letter 87 On the Warm Springs RD, Bath Alum quad, it is recommended that Management Area 17 be changed to Management Area 16 within the Bluegrass Hollow drainage because that is what this area is in alternative 7

Letter 4038 On the Warm Springs RD, Bath Alum quad, it is recommended that MA 17 be changed to MA 16 within the Bluegrass Hollow drainage.

Letter 4038 On the James River RD, Jordan Mines, Potts Creek & Alleghany quads, it is recommended that MA 17 be changed to MA 16 for that land west of State Routes 607 and 616, west of State Route 615, south of State Rt. 614, and east of State Rt 600

Letter 4038 On the Pedlar RD, Big Island quad, it is recommended that MA 17 be changed to MA 16 south of State Rt. 130 and west of the Blue Ridge Parkway

Response Alternatives 2, 7 and 12 examine a range of allocations for this particular area, including the recommended change to Management Area 16 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 17 because high concentrations of high quality timber exist in this area Managing these high quality sites helps the Forest address the Nation-wide below-cost timber sale issue. There are other areas that are more appropriate for Management Area 16 designation Likewise, one of the aesthetic standards for Management Area 17 has been revised to include adopting a partial retention VQO in the foreground areas along sensitivity level 1 and 2 roads

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Letter 87 On the Warm Springs RD, Warm Springs, Healing Springs and Falling Springs quads, it is recommended that Management Area 7 be changed to Management Area 15 for the three large Forest parcels west of U S. Highway 220 because the existing Partial Retention VQO's will be protected by this designation and because that is what this area is in alternative 7

Response Alternatives 6, 7, 12 and 13 partially examine a range of allocations for this particular area, including the recommended change to Management Area 15. For the two northern tracts, the ID team believes this recommendation is consistent with the overall theme of the preferred alternative. The Management Area has been changed in the preferred alternative to correspond with the recommendation For the southern tract, the

preferred alternative allocates the area to Management Area 17 because high concentrations of high quality timber exist in the area Managing these high quality sites helps the Forest address the Nation-wide below-cost timber sale issue. Likewise, one of the aesthetic standards for Management Area 17 has been revised to include adopting a partial retention VQO in the foreground areas along sensitivity level 1 and 2 roads

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Letter 87

On the Warm Springs RD, Bath Alum and Warm Springs quads, it is recommended that Management Area 7 be changed to Management Area 5 on the east side of Piney Mountain

Response

No alternative examines the recommended Management Area for this particular area. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 17 because high concentrations of high quality timber exist in this area Managing these high quality sites helps the Forest address the Nation-wide below-cost timber sale issue Likewise, one of the aesthetic standards for Management Area 17 has been revised to including adoption a partial retention VQO in the foreground areas along sensitivity level 1 and 2 roads

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Letter 87

On the Warm Springs RD, Bath Alum and Warm Springs quads, it is recommended that Management Area 15 be changed to Management Area 5 for the SPNM ROS area on Warm Springs Mountain north of State Route #39

Response

No alternative examines the recommended management area for this particular area The ID team believes this recommendation is inconsistent with the overall theme of the preferred alternative because the SPNM area in question cannot be seen from any major travel route such as Route 220 or 39

Letter 87

On the Warm Springs RD, Minnehaha Springs quad, it is recommended that Management Area 15 be changed to Management Area 14 west of Little Back Creek because that is what the area is in alternative 14 and because it is adjacent to Management Area 6.1 on the Monongahela N F.

Response

Alternatives 6 and 11 examine a range of allocations for this particular area, including the recommended change to Management Area 14 While consistent with the overall theme, the preferred alternative allocates the area to two Management Areas. 14 and 15 Management Area 14 is allocated north of Wildcat Hollow using the boundary of the Little Alleghany Mountain Roadless Area Management Area 15 is allocated south of Wildcat Hollow Both Management Areas are compatible with the Monongahela National Forest's 6 1 designation. As stated in the Monongahela's Forest Plan, page 164, lands assigned to this prescription have the basic components of habitat needs for the wild turkey and black bear associations

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Letter 188

All Retention areas in the current VQO inventory should be placed in an MA which affords at least a Retention VQO.

Response

Alternative 2 addresses this concern It adopts the visual quality objectives as inventoried

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Letter 2694

I ask that the Big Levels area be managed as Management [Area] #14, 15, or 16

Response

Big Levels, depending on how you map it, now contains a number of management areas Included are Management Areas 4, 16, and 22

Letter 3637

Change management area 9 category on Warm Springs Dollyanne area to a timber production, wildlife emphasis area This area has been rejected in the past as an Eastern wilderness and should now be returned to multiple use management with access for sportsmen and timber made available for local businesses

Response

Allocations for Dolly Anne have changed based on public input and management concerns Portions are classified as management area 14 (suitable for timber management), 4 and 9 See Forest Plan map for exact allocation boundaries

Letter 3942 — I offer two suggestions regarding the wording of the prescription for Management Area 9. 1) In Standard 279, please change to "Existing system roads may continue to be used". 2) In Standard 282, please change to "No salvage will be done in Management Area 9", 3) In Standard 291, please change the second sentence to "Additional wildlife improvements are not permitted".

Response — Wording changes have been made for Management Area 9. Additional wildlife habitat improvements are allowed. They will not alter the general characteristic of the area, and if it is in a "roadless area" will not alter the "roadless" qualities.

Letter 3660 — Forest Standard 1024 should be at least 5-10% Letter 3728 Management Area 14. Forest Standard 1025 - Change 30 percent to 45 percent in order to achieve a 135-year rotation.

Letter 3728 — Management Area 14. Forest Standard 1024 - Change 1 percent to 2.5 percent.

Response — Standards 1024-1028 are the method that the ID Team chose in the DEIS and Draft Revised Plan to meet the NFMA management requirement (36 CFR 219 19) to insure adequate habitat to maintain viable populations of management indicator species. The ID Team has decided that this method of complying with the management requirement is not effective. Therefore, standards 1024-1028 have been removed from the Revised Plan. Monitoring requirements on Management Indicator Species have been added to Chapter 5 of the Revised Plan as the method to comply with this management requirement This procedure is described in more detail in Appendix J of the FEIS

Letter 87 — On the Deerfield RD, numerous quads, it is recommended that Management Area 11 be changed to Management Area 15 below a certain contour level on the east slope of Great North Mountain because that is what this area is in alternative 14.

Response — Alternatives 3, 7, 9, 11, and 13 eliminate all existing ATV trails and preclude construction of any new trails These alternatives also limit licensed off-highway vehicles to differing amounts of open system roads. One of them will be selected as the Revised Plan if it identified as the alternative that maximizes net public benefits. It is important to show the public where ATV's could be ridden on trails within the Forest Management Area 11 depicts the only areas of the Forest where ATV's are permitted on designated trails. The remainder of the Forest is closed to vehicles, such as ATV's, which are not licensed by the appropriate state

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Letter 87 — On the Deerfield RD, Augusta Springs, Elliott Knob, and Deerfield quads, it is recommended that Management Areas 1, 14 and 17 be changed to Management Area 7 for the foreground VQO zone along FDR #82, FDR #77 and State Routes #688 and #689.

Response — Alternatives 6, 11, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 7 While consistent with the overall theme, the preferred alternative allocates this area to numerous Management Areas because these roads are neither a sensitivity level 1 travel route, a Virginia Byway, nor access to major recreational or interpretive facilities on or near the Forest.

Letter 87 — On the Deerfield and Dry River RD's, West Augusta and Stokesville quads, it is recommended that Management Areas 15 and 16 be changed to Management Area 7 for the foreground VQO zone along the White Oak National Recreation Trail

Response — Alternatives 6 and 11 examine a range of allocations for this particular area, including the recommended change to Management Area 7. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 13 using the foreground zone as the boundary along the White Oak Trail The North River developed recreation sites combined with this trail makes a Management Area 13 designation appropriate for this area

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Letter 87 — On the Dry River RD, Stokesville quad, it is recommended that Management Area 10- (North River) be changed to Management Area 13

Response	No alternative allocates this particular area to the recommended Management Area While consistent with the overall theme, the preferred alterative allocates this area to Management Area 10 to maintain the Special Management Area boundaries of the North River from the 1986 Forest Plan By combining it with adjacent Management Area 13, the gorge area of the river, would, in effect, lose its unique identity as an important resource on the Forest
Letter 87	On the Dry River RD, Singers Glen and Rawley Springs quads, it is recommended that Management Area 1 be changed to Management Area 5 from Cross Mountain on the north, Hogpen Mountain and FDR #240 on the west and south and State Route #612 on the east because that is what this area is in alternative 6.
Response	Alternative 6 allocates this particular area to Management Area 5 The recommendation is not consistent with the intent of where Management Area 5 is to be applied. The preferred alternative allocates this area to Management Area 22 This Management Area recognizes the uniqueness of areas such as Slate Lick Lake or the Wallace Tract Management Area 22 provides direction for management of existing ponds, wetlands, fields and hedgerows for wildlife viewing, nature study, small game management or combinations thereof
Letter 87	On the Dry River RD, Fulks Run and Cow Knob quads, it is recommended that Management Area 15 be changed to Management Area 7 for the foreground VQO zone along State Route #818 from the forest boundary to Leading Ridge Road FDR #240
Response	Alternatives 6, 9, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 7 Alternative 9 allocates this area to Management Area 5 which protects viewsheds similar to Management Area 7 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because this road is neither a sensitivity level 1 travel route, a Virginia Byway, nor access to major recreational or interpretive facilities on or near the Forest
Letter 87	On the Lee RD, numerous quads, it is recommended that Management Area 15 be changed to Management Area 14 along Great North Mountain from Fulks Run on the south to State Route #59 on the north, and from Mathias and State Route 20 on the west to State Route #610, #263, #717 and FDR 252 on the east, whereby timber harvesting can occur except in existing SPNM ROS areas
Letter 4038	On the Lee RD, Fulks Run quads, it is recommended that MA 17 be changed to MA 14 above a 2400-foot contour elevation to the top of Great North Mtn
Letter 4038	On the Lee RD, Fulks Run quad, it is recommended that MA 1 be changed to MA 14, east of State Rt 259
Response	The recommendation for Great North Mountain is consistent with the overall theme of the preferred alternative. The Management Area for the higher elevations along Great North Mountain have been changed in the preferred alternative to Management Area 14 For that area west of Great North Mountain to Mathias, alternatives 6 and 11 examine a range of allocations, including the recommended change to Management Area 14. While consistent with the overall theme, the preferred alternative allocates this area to Management Areas 15 and 9 because of the existence of private land and associated State roads between Great North Mountain and Cove Mountain and the existing SPNM ROS in this area
Letter 87	On the Lee RD, Wolf Gap and Lost City quads, it is recommended that Management Area 15 be changed to Management Area 14 along Bens Ridge and Long Mountain east of State Route #259/5 and west of State Route #23/10 because that is what this area is in alternative 14
Response	The recommendation for Long Mountain is consistent with the overall theme of the preferred alterative The Management Area along Long Mountain has been changed in the preferred alternative to Management Area 14 For Bens Ridge area, alternatives 6 and 11 examine a range of allocations, including the recommended change to Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because the area is lower in elevation than the adjacent Long Mountain area
Letter 87	On the Lee RD, Elkton West and Tenth Legion quads, it is recommended that Management Area 14 be changed to Management Area 7 for the foreground VQO zone along Cub Run Road #65 and Pitt Spring Road #375

Response — Alternatives 6 and 13 examine a range of allocations for these two roads, including the recommended change to Management Area 7 While consistent with the overall theme, the preferred alternative uses the roads as the boundary of numerous Management Areas because the roads are neither a sensitivity level 1 travel route, a Virginia Byway, or access to major recreational or interpretive facilities on or near the Forest

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Letter 87 — On the Lee RD, Hamburg quad, it is recommended that Management Area 14 be changed to Management Area 7 for the foreground VQO zone along Crisman Hollow Road #1720 and Hidden Spring Road #730 because that is what this area is in alternative 14

Response — The recommendation for Crisman Hollow is consistent with the overall theme of the preferred alternatives The Management Area along Crisman Hollow Road has been changed in the preferred alternative to Management Area 7 For Hidden Springs Road #730, alternatives 6 and 13 e a range of allocations for this road, including the recommended change to Management Area 7 While consistent with the overall theme, the preferred alternative uses the road as the boundary of numerous Management Areas because FDR 730 is neither a sensitivity level 1 travel route, a Virginia Byway, nor access to major recreational or interpretive facilities on or near the Forest

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Letter 87 — On the Lee RD, Hamburg quad, it is recommended that Management Area 14 be changed to Management Area 9 *for that Forest land east of Crisman Hollow Road because this is a SPNM ROS area and contains numerous* trails

Response — Alternatives 6, 9 and 13 allocate the Duncan Knob area to Management Area 9. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because enough area has been allocated to a recreation emphasis to meet recreation demand on the Lee Ranger District when one considers that both Southern Massanutten and Northern Massanutten Roadless Areas are allocated to Management Area 9

Letter 87 — On the Lee RD, Hamburg and Edinburg quads, it is recommended that Management Area 7 be changed to Management Area 15 for that area east of FDR #374 and north of Hidden Springs Raod #730 and south of Taskers Gap ATV area

Response — No alternative considers the recommended allocation for the area While consistent with the overall theme, the preferred alternative allocates this area to Management Area 16 because of existing timber investments in the area and the presence of an open road

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Letter 87 — On the Lee RD, Edinburg and Rileyville quads, it is recommended that Management Area 11 be changed to Management Area 7 north of State Highway #675 to eliminate the existing ATV route through Management Area 4

Letter 4038 — On the Lee RD, numerous quads, it is recommended that MA 11 be changed to MA 16 south of State Rt. 675

Letter 4038 — On the Dry River RD, Rawley Springs quad, it is recommended that MA 11 (Rocky Run ATV Area) be changed to MA 14

Response — Alternatives 3, 7, 9, 11, and 13 eliminate all existing ATV trails and preclude construction of any new trails These alternatives also limit licensed off-highway vehicles to differing amounts of open system roads One of them will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits. It was important to show the public where ATV's could be ridden on trails within the Forest. Management Area 11 depicts the only areas of the Forest where ATV's are permitted on designated trails The remainder of the Forest is closed to vehicles, such as ATV's, which are not licensed by the appropriate state While consistent with the overall theme, the preferred alternative allocates areas to Management Area 11 because ATV trails currently exist at Taskers Gap/Peters Mill Run, South Pedlar, and Rocky Run In the preferred alternative, the boundary of Management Area 4 near the Taskers Gap ATV trail has been changed to coincide with the creek Thus the existing trail does not go through Management Area 4

Letter 87

On the Lee RD, Strasburg quad, it is recommended that Management Area 13 be changed to Management Area 9 around Buzzard Rock

Response

Alternatives 6 and 9 examine a range of allocations for this particular area, including the recommended change to Management Area 9. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 13 because trail #4048 is heavily used by people from the nearby Washington DC metropolitan area

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Letter 87

On the Lee RD, Strasburg quad, it is recommended that Management Area 7 be changed to Management Area 9 from Little Passage Creek on the south and west to Signal Knob on the north because this is what this area is in alternative 14

Response

Alternatives 6, 9, and 13 examine a range of allocations for this particular area, including the recommended change to Management Area 9 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 13 because the area is heavily used by people from the nearby Washington DC metropolitan area and it is adjacent to the Elizabeth Furnace Recreation area.

Letter 4038

On the Lee RD, New Market & Hamburg quads, it is recommended that MA 7 be changed to MA 14 west of Massanutten Mt from the Rt 211 visual corridor on the south to Hidden Spring Rd #730 on the north, including the area west of Crisman Hollow Rd #274

Response

No alternatives considers the recommended change to Management Area 14 for this area Alternatives 7 and 12 allocate this particular area to a similar Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 5 because the west side of the Massanutten Mountain is the most prominent Shenandoah Valley landmark seen by the many people traveling Interstate 81. It was important to single out this most visible feature and manage it accordingly

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Letter 4038

On the Lee RD, numerous quads, it is recommended that MA 7 be changed to MA 16 north of Hidden Spring Road #730 to State Rt 675 from Passage Creek on the east to the Forest boundary on the west

Response

Alternatives 2 and 7 examine a range of allocations for this particular area, including the recommended change to Management Area 16 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because most of this area is currently inaccessible Numerous permanent rights-of-way would be needed to provide continuous access to this area if management for early successional stages under Management Area 16 were to occur. It is not practical to expect large sums of money to pursue accessing this area Management Area 15 is more appropriate for this area

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Letter 4038

On the Lee RD, numerous quads, it is recommended that MA 7 be changed to MA 14 north of State Rt. 758 from Passage Creek on the east to the Forest boundary on the west

Response

Alternatives 7 and 12 examine a range of allocations for this particular area, including the recommended change to Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Areas 5 and 15 because most of this area is currently accessible by roads #66 and #771, which are open roads The west side of the Massanutten Mountain is the most prominent Shenandoah Valley landmark seen by the many people traveling Interstate 81 and Management Area 5 was appropriate Because of existing roads and their current status, Management Area 15 is more appropriate for this area

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Letter 4038

On the Dry River RD, Palo Alto quad, it is recommended that MA 9 (Ramseys Draft Addition) be changed to MA 13 north of Trout Run and south and west of FDR #95

Response

No alternative considers the recommended management area for this particular area While consistent with the overall theme, the preferred alternative allocates this area to Management Area 9 because it is more important to maintain consistency and use the roadless area boundary to protect the integrity of the Ramsey's Draft Addition Roadless Area

Letter 4038 On the Dry River RD, Stokesville & West Augusta quads, it is recommended that MA 15 be changed to MA 16 in and around the Trimble Mt Trail south of FDR #95A to North River

Response No alternative considers the recommended allocation for this area. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 13 because the trail is immediately adjacent to a highly developed recreation area at Todd Lake.

Letter 4038 On the Warm Springs RD, Mustoe & Paddy Knob quads, it is recommended that MA 15 be changed to MA 17 from Big Ridge on the southwest to Sues Draft on the northeast.

Response Alternatives 2, 7, 10 and 12 examine a range of allocations for this particular area, including the recommended change to Management Area 17. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because high elevations exist in this area. Management Area 14 is more appropriate for this area considering also that FDR 258 in the Ruckman Draft area has access restricted during certain times of the year

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Letter 4038 On the James River RD, Eagle Rock and Strom quads, it is recommended that MA 15 be changed to MA 14 south of Shirkey Mill Branch and the James River to the Forest boundary.

Response No alternative considers the recommended allocation for this area. Alternatives 2, 6, 7, 9, 10, 11, 12, and 13 allocate this particular area to a similar Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because Management Area 15 is desired by the most publics.

Letter 4038 On the Pedlar RD, Big Island quad, it is recommended that MA 11 (South Pedlar ATV area) be changed to MA 16.

Response Alternative 2 examines a range of allocations for this particular area, including the recommended change to Management Area 16 Alternatives 3, 7, 9, 11, and 13 eliminate all existing ATV trails and preclude construction of any new trails These alternatives also limit licensed off-highway vehicles to differing amounts of open system road One of them will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits It was important to show the public where ATV's could be ridden on trails within the Forest Management Area 11 depicts the only areas of the Forest where ATV's are permitted on designated trails. The remainder of the Forest is closed to vehicles, such as ATV's, which are not licensed by the appropriate state. While the recommended change is consistent with the overall theme, the preferred alternative allocates this area to Management Area 11 because the South Pedlar ATV trails currently exist in this area

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Letter 4038 On the Pedlar RD, Cornwall quad, it is recommended that MA 1 be changed to MA 15 near Midvale

Response No alternative considers the recommended allocation for this area Alternatives 2, 7, 10 and 12 allocate this particular area to a similar Management Area 14 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 9 to maintain consistency with adjacent and larger Management Area 9 at Adams Peak

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Letter 4038 On the Pedlar RD, Montebello quad, it is recommended that MA 7 be changed to MA 13 from the Rockbridge/ Amherst County line on the north and east of State Rt 634

Response No alternative considers the recommended allocation for this area While consistent with the overall theme, the preferred alternative allocates this area to Management Area 7 because most of this area is private land and what public lands exist are not adjacent to existing developed recreation areas That portion of Management Area 13 in DEIS alternative 8 west of Management Area 6 was changed to Management Area 7 in the preferred alternative to provide consistency in management area designations This area also did not fit the description of where Management Area 13 should be applied

Letter 4038 On the Pedlar RD, Big Levels and Massies Mill quads, it is recommended that MA 1 be changed to MA 15 for the land east and north of the North Fork of the Tye River.

Response Alternatives 2 and 10 examine a range of allocations for this particular area, including the recommended change to Management Area 15. While consistent with the overall theme, the preferred alternative allocates this area to Management Area 7 because most of the public land is inaccessible, small parcels that lie between the nationally recognized Blue Ridge Parkway and the South Fork Tye River, which is eligible for inclusion in the National Wild and Scenic River System.

Letter 3728 Management Area 7 This is a most difficult MA on which to comment It unduly complicates the Plan and could be deleted. Managing viewsheds should be accomplished with restrictive standards If this M A is retained, we recommend acreages be delineated for the sub-units (Scenic Routes, Highlands Scenic Tour, etc) and address wildlife standards in the Midground, Background and Unseen Area Some of the standards in this Management Area appear to be contradictory For example, with a VQO of Retention, the area is available for oil and gas leasing and allows the salvage of timber. Also, in order for us to comment further, it would be necessary for us to understand the meaning of "natural methods" of constructing wildlife habitat improvements

Response Placing the primary emphasis on the visual resource within a management area is as valid as putting it on *wildlife, timber, recreation or any other resource where appropriate. The purpose of Management Area 7 is to* protect and possibly enhance viewsheds along routes where public concern for scenic quality is demonstrably high Emphasizing visual resources within a management area does not complicate the Revised Plan any more *so than if another resource is given primary emphasis The standards within Management Area 7 are not* contradictory Many management practices may occur within this area, but they are carefully planned in order to maintain a natural or near natural landscape appearance Regarding the commenter's last statement, the *wording of that standard has been modified for clarification*

Letter 3728 *Management Area 9. Aesthetics 267 - Change to " must meet the VQO of AT LEAST PARTIAL RETENTION "*

Response VQO allocations to management areas are based on a combination of factors including the VQO inventory, compatibility with the recreation opportunity spectrum class, and compatibility with the general management goal for the area Considering all of these factors, the Retention VQO is the most appropriate allocation to Management Area 9

Letter 4038 On the Warm Springs RD, Nimrod Hall & Healing Spring quads, it is recommended that MA 9 (Beards Mt. Roadless Area) be changed to MA 15 west of the crest of Beards Mtn

Response Alternative 7 examines a range of allocations for this particular area, including the recommended change to Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 9 because it is more important to maintain consistency and use the roadless area boundary to protect the integrity of the Beard's Mountain Roadless Area

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Letter 4038 On the Warm Springs RD, Sunrise quad, it is recommended that MA 1 be changed to MA 15 just west of the Bath County Pumped Storage area

Response Alternatives 2, 7, 10 and 12 examine a range of allocations for this particular area, including the recommended change to Management Area 15 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 14 because high elevations exist in this area Management Area 14 is more appropriate for this area

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Letter 4038 On the Deerfield RD, Craigsville & Green Valley quads, it is recommended that MA 11 below the 2200 to 2600-foot contour interval be changed to MA 17

Response Alternatives 5 and 14 examine a range of allocations for this particular area, including the recommended change to Management Area 17 While consistent with the overall theme, the preferred alternative allocates this area to Management Area 11 because the it is important to show the public where ATV's can be ridden on trails within the Forest. Management Area 11 depicts the only areas of the Forest where ATV's are permitted on designated

tails. The remainder of the Forest is closed to vehicles, such as ATV's, which are not licensed by the appropriate state.

Letter 4038

On the Lee RD, numerous quads, it is recommended that MA 10 (South Fork of the Shenandoah River) be changed to MA 13.

Response

No alternative considers the recommended allocation for this area While consistent with the overall theme, the preferred alternative allocates this area to Management Area 10 because most of the river does not meet the general characteristics of where Management Area 13 should be applied on the ground

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Letter 3941

The large area south of the Tye River and including the Meadow Creek drainage, the Spy Rock Basin, and the Piney River Drainage, currently designated as Management Area #1, should also be designated as Management Area #13.

Letter 3941

The resulting area, lying along the A T from Reeds Gap to U.S. Route 60, within Management Areas #6, #15, #8, #9, would represent a significant, interconnected backcountry recreation resource area with even greater value than its component parts

Response

The recommendations for Meadow Creek drainage and Spy Rock basin are consistent with the overall theme of the preferred alternative These areas have been changed in the preferred alternative to Management Area 13 For the Piney River drainage, while consistent with the overall theme, the preferred alternative allocates this area to Management Area 15 because the area contains timber and wildlife values that outweigh its value for providing dispersed recreation experiences

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Letter 3962

Pg 2-140· [Standards] 756-K & L These openings sizes should decrease. A maximum openings size of 25 acres should be in "L" to reduce the size of even-aged cuts

Response

Standard 756 provides contrast reducing techniques for the protection of visual resources The 40 acre openings are permitted only in areas adopting a modification VQO From a visual standpoint, this is fully acceptable In terms of environmental acceptibility, the NFMA Regulations under 36 CFR 219 27(d)(2) permits openings up to 40 acres for this forest type

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Letter 3962

MA 8. 2-50 Desired future condition - "No evidence of roads exists" is very idealistic. Road and rail cuts made over 100 years ago and unused for over 50 years are still in evidence in other eastern wilderness areas

Response

The sentence in question (in the "Desired Future" for Management Area 8) is changed in the final documents to· Minor evidence of primitive travelways exists with no motorized use permitted

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Letter 4038

Replace the second paragraph on page 2-9 of the Draft Revised Forest Plan with the following "Interpretive facilities and programs are developed throughout the Forest Interpretation emphasizes environmental education, cultural resources and national forest management Proposed interpretive projects and facilities are discussed in Management Areas 7, 12, and Appendix C "

Response

A modification has been made to the paragraph so that it refers only to Appendix C A standard regarding interpretation is included in many of the management area prescriptions, however the detailed proposals are in Appendix C

Letter 4038

Add the following text the end of the third paragraph on page 2-41 of the Draft Revised Forest Plan. "In appropriate areas of the forest, Interpretive Motor Routes are developed which demonstrate the variety of forest habitats and management techniques, as well as historical, cultural and recreational resources located along the route. Points of interest along these routes may be interpreted with a variety of media including but not limited to signs, brochures keyed to numbered stops, audio cassettes, or set frequency radio broadcasts."

Letter 4038 — Add the following text of the end of the fourth paragraph on page 2-41 of the Draft Revised Forest Plan: "Along Interpretive Motor routes, some evidence of management activities will be apparent to provide clear examples of the variety of management tools utilized on the Forest "

Letter 4038 — Change the sixth paragraph under "Desired Future Condition on page 2-99 of the Draft Revised Forest Plan to read. "The trails are designed to interpret nature to the general public, as well as specific groups with disabilities. Three of these trails (Discovery Way, Massanutten Story, and the National Children's Forest) have paved trails on gentle grades to allow for mobility-impaired users to have access. The fourth trail (the Lion's Tale) is a bark covered trail built in cooperation with the Lion's Club to interpret nature to visually impaired users. To the extent funding allows, these trails will be fully maintained with interpretive signing kept up-to-date and in good repair. Opportunities for additional interpretive trail construction will be considered as appropriate. Interpretive motor routes will be developed which provide visitors with an opportunity to learn about wildlife habitat and forest management practices and the species that benefit from such practices (See Management Area 7)."

Response — "Foundations", located in Appendix C of the Revised Plan, is a collection of proposals for interpretive programs. The intent is that this will be a dynamic, evolving document in which material is added or deleted as new ideas are presented and considered (pg C-12) There will be further opportunities for public involvement and comment at the project level for the various interpretive programs.

Letter 4038 — Change the second paragraph on page 2-41 of the Draft Revised Forest Plan to read: "These routes are typified by the Blue Ridge Parkway, Interstate 64, and certain U S , state routes and forest roads, some of which are listed as Virginia Byways "

Response — The Blue Ridge Parkway has been added to the sentence

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Letter 4038 — Change Standard 126 on page 2-43 of the Draft Revised Forest Plan to read. "The viewshed is unsuitable for timber production; however, vegetation management for wildlife habitat enhancement, recreation, or removal of dead trees for salvage purposes may occur or to demonstrate timber management practices."

Response — The wording of the standard has been changed Several additional reasons for conducting vegetation manipulation have been determined.

Letter 4038 — Delete the second paragraph under "Foreground Zone" on page 2-43 of the Draft Revised Forest Plan.

Response — The Highlands Scenic Tour will be used to interpret multiple use management, which includes management of both natural and cultural resources The paragraph has not been deleted in the Revised Plan

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Letter 4038 — Change Standard 137 on page 2-45 of the Draft Revised Forest Plan to read. "Rehabilitation can be used to restore an area or facility to a condition that meets the appropriate visual quality objective Rehabilitation is applied to existing roads, trails, bridges, or parking facilities as needed "

Response — That standard has been deleted. A standard pertaining to the use of the short term alternatives of Rehabilitation or Enhancement has been added under the "Aesthetics" heading

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Letter 4038 — Change Standard 144 on page 2-45 of the Draft Revised Forest Plan to read "The area is suitable for timber management to demonstrate range of habitat management and stand composition management techniques Small openings in the vegetation may be created to provide visual diversity and enhancement "

Response — The standard has been deleted in the Revised Plan Suitability for timber production is discussed in the desired future condition In the preferred alternative, the foreground zone of the Highlands Scenic Tour is unsuitable for timber production. The middleground, or interior area, of the Highlands Scenic Tour is suitable for timber production Interpretive trails from the Tour route to the interior area are proposed

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Letter 4038 — Change Standard 129 on page 2-44 of the Draft Revised Forest Plan to read "The area is managed to meet a visual quality objective of retention, except where management activities are being demonstrated "

Response	Visual resource management is as much a part of multiple use management as timber, wildlife or any other resource. Interpretation along the foreground of the Highlands Scenic Tour will demonstrate this by having all activities meet the retention VQO
Letter 4038	Comment on Standard 143 on page 2-45 of the Draft Revised Forest Plan: If Concept Plan is changed to include the function of interpretive motor route that demonstrates forest management techniques, then leave as is.
Response	The Concept Plan has not been changed; it has always included both motorized and non-motorized interpretation of natural and cultural resources and the Forest Service's role as the managing agency.
Letter 4038	Change Standard 145 on page 2-46 of the Draft Revised Forest Plan to read: "Timber harvesting and other management practices may be employed to achieve these objectives (demonstrating harvest techniques) of the Highland Scenic Tour. These practices are designed in a way which has a positive effect on the viewshed and wildlife habitat and is protective of the cultural resources."
Response	All activities which occur in the foreground zone of the Highlands Scenic Tour will meet the VQO of retention.
Letter 4038	Change Standard 399 on page 2-82 of the Draft Revised Forest Plan to read "The area is managed to meet a visual quality objective of partial retention "
Response	VQO allocations to management areas are based on a combination of factors including the VQO inventory, compatibility with the recreation opportunity spectrum class, and compatibility with the general management goals for the area Considering all of these factors, the retention VQO is the most appropriate allocation for certain lands contained within Management Area 9.
Letter 3660	Forest Standard 1019 needs an exemption for salvage
Response	This standard has been deleted.
Letter 3705	Management Area 17 should be eliminated or merged with Management Area 16.
Response	Management Area 17 still provides early successional habitat, but not to the same level in emphasis as Management Area 16 However, it does help respond to the below-cost timber sale issue better than other management area and in that regard is needed.
Letter 3728	Management Area 18. Fisheries 643 [tentatively renumbered 613a] - [There is no recommended change to the text of this standard.]
Letter 3728	Management Area 18: Change Stocked Cold Water, Cool Water and Warm Water Streams 620 to Coldwater Streams 620 - [There is no recommended change to the text of this standard]
Letter 3728	*Management Area 18. Change Native Trout Streams 619 to Coldwater Streams 619 - [There is no recommended* change to the text of this standard.]
Letter 3728	Management Area 18· Change Stocked Cold Water, Cool Water, Warmwater Streams 622 to Cool Water/ Warmwater Streams 622 - Change to· "Streams are managed in a manner that results in a water temperature regime with 2 degrees fahrenheit of ambient."
Letter 3728	Management Area 18· Change Stocked Cold Water, Cool Water, Warmwater Streams 624 to Cool Water/ Warmwater Streams 624 - [There is no recommended change in the text of this standard]
Letter 3728	Management Area 18 Change Stocked Cold Water, Cool Water, Warmwater Streams 623 to Cool Water/ Warmwater Streams 623 - [There is no recommended change to the text of this standard.]

Letter 3728	Management Area 18. Change Stocked Cold Water, Cool Water, Warm Water Streams 621 to Cool Water/ Warmwater Streams 621 - [There is no recommended change to the text of this standard.]
Letter 3728	Management Area 18· Change Wild Trout Streams 614 to Coldwater Streams 614 - Change to. "Coldwater streams are managed in a manner that results in greater than 125 pieces of large woody debris per stream mile "
Letter 3728	Management Area 18· Change Native Trout Streams 616 to Coldwater Streams 616 - Change to. "Coldwater streams are managed in a manner that results in dissolved oxygen values greater than 7 0 ppm."
Letter 3728	Management Area 18 Change Native Trout Streams 617 to Coldwater Streams 617 - [There is no recommended change in the text of this standard]
Letter 3728	Management Area 18. Change Native Trout Streams 618 to Coldwater Streams 618 - [There is no recommended change in the text of this standard]
Letter 3728	Management Area 18 Change Native Trout Streams 615 to Coldwater Streams 615 - Change to. "Coldwater streams are managed in a manner that results in a maximum summer water temperature of 69 degrees fahrenheit."
Letter 3848	MA 18. Line 619. This line should read "New impoundments" are prohibited on wild trout streams " Impoundments have historically been one of the most destructive aspects of man's activities on fisheries. A large number of wild trout streams on the GWNF already are impounded with severe reduction (or elimination) in downstream fisheries No new impoundments should be permitted
Letter 3848	MA 18 Line 635 Change the word "prohibited" to "limited". We are not absolutely opposed to using heavy equipment in riparian zones for fisheries projects when the benefits of the long term improvements outweigh the short term effects.
Letter 4038	Delete the fourth paragraph under "Desired Future Condition" on page 2-70 of the Draft Revised Forest Plan
Letter 4038	Change the heading "Wild Trout Streams" to "Cold Water Streams" on page 2-121 of the Draft Revised Forest Plan.
Letter 4038	Repeat Standard 440 (tentatively numbered 613e) under "Fisheries" on page 2-121 of the Draft Revised Forest Plan "Access is provided for anglers with special access needs "
Letter 4038	Change Standard 614 on page 2-121 of the Draft Revised Forest Plan to read· "Coldwater streams are managed in a manner that results in greater than 125 pieces of large woody debris (LWD) per stream mile "
Letter 4038	Change Standard 616 on page 2-121 of the Draft Revised Forest Plan to read "Coldwater streams are managed in a manner that results in dissolved oxygen values greater than 7 0 ppm "
Letter 4038	Change Standard 624 under "Cool Water/Warm Water Streams" on page 2-122 of the Draft Revised Forest Plan to read. "Impoundments are allowed on a case-by-case site specific evaluation if 401 certification is obtained from the Virginia Water Control Board. Impoundments are designed to allow complete draining A downstream catch basin is constructed for fish salvage "
Letter 4038	Change the heading "Stocked Cold Water/Cool Water/Warm Water Streams" to "Cool Water/Warm Water Streams" on page 2-122 of the Draft Revised Forest Plan
Letter 4038	Change Standard 615 on page 2-121 of the Draft Revised Forest Plan to read "Coldwater streams are managed in a manner that results in a maximum summer water temperature of 69 degrees fahrenheit with no more than a one degree fahrenheit rise over ambient "
Letter 4038	Add the following new standard (tentatively numbered 620a) on page 2-122 of the Draft Revised Forest Plan under "Cold Water Streams" "Stocking hatchery trout over Class I and Class II wild brook trout streams will be discontinued within 5 years of adoption of this plan "
Response	The Interdisciplinary Team has considered this recommendation and has incorporated the concept in the preferred alternative

Letter 3848 — In Management Area 18 (riparian) we believe that the best management is achieved for fisheries in the GWNF by protecting and enhancing the native trout fishery by seeking means to increase productivity, improve habitat, avoid extension of the range of exotic fish species and ensure aesthetic aspects such as visual quality of *streams We would like the following specific modifications made*·

Letter 4038 — Repeat Standard 437 (tentatively numbered 613b) under "Fisheries" on page 2-121 of the Draft Revised Forest Plan. "Forest lakes and streams are managed for a quality fishing experience. Access is improved or enhanced whenever possible "

Letter 4038 — Repeat Standard 313 under "Cool Water/Warm Water Streams" on page 2-122 of the Draft Revised Forest Plan "Stream disturbing activities are avoided from April 15 to June 15 to protect fish spawning incubation. Any necessary instream activities within these time periods must have concurrence of State and Forest Service fisheries biologists "

Letter 4038 — *Move Standard 620 under the heading "Cold Water Streams" on page 2-122 of the Draft Revised Forest Plan.*

Letter 4038 — Repeat Standard 441 (tentatively numbered 613f) under "Fisheries" on page 2-121 of the Draft Revised Forest Plan. "Stream and lake structures, fish attractors, lake fertilization and/or fish feeding are encouraged to increase productivity Tire reefs are not used in areas where the water level periodically drops so as to expose them to view. Fish feeders are placed on lakes so as to be out of sight from swim sites and other heavy use developed recreation opportunities "

Letter 4038 — Repeat Standard 438 (tentatively numbered 613c) under "Fisheries" on page 2-121 of the Draft Revised Forest Plan· "Fisheries enhancement through stocking and specialized regulations is encouraged to optimize angling opportunities "

Letter 4038 — Repeat Standard 439 (tentatively numbered 613d) under "Fisheries" on page 2-121 of the Draft Revised Forest Plan· "Catch and release fishing regulations are encouraged if needed to optimize or enhance the angling experience "

Response — The Interdisciplinary Team has considered this recommendation and has incorporated the concept into the preferred alternative Stocking and special regulations are not under the Forest Service's authority but are recommended and set by the VDGIF. The Forest Service manages habitat under its authority and consults with State biologists on projects affecting fisheries resources.

Letter 3848 — MA 18. Line 624 [Refers to impoundments on warm-water streams]. Add the following. "Water flow requirements from an impoundment should be equal to or greater than flow entering the impoundment during low flow periods "

Letter 3962 — MA 10 [Standard] 312 Allowing impoundments on a Wild and Scenic River is a contradictory situation The language of 293 & 294 (discourage hydroelectric, dams & levies) indicated that you can't prohibit them, so discourage them in 312

Response — Standards have been eliminated or changed to PROHIBIT new dams and levees on Wild and Scenic River Study Areas and on wild trout streams Any dam constructed on warm-water or cool-water streams will have a complete environmental analysis on biological effects and minimum flow needs

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Letter 3962 — MA 18 2-121 Wild Trout Streams Add a standard to read "OHV/ATV trails are prohibited from crossing a wild *trout stream " Stream disturbing activities are avoided for 6 months of the year A vehicle crossing a stream will* disturb the stream

Response — In the preferred alternative stream crossings are minimized in all riparian areas Where unavoidable, bridges are preferred over fords ATV trails can cross wild trout streams but only on bridges. When ATV use degrades any resource to unacceptable levels, the trail can be closed temporarily

Letter 3962 On the Pedlar RD, Waynesboro West quad, it is recommended that Inch Branch be managed under Mgt Prescription 18B, since it's a native (trout) stream

Letter 3962 On the Pedlar RD, Cornwall quad, it is recommended that Lady Slipper Run be managed under Mgt. Prescrip 18B since it's a native (trout) stream.

Response All wild trout streams under Management Area 18 are managed for native trout resources. The actual riparian area is unsuitable for timber production Vegetative manipulation is done to obtain the desired future condition of the riparian area.

Letter 4038 Delete Standards 296 through 313 on pages 2-66-2-68 of the Draft Revised Forest Plan.

Response The fisheries and aquatic direction and desired future conditions for rivers eligible for the National Wild and Scenic River System is found under Management Area 18 in the Revised Plan.

Letter 4038 Add the following new standard (tentatively numbered 613a) on page 2-121 of the Draft Revised Forest Plan under "Fisheries" "Stream structure work is conducted to protect or enhance native fisheries resources. Structure work is conducted to protect or enhance native fisheries resources Structure work should emphasize natural looking habitat improvement structures. Heavy equipment use in the streams is limited to the amount of time absolutely essential for the project (old standard 643 under fire) "

Response The Interdisciplinary Team has considered this recommendation and has incorporated the concept in the preferred alternative

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Letter 3962 MA 1. [Standard] 12 Define "salvage sale of timber" Change "salvage" to harvesting of dead trees...is permitted

Response Salvage is defined in the glossary of the EIS Salvage will remain the proper term whenever dead, dying or degrading trees are cut and removed.

Letters 3278, 4036

Change Standard 654 on page 2-125 of the Draft Revised Forest Plan to read "Fords are not used in any wild trout streams without concurrence of appropriate state and federal biologists "

Response In the preferred alternative, stream crossings are minimized in all riparian areas. Where crossings occur, bridges are used unless site-specific analysis shows fords to be an acceptable alternative. State and Federal biologists participate in the environmental analysis While co-ordination and consultation with State agencies is appropriate, the Forest Service cannot give the States concurrence status concerning Forest management

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Letter 4226 What types of timbering does the GWNF envision under Standard 756 in Laurel Fork's Special Biological Area and Remote Highlands Areas?

Response Standards in Chapter 3 of the Revised Plan under Management Areas 9 and 21 provide direction on salvage of these two areas

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Letter 3660 Need more acres in MA's 14, 15, 16 & 17

Response See Chapter 3 of the Revised Plan for adjustments in acreages

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Letter 989 Keep the management prescriptions for 4WD use in separate categories from ATV use Classify 4WD use under dispersed recreation under roads

Response A distinction has been made between large 4WD vehicles and ATV's

Letter 2665 — Management areas are almost universally geographically defined by roads and human disturbances not by naturally occurring geophysical phenomenon; the result is an anthropocentric misinterpretation of biological ecosystems and geographical watersheds which should be reflected in any scientific mapping of the forest.

Response — The ID Team normally used easily recognizable landmarks to define management areas. This fact helps the public and the agency to more easily understand where these management areas are located. Also, there is a social element involved in the objectives of most management areas.

Letter 3728 — Management Area 16· Roads 581 - Replace with the following. "Roads are closed (TSL D) unless needed to meet wildlife objectives "

Response — *This standard has been removed from the Revised Plan*

Letter 3984 — Standard 997 could be a loophole, since it is not made clear if the "regeneration area" will correspond precisely *with the sale area Fifteen percent understocked areas, repeated throughout the forest,have cumulative negative* impacts. I suggest that five percent might be a safer standard.

Response — The standard says, "area of the regenerated stand," which corresponds to the cutting unit of the sale. There is *no loophole. Below minimum stocking level does not mean non-stocked, which would be an impact if it* occurred frequently on 15 percent of regeneration area

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Letter 4226 — *[Salvage-removal under Standard 756] introduces salvage operations of openings up to 40 acres. It is not clear* how an "opening" is to be defined from the Plan, or how many openings are to be allowed on any given parcel, or what types of logging methods are to be applied.

Response — The Revised Plan does not show location of openings Such detailed information is only available in site-specific project analysis. Appendix A does indicate what type of harvest may be used.

Letter 4268 — Plan - Management Area 17 contains portions of the forest suitable for intensive timber management

Response — In response to issues about timber harvesting, a management area emphasizing timber management practices was included in the Revised Plan.

Letter 4038 — Add the following new standard (tentatively numbered 321a) on page 2-68 of the Draft Revised Forest Plan under the heading "Soil and Water" "Use of fescue for soil stabilization is avoided where possible due to its detrimental effect on wildlife. Where use of fescue is considered necessary, endophyte free seed will be planted."

Letters 3728, 4038

Add the following new standard (tentatively numbered 658a) on page 2-125 of the Draft Revised Forest Plan under "Soil and Water": "The Forest stays current with Virginia and West Virginia erosion and sediment control regulation and amends the Forest Plan if regulation changes become more restrictive than Forest Plan Standards "

Letters 3728, 4038

Add the following new standard (tentatively numbered 656a) on page 2-125 of the Draft Revised Forest Plan: "Use of fescue for soil stabilization is avoided where possible due to its detrimental affect on wildlife Where use of fescue is considered necessary, endophyte free seed will be used "

Response — The Revised Plan contains management direction on this subject in Chapter 3 under "COMMON STANDARDS".

Letter 3728 — Management Area 18· Delete standards 698, 699 and 700

Letters 3728, 4038	Delete Standards 704 thru 706 on page 2-130 of the Draft Revised Forest Plan
Letter 4038	Delete Table 2-12 on page 2-131 of the Draft Revised Forest Plan.
Letter 4038	Delete Standards 958 thru 966 on page 2-168 of the Draft Revised Forest Plan. These were covered under the rewritten Management Area 18
Letter 4038	Delete Table 2-16 on page 2-169 of the Draft Revised Forest Plan.
Letter 4038	Delete Standards 698 thru 701 on page 2-130 of the Draft Revised Forest Plan.
Response	Standards and tables related to streamside management zones are needed and cannot be deleted. They were, however, moved to "COMMON STANDARDS", since streamside management zones apply to lands in many management areas

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Letter 3728	Management Area 18. Recreation 633 - Change to: "ATV trails are prohibited except at designated crossings where approaches are graveled a minimum of 100 feet from edge of stream. Bridges are used to cross perennial streams "
Response	This change was not adopted A Management Area 11 standard states that bridges or culverts are used where possible.

Letter 3728	Management Area 15 Roads 559 - Replace with: "Roads are designed to the minimum standard needed to maintain and protect the resource Usually only TSL D roads are constructed Wildlife funds are not to be used to pay for the added cost of constructing a road to a higher standard to serve other resources "
Letter 3728	Management Area 14. Standard 534 - Change to "TSL D roads will be constructed in conjunction with wildlife and forest management activities. They are available for foot travel, but are closed to all vehicles except for administrative use."
Response	Standards 534 and 559 in the Draft Revised Plan has been changed to read "TSL D roads may be constructed in conjunction with resource management activities They are closed to all vehicles except for administrative use "

Letter 4038	Delete Standard 74 on page 2-35 of the Draft Revised Forest Plan
Response	This standard is consistent with research natural area management and is therefore retained.

Letter 4038	Change Standard 653 on page 2-125 of the Draft Revised Forest Plan to read. "Portions of roads on either side of stream crossings that would potentially contribute sediment to the stream are graveled and maintained. Special precautions are taken on Hayesville soils "
Response	This change was adopted

Letter 3728	Management Area 18 Roads 644a - Add the following new standard. "Open roads within riparian areas will be reviewed within 5 years and all roads not meeting Forest Service standards will be upgraded or closed to public use "
Letter 4038	Add the following new standard (tentatively numbered 644a) on page 2-124 of the Draft Revised Forest Plan under "Roads" "Open roads within riparian areas will be reviewed and all roads not meeting Forest Service standards will be upgraded or closed to public vehicular use as soon as possible or no later than three years from date of plan adoption "
Response	Due to the budgetary and time requirements imposed by this proposed standard, it could not be adopted.

Letter 4038 Change Standard 646 on page 2-125 of the Draft Revised Forest Plan to read. "Staged revegetation is used in riparian areas Permanent vegetation or suitable stabilization is required and maintained on all cut and fill slopes for all roads Revegetation measures are implemented within 7 days of disturbance "

Response These standards were not changed Fourteen days for revegetation measures allows both for appropriate protection and for management flexibility.

Letter 4038 Change the fourth paragraph under "Recreation" on page 2-73 of the Draft Revised Forest Plan to read Campgrounds and picnic areas may be established in close proximity to the river as long as riparian resources are protected "

Response This change was made

Letter 3728 Management Area 18· Treat aquatic resources and terrestrial resources within riparian areas in an equal manner in this Plan The following is our recommendation for riparian management on the GWNF "Because of the uniqueness of riparian areas and their associated ecological, social, and economic benefits, riparian areas on the Forest will be managed as a separate MA to protect and enhance those unique resource values Riparian areas have variable widths that are determined by ecologically significant boundaries On-the-ground conditions will determine the width of individual riparian area, however, the riparian width will be at least 66' on either side of perennial streams, lakes, and ponds Riparian areas consist of aquatic areas, wetlands, and riparian ecosystems associated with ponds, lakes, streams, spring seeps, bogs, etc The Federal Manual for Identifying and Delineating Jurisdictional Wetlands is used to delineate wetlands The extent of riparian ecosystems is determined on the ground using features of soil, landform, and vegetation No feature is used alone to delineate these ecosystems Characteristics indicative of these ecosystems are (1) Soils - Entisols and inceptisols; (2) Landform - the floodplain and the first terrace; (3) Vegetation - the presence of wetland plants classified as obligates or facultative wetland This 17,933-acre management area does not include those riparian areas where legal or administrative mandates restrict certain activities. These areas include existing wilderness and roadless areas recommended for wilderness study (MA 8), the Little Laurel RNA (MA 4), developed recreation areas (MA 12) and administrative sites, utility corridors and communication sites (MA 20) Mgmt. direction for the riparian areas in these MAs is contained in the standards for the appropriate management area "

Letter 3728 Change the wording under "Desired Future Condition" in Management Area 18 to read. "Riparian areas will generally take on the characteristics of a climax forest. Large diameter trees will dominate this area but a variety of age classes will eventually be present due mainly to naturally created forest openings The maturing and eventual death of large woody vegetation will increase the volume of large stems in the stream and on the ground within the riparian area. These large stems will increase stream complexity, resulting in better pool structures, improved bank stability, added nutrients to the stream system, and reduced flow velocity that will decrease downstream flood damages The decaying trees on the ground will improve soil conditions and provide improved habitat for numerous species of plants and animals dependent on riparian habitats Riparian areas adjacent to perennial streams, lakes, and ponds and within spring seeps and bogs are considered unsuitable for timber production. Some vegetation mgmt does occur in order to benefit riparian-dependent species or to speed the timeframe to achieve future desired condition. The riparian areas provide natural corridors that enhance daily movements and migration of wildlife populations."

Response The Management Area 18 description and desired future condition have been rewritten and include many of these ideas Although no minimum riparian distance is prescribed, even the narrowest riparian management areas will be protected by filter strips, shade strips, and vehicle exclusion zones of at least 66 feet from each bank See Chapter 3 of the Revised Plan for details

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Letter 3728 The following paragraph should apply to all of Management Area 18. "In addition to standards 756-757, 771-823, 833-850, 855-585, 891-904, 906,936, 944-947, 971-989, 992, and 1021-1028 listed in Forest Standards at the end of this chapter, standards 611 through 707 apply to all lands within this management area "

Response Standards 611-707 were divided by management area prescription Some were deleted and others moved to common Forest standards See Chapter 3 of the Revised Plan for details

Letter 3728	Management Area 18 Designated Crossings 703 - Change to. "Revegetation measures are implemented to rehabilitate areas within 7 days of disturbance "
Letter 3728	Management Area 18 Soil and Water 657 - Change to· Revegetation measures within areas disturbed by management activities are treated within 7 days from the start of disturbances."
Letters 3728, 4038	Change Standard 652 on page 2-125 of the Draft Revised Forest Plan to read· "Revegetation measures are implemented on fill slopes over culverts within 7 days of installation."
Letter 3728	Management Area 18· Roads 646 - Change to "Stage revegetation is used in riparian areas Permanent vegetation or suitable stabilization is required and maintained on all cut and fill slopes for all roads. Revegetation measures are implemented within 7 days of disturbance."
Response	These standards were not changed Fourteen days for revegetation measures allows both for appropriate protection and for management flexibility

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Letter 989	The management prescription for Management Area 11 for motorized recreation is modified on page 4-8 to include 4WD use in an ATV category This implementation monitoring program states that 4WD roads can only be constructed to meet demand in Management Area 11 This contradicts other sections which include no such limitation
Response	ATV trails will be monitored separately from 4WD roads in the Revised Plan

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Letter 3840	Pg 2-117, [Standard] #594 - Roads constructed for timber harvesting will be closed to protect soil and water.
Letter 3962	MA 16 [Standard] 581 While we are advocating no new roads, if you build them they should be closed to public and OHV use
Response	As discussed in Chapter 2 of the Revised Plan under "ISSUE 3 — FOREST ACCESS", the Revised Plan estimates that 90% of new system roads will be closed to public use "

Letter 3840	Pg 2-117, [Standard] #596 - Road locations and densities should meet biological value and biodiversity issues not timber access needs
Response	The intent stated in Standard 596 of the Draft Revised Plan is appropriate for Management Area 17

Letter 3840	Pg 2-104, [Standard] #519 - No new road construction is permitted Reconstruction is limited to protection of resource values. Existing roads are to be closed except for administrative use
Response	The Little River and Mount Pleasant Roadless Areas have been allocated to Management Area 21 in the Revised Plan. A version of Standard 519 has been retained

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Letter 3840	In river corridors MA 10 and any adjacent 13A or 13B areas Pg 2-71, [Standard] #339 - No additional roads are constructed within the corridor or area
Response	Management Area 10 only applies to the corridors of rivers qualifying for recreational or scenic river designation It cannot contain standards that apply to other management areas

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Letter 3840	Pg 2-62, MA 9 - Close all roads A few peripheral roads may be used for administrative purposes for wildlife maintenance openings (mowing or prescribed burning)

Letter 3962 MA 9: [Standard] 279 Road reconstruction should not be allowed in roadless areas. Existing roads should be closed

Response There are roads in Management Area 9 that have been traditionally opened to public use The concept of "Remote Highlands" includes the intent to leave these roads open to public use as long as unacceptable environmental damage is not occurring from their use

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Letter 3962 MA 4: [Standards] 46, 57 & 72 Change to read - "No roads are constructed " The phrase "is permitted to reach the boundaries of Historical Areas" implies that roads could be built through other areas regardless of prescription.

Response Standards 46 and 57 in the Revised Plan express the road policy consistent with the management of Historic and Geological Areas. Standard 72 in the Revised Plan has been changed to read. "Road construction is not permitted inside the area "

Letter 4268 Plan - Revegetation projects should use native species

Response Where possible, and while meeting project revegetation conditions, the Forest will use plant species native to this region

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Letter 3728 Forest Standard 773 The susceptibility of the cave biota to disturbance should be addressed specifically in the cave mgmt. Plan

Response This point will be addressed when plans for the management of individual caves are developed.

Letter 4038 *Delete Standards 71 and 72 on page 2-35 of the Draft Revised Forest Plan.*

Response Standard 71 in the Draft Revised Plan has been retained as written in the Revised Plan Standard 72 has been changed to read. "Road construction is not permitted inside the area."

Letter 4038 Change Standard 339 on page 2-71 of the Draft Revised Forest Plan to read. "No additional open roads are constructed within the corridor "

Response The intent in the Draft Revised Plan was to not construct any additional roads in rivers qualifying for scenic river designation under the National Wild & Scenic Rivers Act This same intent is continued in the Revised Plan

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Letter 4038 Delete Standards 355 through 364 on page 2-74 of the Draft Revised Forest Plan

Response Riparian areas within Management Area 10 are now part of Management Area 18. Therefore, these standards have been deleted from the Revised Plan

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Letter 4038 Delete the section titled "Roads" and Standards 394 thru 395 on page 2-81 of the Draft Revised Forest Plan.

Response The road section in Management Area 11 is consistent with the management intent for this management area. These standards have been retained

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Letter 4038 Repeat Standard 534 (tentatively numbered 579c) under "Roads" on page 2-114 of the Draft Revised Forest Plan: "TSL D roads may be constructed in conjunction with forest management activities. They are available for foot travel, but are open for seasonal use where compatible with wildlife objectives "

Response The intent of Management Area 16 is to provide some roads open to public use Some of the newly constructed roads could be TSL C The decision on the traffic service level must be made at the project level during

implementation of the Revised Plan Biological objectives in Management Area 16 need to be part of this consideration

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Letter 4038 — Change Standard 581 on page 2-114 of the Draft Revised Forest Plan to read· "Roads are opened or closed (TSL D) to meet biological objectives "

Response — Standard 581 of the Draft Revised Plan has been removed for the Revised Plan

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Letter 3962 — MA 10 Typing error at page 2-75, Standards, 3rd line, "947-996?, 970"

Response — All references to the Common Standards (called Forest Standards in the draft) are rewritten in the final documents

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Letter 3728 — Management Area 18· Timber and Other Vegetation 660 - Change to. "Riparian areas are classified as unsuitable for timber production "

Response — Some riparian areas remain suitable Standards were modified, however, to make the first 66 feet of all riparian areas unsuitable for timber management.

Letter 3728 — Management Area 18 Timber and Other Vegetation 661 - Change to. "Vegetation management can be conducted to benefit riparian-dependent resources All vegetation manipulation requires concurrence by appropriate State and Forest Service biologists."

Response — While coordination and consultation with State agencies is appropriate, the Forest Service cannot give the States concurrence status concerning Forest management.

Letter 3728 — Management Area 18 Delete Standards 662 through 680.

Letter 4038 — Delete Standards 662 thru 680 on pages 2-127 thru 2-128 of the Draft Revised Forest Plan

Response — Standards 667, 669 and 679 were deleted Standards 662-666 apply to all riparian areas and are retained. Standards 668 and 670-678 were moved to "COMMON STANDARDS" Standard 680 was modified to make the first 66 feet of riparian areas unsuitable for timber production.

Letter 3728 — Management Area 18· Delete Standards 682 through 685

Response — Standards 682, 684 and 685 were deleted Standard 683 was reworded to allow vegetative management to speed the recovery of the diversity and complexity or riparian vegetation

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Letter 3728 — Management Area 18. Timber and Other Vegetation 681 - Change to· "Timber harvest adjacent to riparian areas is conducted [according to] riparian buffer zone (RBZ) standards "

Letter 3728 — Management Area 18 Timber and Other Vegetation 681a - Add the following new standard. "The riparian buffer zone shall extend for 33 feet beyond the established riparian zone on all streams, lakes and ponds, 33 feet from the bank of all intermittent streams and 66 feet beyond the edge of wetlands, spring seeps, and bogs."

Letter 3728 — Management Area 18 Designated Crossings 701 - Change to "Vehicular use within the riparian area and buffer zone is limited so as to result in less than 5 percent of the area with bare soil exposed "

Letter 3728 — Management Area 18 Timber and Other Vegetation 687 - Change to "Corridors for cable logging in adjacent non-riparian areas may be cut through riparian areas after approval by the appropriate State and Forest Service biologists "

Letter 3728 — Management Area 18. Timber and Other Vegetation 686 - Change to "In riparian areas, salvage is permissible if it benefits riparian resources"

Letter 3728 — Management Area 18 Timber and Other Vegetation 681b - Add the following new standard "The RBZ is suitable for timber harvest but no more than 50% of the overstory may be removed Salvage of all dead and dying trees is permitted within the RBZ"

Letter 3728 — Management Area 18 Timber and Other Vegetation 681c - Add the following new standard· "The riparian management zone, along with the RBZ, will serve as a vehicle exclusion zone, shade strip, and filter strip except where slopes exceed 45% In these situations, the filter strip will be extended to a minimum of 200 feet"

Response — These suggested changes entail the designation of riparian buffer zones that extend beyond the riparian area Streamside management zones of at least 66 feet buffer narrow riparian areas Additional buffer zones are not needed

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Letter 3840 — Pg 2-128, [Standard] #683 - Any particular problems or needs relative to a riparian area that is determined by FS and other applicable ecologists and biologists may be addressed on a site-specific basis

Response — The suggested change in this standard does not directly address vegetative management in riparian areas This standard was modified to allow vegetative management to enhance the recovery of the diversity and complexity of vegetation Riparian-dependent resources and values are given the highest priority.

Letter 2629 — Forest access 'could' become VERY LIMITED by #8 Many of the proposed management areas are so different than they are presently, it would make enacting and enforcing them nearly impossible and would only serve to alienate many different user groups, including OHV/Four Wheel Drive Some of the areas set as 'Roadless' areas, in no way fit the description of 'Roadless' Closing those existing roads would put unnecessary added and probably harmful pressure on the few remaining 'prime' roads.

Response — Management areas have been allocated so as to maximize the net public benefits of the lands to which they are applied and in most cases do not change the character or access of the lands as they presently are Twenty-seven roadless areas were evaluated in the FEIS as presented in Appendix C Existing roads in these roadless areas are discussed on an area-by-area basis Under the Revised Plan, a road system will be maintained that serves the public, meets management needs, and protects resources in a cost-effective manner.

Letter 4038 — Delete the second paragraph under Management Area 11 on page 2-76 of the Draft Revised Forest Plan.

Response — The paragraph was deleted

Letter 4038 — Change the second paragraph under Management Area 18 on page 2-120 of the Draft Revised Forest Plan to read "Riparian areas have variable widths that are determined by ecologically significant boundaries On the ground conditions will determine the width of individual riparian aeras, however, the riparian width will be at least 66 feet on either side of perennial streams, lakes, ponds, wetlands, spring seeps, and bogs"

Response — No minimum width to riparian area was set. However, even the narrowest riparian areas will be protected by filter strips, shade strips, and vehicle exclusion zones of at least 66 feet from each bank. Only those portions of riparian zones that extend beyond 66 feet from a bank can potentially be suitable for timber production.

Letter 4038 — Replace paragraphs one, two, and three under "Desired Future Condition" on pages 2-120 thru 2-121 of the Draft Revised Forest Plan with: "Riparian areas will generally take on the characteristics of a climax forest Large diameter trees will dominate this area but a variety of age classes will eventually be present due mainly to naturally created forest openings The maturing and eventual death of large woody vegetation will increase the volume of large stems in the stream and on the ground within the riparian area These large stems will increase stream complexity resulting in better pool structures, improved bank stability, added nutrients to the stream system, and reduced flow velocity that will decrease downstream flood damages. The decaying trees on the ground will improve soil conditions and provide improved habitat for numerous species of plants and animals dependent on riparian habitats. Riparian areas are considered unsuitable for timber production. Some vegeta-

tion management does occur in order to benefit riparian-dependent species or to speed the time frame to achieve the desired future condition. The riparian areas provide natural corridors that enhance daily movements and migration of wildlife populations."

Response — The desired future condition for Management Area 18 was rewritten and expanded, with emphasis on biological diversity and complexity.

Letter 4038 — Add the following new standard (tentatively numbered 659a) on page 2-126 of the Draft Revised Forest Plan: "The water quality standards and anti-degradation policy established by the Virginia Water Control Board shall not be violated."

Response — A standard to this effect was added.

Letter 3962 — MA 6: [Standard] 109. If the area is unsuitable for timber production, why will there be timber yields that are non-chargeable? Are these wildlife clearings (111) or vista clearings (80)?

Response — Standard 109 was amended to drop the reference to non-chargeable Non-chargeable is an administrative term used to classify volume from lands unsuitable for timber production.

Letter 3962 — MA 11. [Standard] 410. The maximum size of even-aged openings should be 20 acres.

Response — Standard 410 is deleted and size of openings is now governed by the common standard of 40 acres in Virginia and 25 acres in West Virginia for even-aged management Since Management Area 11 emphasizes motorized recreation a size restriction that emphasizes wildlife habitat development is unnecessarily restrictive.

Letter 3962 — MA 17 [Standards] 605 & 6 Using herbicides is contrary to using biology as the driving force.

Response — Intensive, effective and efficient timber production is the emphasis of Management Area 17 To achieve the desired future condition herbicides will be used in post and pre-harvest situations when site specific analysis supports that conclusion

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Letter 3962 — [Standard] 607 How do we find the areas where pine is the prescribed Management type? This needs to be on a map in the Plan.

Response — This is site specific information which will not be detailed or displayed in the Revised Plan Project level analysis will identify when and where pine seedlings will be planted This is now a common standard.

Letter 3962 — Pg 2-172. [Standard] 991. Why would you harvest on lands unsuitable for harvesting? Doesn't this defeat the purpose of classifying lands as unsuitable?

Response — Refer to FEIS, Appendix B, and Revised Plan, Appendix A, to gain an understanding of land suitability analysis. Basically, there is land that could have been suitable, however, it was not scheduled for harvesting in the FORPLAN II solution for the preferred alternative This land is classified as unsuitable for timber production because it is not needed, not because it is unproductive This land may need vegetation manipulation to help achieve the desired future condition of the management area where it is located If a timber sale is the most cost effective way to achieve that vegetative manipulation, then the timber is harvested, even though the land is classified as unsuitable. Volume produced is non-chargeable towards accomplishing the average annual allowable sale quantity.

Letter 3728 — Management Area 17· Fire 590 - Add " specific silvicultural AND WILDLIFE OBJECTIVES "

Response — Since Management Area 17 emphasis is on timber production, prescribed burning is used to meet specific silvicultural objectives first There will at the same time be benefits to wildlife from the prescribed burn, but the main purpose is for silvicultural needs

Letter 3728 Management Area 16' Timber - Add the following new standard [tentatively numbered 585a]: "Conversion of hardwood to pine is not permitted "

Response Common standards only allow regeneration of hardwood to hardwood and pine to pine.

Letter 3728 Management Area 17. The following is a recommended "purpose" for this MA. The "description" and "DFC" should conform to this purpose statement. Purpose: This MA will emphasize the following: Primary: - Even-aged and uneven-aged silvicultural systems will be used to provide large, high quality hardwood trees for lumber, hard mast production and scenic attributes Secondary: - Wildlife species tolerant of disturbances such as deer, grouse, squirrels, prairie warbler, chestnut-sided warbler and New England cottontail. - Some licensed motorized recreation opportunities will occur.

Response This management area will minimize adverse effects on wildlife, soil, water, recreation and visual values in a cost effective manner. Forest product commodity outputs will contribute to social and economic well-being of local people. Indigenous forest pests are kept at acceptable levels Motorized recreation opportunities are provided.

Letter 3728 Management Area 15: Timber 568 - Delete this standard.

Response This standard is replaced with. Intermediate cuttings--such as improvement, salvage, sanitation cuttings--will occur as long as progression toward the uneven-aged character of this land is maintained

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Letter 3728 Management Area 9: Timber 282 - Change to: "Land is classified as unsuitable for timber production but suitable to meet wildlife habitat objectives & for salvage of dead & dying timber."

Response Land is classified only as suitable or unsuitable for timber production Vegetation manipulation can occur on unsuitable land to meet wildlife habitat objectives. A timber sale can be used if it is the most cost effective way to manipulate the vegetation.

Letter 4038 Delete Standard 166 on page 2-48 of the Draft Revised Forest Plan.

Response Standard 166 has been deleted

Letter 4038 Delete Standard 147 on page 2-46 of the Draft Revised Forest Plan.

Response Standard 147 has been deleted.

Letter 3962 MA 11. [Standard] 414 Where is pine the prescribed Management Area type? Information showing this should be available for public comment

Response Prescribed management type is the forest type for which the stand should be managed Usually it is identical to the forest type The pine management type is where pine forest types are found, or where a mixed stand should be managed for pine

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Letter 3962 [Forest Standard] 1012 The maximum size opening should be changed to 25 acres

Letter 4038 Change Standard 1012 on page 2-176 of the Draft Revised Forest Plan to read. "The maximum size of openings for all management types on the George Washington National Forest for clearcut, shelterwood, seed tree, and other even-aged harvest cutting methods is 25 acres "

Response Maximum size of 40 acres is the amount specified in NFMA In several management areas where wildlife or visual resources are emphasized the maximum size has been lowered

Letter 4038 — Change Standard 1018 on page 2-176 of the Draft Revised Forest Plan to read· "Temporary roads and skid trails are revegetated after silvicultural activities are completed. The objective is to stabilize soils and provide moderate herbaceous growth of grasses and forbs. Fescue is not permitted "

Response — The standard is not changed Closed roads are seeded with non-invasive grass/forb/legume seed mixtures with known value to wildlife

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Letter 4038 — Comment on Standard 1004 on page 2-174 of the Draft Revised Forest Plan· "Pitch and table mountain pine need fire to regenerate successfully. Please clarify!"

Response — They are serotinous species, meaning that heat from fire is needed to release the seeds from the cone for natural regeneration

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Letter 4038 — Repeat Standard 548 (tentatively numbered 991b) on page 2-172 of the Draft Revised Forest Plan· "No artificial conversion of hardwood or hardwood-pine forest types to pine or pine-hardwood forest types is permitted."

Response — This standard has been deleted Artificial regeneration with genetically improved seedlings are used to regenerate pine or pine hardwood stands where pine is the prescribed management type.

Letter 4038 — Repeat Standard 540 (tentatively numbered 991a) on page 2-172 of the Draft Revised Forest Plan· "The area is suitable for timber production Uneven-aged management using group selection and individual tree selection harvest cutting methods may occur, but should be limited to where visuals are a major concern, as along some roads, etc."

Response — This standard is deleted Portions of some management areas have characteristics suitable for using uneven-aged management Uneven-aged management practices will be used in these areas if site specific analysis indicates such practices are appropriate to achieve the desired future conditions.

Letter 4038 — Change Standard 991 on page 2-172 of the Draft Revised Forest Plan to read. "Any projects involving timber harvesting on lands identified as unsuitable for timber harvesting in the Revised Forest Plan are evaluated to determine that (1) such harvesting is necessary to protect or enhance multiple-use values other than timber production (2) such harvesting is consistent with the management direction for the appropriate management area, as determined by the appropriate resource professionals (ie State/USFS wildlife biologists in MA's 9, 10, 11, 14, 15, 16, and 18) The decision document contains this finding "

Response — The standard is left unchanged The NEPA process already requires consultation with others

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Letter 4038 — Question on Standard 970 on page 2-169 of the Draft Revised Forest Plan "Does this exclude skidders, etc Where does this apply on the Forest, in intermittent streams or Forest-wide? Please clarify on delete!"

Response — This standard means wheeled or tracked vehicles will not be used to conduct mechanical site preparation, planting, release or weeding Forest wide

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Letter 3728 — Management Area 14. Timber 550 - Delete this standard and apply Forest Standard 1005 instead

Response — This has been done

Letter 3728	Management Area 17 A standard is needed for a management direction for sites less than 70 for oak
Response	*Clear direction is provided in the desired future condition description for sites 50-60 for oak. They will be* managed for a mix of products
Letter 3728	Management Area 17 Add the following new standard [tentatively numbered 596a] "OPEN roads and vehicular trails are limited to no more than 2 miles per compartment (approximately 1,000 acres)."
Response	Roads will be left open, closed, or closed seasonally in a manner that will protect soil and water resources or meet the management objectives and desired future condition of the management area
Letter 3840	Pg 2-73, [Standard] #341 - "Unsuitable".
Response	The management area is unsuitable for timber production. However, visual quality objectives still apply for managing the visual resource
Letter 3840	In river corridors MA 10 and any adjacent 13A or 13B areas Pg 2-71, [Standard] #340 - The area is classified as unsuitable for timber production
Response	All of Management Area 10 is unsuitable for timber production
Letter 3840	Pg 2-103, [Standard] #505 - Land is classified as unsuitable for timber production Salvage of dead trees along system roads is not permitted
Response	Portions of Management Area 13 are suitable for timber production using uneven-aged management practices. Refer to the map that accompanies the Revised Plan.
Letter 3840	Pg 2-119, [Standard] #603 - Even-age openings can range in size up to 10 acres (not 40) All timber cuts must be surrounded by biological and visual buffer zones
Response	In Management Area 17 where timber production is emphasized, maximum size of opening can be 40 acres as allowed in NFMA Size may be less if needed to meet visual quality objectives or silvicultural needs.
Letter 4038	*Delete Standard 691 on page 2-129 of the Draft Revised Forest Plan*
Response	The standard is deleted. Staged vegetation is used in riparian areas on sites where excessive sedimentation is likely to occur Permanent vegetation is established and maintained on cut and fill slopes
Letter 4038	Change Standard 686 on page 2-129 of the Draft Revised Forest Plan· "In riparian areas, salvage is permissible if it benefits riparian resources "
Response	*Standard 686 is changed to read. dead or dying timber can be salvaged from riparian areas on a site specific* basis if desired future condition is maintained or can be met
Letter 4038	Change Standard 661 on page 2-126 of the Draft Revised Forest Plan to read. "Vegetation management can be conducted to benefit riparian-dependent resources All vegetation manipulation requires concurrence by appropriate State and Forest Service biologists "
Response	This standard is deleted Any project on lands unsuitable for timber production in Management Area 18 would require review as part of the NEPA process

Letter 4038	Change Standard 602 on page 2-119 of the Draft Revised Forest Plan to read. "The Forest strives for the following percent ranges of suitable forest land in the 0 to 10 year age classes: Upland Hardwoods - 8 to 13, Cove Hardwoods - 11 to 14, Scarlet oak/Black oak - 10 to 13, White Pine - 13 to 25, Yellow Pine - 14 to 20, Virginia Pine - 17 to 25"
Response	Standard 602 is changed to only refer to the three working groups from which timber will be harvested. They are Upland Hardwoods 8 to 13%, Cove Hardwoods 11 to 14%, and White Pine 13 to 25%.
Letter 4038	Replace the ninth paragraph on page 2-4 of the Draft Revised Forest Plan with the following· "Through riparian area management, large woody debris provides self-sustaining habitat. The need for additional fish structures and structure maintenance will be reduced through time."
Letter 4038	Replace the tenth paragraph on page 2-4 of the Draft Revised Forest Plan with the following: "Management Area 18 gives specific objectives for large woody debris, water temperature, sedimentation, and dissolved oxygen levels See Management Area 18, standards 611 through 707 "
Response	The desired future condition of the preferred alternative has sufficient amounts of large woody debris that provide self-maintaining habitat, consequently additional artificial structures are not required. Where the desired future condition is not met, artificial structures are added to provide sufficient habitat
Letter 4038	Change Standard 601 on page 2-118 of the Draft Revised Forest Plan to read. "Rotation ages for even-aged systems vary between the following range· Upland Hardwoods - 80 to 120, Cove Hardwoods - 70 to 90, Scarlet oak/Black oak - 80 to 100, White Pine - 40 to 80, Yellow Pine - 50 to 70, Virginia Pine - 40 to 60"
Response	Standard 601 is changed to only refer to the three working groups from which timber will be harvested. They are Upland Hardwoods 80 to 120, Cove Hardwoods 70 to 90, White Pine 60 to 80.
Letter 4038	Change Standard 600 on page 2-118 of the Draft Revised Forest Plan to read· "On lands managed for quality sawtimber, minimum diameter objectives are· for upland hardwoods - 16" - No reference to years, for cove hardwoods - 18" - No reference to years, for white pine - 14"-16" - No reference to years"
Response	Standard 600 is left as is. A diameter objective is meaningless without an age objective when managing for effective timber production
Letter 4038	Change Standard 599 on page 2-118 of the Draft Revised Forest Plan to read. "Lands with the following site indices are managed for quality sawtimber· for upland hardwoods - 70 + oak, for cove hardwoods - 70 + oak, 90 + yellow poplar, for white pine - 80+ white pine"
Response	Standard 599 remains unchanged White pine is productive on lower sites than hardwoods.
Letter 4038	Change the second paragraph under "Desired Future Condition" on page 2-117 of the Draft Revised Forest to read· "Motorized recreation opportunities are provided along arterial, collector, and local roads and trails. Existing trails are maintained A variety of motorized and non-motorized recreation activities can occur including hunting, fishing, mountain biking, dispersed camping, wildlife viewing, driving for pleasure, and viewing scenery Management activities may or may not be visually evident."
Response	The paragraph was changed to read Motorized recreation opportunities for OHV and sedan travel are provided along arterial, collector, and local roads and trails Existing trails are maintained A variety of motorized and non-motorized recreation activities occur including hunting, fishing, hiking, bicycling, berry picking, dispersed camping, driving for pleasure, and viewing scenery and wildlife Management activities may or may not be visually evident Mineral activities may occur in a few locations Maintenance and restoration of developments will be used to provide for wildlife habitat

Letter 4038 — Add the following new paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan: "Existing trails are maintained and new trails are developed to improve recreational access, where demand warrants."

Letter 4038 — Add the following new paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan. "Road locations and densities should meet timber access and wildlife habitat needs."

Letter 4038 — Add the following new paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan: "Roads constructed for timber harvesting are managed for recreation, hunting, fishing, wildlife viewing and administrative access."

Response — Common standards for roads apply to Management Area 17 and don't need to be described in the desired future condition. Roads are only built in this management area to meet timber needs.

Letter 4038 — Delete the fifth paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan.

Response — The paragraph was deleted

Letter 4038 — Replace the fourth paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan with: "On lands with a site index 50 or 60 equivalent for oak, even-aged and uneven-aged timber harvest cutting methods are used to maintain healthy, vigorous mixed hardwood, pine hardwood and pine stands, particularly those dominated by the oak-hickory types, and which provide a mix of forest habitats ranging from early successional regeneration openings to mature stands. Rotation ages on these sites vary, depending on species composition and the silvicultural method best suited for regenerating that species (oak-hickory types are favored wherever possible)."

Response — The paragraph was slightly revised to read· On lands with a site index 50 or 60 equivalent for oak, timber cutting methods provide a mix of forest products which are cut, regenerated, and grown on lands classified as suitable for timber production. The particular mix of products is governed by the silvicultural needs of forest stands. Products produced are sawtimber, pulpwood, fuelwood, and posts Timber objectives are not concentrated on any single aspect of the available market, but rather the mix of forest products offered fluctuates depending on silvicultural needs and practices applied Opportunities are provided for firewood gathering

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Letter 4038 — Replace Standard 585 on page 2-115 of the Draft Revised Forest Plan with· "Regeneration harvest cuts average 10 acres in size, but may range up to 20 acres, if wildlife habitat objectives dictate and they are approved by the appropriate State/USFS biologists."

Response — The standard now reads· Regeneration cuts average approximately 8-10 acres in size, and do not exceed 20 acres

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Letter 4038 — Change Standard 584 on page 2-114 of the Draft Revised Forest Plan to read: "Rotation ages for even-aged management very between the following range· Upland Hardwoods - 80 to 100, Cove Hardwoods - 70 to 100, Scarlet/black oak - 60 to 80, White Pine - 40 to 80, Yellow Pine - 60 to 80, Virginia Pine - 50 to 70"

Response — The standard was modified to specifically indicate scarlet oak, as a part of upland hardwoods, has a rotation age range of 60-70 years

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Letter 4038 — Change paragraph two under "Desired Future Condition" on page 2-113 of the Draft Revised Forest Plan to paragraph four and change it to read. "Both motorized and non-motorized recreation opportunities are provided. A variety of recreational activities can occur, such as hiking, hunting, fishing, mountain biking, driving for *pleasure, viewing scenery, and dispersed camping* "

Response — The paragraph was modified to include fishing and wildlife viewing

Letter 4038 — Change the ninth paragraph under Management Area 16 on page 2-113 of the Draft Revised Forest Plan to read: "Roads constructed for timber harvesting are managed for recreation, hunting, fishing, wildlife viewing and administrative access."

Letter 4038 — Replace the first paragraph under "Desired Future Condition" on page 2-113 of the Draft Revised Forest Plan with: "Hardwood and mixed hardwood stands in this management area would average 60 to 100 years of age and are characterized by a mosaic of small, well-dispersed openings (of various age classes) and permanent herbaceous clearings A mixture of forest vegetation varying in size, shape, height and species composition is produced that emphasizes areas in regeneration and provides grass, forbs and browse."

Letter 4038 — Change paragraph three under "Desired Future Condition" on page 2-113 of the Draft Revised Forest Plan to paragraph two and change it to read "Uneven-aged and even-aged harvest methods with a 5-year to 10-year entry cycle provide mosaics of small openings where vegetation varies in size, shape, height, and species composition and at least 10-15% of the area in regeneration (0 to 10 year age class), as least 10-15% in saplings (11 to 20 year age class) and at least 10-15% in young polesized hardwoods (21 to 30 year age class). Grass, forbs, and browse are also provided on at least 2% of the management area."

Letter 4038 — Add a new third paragraph under "Desired Future Condition" on page 2-113 of the Draft Revised Forest Plan: "Even-aged harvest methods will be emphasized to create desired understory and stem density conditions, to maintain oak-hickory regeneration and to provide stand diversity Even-aged management is the optimal and predominant method of regeneration for the purpose of this management area Uneven-aged harvest methods are used where visual objectives are a concern. Timber harvest operations are dispersed throughout the compartments to enhance wildlife habitat suitability, however cutting units are laid out so that the desired age classes are adjacent or in close proximity to each other "

Response — The entire desired future condition was rewritten However, the references to timber management are not included The emphasis is on early successional species and habitat

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Letter 4038 — Add the following new standard (tentatively numbered 550a) on page 2-108 of the Draft Revised Forest Plan under "Timber": The total area regenerated per entry period will not exceed 10% of the National Forest ownership within the compartment "

Letter 4038 — Add the following new standard (tentatively numbered 574a) on page 2-112 of the Draft Revised Forest Plan. "The total area regenerated per entry period will not exceed 10% of the National Forest ownership within the compartment "

Response — The amount of regeneration will be guided by how it helps meet the desired future condition. Standards such as rotation ages and habitat conditions over a wider area than an arbitrary compartment boundary will be used.

Letter 4038 — Delete Standard 568 on page 2-112 of the Draft Revised Forest Plan.

Response — There is no such standard number on page 2-112

Letter 4038 — Add the following new standard (tentatively numbered 559b) on page 2-110 of the Draft Revised Forest Plan. "Even-aged regeneration cuts (clearcut, shelterwood, and seed tree) are separated from each other by a minimum distance of 660 feet (10 chains) "Removal cuts" (in this case, the practice of commercially removing the overstory, usually a mixed oak stand containing scattered white pine sawtimber, from a naturally established white pine seedling-sapling understory/midstory) are also regeneration cuts to which these dispersion requirements apply."

Response — The minimum dispersion distance has been 330 feet (5 chains) Without some justification for a greater distance, there is no reason to change

Letter 4038 Add a "Timber" section on page 2-110 of the Draft Revised Forest Plan

Response The timber standards appear throughout the pages describing this management area

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Letter 4038 Replace the third paragraph under "Desired Future Condition" on page 2-110 of the Draft Revised Forest Plan with: "*Where silviculturally optimal, uneven-age harvest methods with 10 to 15-year entry cycles provide* continuous overstories of older and younger trees, large dens, continuing supplies of hard and soft mast for *wildlife or brood range.*"

Response The desired future condition for Management Area 15 does not specifically mention the use of uneven-aged management However, a standard is included to allow uneven-aged management in portions of the management area identified as feasible for uneven-aged management. Site specific analysis during project implementation will describe how uneven-aged management is helping to achieve the desired future condition

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Letter 4038 Add a new paragraph under "Desired Future Condition" on page 2-110 of the Draft Revised Forest Plan "The even-aged harvest method will be emphasized to maintain oak regeneration, to create open understory conditions and to provide stand diversity Even-aged management is the optimal and predominant method of regeneration for the purpose of this Management Area Long narrow cuts with an undulating perimeter are preferred Even-aged harvest methods with longer rotations are used to provide mosaics of older and younger trees, large dens and continuing supplies of hard and soft mast. Timber harvest operations are dispersed, not concentrated, within the compartment to enhance wildlife habitat suitability."

Response The desired future condition has been rewritten to include some of the commenters' concerns

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Letter 4038 Repeat Standard 548 (tentatively numbered 541a) under "Timber" on page 2-107 of the Draft Revised Forest Plan. "No artificial conversion of hardwood or hardwood-pine forest types to pine or pine-hardwood forest types is permitted "

Response Artificial regeneration is covered in Chapter 3 of the Revised Plan under "COMMON STANDARDS".

Letter 4038 Delete Standard 542 on page 2-107 of the Draft Revised Forest Plan.

Response This standard was deleted

Letter 4038 Repeat Standard 585 (tentatively numbered 403e) under "Timber" on page 2-83 of the Draft Revised Forest Plan: "*Regeneration harvest cuts average 10 acres in size, but may range up to 20 acres, if wildlife habitat objectives* dictate and they are approved by the appropriate State/USFS biologists."

Response In Management Area 11 where motorized recreation is emphasized, the Common Standards relating to size of openings is sufficient direction for helping to achieve the desired future conditions Restrictions in size for wildlife habitat are not necessary

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Letter 4038 Repeat Standard 584 (tentatively numbered 403d) under "Timber" on page 2-83 of the Draft Revised Forest Plan. "Rotation ages for even-aged management vary between the following ranges: Upland Hardwoods - 80 to 100, Cove Hardwoods - 70 to 100, Scarlet/black oak - 60 to 80, White Pine - 40 to 80, Yellow Pine - 60 to 80, Virginia Pine - 50 to 70."

Response Management in the yellow pine working group is not needed to meet the desired future conditions in Management Area 11. Scarlet oak/black oak is considered as part of the upland hardwoods working group and does not need a shorter rotation in this management area

Letter 4038	Repeat Standard 583 (tentatively numbered 403c) under "Timber" on page 2-83 of the Draft Revised Forest Plan· "Even-aged management is the predominant silvicultural system used to meet wildlife requirements The decision on any specific timber harvest method is based on site-specific analysis "
Response	Both uneven-aged and even-aged systems can be used in Management Area 11 The actual cutting method in either system will be a site specific decision
Letter 4038	Repeat Standard 533 (tentatively numbered 403a) under "Timber" on page 2-83 of the Draft Revised Forest Plan· "Closed roads are seeded with vegetation for wildlife species. Fescue is not seeded for wildlife species "
Response	Closed roads are seeded with non-invasive grass/forb/legume seed mixtures with known value to wildlife.
Letter 4038	Repeat Standard 582 (tentatively numbered 403b) under "Timber" on page 2-83 of the Draft Revised Forest Plan· "The area is suitable for timber production "
Response	The suitable and unsuitable portions of Management Area 11 are clearly described in the narrative
Letter 4038	Delete Standards 404 through 414 on pages 2-83 and 2-84.
Response	Standards 405 through 411 are deleted Standards 412-413 are now in Chapter 3 of the Revised Plan under "COMMON STANDARDS"
Letter 4038	Change Standard 369 on page 2-75 of the Draft Revised Forest Plan to read· "The Forest strives to attain an overall rotation of 120+ years for even-aged stands Rotation ages for even-aged systems are varied between the following range Upland Hardwoods - 120 to 200, Cove Hardwoods - 120 to 170, Black/Scarlet Oak - 70+, White Pine - 80+"
Response	Scarlet oak is part of Upland Hardwoods and has a rotation age of 70+
Letter 4038	Add the following new standard (tentatively numbered 76a) to page 2-35 of the Draft Revised Forest Plan: "No salvage of insect damaged, diseased, wind thrown, or fire killed trees shall occur. Firewood cutting shall not occur "
Response	The standard now reads· Salvage of dead and dying trees, and firewood gathering is not permitted.
Letter 4038	Change Standard 76 on page 2-35 of the Draft Revised Forest Plan to read "Existing and candidate Research Natural Areas are classified as unsuitable for timber production "
Response	The entire Management Area 4 is unsuitable for timber production as stated in the narrative. It is not necessary to restate for each portion of the management area
Letter 4038	Revise Table 2-7 [in the Draft Revised Forest Plan] to reflect acreages in even-aged and uneven-aged systems only, instead of listing particular methods, make sure table says estimated average acreages Clearly refer to all the potential (known and future) harvest methods which may be employed EXAMPLE. Shelterwood and modified shelterwood are not the same methods and modified is not mentioned in the Plan but is being promoted by the GWNF Staff
Response	Table 2-7 is revised to show estimates of the type of cutting methods Such information is disclosed for each alternative in the FEIS

Letter 4038 — Combine the Timber and Vegetation write-ups on pages 2-14 thru 2-17 of the Draft Revised Forest Plan into a new heading of "Vegetation Management". Refer to pages 13 and 14 of the Commonwealth of Virginia comments for the correct order of the paragraphs

Response — Since the "Timber" narrative refers to treatments on lands suitable for timber production and the "Vegetation" narrative refers to treatments on unsuitable land, the two distinctions are important

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Letter 4038 — Add the following new standard (tentatively numbered 29a) to page 2-29 of the Draft Revised Forest Plan under the heading "Timber and Other Vegetation" "Salvage of insect damaged, diseased, wind thrown, or fire killed trees shall occur only if that activity is consistent with the special biological management objectives for the area. Firewood cutting shall not occur "

Response — Cutting of dead or dying trees can occur along existing roads to provide public safety. Availability for removal as salvage depends on the degree of disturbance determined on a case by case basis

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Letter 4038 — Replace the third paragraph on page 2-16 of the Draft Revised Forest Plan with the following. "On Lands Unsuitable for Timber Production. As displayed in Table 2-6, approximately _____% of the Forest is unsuitable *for timber production On most of these lands, the desired future condition involves allowing natural disturb*ances and changes that occur in a forest environment to be the controlling factor affecting vegetation. Some habitat manipulation may take place on unsuitable lands to meet biological objectives "

Letter 4038 — Replace the final paragraph on page 2-15 of the Draft Revised Forest Plan with the following. "The Forest Plan allows both even-aged and uneven-aged harvest systems and specifies that the system which will best achieve the goals and objectives of the Management Area will be utilized "

Letter 4038 — Replace the third paragraph on page 2-17 of the Draft Revised Forest Plan with the following. "About _____% of the suitable land is managed to emphasize production of high-quality habitat with increased public access Management on these lands emphasizes high quality habitat, while producing valuable sawtimber, and provides fuelwood and pulpwood See Management Area 17."

Letter 4038 — Replace the fourth paragraph on page 2-16 of the Draft Revised Forest Plan with the following· "Trees may be salvaged when existing access makes them readily available and when such action is consistent with Management Area objectives "

Letter 4038 — Replace the second paragraph on page 2-17 of the Draft Revised Forest Plan with the following "On Lands Suitable for Timber Production The desired future condition on lands suitable for timber production involves changes in vegetation to accomplish specific Management Area objectives Table 2-6 contains a breakdown of the number of acres of land suitable for timber production in each management area. COMMENT Revise acreages according to the attached standards and guides "

Letter 4038 — Replace the fifth paragraph on page 2-16 of the Draft Revised Forest Plan with the following. "Habitat improvement projects cause vegetation disturbances when clearings are created or prescribed burning is done."

Response — This section has been completely rewritten These comments are no longer relevant.

Letter 4038 — Change Standard 540 on page 2-107 of the Draft Revised Forest Plan to read. "The area is suitable for timber production Uneven-aged management using group selection and individual tree selection harvest cutting methods may occur, but should be limited to where visuals are a major concern, as along some roads, etc."

Response — This standard is deleted There is no longer any land dedicated to uneven-aged management in Management Area 14

Letter 3962 — Standard 568 "Only ground based logging systems are used." Should be added to all Management Areas that are suitable for timber production

Response — Cable logging and helicopter logging are viable logging systems that can often be less disturbing to the soil than ground based systems when valuable timber is involved. They will be used when appropriate

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Letter 3962 — MA 17 [Standard] 603 Opening size should be limited to 25 acres, with a 20 acre average. Openings should also be biological driven by wildlife needs, not timbering needs

Response — In Management Area 17 where timber production is emphasized, opening size is driven by efficient economical and effective timber production This is the whole purpose of having management areas Management areas are areas of the Forest with similar management objectives where compatible management prescriptions are applied

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Letter 3962 — MA 10. [Standard] 368 Add even-aged to this standard. I cannot find a Forest Standard for slopes and timbering in this plan

Response — This standard is deleted

Letter 3962 — MA 9 [Standard] 282. Salvage of dead or dying timber should be considered timber production and is therefore not allowed If salvage stays in, salvage should only be accessible from existing roads that are on the perimeter of the area, and not from roads that go into the area (These should be closed to conform with the roadless classification)

Response — Project plans and their environmental analyses which plan to conventionally harvest timber recognize and specifically analyze conditions and situations where soil productivity may be impaired long term These conditions are listed as· soils less than 20 inches to bedrock, extremely stony surfaces, and conditions established by the soil inventory where K-value (soil erodibility factor) and continuous slope indicates the T-factor (allowable soil loss) is exceeded Salvage of dead, dying or damaged trees can occur from perimeter roads using helicopter logging for a distance up to 1/2 mile Salvage and firewood gathering from interior roads can occur using ground based methods without additional road construction. Landings can be provided adjacent to existing roads There are very few roads within Management Area 9 These do not preclude roadless classification since up one-half mile of road per 1000 acres is permissible in roadless areas

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Letter 4038 — Change Standard 681 on page 2-128 of the Draft Revised Forest Plan to read· "Timber harvest adjacent to riparian areas is conducted using riparian buffer zone (RBZ) standards "

Letter 4038 — Add the following new standard (tentatively numbered 681b) on page 2-128 of the Draft Revised Forest Plan under "Timber and Other Vegetation" "The riparian buffer zone is suitable for timber harvest but not more than 50% of the overstory may be removed Salvage of all dead and dying trees is permitted within the RBZ."

Letter 4038 — Delete Standards 682 thru 685 on pages 2-128 thru 2-129 of the Draft Revised Forest Plan

Letter 4038 — Add the following new standard (tentatively numbered 681c) on page 2-128 of the Draft Revised Forest Plan under "The riparian management zone, along with the RBZ, will serve as a vehicle exclusion zone, shade strip, and filter strip except where slopes exceed 45% In these situations, the filter strip will be extended to a minimum of 200 feet "

Letter 4038 — Add the following new standard (tentatively numbered 681a) on page 2-128 of the Draft Revised Forest Plan under "Timber and Other Vegetation"· "The riparian buffer zone shall extend for 33 feet beyond the established riparian zone on all streams, lakes, ponds, wetlands, spring seeps, bogs, and 33 feet from the bank of all intermittent streams "

Response — Standards 684 and 685 are deleted Standards 681-683 are replaced with The first 66 feet of the riparian areas is unsuitable for timber management The remaining riparian area is classified as suitable for timber management that meets the desired future condition of the riparian areas and blends with the adjacent management area's desired future condition Vegetation in riparian area is managed as follows

The first 66 feet from the edge of stream bank is classified as unsuitable for timber management The highest priority is to manage vegetation to meet the Desired Future Condition of the aquatic (fisheries and aquatic

dependent animals and plants) resources Identification of vegetation to treat (overstory and understory) is determined by site specific analysis

The remaining riparian zone is classified as suitable for timber management and appropriate blend treatments with the adjoining areas' desired future condition The highest priority is to manage vegetation in a manner that will benefit terrestrial dependent animals and concurrently provide high quality forest products except where aquatic zones such as seeps, depressions, and old channel beds exist In these cases, managing for aquatic dependent resources is the highest priority

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Letter 4038 — Change the first paragraph under "Desired Future Condition" on page 2-117 of the Draft Revised Forest Plan to read. "Vegetation within this management area consists of a mixture of forest stands of varying ages and forest types, depending on site quality Individual stands are fairly uniform in age but contain a variety of species which, due to growth variations, are of different sizes The Forest is characterized by a mosaic of habitat types, ranging from mature forest stands to early successional habitat, with a mixture of age classes interspersed with permanent herbaceous clearings Dispersion and distribution of age classes is dependent on site quality and habitat objectives "

Letter 4038 — Add the following new paragraph between the first and second paragraphs under "Desired Future Condition" on page 2-117 of the Draft Revised Forest Plan "Better sites supporting older stands with longer rotation ages provide habitat for species which prefer mature forest stands such as squirrel, turkey, pileated woodpecker, etc Poorer sites supporting shorter rotation ages provide a variety of age classes favoring species which prefer early successional habitat or mixed aged stands, such as ruffed grouse, deer, white-eyed vireo, chestnut-sided warbler, etc "

Response — There are no specific wildlife habitat objectives in this management area Management activities in the stands are spatially distributed and timed to minimize effects on wildlife values in a cost effective manner.

Letter 4038 — Change the first paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan to read. "This 60,131-acre management are contains portions of the Forest containing the better quality sites which produce the best wildlife habitat and can support high wildlife populations. This management area is intensively managed to provide quality hardwood and mixed stands, creating a variety of habitat types which benefit a wide range of wildlife species Even-aged and uneven-aged silvicultural methods are used within this management area to achieve desired biological objectives The management area is well accessed, providing a range of opportunities for wildlife viewing, hiking, hunting, fishing, mountain bicycling, timber harvesting and fuelwood gathering."

Letter 4038 — Replace the second paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan with. "The Forest is characterized by a mosaic of habitat types, ranging from mature forest stands to early successional habitat, with a mixture of older, younger and regenerated stands Dispersion and distribution of age classes is dependent on site quality and habitat objectives."

Letter 4038 — Replace the third paragraph under Management Area 17 on page 2-116 of the Draft Revised Forest Plan with· "On lands with a site index of site 70 or higher for oak, or equivalent for other species, timber harvest cutting methods are applied that will best provide high quality mixed hardwood, pine hardwood and pine stands - where suitable, oak-hickory types are favored - providing quality wildlife habitat. These sites are managed on long rotations Decisions on specific harvest methods are based on site-specific project-level analysis to meet habitat objectives "

Response — The paragraph was left unchanged The emphasis for this management area is timber production. Management in the stands are spatially disturbed and timed to minimize effects on wildlife values in a cost effective manner.

Letter 4038 — Change the first paragraph under "Uneven-Aged Management" on page 2-107 of the Draft Revised Forest Plan to read "In addition to standards 851-854, 938, 939, 990, 993, 996-1003, and 1015-1019 in the FOREST STANDARDS at the end of this chapter, standards 540-541, 543, 548, and those not numbered apply to lands that are suitable for timber production where uneven-aged timber harvest cutting methods are employed to achieve wildlife objectives "

Response	Chapter 2 was rewritten and is now Chapter 3 Standards for uneven-aged Management no longer apply to Management Area 14 because there are no lands dedicated to uneven-aged management
Letter 4038	Change the first paragraph on page 2-42 of the Draft Revised Forest Plan to read "Besides standards 112 thru 128 listed below, standards 756-823, 825, 826, 831-850, 855-937, 940-966, 971-989, 992, 1018, and 1021-1027 under FOREST STANDARDS at the end of this chapter apply to the visual foreground of outstanding scenic routes traversing the Forest. These are typified by Interstate 64, certain U S and state routes, some of which are listed as Virginia By-Ways "
Letter 4038	Change the sixth paragraph on page 2-44 of the Draft Revised Forest Plan to read "The FOREST STANDARDS listed under SCENIC ROUTES above and standards 129-138, 140-146, and 148 listed below apply to the visual foreground zone of the Highlands Scenic Tour."
Letter 4038	Change the first paragraph on page 2-47 of the Draft Revised Forest Plan to read· "Besides standards 150-152, 154-155, and 157-165 listed below, standards 756-767, 771-823, 833-935, 938-966, 970-993, 996-1003, 1015-1019, and 1021-1027 under FOREST STANDARDS at the end of this chapter apply to the midground, background and unseen areas of the Highlands Scenic Tour."
Response	Chapter 2 was rewritten and is now Chapter 3 For Management Area 7 see Standards, The Highlands Scenic Tour - Standards Foreground and Standards Middleground Other than the Common Standards noted, the standards listed apply only to Management Area 7
Letter 4038	Change the first paragraph under "Even-Aged Management" on page 2-108 of the Draft Revised Forest Plan to read "In addition to standards 768-770, 825-831, 851-854, 938, 939, 941, 967-970, 990, 993-995, 996-1002, 1004, 1006-1014, and 1016-1019 in the FOREST STANDARDS at the end of this chapter, standards 544-550, and those not numbered below apply to lands that are suitable for timber production where even-aged timber harvest cutting methods are employed to achieve wildlife objectives "
Response	Chapter 2 was rewritten and is now Chapter 3 For Management Area 14 see Standards, Suitable Lands. Other than the Common Standards, the standards listed apply only to Management Area 14
Letter 4038	Change the first paragraph on page 2-66 of the Draft Revised Forest Plan with the following "In addition, to standards 756-823, 825, 826, 831-850, 855-858, 891-904, 906-937, 941-946, 967-969, 971-989, 991, 992, and 1020-1027 at the end of this chapter, standards 292 thru 295, and 314 thru 325, and those not numbered are common to both recreational and scenic rivers All Standards set forth in Management Area 18 also apply to this management area "
Letter 4038	Change the first paragraph on page 2-73 of the Draft Revised Forest Plan to read· Standards 341 thru 354 apply to segments of rivers qualifying for scenic river designation "
Response	Chapter 2 was rewritten and is now Chapter 3 For Management Area 10 see Standards (common to both recreational scenic rivers), Scenic River - Standards and Recreational Rivers - Standards Other than the common Standards noted, the standards listed apply only to Management Area 10
Letter 4038	Change the first paragraph under "Standards" on page 2-76 of the Draft Revised Forest Plan to read "In addition to standards 756-767, 771-823, 833-850, 855-858, 891-937, 944-946, and 971-990 at the end of this chapter, standards 371-373, 376-378, 382-389, 391-393 and those not numbered listed below apply to all lands within this management area "
Letter 4038	Change paragraph one under "Standards" on page 2-82 of the Draft Revised Forest Plan to read· "In addition to standards 851-854, 859-890, 938-940, 942, 943, 947-966, 970, 991, and 993-1019 listed under FOREST STANDARDS at the end of this chapter, standards 399-403, 533, 562, 582-587 and those not numbered listed below apply to lands suitable for timber production within this management area "
Response	Chapter 2 was rewritten and is now Chapter 3 For Management Area 10 see Standards Other than the Common Standards noted, the standards listed apply only to Management Area 11

Letter 4038 Change the heading of the fourth paragraph on page 2-101 of the Draft Revised Management Plan to read: "Crabtree Falls, Lake Moomaw, Hidden Valley, Sherando Lake, Panther Falls"

Letter 4038 Change the first paragraph under "Standards" on page 2-103 of the Draft Revised Forest Plan to read. "Besides standards 508 thru 523 listed below, standards 756-823, 825, 826, 833-850, 855-858, 891-904, 906-935, 941, 944-946, 979, 984-989, 992, and 1021-1027 under FOREST STANDARDS at the end of this chapter apply to Little River, Mount Pleasant, and Spy Rock Basin "

Letter 4038 Change the first paragraph on page 2-102 of the Draft Revised Forest Plan to read: "In addition to standards 756-766, 771-821, 833-850, 885-904, 906-936, 944-948, 971-989, 991, and 1024-1027 listed in the FOREST STANDARDS at the end of this chapter, standards 491 thru 507 and one not numbered apply to Crabtree Falls, Lake Moomaw and Hidden Valley--Jackson River "

Response Chapter 2 was rewritten and is now Chapter 3 For Management Area 13 see Standards Other than the Common Standards noted, the standards listed apply only to Management Area 13.

Letter 4038 Change the first paragraph under "Standards" on page 2-110 of the Draft Revised Forest Plan to read· "In addition to standards 756-767, 771-823, 825-831, 832-850, 859-937, 940, 941, 942-966, 967-969, 971-989, 991, 993, 1020 in the FOREST STANDARDS at the end of this chapter, standards 533, 551-563, 939, 1024, 1027 and those not numbered apply to all lands within this management area."

Letter 4038 Change the first paragraph under "Even-aged Management" on page 2-112 of the Draft Revised Forest Plan to read. "In addition to standards 768-770, 825-831, 851-854, 938, 939, 941, 967-970, 990, 996-1002, 1004-1014, and 1016-1019 in the FOREST STANDARDS at the end of this chapter, standards 570 thru 574, and those not numbered below apply to lands that are suitable for timber production where even-aged timber harvest cutting methods are employed to achieve wildlife objectives "

Letter 4038 Change the first paragraph under "Lands Unsuitable for Timber Production" on page 2-111 to read. "In addition to standards 768-770, 825-831, 941, 967-969, and 991 in the FOREST STANDARDS at the end of this chapter, standard 564 and 565 apply to lands that are unsuitable for timber production."

Letter 4038 Change the first paragraph under "Uneven-aged Management" on page 2-111 of the Draft Revised Forest Plan to read· "In addition to standards 851-854, 938, 939, 970, 990, 991, 993, 996-1003 and 1015-1019 in the FOREST STANDARDS at the end of this chapter, standards 566, 567 and those standards not numbered apply to lands that are suitable for timber production where uneven-aged timber harvest cutting methods are employed to achieve wildlife objectives "

Response Chapter 2 was rewritten and is now Chapter 3. For Management Area 15 see Standards, Standards Unsuitable Land, Standards Uneven-aged Management, and Standards Even-aged Management Other than the Common Standards noted, the standards listed apply only to Management Area 15

Letter 4038 Change the first paragraph under "Standards" on page 2-114 of the Draft Revised Forest Plan to read· "In addition to standards 756-823, 825-990, 993-1002, 1004-1014, and 1016-1018, 1020-1023, and 1025 listed in the FOREST STANDARDS at the end of this chapter, standards 531, 533, 534, 562, 576-587 and those not numbered below apply to all lands within this management area "

Response Chapter 2 was rewritten and is now Chapter 3 For Management Area 16 see Standards. Other than the Common Standards noted, the standards listed apply only to Management Area 16.

Letter 4038 Change the first paragraph under "Standards" on page 2-117 of the Draft Revised Forest Plan to read· "In addition to standards 756-823, 825-990, 993-1002, 1004-1014, 1016-1018, and 1020-1023 listed in the FOREST STANDARDS at the end of this chapter, standards 533, 562, 564, 589-610, 1026-1027 and those not numbered below apply to all lands within this management area "

Response Chapter 2 was rewritten and is now Chapter 3 For Management Area 17 see Standards. Other than the two Common Standards noted, the standards listed apply only to Management Area 17

Letter 4038	Change the first paragraph under "Standards" on page 2-121 of the Draft Revised Forest Plan to read: "In addition to standards 756-757, 771-823, 833-850, 855-858, 891-904, 906-936, 944-947, 971-989, 992, and 1021-1027 listed in FOREST STANDARDS at the end of this chapter, standards 313, 437-441, 611-633, 638-642, 644-661, 681, 686-690, 692-697, 702, 703, 707 and those not numbered listed below apply to all lands within this management area."
Response	Chapter 2 was rewritten and is now Chapter 3 For Management Area 18 see Standards for all MA 18 Lands, and Management Area 18A - Standards. Other than the Common Standards noted, the Standards listed apply only to Management Area 18
Letter 4038	Replace the tenth paragraph on page 2-14 of the Draft Revised Forest Plan with the following: "Allowable Sale Quantity Timber management is one of the major tools used to achieve the desired future condition of the Forest. Management area goals produce a continuing flow of wood products for the benefit of society in concert with accomplishing other resource objectives The average annual allowable sale quantity for the plan period is _____ million board feet harvested off lands suitable for timber production. Appendix A of this Revised Forest Plan contains details of the timber management program including the base sale schedule."
Response	This paragraph was deleted in the revision of Chapter 2 Allowable sale quantity is defined in the glossary
Letter 4038	Delete the final paragraph on on page 2-16 of the Draft Revised Forest Plan
Response	This paragraph was deleted in the revision of Chapter 2
Letter 48	Revise the acreages in Table 2-16 of the Draft Revised Forest Plan based on changes caused by adjustments in the standards in Management Areas 14, 15, 16 and 17
Response	There are no acreages in Table 2-16 There is a table of unacceptable weather conditions for herbicide application Herbicides will continue to be a viable option for post and pre-harvest site preparation
Letter 2665	"Illegal OHV use is prevalent Law enforcement and peer pressure have not been effective tools for controlling illegal use off designated routes " Peer pressure and enforcement have continued to prove ineffective against ATV abuses (Plan, 2-81, 2-82)
Response	Law enforcement is an integral part of forest management and as such is an integral part of Land Management Planning Nevertheless, the specifics of law enforcement is outside the scope of the planning process. Not having specific routes designated for ATV's would make management and law enforcement much more difficult.
Letter 3728	Forest Standard 771: The WVDNR is not aware of the existence of the West Virginia Cave Board mentioned in this standard Agencies to be consulted regarding "caves" should be identified in this standard Perhaps the Cave Conservancy of the Virginias and the Nature Conservancy should be official contacts
Response	Reference to specific agencies has been removed from the standard
Letter 3728	Forest Standard 775 In the second sentence the phrase "adjacent to cave entrances" should be more clearly defined.
Response	The standard has been simplified in the Revised Plan
Letter 3728	Management Area 15. Recreation 555 - We request that this standard be deleted
Letter 3840	Pg 2-110, [Standard] #555 - Motorized use allowed where it doesn't conflict with indicator species objectives (on open system roads only)
Response	Standard 555 has been deleted from Management Area 15 in Chapter 3 of the Revised Plan.

Letter 3728 — Management Area 17 Recreation 593 - Add the following "The area is managed to provide recreation opportunities compatible with a semi-primitive motorized 2, semi-primitive motorized 1, or a roaded modified ROS classification This allows a non-motorized recreation opportunity spectrum classification as stated in the Desired Future Condition for this management area "

Letter 4038 — Change Standard 593 on page 2-117 of the Draft Revised Forest Plan to read· "The area is managed to provide recreation opportunities compatible with a roaded natural ROS classification "

Response — Management Area 17 contains acreage with three adopted ROS classes roaded modified, roaded natural, and semi-primitive motorized (sub-class 1)

Letter 3728 — Management Area 15. Add the following new Forest Standard [tentatively numbered 556a] which reads as follows "Existing trails are maintained and the trail system expanded."

Response — Trail management is covered under "COMMON STANDARDS" in Chapter 3 of the Revised Plan

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Letter 3728 — Forest Standard 786 It is not clear how and by whom caves are classified to one of the 3 classes. How is this done? How are classifications reviewed? Will caves be monitored to determine impacts of visitation?

Response — This standard, repeated as Appendix D of the Revised Plan, has been deleted as a standard Determination of classification will be made by Forest professionals including but not limited to the Forest Archaeologist, Botanist, Wildlife Biologist, appropriate Staff Officers and District Rangers. Cooperating agencies and educational institutions will be involved as necessary and appropriate Caves will be monitored for impacts

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Letter 3840 — Pg 2-114, [Standard] #581 - Roads are closed (TSL D) OHV use on open system roads only

Response — This standard has been deleted from the Revised Plan

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Letter 3840 — Pg 2-104, #[Standard] 514 - ".. *some roaded natural recreation opportunities are offered in the periphery of* these areas" - seems to be a constant attempt to invade roadless areas with roads and road oriented activities. The periphery of roadless areas should reflect a management attempt to protect the integrity of the designated area

Response — The areas on the periphery of roadless areas may be managed to protect the integrity of the roadless area by allowing no new roads to intrude Nevertheless, an open road on the periphery is still there and does have an influence on the area

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Letter 3840 — Pg 2-103, Desired Future Condition - Existing roads to be closed and are not opened seasonally

Response — The "Desired Future" for Management Area 13 has been rewritten. However, it is within the theme of the management area to allow motorized use on existing open roads by licensed vehicles only. This remains in the standards for the area

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Letter 3840 — Pg. 2-117, 2nd paragraph - Motorized recreation opportunities are provided on open system roads only, and not on any trails.

Response — The "Desired Future" for Management Area 17 has been rewritten Motorized use is not allowed on trails.

Letter 3848 — 2a. MA 9 Line 279. Add "Existing roads should be evaluated for closure" In keeping with the spirit of remote highlands we should actively be encouraging visitors to explore the forest on foot. This statement does not imply an advocacy of closure of all roads in area 9, but will encourage consideration of the values of roadless tracts.

Letter 3848 — 2b MA 9 Line 279 (again) In area 9 add "Motor vehicles are confined to open roads and trails Open range driving through forest and riparian areas is prohibited "

Response	Standard 279 has been rewritten to better define road management in Management Area 9. Cross country motorized travel is prohibited in all alternatives in all management areas.
Letter 3848	3. In area 11 we have several concerns The first of these is the relative size of the area, some 17,000 acres for 5 trails We believe that the designation of an entire area for ATV/OHV use could lead to open ranging within this area rather than confining the vehicles to the constructed trails. In area 18, riparian zone are designated for streams, why not designate specific trails as such with ATV/OHV use confined explicitly to zones of say 25 feet? This would confine these vehicles, then, to designated paths and it would be clear that open ranging is not permitted The rest of the designated area 11 includes room for possible trail expansion after appropriate review and public comment We therefore recommend the following specific changes:
Letter 3848	3a. MA 11. Line 373. Add "ATV/OHV trails are designated zones of up to 25 feet width " [We suggest 25 feet, more or less may be appropriate].
Response	The write up for Management Area 11 has been rewritten to clarify what happens First, the preferred alternative has only four ATV trails, three existing and one proposed Use is restricted to the trail only and a 25 foot zone is inappropriate Cross country travel is prohibited Any ATV trail construction will be preceded by necessary environmental analysis on the impacts to resources and analysis of any trade-offs among resources
Letter 3848	3b. MA 11. Line 377. Add "New OHV/ATV trails should not be constructed where they will need to cross a riparian zone" Change existing line to " ..designated crossings which are bridged or graveled. " Motor powered vehicles which are intended to be used off roads have resulted in considerable resource damage due to irresponsible human use. We are particularly concerned that these vehicles are not permitted to be operated in a place such that the opportunity for abuse in riparian zone arises We would further add "New OHV/ATV trails should not be opened or constructed within 100 yards of a wild trout stream " By providing a buffer sone of a football field's length between a trout stream and an ATV/OHV trail, the possibility of abuse is reduced and conflicts between user groups are controlled
Letter 3848	3d. MA 11. Lines 374 and 385 To both of these lines we would the phrase " ..except when the trail is within 100 yards of a trout stream " This in keeping with our comments in 1c above
Response	The concept of recommendations made in this comment is included in the Common Standards for the protection of riparian areas
Letter 3848	3c. MA 11. Line 379 Change to "OHV and ATV use open to OHV or ATV use " This clarifies that ATV use off trails is prohibited.
Response	The wording of Standard 379 has been moved to the Common Standards The discussion for Management Area 11 has been rewritten to clarify that cross country motorized travel is prohibited
Letter 3848	3e. MA 11. Line 389e Add "Trails are located no closer than 100 yards of these areas."
Letter 3848	3f MA 11. Line 389f. Add "Trails are located no closer than 100 yards to these areas "
Response	A specific distance criterion is inappropriate to best protect the resources The resources of an area, natural and cultural, will be protected as necessary
Letter 3848	3g MA 11 Lines 394 and 395 The following should be added· "Illegal ATV/OHV use will result in trail closure until a management plan to reopen the trail is approved by the Forest Supervisor
Response	A separate standard is included which states that routes or trails are closed when unacceptable adverse effects occur or are likely to occur The routes remain closed until the adverse effects are eliminated and until measures are implemented to prevent recurrence

Letter 3962 MA 1. 7. This standard should appear in every Management Area. Vehicles use should only be on open system roads. Trails are not suitable for OHV use

Response Management Area 1 has been dropped from the preferred alternative Appropriate discussion has been included to state that licensed OHV use is restricted to open roads.

Letter 3962 MA 11: [Standard] 379. OHV use should only be available on roads open for public use. Trails for OHV use are actually roads, should be called roads, and should be shown on system road maps, and should count as roads. When these "trails", go into roadless areas, you call them roads. You need to be consistent. 382. Why define rides as short or long? This separation is not used in any other recreational description. Delete "and from short to long" in first sentence, and delete sentences #2 and 3. 389c. Delete "minimum two-hour riding experience" 390c. Please shown me an area with significant ATV use that does not pose a significant disruption to wildlife habitat. Does this mean that all ATV trails will be closed?

Response Standard 379 in the Draft Revised Plan has been moved to Common Standards and renumbered. In the preferred alternative, licensed OHV use is restricted to open roads. Roads are called roads throughout the plan. Standard 382 in the Draft Revised Plan has been deleted. A two hour minimum experience is desirable from a user point of view and this standard remains Effects of ATV's on wildlife habitat are considered in the environmental analysis completed or to be completed for each ATV trail It is acknowledged that there are impacts to wildlife habitat Standard 390 has been deleted from the preferred alternative.

Letter 3962 MA 12· [Standards] 448 & 475. OHV use should not be allowed in these sites. They should stay on designated roads that are open to everyone Developed recreational sites should have roads to them that a passenger car can travel.

Response Roads in all developed recreation sites are suitable for normal passenger car use. Licensed OHV's may use any road in accordance with the laws of the states

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Letter 3962 [Standard] 556. Public motorized travel needs to be prohibited as early as February to protect physical resources. Driving on OHV roads in February and March during mud season can be very destructive

Response The reasoning behind this standard has been included in another standard in Management Area 15 The District Rangers will have the option of closing any route with unacceptable resource damage at any time.

Letter 3962 MA 9· [Standard] 273. Recreation facility development should not be allowed within the area. Solitude and development are not compatible. You should be striving for low interaction between users.

Response Facilities of a primitive nature may be present to protect the resources and safety of visitors. The standard has been removed and wording has been incorporated in the "Desired Future" of Management Area 9 to this effect.

Letter 3962 MA 11· In [Standard] 389e, routes are selected that avoid sensitive species areas. The Peters Mill Run ATV complex runs right beside a Special Biological Area In fact some of the sensitive species have been killed by ATV use off the road This area should be closed until the sensitive species have recovered in the area they once were

Response In the preferred alternative, the boundary of Management Area 4 near the Taskers Gap ATV trail has been changed to coincide with the creek The existing trail does not go through Management Area 4 In areas where unacceptable adverse environmental impacts occur, ATV trails will be closed until the situation is corrected

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Letter 3962 MA 11. 2-81 & 2-82 - Desired future conditions Why are we planning for well-designed and well-maintained overnight camping facilities within this specific Management Area? The users of Management Area 11 can use the campsites in the forest that are open to all users You are limiting the general public use of them by putting them in an area with only one specific recreational opportunity

Response — There are no developed recreation campgrounds in Management Area 11. Users may camp in the area very much as they may camp most anywhere in the Forest If funding allows and demand calls for it, developed campgrounds may be built to serve ORV/ATV users. However, they will not be for exclusive use by such users. Management Area 11 emphasizes motorized recreation opportunities. However, it is not meant to limit other recreation opportunities that are compatible.

Letter 3962 — MA 17 2-117. Desired future conditions Motorized recreation opportunities should not be provided along trails. They should only be on system roads.

Response — This comment is correct Motorized use of trails should not occur in Management Area 17.

Letter 3962 — Standard 7, "OHV use restricted to open system roads", should be in every Management Area of the Plan.

Letter 3962 — There is a broad spectrum of OHV standards [122, 139, 153, 315, 2-69]. Standard 530 is a better one and should be in all Management Areas. "Public motorized use is restricted to open system roads."

Response — Standards in Management Area 11 and common standards address OHV use The concept of the comment is included in the appropriate discussions and standards

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Letter 3998 — PATC urges the inclusion by the Forest Service of the Big Blue and Big Schloss trails system under Management Area 6 as 'sensitivity level 1' trails

Response — Management Area 6 is exclusively for the Appalachian National Scenic Trail The Big Blue and Big Schloss trails will be protected as appropriate within the management areas that they traverse

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Letter 4038 — Delete the fifth paragraph on page 2-9 and Table 2-24 in the Draft Revised Forest Plan.

Response — The Revised Plan has been reformatted There will be a table in the plan that lists open roads that will offer the best opportunities for high clearance vehicles

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Letter 4038 — Replace the third paragraph on page 2-9 of the Draft Revised Forest Plan with the following. "Motorized Dispersed Recreation The desired future condition is to maintain a network of open system roads that provide dispersed motorized recreation to licensed vehicles in a variety of forest settings The decision as to which roads will be open will be based on each Management Area's objectives "

Response — The format of the Revised Plan is different from that of the Draft The concept behind this comment has been incorporated

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Letter 4038 — Replace the fourth paragraph on page 2-9 of the Draft Revised Forest Plan with the following· "ATV use on the Forest is incompatible with an alternative that emphasizes biological values No new trails will be developed. However, three trail complexes exist or are being developed on the Forest Existing trails will continue to be provided if users comply with regulations and no resource degradation occurs. See Management Area 11 "

Response — This recommendation that no new trails be developed was not adopted However, any new trail that is developed must be analyzed for environmental effects and trade-offs among all resources, natural and cultural.

Letter 4038 — Change Standard 25 on page 2-29 of the Draft Revised Forest Plan to read "All forms of off-road vehicle use shall be prohibited "

Response — This recommendation does not apply to the wording of standard 25 Off-road vehicle use is addressed in common standards Standard 26 has been changed to reflect that motorized public use is restricted to open system roads and new road construction is normally prohibited

Letter 4038 *Delete Standard 66 on page 2-34 of the Draft Revised Forest Plan*

Response Standard 66 in the Draft Revised Plan has been replaced with a new standard that states that lands within this management area retain their existing ROS classification

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Letter 4038 Delete Standard 70 on page 2-34 of the Draft Revised Forest Plan

Response This standard is needed and has not been deleted

Letter 4038 Delete Standard 139 on page 2-45 of the Draft Revised Forest Plan This standard is a repeat of Standard 122

Response This standard has been deleted ORV use is addressed in common standards and in individual management *areas as necessary*

Letter 4038 Change Standard 280 on page 2-64 of the Draft Revised Forest Plan to read "Bridges and culverts are not installed for visitor convenience, but may be established for safety and resource protection or management purposes"

Response Bridges and culverts installed for management purposes would be for user convenience This is not appropriate to the the theme of Management Area 9

Letter 4038 *Delete Standard 153 on page 2-47 of the Draft Revised Forest Plan*

Response This standard has been deleted.

Letter 4038 Delete Standards 389i, 390 a-e, 1-3, and Table 2-10 on pages 2-79 thru 2-80

Response Standards for Management Area 11 have been reformulated to better address motorized recreation

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Letter 4038 Change letter a under Standard 389 on page 2-78 of the Draft Revised Forest Plan to read· "a Demand is *determined and documented In measuring demand, the following factors are normally included. the commit*ment of an OHV club for assistance with construction, maintenance, patrolling and monitoring, significant number of requests by ATV users or other publics to provide facilities; demonstrated conflicts with ATV use and other Forest users; and existing uncontrolled ATV use subjects the natural resources to unacceptable adverse effects."

Response This standard has been rewritten with simpler wording than in either the draft or in the recommended changes The intent of the standard has not changed however

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Letter 4038 Change Standard 389 on page 2-78 of the Draft Revised Forest Plan to read. Proposals for ATV routes are *evaluated during project level analysis using the following criteria from the publication titled Management* Direction For Off-Road Vehicle Use in the Appalachian Mountain National Forests (pages 4-5)·"

Response The standard has been rewritten to be more inclusive than either the Draft Revised Plan or the recommended changes Specific route analysis may have additional criteria not included in any of the references.

Letter 4038 Replace Standard 388 on page 2-78 of the Draft Revised Forest Plan with. "Monitoring and evaluation of ATV trails will be accomplished principally by trail user organizations with Forest Service backup and enforcement ATV trails will be closed by the Forest Service in the event of egregious misuse or abuse. The following activities constitute misuse or abuse illegal access off designated routes, failure to maintain trails in accordance with *agreements with the Forest Service, failure to ensure appropriate trail user behavior including the prevention* of adverse impacts upon adjacent natural resources, and violation of law or regulation associated with ATV trail use"

Response	The recommended change would be too complex for the scope of this plan Such wording would be confusing rather than helpful However, the concept behind the recommended change is already in place within the standards for Management Area 11 and in other applicable regulations and directions. Monitoring and evaluation will be done as necessary
Letter 4038	Change Standard 387 on page 2-78 of the Draft Revised Forest Plan to read. "Area or trails are closed to the type of ATV causing, or likely to cause, considerable adverse effects. The areas or trails remain closed until the adverse effects have been eliminated and until measures have been implemented to prevent recurrence Action is taken to provide alternate trails where feasible "
Response	Changes made to this standard make it simpler and more straight forward than either the recommendation or the Draft Revised Plan.
Letter 4038	Change Standard 383 on page 2-77 of the Draft Revised Forest Plan to read: "Series of loops are used when laying out and designing OHV trail systems This results in a more compact trail system that confines the impacts of ATV use to an area that is smaller relative to trail systems that are linear and long-distance in nature "
Response	The existing standard is simpler and says the same thing.
Letter 40	Delete Standards 379 thru 381 on page 2-77 of the Draft Revised Plan.
Response	Standard 379 has been moved to Common Standards, 380 has been reworded, and 381 has been deleted
Letter 4038	Replace Standard 378 on page 2-77 of the Draft Revised Forest Plan with: "Volunteer and trail user organizations are principally responsible for ATV trail maintenance and for oversight of ATV trail use Such organizations must adopt trails with, and accept, these responsibilities in order for trail systems to remain open Volunteers will be actively recruited to assist the Forest Service in trail construction and maintenance The intent is to promote the use of peer pressure to enforce compliance with rules governing ATV system use "
Response	The recommended changes would make the standard overly complex and would be beyond the scope of the specific standard. We agree to the idea that volunteers have an important role in management. The Forest has excellent relationships with groups and individuals and will continue to work them for the best management of motorized recreation opportunities
Letter 4038	Change the third paragraph on page 2-94 of the Draft Revised Forest Plan to read· The Bear Wallow area near existing facilities at Elizabeth Furnace will be developed as a 15-unit horse camp It will have full amenities for keeping horses and a bathhouse with flush toilets and warm showers The road access to the area will be paved A suitable horse trail system will be developed and maintained.
Response	The discussion under Management Area 12 has been reformatted. Certainly, if a campground with facilities for keeping horses is to be built, it would follow that there ought to be a trail available for equestrian users. The proposed Bear Wallow site is included for highly developed facilities, but specific reference to providing horse keeping facilities has been removed. Site specific decisions will be made at such time as the area is built.
Letter 4038	Add a #3 footnote on page 2-87 of the Draft Revised forest plan which reads· "We do not recommend expansion of facilities at McClintic Point "
Letter 4038	Delete seventh paragraph under "Desired Future Condition" on page 2-89 because McClintic Point is not to be developed
Response	McClintic Point group camping facilities will be developed. Environmental analysis on this project has been completed

Letter 4038 Management Area 12 page 2-88 of the Draft Revised Forest Plan· COMMENT: Horse trails at Edinburg Gap site should avoid Special Biological Area.

Response Standards under Management Area 4 state that trails and other recreation facilities are located so no negative impacts occur to the natural values of the established area.

Letter 4038 Change Standard 401 on page 2-82 of the Draft Revised Forest Plan to read. Roads constructed to provide access for timber sales may be used to provide ATV opportunities when they can be incorporated into existing trail complexes and are compatible with habitat objectives "

Response Motorized recreation is the emphasis of Management Area 11 not wildlife habitat management. It is understood that habitat management may occur within the management area, but under the theme of the management area it is subordinate to motorized recreation. In reality, wildlife habitat objectives will likely play an important part of trail and road development.

Letter 4038 *Change paragraph two under "Desired Future Condition" on page 2-82 of the Draft Revised Forest Plan to read:* "Illegal ATV use is not prevalent Law enforcement and peer pressure are effective tools for controlling illegal use of lands off designated routes.

Response The "Desired Future" for Management Area 11 has been rewritten. Illegal use is not allowed. While law enforcement is important and is an integral part of management, it is outside the scope of the planning process.

Letter 4038 Change paragraph one under "Desired Future Condition" on page 2-81 of the Draft Revised Forest Plan to read: "The area is characterized by a natural, relatively unmodified environment The ATV trail system blends well with the natural environment. Impacts from ATV use are confined to the immediate trail environment The area is served by well-designed and well-maintained trailheads and overnight camping facilities."

Letter 4038 Change paragraph one under "Desired Future Condition" on page 2-82 of the Draft Revised Forest Plan to read: "The area contains a mixture of stands of varying ages and forest types. The ATV trail system blends well with the natural environment. Impacts from ATV use are confined to the immediate trail environment. The area is served by well-designed and well-maintained trailheads and overnight camping facilities.

Response The "Desired Future" for Management Area 11 has been rewritten and reformatted The concept of the recommended change is incorporated in the discussion, but not the exact wording.

Letter 4038 Add a second paragraph under "Lands Suitable for Timber Production" on page 2-82 of the Draft Revised Forest Plan. "*In ATV trail systems, consideration is given to aesthetically pleasing trail experiences for users. For this* reason, the desired visual quality objective is Partial Retention, which can be achieved through buffering trails from timber harvest areas."

Response The discussion on Management Area 11 has been rewritten and reformatted with lands suitable and unsuitable for timber production combined. The VQO for the trails is partial retention Techniques for meeting the VQO do not need to be directed in management area standards

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Letter 4038 Change Standard 910 on page 2-163 of the Draft Revised Forest Plan to read· "Low standard roads and travelways may be used to augment horse, mountain bike, and general hiking demands, if such use does not significantly impact the biological resource "

Response This is a Common Standard. Standards for individual management areas address impacts on various biological resources. The forest will be managed for all resources, biological and otherwise, with the net public benefits being maximized This involves a balancing of resource uses

Letter 4038 — Change Standard 784 on page 2-145 of the Draft Revised Forest Plan to read. "Laws protecting caves from illegal relic collectors and vandalism are vigorously enforced. The Virginia Cave Act requires a permit for any cave collection and research "

Response — Caves will be managed according to several state and federal laws. The Virginia Cave Act is recognized, but it is not necessary to mention it individually

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Letter 4038 — Change Standard 774 on page 2-145 of the Draft Revised Forest Plan to read. "Until a significant cave list is completed, all caves are protected from two types of potential damage. subterranean impacts (impacts from within the cave, chiefly recreation), and surface impacts (damage from surface activities). Damage from visitor traffic, vandalism, and carelessness may occur in caves Trash, litter, trampling, broken speleothems, graffiti, and human body waste are the most prevalent damage Damage to cave life such as bats and cave beetles is less apparent but may be irretrievable."

Response — As recommended, the reference to blind cave fish was deleted, since none are known to exist on the Forest.

Letter 4038 — Change Standard 633 on page 2-123 of the Draft Revised Forest Plan to read. "ATV trails are prohibited except at designated crossings where approaches are graveled a minimum of 50 feet from edge of stream. Bridges are used to cross perennial streams "

Response — This standard has been rewritten and included in the common standards The goal of protecting streams is intended

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Letter 4038 — Change Standard 630 on page 2-123 of the Draft Revised Forest Plan to read· "Resource damage around lakes and streams is minimized. Trails and camps are managed to discourage overuse of areas adjacent to lakes, streams, and fragile soils Streamside management zones are established where overuse damages riparian resources."

Response — A separate standard has been added addressing unacceptable resource damage and rehabilitation.

Letter 4038 — Change Standard 556 on page 2-110 of the Draft Revised Forest Plan· "Public motorized travel may be seasonally prohibited (April through August) to protect physical and biological resources and wildlife habitat.

Response — Wildlife habitat is a biological resource The change is not needed

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Letter 4038 — Change Standard 555 on page 2-110 of the Draft Revised Management Plan to read· "Motorized use is allowed where it doesn't conflict with management area objectives "

Response — Standard 555 has been removed Motorized use of roads and trails is addressed in common standards and management area standards as appropriate In all cases it will be within the objectives of the individual management areas.

Letter 4038 — Change Standard 930 on page 2-165 of the Draft Revised Forest Plan to read. "When feasible to do so, and consistent with other management activities, trailhead parking and hunter/fisherman parking areas are provided where roads are open to public vehicular travel intersect system trails or at suitable sites along existing roads or on the periphery of the management area At a minimum, all trail/road intersections should have a hiker symbol sign and the name of the trail "

Response — The existing standard is simpler and accomplishes the same purpose There is no need to specifically identify that hunters and fishermen may use trailhead parking

Letter 4038 — Change Standard 918 on page 2-163 of the Draft Revised Forest Plan to read: "Management activities along system trails shall be implemented with sensitivity to the experience of the users, however, where conflicts occur between recreational use of a trail and habitat objectives, the recreational interests are subordinate to the biological objectives Appropriate techniques to mitigate the effects of management activities should be addressed in NEPA documentation. Measures to mitigate the effects of activities might include vegetative screenings; the temporary re-routing of trail segments, temporary trail closure, avoidance and reclamation, and timing of project implementation to reduce impacts during high use periods "

Response — The recommended change is not made Recreational resources are not subordinate to biological resources The Forest will be managed to maximize net public benefits with all resources considered in balance, with emphasis as appropriate under each management area.

Letter 4038 — Change Standard 530 on page 2-106 of the Draft Revised Forest Plan with: "Public motorized use is restricted to open system roads Most existing roads and any new roads that are built are closed to public access, unless wildlife objectives dictate that they be opened Open road density is maintained at desired level, if a road is opened an equal length of road in the same compartment is closed "

Response — The standard is not changed. Road management is discussed elsewhere in the management area discussion and under Common Standards

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Letter 4038 — Change Standard 514 on page 2-104 of the Draft Revised Forest Plan to read. "Semi-primitive recreation opportunities requiring primarily unmodified environments are provided Some roaded natural recreation opportunities are offered in the periphery of these areas Mountain bike trails should be provided in addition to hiking trails."

Response — The standard has been reworded in the Revised Plan

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Letter 4038 — Change the third paragraph under "Management Area 13" on page 2-101 of the Draft Revised Forest Plan to read. Crabtree Falls, Lake Moomaw, Hidden Valley–Jackson River, Sherando Lake and Panther Falls are managed to provide for a denser concentration of recreation users with a greater degree of motorized access than Little River and Mount Pleasant Little River, Spy Rock Basin and Mount Pleasant are managed to retain their roadless characteristics.

Letter 4038 — Change the fourth paragraph on page 2-103 of the Draft Revised Forest Plan to read: "Little River, Mount Pleasant and Spy Rock Basin are managed to provide a primitive recreation experience. There is little evidence of other users and low interaction between users Facilities of a primitive nature may be present to protect the resources and the safety of visitors. Visitors could normally expect to view those species requiring older vegetation and low levels of disturbance."

Letter 4038 — Change the fourth paragraph heading on page 2-103 of the Draft Revised Forest Plan to read: "Little River, Mount Pleasant, and Spy Rock Basin "

Response — The discussion on Management Area 13 has been rewritten and reformatted. Little River and Mount Pleasant have been allocated to Management Area 21.

Letter 4038 — Change Standard 500 "Recreation" on page 2-102 of the Draft Revised Forest Plan to read: "A trail system that serves the needs of the visiting public is developed and administered Mountain bike trails are developed where possible

Response — The standard has been reworded for the Revised Plan. There really isn't a need to specifically break out mountain bikes. The list of trail projects contained in Appendix B are not prioritized. Decisions on what types of trail to build and where will be made on an annual basis as funding allows

Letter 4038	Change the second paragraph under "Management Area 13" on page 2-101 of the Draft Revised Forest Plan to read: "These areas are managed to provide a diversity of habitats and to increase opportunities for wildlife viewing, hunting, and fishing. These areas will be managed to enhance and interpret the unique natural resources of the area, to develop and administer a trail system that supports the demand, and to provide the facilities necessary to prevent degradation of the natural and aesthetic resources of the area."
Response	The description and "Desired Future" for Management Area 13 have been rewritten to clarify the management objectives of Management Area 13 as lands where dispersed recreation opportunities are emphasized. This certainly includes wildlife viewing, hunting, and fishing along with other resources
Letter 4038	Management Area 12 page 2-99 of the Draft Revised Forest Plan - COMMENT This center is located on private land should not be interpreted on USFS property. Furthermore, this is not multi-use management!
Response	The planned interpretive facility is planned for lands that are government owned Interpretation is very much a part of multiple use management
Letter 4038	Change paragraph one under "Lands Suitable for Timber Production" on page 2-82 of the Draft Revised Forest Plan to read· "These lands are managed to provide a variety of motorized recreation opportunities Ample opportunities for access are provided through a system of primitive or "old woods" roads and motorized trails. Opportunities are afforded for increased access for hunting and other recreation requiring roads. Roads constructed for timber harvesting may provide ATV recreation use following the completion of timber harvesting "
Response	The discussion for Management Area 11 has been rewritten and reformatted. The emphasis is still on motorized recreation opportunities Other dispersed activities are appropriate and will be allowed. Any developed overnight camping facilities will be developed under Management Area 12. Dispersed camping is allowed in this management area
Letter 4038	Management Area 11: COMMENT A VQO of partial retention is appropriate for lands unsuitable for timber harvest.
Response	Management Area 11 has a VQO of partial retention.
Letter 4038	Change paragraph two under "Desired Future Condition" on page 2-81 of the Draft Revised Forest Plan to read. "Illegal ATV use is not prevalent Law enforcement and peer pressure are effective tools for controlling illegal use of lands off designated routes "
Response	The discussion for Management Area 11 has been rewritten and reformatted Illegal OHV use is not allowed
Letter 4038	Paragraph 1 under "Lands Not Suitable for Timber Production" on page 2-81 of the Draft Revised Forest Plan - COMMENT. This paragraph should be removed or rewritten to address ATV trails only and not OHV as originally intended
Response	The discussion for Management Area 11 has been rewritten and reformatted The distinction between ATV's and other vehicles is clarified This management area designation will be used for roads that are particularly desirable for high clearance 4WD vehicles as well as for ATV routes.
Letter 4038	Change Standard 392 on page 2-81 of the Draft Revised Forest Plan to read "The costs of construction, reconstruction, and maintenance, along with impacts on natural resources, are used as factors in determining ATV systems and locations "
Response	This standard has been deleted Costs are certainly an important factor in any management activities and decisions and this is recognized in the planning process

Letter 4038	Change letter g under Standard 389 on page 2-79 of the Draft Revised Forest Plan to read· ATV use that is compatible with the ROS objective established for the Management Area is permitted."
Letter 4038	Change letter h under Standard 389 on page 2-79 of the Draft Revised Forest Plan to read: "ATV routes are *designed to avoid locations near private lands to reduce possible conflicts* "
Response	This standard has beed deleted Management Area 11 still covers all types of OHV's

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Letter 4038	Change Standard 376 on page 2-77 of the Draft Revised Forest Plan to read: ATV effects on the land and resources are minimized. Damage to soil, watershed, vegetation, or other natural, cultural, and historical resources of the public lands is minimized."
Response	The standard has been rewritten and does not mention specific vehicle types.

Letter 4038	Delete Standard 375 on page 2-76 of the Draft Revised Forest Plan.
Response	This standard is appropriate for this management area and is included in the Revised Plan.

Letter 4038	Delete Standard 374 on page 2-76 of the Draft Revised Forest Plan.
Response	This standard has been deleted

Letter 4038	Replace Standard 373 on page 2-76 of the Draft Revised Forest Plan with "ATV trail and road systems will include single-track, narrow trails for motorcycle and ATV user."
Response	The standard has been rewritten in the Revised Plan. Reference to all types of OHV's remains

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Letter 4038	Change the first paragraph under Management Area 11 on page 2-76 of the Draft Revised Forest Plan to read· *This 16,999-acre management area contains three ATV complexes which are located within other management* areas Dry River - Rocky Run, Lee - Taskers Gap, Pedlar - South Pedlar Area"
Response	The discussion on Management Area 11 has been rewritten and reformatted The three existing ATV trails and the one proposed trail are included The opportunities for licensed ORV's are also included.

Letter 4038	Delete Standard 68 on page 2-34 of the Draft Revised Forest Plan
Letter 4038	Change Standard 366 on page 2-75 of the Draft Revised Forest Plan to read· Silvicultural practices are allowed provided that they meet the visual quality objective of partial retention, and protect the immediate river *environment, water quality, scenic fish and wildlife and other values. Silvicultural activities remain* visually subordinate to the characteristic landscape "
Response	This standard has been deleted in the Revised Plan.

Letter 4038	Delete the fourth paragraph under "Desired Future Condition" on page 2-72 of the Draft Revised Forest Plan
Response	The paragraph has been deleted

Letter 4038	*Replace the last paragraph on page 2-12 of the Draft Revised Forest Plan with the following: "Twenty-one areas* form the heart of the Remote Highlands, a management area that does not call for new road construction or other activities that alter the roadless characteristic of these areas The desired future condition for Remote Highlands is discussed in Management Area 9 "

Response	This is not meant to be an all inclusive description of Remote Highlands The description and desired future condition of Remote Highlands are discussed under Management Area 9. Standards state that no new road construction is allowed with exceptions noted.
Letter 4038	Delete Standard 22 on page 2-29 of the Draft Revised Forest Plan
Response	The Revised Plan contains a simpler version of this standard.
Letter 4038	Change the paragraph under "Desired Future Condition" on page 2-36 of the Draft Revised Forest Plan to read: "The Forest appears natural to the average visitor. It will be a mosaic of predominately mature hardwood stands and scenic vistas. A variety of recreational activities are available such as hiking, hunting, wildlife viewing, fishing, viewing scenery, and dispersed camping "
Response	Wildlife viewing opportunities are mentioned in the "Desired Future" of Management Area 6 in the Revised Plan The list of recreational opportunities is not meant to be all inclusive and shouldn't be interpreted as such. Any dispersed recreation activities that do not conflict with the objective of the Appalachian National Scenic Trail are permitted.
Letter 4038	Change the first paragraph under "Desired Future Condition" on page 2-69 of the Draft Revised Forest Plan to read. "The river and a one-quarter mile corridor on each side of the river exist in a natural to near-natural setting. The river and its channel are not modified in anyway Dams or other structures that impede the flow of the river are discouraged The river user is aware that man's activities have changed the original character of the river and its surrounding landscape only in selected areas and for short stretches. They are not strongly offended by what they see "
Response	The wording of the desired future condition of scenic rivers has been changed to be more descriptive and in line with the intention of the Wild and Scenic Rivers Act of 1968
Letter 4038	Change the third paragraph under "Desired Future Condition" on page 2-72 of the Draft Revised Forest Plan to read· "Recreation use of the river and within the corridor is concentrated. Opportunities for solitude are not readily available Social interaction with other recreation users is a key reason that users come to developed sites along the river Water based recreation activities may include canoeing, rafting, kayaking, swimming, skinny dipping, and fishing. Land based activities might include picnicking, hiking, hunting, camping, bicycling, horseback riding, and interpretive services."
Response	The list of activities that may occur in a Recreational River corridor is not intended to be all inclusive.
Letter 4219	In MA 11, standard 373 states that both OHV roads and ATV trails OHV travel should be limited to the open road system
Response	The standard has been rewritten and clarified Definitions of vehicle types have been included as well.
Letter 4219	In MA 11, the desired future condition description says that the area is served by well-designed and well-maintained trailheads and overnight camping facilities. The provision of overnight camping facilities should be a site specific decision If overnight camping facilities are provided, the area should be designated management area 12
Response	It is agreed that developed overnight camping facilities will be in Management Area 12 Before any such facilities are constructed, project specific analysis must be completed and location will be a site specific decision
Letter 2664	The VWTF strongly recommends that Alternative 8 be modified toward the levels of Alternative 12, e g more clearcutting, higher ASQ, more suitable acres, more acres available for wildlife management work and less new road construction

Response — Such a drastic change in Alternative 8 would invalidate the major goals and objectives of this alternative Alternative 12 was formulated to address these concerns If identified as the alternative which maximizes net public benefits, then it will be selected by the Regional Forester to serve as the Revised Plan

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ADEQUACY OF THE REVISION: *Plan Implementation*

Letter 57 — Annual monitoring is a bit too much. It will not get done on the N F and it is not necessary.

Response — The 1982 NFMA Regulations require that "at intervals established in the plan, implementation shall be evaluated *on a sample basis to determine how well objectives have been met and how closely management standards* and guidelines have been applied" [36 CFR 219.12(k)]. Monitoring is an integral part of the total management process The costs of monitoring and evaluation will be included in our annual budget requests. Plan Appendix F, which provides detailed budget information, has been revised to include monitoring costs under the appropriate resources.

Letter 3537 — Chapter 4 of the Draft Plan describes the monitoring program. In the Effectiveness Monitoring summary on pp. 4-14 through 4-17 there are two references made to OHV/ORV use This seems to be an inadequate methodology, especially when trying to monitor unlicensed ORV users. The second reference deals with monitoring soil *impacts of OHV/ORV use Although this is a needed environmental monitoring program, more standards are* needed to analyze the adverse effects of OHV use Wildlife fragmentation due to the noise caused by OHV/ORV use should be monitored Also, user conflicts should be monitored in the same fashion. This would inevitably add new variables that may indicate the need for Forest Service action

Response — The monitoring program is not intended to depict all monitoring activities undertaken on the Forest. To be able to rely on current work forces to complete needed monitoring, the Forest had to simplify and focus on what it felt was important Executive Order 11644 ensures that "the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of thse lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands" (EO 11644, Sec. 1). It is felt, first and most critical, that the land and water needed to be protected The monitoring program focuses on the standard that if violated, could have the greatest effect on the environment. Lastly, once the standard has been proven to achieve the desired results when properly implemented, then different standards, such as those mentioned in this comment, can be monitored. ATV's were permitted in the preferred alternative only where the environment is protected, where there are no existing conflicts with critical wildlife habitat or recreationists who desire a nonmotorized experience, and where user safety is promoted

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Letter 3742 — One ATV route has been constructed (Taskers Gap) and two are currently under construction (South Pedlar and Rocky Run). If any ATV areas are designated in the Plan, the existing EAs for ATV routes should be reviewed to ensure that the EAs comply with standards established in the Plan. The routes of any trails which are in compliance with the Plan should be shown on the Plan map.

Response — As stated in the Revised Plan, Chapter 4· "Any resource plans, permits, contracts, or other instruments not yet implemented will be assessed for compliance to the standards in Chapter 3 of this document prior to any decision " The Forest does not see the need to review EA's associated with ATV projects that have been started, but not yet finished because the South Pedlar and Rocky Run trail systems were designed using standards in the 1986 Plan Amendment #4 The same standards are in the Revised Plan After these ATV trails are constructed, they will be administered and maintained according to the Revised Plan

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Letter 3848 — We recommend that to offset concerns and ensure that a voice is given to the general public in forest management decisions, that a standing committee of unpaid citizens be constituted to advise the GWNF. It could help to allay concerns about a lack of balance in the decision making process

Response — We would hope that the Revised Plan provides the necessary balance on managing the resources and that we have gained the trust of the people who participated in the revision effort in that we have indeed listened to them Chapter 4 of the Revised Plan states "The public will have opportunities to be involved in decisions about specific projects." In fact, we encourage people to advise the Forest Service and be involved with projects on-the-ground before the decision is made. During our scoping process, we continually state that we would be

happy to meet with people on-the-ground to discuss proposed projects. We strongly believe in this kind of open decision making process where everyone can participate We believe it will improve our communication with the public It will assure people that the Forest is listening and considering their views before a decision is reached. The Forest does not believe it's necessary to go through the time-consuming, tedious process of establishing a formal advisory committee which meets the requirements of the Federal Advisory Committee Act.

Letter 3883 GWNF should continue to cooperate with Virginia and West Virginia and their local governments in the many matters of mutual concern.

Response The Forest is proud of its excellent relationships with state and local governments in West Virginia and Virginia. We'll continue to nurture this close working relationship as we implement the Revised Plan

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Letter 3883 GWNF should reduce expenditures which do not support the major national concerns and objectives

Letter 3984 I cannot stress enough how important it is for the George Washington National Forest to achieve full funding for the scientific studies of its resources that are necessary I propose that as a test and as a model of what can be done on an Eastern National Forest, you secure a guarantee of full funding for the implementation phase from the Washington Office

Response The Revised Plan attempts to strike a balance between national, regional, and local concerns It then portrays the estimated costs of achieving that balance. Considering national concerns and objectives, there can be no guarantee that Congressional consideration of Plan requests will result in full funding of budgets The budget is "realistic" in the sense that it provides an accurate assessment of funding necessary to accomplish Plan objectives Our view is that the Plan should not be limited by the vagaries of existing budget realities. If this were the case, we would have little hope of affecting needed long-term changes in priorities If future reductions in appropriated funds become a limiting factor, it may be necessary to make adjustments in management. These decisions are appropriately considered during Revised Plan implementation, and the Revised Plan may be amended to reflect changes in the objectives

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Letter 3883 It is recommended that the GNWF continue regular annual consultations with public interest groups

Response Chapter 4 of the Revised Plan states. "The public will have opportunities to be involved in decisions about specific projects " In fact, we encourage people to advise the Forest Service and be involved with projects on-the-ground before the decision is made During our scoping process, we continually state that we would be happy to meet with people on-the-ground to discuss proposed projects We strongly believe in this kind of open decisionmaking process where everyone can participate We believe it will improve our communication with the public It will assure people that the Forest is listening and considering their views before a decision is made

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Letter 3940 Plan. Page 2-3, Paragraph 4· We emphasize the importance of monitoring and evaluation to determine if management strategies are achieved. Take alternative actions if current management strategies aren't achieving desired future conditions

Response Monitoring is an integral part of the total management process The Plan will be monitored to provide the quality control necessary to ensure it is implemented properly. As stated in the Revised Plan, Chapter 4· "Taking action when warranted by monitoring information is important Indeed, the possibility of taking corrective action is the entire rationale for all monitoring and evaluation "

Letter 4038 COMMENT· Adequate funding to achieve the desired biological goals including monitoring, surveys, research, and management should be emphasized in the budget

Response A common question that comes to most people's minds whenever something is proposed is· "How much is this thing going to cost?" The budget information in FEIS chapter 2 is intended to highlight the major cost differences between the alternatives In the DEIS, the Forest did recognize that the preferred alternative had one of the highest budgets In this FEIS, the budget has been updated to better reflect the money needed to implement each alternative

The final decision will consider the budget needed to implement the Plan. In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan. However, no single factor, such as the budget, will lead to this selection

The Forest will budget to implement the Revised Plan [1982 NFMA regulations at 36 CFR 219.10(e)]. Yearly, Forest budget proposals are aggregated nationwide by the Forest Service and submitted to the President. These proposals then become part of the President's budget request to Congress.

The Forest's annual budget, as authorized by Congress, may vary from that which is indicated in Plan Appendix F. The Plan will be monitored to provide the quality control necessary to ensure it is implemented properly. The Implementation Monitoring Summary in the Plan's Chapter 4 provides for monitoring the budget. If annual budgets over time vary significantly from long-term direction, a Plan amendment may become necessary [36 CFR 219 10(e)].

Chapter 4 of the Revised Plan also discusses yearly budget proposals. Plan Appendix F displays the detailed budget information needed yearly to achieve the Plan goals and objectives

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Letter 4219 — All projects implementing this Plan should be regarded as significant amendments

Response — The 1982 NFMA Regulations permit amendments that may result in either significant or non-significant changes to the Forest Land and Resource Management Plan [36 CFR 219 10 (e)(f)] Significant amendments occur when the action significantly alters the multiple-use goals and objectives for long-term land and resource management. One of the ways the need for an amendment can surface is from analysis of projects as mentioned in this comment. Projects designed to be consistent with the Revised Plan do not require Plan amendments. The need for amending will surface during project-level analyses when proposals are discovered to be inconsistent with Plan standards, goals, or objectives If the amendment is determined to be insignificant, it will be documented in the decision document for the project An amendment that proposes a significant change to the Plan must follow the procedure for development and approval of the Plan [36 CFR 219 10(f)] The reader is encouraged to read Chapter 4 of the Revised Plan It discusses Plan implementation, including the need to amend the Forest Plan.

Letter 4268 — We recommend that monitoring for site specific activities include feedback loops early in the process to avoid potential impacts to water quality, air quality and riparian areas

Response — As stated in the Revised Plan, Chapter 5, two reports will be prepared as part of the monitoring program. Annual reports will summarize monitoring activities and document the feedback loop The five-year evaluation report will summarize findings of all long-term monitoring activities, and include a comprehensive review of Plan implementation

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Letter 4268 — Mitigation of potential adverse impacts has, in general, received minimal attention EPA believes that avoidance should be considered first with all options following A better discussion on mitigation for unavoidable impacts should be included in the FEIS

Response — It is important to understand that there are two levels of decisionmaking in the Forest Service. The Revised Plan represents only the first level of decisionmaking about the management of the Forest. Site-specific, project planning to implement the goals and objectives of the Revised Plan is the second level of decisionmaking.

"Cumulative impact" is the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions . . " (40 CFR 1508 7). Cumulative impacts are among the effects (40 CFR 1508.8) that must be included in considering the environmental consequences of actions (40 CFR 1502 16)

The standards for each alternative contain mitigation measures that must be immediately achievable if that alternative is implemented. For most areas, by implemented standards associated with each alternative, many significant effects to the environment are avoided. As stated in the FEIS, Chapter 3· "The effects of each alternative are disclosed with the mitigating measures in place." Even with these measures in place, there

continues to be unavoidable effects on the environment in each alternative As they relate to the issues identified, those significant effects are disclosed in the FEIS.

Letter 3824

It is obvious that the FS needs to undertake a site-specific EIS in the Laurel Fork area before proceeding with its current plan to divide the area into two and possibly 3 mgt areas and permit mineral development, reservoir construction, mass camping and certain timbering and road construction projects The FS knows full well what is expected of a good-faith EIS. It is also apparent that the draft EIS does not fulfill the NEPA obligations as they pertain to the above activities in the Laurel Fork area.

Response

The description of environmental effects under the Alleghany Front Lease Area discussion in the FEIS has been rewritten to describe the environmental consequences of the reasonably forseeable development scenario detailed in Appendix E of the FEIS. The FEIS has also been rewritten to discuss total cumulative effects of field development in Laurel Fork

Many of the other concerns about Laurel Fork deal with site-specific implementation of the Revised Plan It is important to understand that there are two levels of decisionmaking in the Forest Service. The Revised Plan represents only the first level of decisionmaking about the management of the Forest Site-specific, project planning to implement the goals and objectives of the Forest Plan is the second level of decisionmaking

During the Plan implementation period, specific activities and projects will be proposed, and site-specific evaluation for each activity or project, or group of activities or projects made The evaluation will include whatever additional environmental analysis, including cumulative effects analysis, is needed to comply fully with NEPA and other environmental laws and regulations Further, each project or activity must comply with environmental protection requirements established in NFMA and its implementing regulations (16 USC 1604(g) and 36 CFR 219 27) Each project or activity must also be consistent with the Forest Plan (16 USC 1604(i))

Letter 3940

Management or monitoring programs are the backbone for measuring the success of management activities on the Forest. There is a need and opportunity for increased monitoring of T & E and sensitive species, as well as, other wildlife species. The effectiveness of timber management and other techniques in achieving habitat or biological objectives should be monitored also Increased monitoring will require adequate funding. The level of funding listed in the Draft Plan does not appear sufficient to meet these needs

Letter 4268

Adequate monitoring of area-sensitive indicator species has not been incorporated into the Plan. How does the Forest Service plan to monitor, inventory, and mitigate for adverse impacts to these sensitive species?

Response

Please refer to Chapter 5 of the Revised Plan for discussion of monitoring

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Letter 4219

The CTF has provided substantial comment on the inventories for VQOs, ROS, Special Biological Areas, Roadless Areas, Roads/Trails, and Wild/Scenic Rivers We request that you review the correspondence with us on these inventories and that this correspondence be made part of the record for the preparation of the LRMP

Response

Correspondence related to the draft documents received during the 3-month-long comment period have been responded to To track CTF correspondence and its impacts, see the how-to section in the first few pages of this appendix.

Letter 8 I am aware that your plan has its critics but I urge you and your staff to stand firm

Letter 50 I like the 10-year Land and Resource Management Plan.

Letter 89 This is an excellent and well designed plan and I am in agreement

Letter 90 I favor the Draft Plan.

Letters 387, 884, 1283, 1318, 1450, 1662, 1676, 1651, 1869, 2014, 2026, 2242, 2255, 2260, 2277, 2291, 2336, 2350, 2353, 2386, 2389, 2469, 2481, 2484, 2548, 2564, 2652, 2657, 2806, 2807, 2808, 2834, 2844, 2847, 2863, 2884, 2931, 2940, 3464, 3487, 3490, 3499, 3501, 3503, 3513, 3516, 3534, 3549, 3564, 3565, 3572, 3597, 3626, 3634, 3646, 3653, 3678, 3696, 3697, 3713, 3714, 3754, 3762, 3769, 3828, 3855, 3923, 3924, 3959, 3969, 3970, 4008, 4233
I support Alt 8

Letters 495, 2546, 2590, 3918, 4027, 3932
We support Alternative #8

Letter 732 Without going into a lot of statistics I just wanted to go on record and ask for the approval of plan 8

Letter 971 I support Alternative 8 because it is the one chosen by the Forest Service

Letter 988 I wholeheartedly support Alt 8, the GWNF preferred alt

Letter 1655 I feel that Alt 8 seems reasonable

Letter 1806 I would like to express my preference of Plan #8.

Letter 1813 The Plan is a good one so let's get on with it

Letter 1835 Alt 8 is so very definitely preferable!

Letter 1841 I am basically in agreement with Alternative No 8, the preferred alternative

Letter 1994 We think Alt 8 offers the best chance of working.

Letter 2002 I support Alternative #8 of the Draft Revised Forest Plan for the George Washington National Forest, which is, I believe, preferable to any of the other alternatives under consideration at this time.

Letter 2013 I urge the GWNF to adopt Alt 8 in the final Forest Plan

Letter 2050 I am pleased that the Forest Service chose Alternative 8, which emphasizes biological values and reduces the allowable sale quantity of timber

Letters 1592, 2223, 2875
Alternative 8 is the best plan.

Letter 2331 I urge you to stick to Alternative 8. (USFS Preferred Alternative).

Letters 2339, 2866, 3727, 3771, 3930
Adopt Alternative 8 This is a balanced plan.

Letters 2229, 2343, 2484, 3466, 2595, 3570, 3615, 3868, 3910, 3992
I support Alternative 8 [of] the Land and Resource Management Plan for the George Washington National Forest

Letter 2346	Please favor Alternative 8 of the Forest Service plan for the George Washington National Forest.
Letter 2352	Implement Alt 8
Letter 2381	I strongly urge you to push for your Alt. 8 in the GWNF not alt. 12
Letter 2475	It's my sincere hope that you will support Alternative 8 as it is written
Letter 2476	Alternative 8 makes the most sense to me
Letter 2490	I believe that Alternative 8 is the better choice
Letter 2493	I am absolutely against Alternative 12 and hope you do all in your power to gain approval of Alternative 8.
Letter 2509	Both my wife and I favor Alternative 8 as the Forest Service's proposed course of action.
Letter 2511	I absolutely support Alternative 8 which is the USFS preferred alternative.
Letter 2567	I think that Alternative 8 is a sound management plan, and I support the Forest Services in their efforts toward making this proposal happen
Letter 2579	Troop 326, Boy Scouts of America, support[s] Alternative 8
Letter 2599	Please don't screw up our Forests. Please go with Alternative 8.
Letter 2626	Please consider Alternative 8 as your only logical approach to managing the GW Forest.
Letter 2654	Adopt option #8 Although this option isn't perfect, it is a reasonable compromise and much better than any of the other options
Letter 2695	I urge you to stay with plan 8 and not to go with plan 12.
Letter 2717	Alternative 8 has my family's and my wholehearted support
Letter 2850	Please accept Alternative 8
Letters 2854, 2862, 3497, 3836	Please support Alternative #8.
Letters 2856, 3698, 3885	Select Alternative #8
Letter 2861	Alternative #8 seems to be the most reasonable balance.
Letter 2865	I am pro-access, pro-timbering and pro-environment I therefore strongly urge the adoption of Alternative 8
Letter 2872	I urge you to consider Alternative #8
Letter 2896	Follow the proposed course of action that is designated as Alternative 8
Letter 2911	Go with Alternative 8.
Letter 2912	Do everything within your power to implement the Forest Service's proposed course of action as outlined in Alternative #8.
Letter 2920	I strongly urge you to resist efforts to make you deviate from your proposal Alternative 8
Letter 2935	On balance we agree with the FS that Alt 8 is in fact the preferred alt.

Letters 3428, 3429, 3430, 3431, 3432, 3433, 3434, 3435, 3436, 3437

I support your preferred Alternative 8 plan for the forest

Letters 3441, 3442, 3443, 3444
I support the George Washington National Forest Land and Resource Management Plan as it is now written.

Letter 3457 Accept my congratulations on the USFS preferred alternative. There are groups pressuring you to permit more cutting, more road building, less scenic protection. Resist these pressures.

Letter 3458 I support the Forest Service plan for George Washington Forest

Letter 3459 I support Alternative 8 This alternative will preserve a special part of the forest. We need to share with future generations.

Letter 3460 I vote for Alternative 8 as a balanced approach.

Letter 3461 I strongly urge your support of ALTERNATIVE 8.

Letter 3467 I support Alternative 8 and feel [it] is a fair and balanced plan.

Letter 3469 I strongly urge that Alternative 8 be adopted as the management plan that is to guide the U.S. Forest Service in managing the George Washington National Forest.

Letter 3470 Please take the necessary steps in selecting Alternative 8

Letter 3473 We strongly urge you to choose Alternative 8 in your G.W.N F plan.

Letter 3477 I sincerely hope you will maintain the Forest Service's preference for Alternative 8.

Letter 3480 Please vote for Plan 8!!

Letter 3481 I add my personal commendation of Preferred Alternative #8.

Letter 3483 I strongly support Alternative 8. While it is not perfect, it is clearly better than any other.

Letter 3491 Alternative 8 is a good compromise.

Letter 3493 Please register my vote in favor of Alternative #8.

Letter 3495 Alternative 8 is by far the best course of action.

Letter 3496 I urge you to stay with Alternative 8

Letter 3508 Choose Alternative #8

Letter 3509 Alternative #8 best serves that purpose.

Letter 3510 I agree with Alternative 8

Letters 3511, 3531
Implement Alternative #8.

Letter 3524 I urge you to support Alternative 8

Letter 3526 I urge that you choose Alternative #8.

Letter 3532 I favor Alternative Plan #8. I believe this will [be] in the best interest of all those concerned.

Letter 3536 I support Alternative 8 It is a well balanced approach I hope you will continue to resist those who would sacrifice our future in this manner

Letter 3538	I urge you to use plan 8.
Letter 3547	The CEC supports the adoption of Alternative 8
Letter 3548	Stay with your Preferred Alternative 8
Letter 3550	I request implementation of Alternative 8
Letter 3571	I am in complete agreement with Alternative 8 to the extent that I would donate money, participate in a march, write a letter or most anything else that I could to see this plan adopted
Letter 3593	I am in favor of Alternative 8
Letter 3605	Push for Alt 8
Letter 3607	In Alt. 8 I find a compromise plan fair to all interests
Letter 3644	I prefer Alternative No 8 which is the preferred alternative of the Forest Service.
Letter 3652	The timber industry needs the rigid limitations as proposed in Resolution 8 of the Bill going to Richmond. We applaud your efforts in restricting clear cutting on national lands
Letter 3866	I support Alternative 8 and am strongly opposed to Alternative 12 or any other alternative that disrupts more of our forest than Alternative 8
Letter 4062	Please as a minimum, stick to Plan 8 if there is not a stricter one to offer
Response	In the record of decision for the FEIS, the Regional Forester will select the the alternative to serve as the Revised Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process, but rather the identified ability of the selected alternative to maximize net public benefits. Besides public comments, other factors such as national and regional policy and the analysis of resource opportunities also play a role in reaching this decision.

Letter 175	It is my opinion that the planners have made a thorough and objective study, and I believe that their recommendation to adopt Alternative 8 best serves the Forest Service mandate for multiple use of forest resources
Letter 377	I support Alternative 8, because big business is taking too much of our national forests I believe we should do everything in our power to preserve our forests for our children
Letter 378	Alternative 12 allows far too much clear cutting I am supportive of Alternative 8.
Letter 1097	The plan of the USFS is quite reasonable which includes three new wilderness areas, expanded access for disabled hunters and anglers, and continued protection of undeveloped areas.
Letters 1875, 1887	I am pleased that the FS chose Alt. 8 Since I am interested in birds, I am especially pleased to see Special Biol. Areas addressing the needs of nongame species I would like to see more of this The acreage protected as Remote Highlands is important These areas provide the unusual habitat upon which some bird species depend for feeding, nesting and migration I'm pleased that you have limited the use of ATVs in the forest. They are noisy, polluting machines
Letter 1299	[Under] Alternate Plan 8, the forest would receive the kind of evenly proportioned management the public has wanted
Letter 1566	I support Plan 8 Plan 8 is a balanced, intelligent management plan for the future of the forest.
Letter 1573	I believe in alternative #8 I think it distributes an amount to all the cause listed on the alternative sheet It gives something to everyone.

Letter 1575 I believe that Alternative #8 would best manage the forest because it allows industries, such as Westvaco, cut down some trees but keep few areas from being clearcut It also allows trails for ATVs to wonder around on Also, this alternative best manages the recreational rivers

Letter 1579 I support Alternative #8 because they aren't really hurting the animals They are cutting a little too much timber, but they are making money for Bath Co Only one problem Alternative #8 doesn't provide migration corridors and doesn't protect Watersheds/Riparian Areas

Letter 1584 Eight is the best alternative [it] compromises industry and wildlife

Letter 1586 *I support Alternative #8 It stabilizes the forest by cutting little forest, but enough for us to get the things we need* If a greater demand comes for wood and paper products, then maybe people will realize they need to recycle.

Letter 1587 The alternative I like the best was alternative #8 The reason I pick #8 is that people have jobs and money is coming into the native forest, and the land is not being used all at once

Letter 1589 I think Alternative #8 is the best of the 14 People should not be able to cut down trees in one place People could cut trees from different areas and still have over enough

Letter 1594 I choose Alternative 8 because it has a pretty large amount of sales It also has to do with lots of acres, lots of money to be made, and lots of wood to be sold

Letter 1600 I pick Alternative #8 because we should have more places to ride ATVs

Letter 1630 I fully support Alt 8 of the study I do this in the spirit of compromise If I felt a more restrictive Alt had even a remote chance of being seriously considered, I would give that my support

Letter 1836 We support Alternative 8 We feel that the revised LRMP constitutes a well-reasoned approach to the stewardship of historic properties by the GWNF

Letter 1988 I support Alt 8. Alt. 8 provides the necessary mix of services which allows the interests of all forest users to be achieved, but not at the expanse of any individual or group

Letter 2057 Alternative 8 seems to be a good compromise management plan -- allowing ample timber harvesting while stressing other values and the "multiple-uses" of the Forest

Letter 2239 Alternative #8 is preferred I note with appreciation the reduction of land declared suitable for the proposal to increase the area to be managed as a special zone to protect unique plants and animals

Letter 2240 I support Alt 8. This alt appears to do an excellent job of answering the multiple use mandates of the USFS It provides for reasonable levels of timbering activity and OHV usage while protecting natural and scenic areas such as the Appalachian National Scenic Trail

Letter 2307 The Shenandoah Valley Soil & Water Conservation District passed a resolution of unanimous support to Alternative 8 We feel this alternative offers a balance of active resource use along with appropriate conservation of the basic soil and water resource

Letter 2326 *I recommend alternative 8 for future forest use I believe we should keep those forests pristine and natural*

Letter 2349 I urge you to hold your draft plan as issued I believe it would produce the widest range of environmental benefits, as well as recreational opportunities

Letter 2366 Alt 8 offers a reasonable compromise between the often-conflicting uses of recreation and timber harvest.

Letter 2367 I believe Alternative #8 of the GWNF plan best satisfies that balanced use

Letter 2367 *A balanced use of the GWNF will allow progress for industry and insure recreational wilderness for our children.* I believe Alternative 8 best satisfies that balance

Letter 2368 I urge you not to make changes in your draft plan, but support Alt 8 Any changes that would have a negative effect on the Appalachian Trail, such as heavy emphasis on the production of timber would have a negative

effect on the AT's aesthetic and biological resources Existing roadless and undeveloped areas are important to the AT experience The opening of large areas of the forest to OHVs would have an effect on these lands for primitive recreation

Letter 2457 I am in favor of Alternative 8 [Do] not make changes in [the] draft plan. These changes would have serious negative effects on the Appalachian Trail

Letter 2461 I urge adoption of Alternative 8 Under Alternative 8, the area encompassing The Priest and Three Ridges, will be managed as wilderness. It is important to preserve these areas for future generations

Letter 2462 I urge you to favor Alternative 8 of the plan. Alternative 8 is a well balanced program and will serve the citizens at large and industry the best.

Letter 2466 I am strongly in favor of Alternative #8 This emphasizes protection of the Appalachian Trail corridor and other scenic areas, while allowing some timber sales and clearcutting in less sensitive areas

Letter 2472 I support Alternative #8 Alternative 8 presents the proper balance, and I urge its adoption.

Letter 2473 I strongly oppose any change in the draft plan that would encourage off-road vehicle use or excessive timber cutting. Alternative 8 is clearly preferable

Letter 2477 I support Alternative 8 I feel that this plan offers a balanced blend of benefits for the owners of this public land- the present and future generations of American citizens.

Letter 2479 It is time to stop the rape of our environment and enact Alternative 8!

Letter 2480 I read your Alt. 8 draft Plan and support your efforts to save the area for future generations to enjoy the wilderness The AT, timber industry and ORVs can all exist under Alt 8

Letter 2486 Alternative 8 seems to fit my view of how to treat forest now, and in the foreseeable future; I trust you will do all in your power to follow Alternative #8

Letter 2503 I support Alt 8 of the GWNF Land and Resources Mgt. Plan This clearly provides a balanced approach for the various interests

Letter 2520 I recommend that Alternative 8 draft forest plan be selected for the George Washington National Forest This plan offers a balance blend of benefits and I believe it is in the best interests of the general public.

Letter 2554 I favor Alternative 8. That alternative would allow a wide range of high quality recreational uses while still permitting a harvest of timber, would result in the recommendation of an additional 10,000 acres for wilderness designation, and would ensure that almost all of the current roadless areas would remain roadless

Letter 2556 I lend support to the forest administration's draft plan, Alternative 8, which I believe is a reasonable compromise between competitive interests I know the forest land and I have seen first hand the results of misuse by all-terrain vehicles and the timber industry Please do not compromise further to the detriment of future generations

Letter 2560 I support Alternative 8. Anything less would have serious negative effects on those who frequently make use of the Appalachian Trail and all that it offers in outdoor recreation and exercise. I feel that it offers a well balanced approach to recreational opportunities, preserving clean water supplies, protection of game, animal and fish population, and provides for timber harvesting in a responsible manner

Letter 2573 I support Alternative 8. Alternative 8 provides for a more sustainable use of the forest resouces, timber, recreation, wildlife and wilderness than Alternative 12

Letter 2584 It is quite apparent that Alternative 8 is superior to any other alternative in the proposed plan and we go on record as supporting Alternative 8

Letter 2588 I feel very strongly that Alternative 8 must be selected to adequately meet the needs of land and resource management in the near term and for future decades

Letter 2591	Help protect the A.T. the wilderness, the earth Support Alternative 8.
Letter 2598	I urge you to support Alternative 8 It balanced restrictions on the use of clearcuts, ORV's and the destruction of high visual quality are essential not only for our generation but future generations' experience of the wilderness.
Letter 2600	I urge you to adhere to Alternative 8 Of all the drafts this one is the most balanced and provides for the most reasonable allocation of benefits to all, and is therefore an expression of the rights of all rather than an expression of the appetites of a few
Letter 2601	I support Alternative 8 as a compromise with logging and ORV interests, whose needs I believe to be more than adequately supplied by the Alternative.
Letter 2605	I support Alternative 8. Alternative 8 is the balanced strategy to provide for the conservation and best use of the Forest's resources
Letter 2607	Proposed Alternative 8 appears to meet the legitimate interests of the public and I support it, including the small increase in wilderness designation.
Letter 2614	I urge you to support Alt. 8. This Alt offers a blend of benefits for the present and future generations of American citizens. Issues of biodiversity and ecosystem mgmt. are better handled by this alt.
Letter 2621	I support Alternative 8 which seems to provide for appropriate multiple use of the forest and oppose Alternative 12.
Letter 2622	I support Alternative 8 for the new forest plan. Alternative 8 seems to me a fairly balanced plan that gives many diversified recreational uses for the forest
Letter 2649	Certain acres should remain off-limits to motorized travel and forestation For this reason, I support Alternative 8
Letter 2656	I hope that Alt 8 will be followed because it seems to best preserve the Appalachian Trail surroundings and still defer to the interests of other parties
Letter 2712	I support your choice of Alternative 8, and the rational of viewing the Forest as a biological entity
Letters 2713, 2915	I support Alt 8 which is a balanced blend of benefits for all the people.
Letter 2720	I urge you to implement Alternative 8 I believe that Alternative 8 provides the best balance between use of the forest now and safeguarding some of it for future Americans to use and enjoy.
Letter 2735	I support Alternative 8 which offers a balanced blend of benefits. It will help maintain supplies of clean water in the area and protect wildlife at the same time that it will allow limited timber harvests
Letter 2736	I am opposed to off-road vehicles in the forest I therefore support Alternative 8.
Letter 2837	I support your recommendation to implement Alternative 8. I believe that a plan based on biological diversity to be most beneficial over the long run
Letter 2846	I strongly recommend Alternative 8, to maintain the region's recreational and tourism attractions. Preserve existing mixture of trees and bushes, recreational hunting and the uniqueness of the Appalachian Trail.
Letter 2853	I feel the Alternative 8 is the best-serving plan for controlled, responsible use of the forest.
Letter 2860	I support Option #8 for the forest plan. It seems to be a fair compromise for both recreation and commercial use.
Letter 2867	All in all, I believe the Alternative 8 which has been chosen by the Forest Service is a preferred and balanced resolution of the competing interests involved in the Forest I believe Alternative 8 is a good compromise which no one likes but everyone can live with and should be maintained as the Forest Plan.

Letter 2874 I urge you to adopt Alternative 8 Alternative 8 provides the best balance of resource utilization, recreation, and wilderness experience for the citizens

Letter 2895 I feel that Alternative 8 is the proper choice to ensure the best care for this country's natural resources

Letter 2927 I believe that Alternative 8 is a plan that encompasses not only the interests of hikers, fishermen and other sportsmen, but includes the timber industry and off-road vehicle groups as well

Letter 2930 Alternative 8 proposed by the U S Forest Service is the option that optimizes the benefits of the national forests to the various constituencies. I hope that Alternative will be adopted

Letter 2934 We support Alternative 8 which we believe offers the most suitable balance between recreational opportunities, the responsible harvest of timber in the region, and preservation of a key forest ecosystem

Letter 2940 I support Alternative 8 I am truly concerned about the environment and proper management of public lands so as to maintain much land for recreational use for the American people

Letters 3425, 3426, 3427, 4156
I support Alternative 8 The proposal is far more suited to the needs of the public--the owners of Washington Forest

Letter 3465 I support Alternative 8 of the George Washington National Forest Land and Resource Management Plan I think it represents a balanced approach to forest management

Letter 3471 It is very important to me to see the wilderness area in Virginia preserved and alternative 8 seems to be the best alternative

Letter 3472 I think that Alternative 8 should be used in the George Washington National Forest This is in the best interest of all concerned at present and in the future

Letter 3509 A balanced program will allow some progress for industry & ensure a recreational wilderness for our children Alternative 8 best serves that purpose

Letter 3522 I strongly urge you to follow Alternative 8 which offers a balance of uses and protects the natural resources and the Appalachian Trail

Letter 3530 I read with horror the timber industry's plans for George Washington National Forest. Alternative 8 would at least have less negative effects and should satisfy even the timber and ORV industries.

Letter 3530 Alternative 8 is very fair and should satisfy the timber and ORV industries

Letter 3541 Protect our priceless forest from further exploitation by the timber industry and damage by off-road vehicles Please support Alternative 8

Letter 3561 I strongly urge you to support Alternative 8 of the Draft Plan for the George Washington Forest Let's preserve wilderness experiences for future Americans and minimize encroachment on primitive areas by commercial timber and ATV interests

Letter 3631 The Blue Ridge River Runners support Alt 8 We feel that this alt is a good blend of multiple uses and will benefit both current and future generations of forest users

Letter 3634 I support Alternative 8 The George Washington, along with ALL OF OUR NATIONAL FORESTS are owned by all of the people of our country not [just] the timber industry [or] the ORV people There are other and equally important values to consider wilderness, hiking, camping, fishing, hunting, birds, animals, and just looking at a world the Good Lord Blessed us with

Letter 3641 [We] prefer alternative (8). It is a good and reasonable approach to offering recreational opportunities, clean water supplies, protection for game animals and fish, as well as reasonable timber harvesting

Letter 3642 I support Alternative 8 This proposal is far more suited to the needs of the public -- the owners of Washington Forest -- than the industry of off-highway vehicles

Letter 3698	Alternative 8 seems to strike a balance among the users of the lands under consideration
Letter 3708	I prefer Alternative 8 for the development of the George Washington National Forest I think this approach presents the most balanced one for the Forest
Letter 3716	I recommend Alternative 8 as a balanced management plan for land use
Letter 3723	I urge that Alt 8 be adopted This plan permits recreational opportunities, supplies clean water, protects game and fish and allows for the harvesting of timber This plan limits motorized use and restricts clearcutting.
Letter 3724	Alt. 8 is the best of the alts. I support its lesser emphasis on timber harvesting, its inclusion of additional acreage for wilderness, its inclusion of a substantial measure of forest land categorized by visual quality objectives, and perhaps most importantly its restriction on the use of forest land by OHVs The latter simply do not belong on land adjacent to the A T. Land adjacent to the Trail will inevitably lead to trail use by ATVs and there is no way that FS personnel will be able to prevent it
Letter 3746	It is very important that Alt 8 be adopted Alt 8 provides a well balanced for recreation and timber harvest, while insuring this balance remains in place for future generations
Letter 3761	I support Alt 8 (1) When using the Forest, visual quality is very important Alt 8 has a high amount of land, over half, with a VQO of Preservation and Retention Also, Alt 8 has only small amounts of land rated with a VQO of Modification (2) I feel that the timber harvest should be kept to a minimum as done in Alt 8. Timber harvesting should take a lower priority to the recreation value that the Forest provides (3) Alt. 8 will better control OHV use of the Appalachian Trail (4) Alt 8 will protect the remote character of the Appalachian Trail by providing for more possible wilderness, natural, and roadless areas
Letter 3767	Approve Alternative 8 with measures to assure wild areas for future generations
Letter 3785	ALTERNATIVE 8 encourages the development and wise use of renewable resources [It] is a very well balanced [plan] which provides for the multiple use of all the Forest users.
Letter 3786	I support Alternative #8 for the management plan for the George Washington National Forest The GWNF has many areas high in scenic quality such as the Priest and Three Ridges which merit special protection
Letter 3788	The emphasis on conservation of Alternative 8 will better serve future generations Accept Alternative 8.
Letter 3794	We express support for Alt 8 as the most reasonable and well-balanced, available option
Letter 3795	Hold fast to the multiple use plan proposed by your agency Once wilderness is lost, it is gone forever. Hold on to what remains
Letter 3798	Add my name to the thousands who prefer this balanced approach, USFS preferred Alternative 8, to the development of this area, preserving the wilderness areas for future generations and limiting the acreage that will be exposed to clearcuts
Letter 3800	I support Alt. plan 8 There is too much commercial cutting already Save our forests for our future generations, especially Mt Pleasant in Amherst and other wilderness locations
Letter 3811	I support the George Washington National Forest Land and Resource Management Plan - Alternative 8 While I personally prefer more acreage recommended for wilderness designation and no additional road construction within the Forest, Alternative 8 appears to be a reasonable, balanced approach
Letter 3820	I strongly urge that Alternative 8 be adopted with no modifications
Letter 3820	Alternative 8 appears to offer a good balance between recreational opportunities, preservation of natural resources and wildlife and timber harvesting
Letter 3829	We strongly urge you to proceed with Alt 8 This plan provides for a balanced blend of benefits for the owners of this public land, for recreationists and industry interests for now as well as for future generations.

Letter 3832	I feel quite strongly that Alternative 8 is the balanced management plan which will serve the multiple needs of the public
Letter 3839	In analyzing Alt. 8 vs. Alt. 12 of the Plan, it appears obvious that there is only one choice if one is to consider the future preservation and quality of the important wilderness resources in VA, that is Alt. 8 We enthusiastically support Alt. 8 which is the recommendation of the USFS.
Letter 3841	I urge you to adopt Alt 8 as the best plan for the overall use of the NF. If we do not keep the beauty of the wilderness today, it will not be there for those coming after us to enjoy.
Letter 3843	I urge the implementation of Alt 8 which seems to give a good balance between the interests of those of us who enjoy and care deeply about the environment and natural beauty and the timber and ORV industries.
Letter 3862	I urge the Forest Service to adopt the well-balanced management approach provided by Alternative 8.
Letter 3871	I believe the alternative favored by the U.S Forest Service, Alternative 8 is a better approach as a forest management plan. I think Alternative 8 offers more benefits to more people in our nation.
Letter 3887	Plan 8 is the best alternative for balanced multiple use of the national forest
Letter 3897	I am in favor of Alternative 8 I believe that a properly informed public will always support balanced conservation over blatant exploitation
Letter 3906	ALTERNATIVE 8 provides, in my opinion, a good balance between all concerned users of Forest Service lands. The "Land of Many Uses" concept should remain so, but not so heavily weighted in the direction of ALTERNATIVE 12
Letter 3908	Alternate 8 of the George Washington National Forest Land and Resource Management Plan is a responsible endeavor for control and balance in both the short and long term.
Letter 3910	I support Alternative 8 of the GWNF management plan. My main concern is to keep the National Forest a place for the public to enjoy and not for industries to profit from
Letter 3916	I urge you to put Alternative 8 in place It seems to be the most balanced plan.
Letter 3920	Alternative 8 produces wide range recreational opportunities, preserves clean water supplies, protects game animal-fish populations, provides harvesting timber responsibly It offers appropriate balance forest uses and serves multiple needs of public
Letter 3928	I approve Alternative 8 for the Forest Plan I am in favor of the high value which the Plan places on recreational opportunities I am opposed to below cost timber sales and unbridled clear-cutting practices. I think Alternative 8 will be the healthier alternative for the forest and will still deal fairly with the lumber industry.
Letter 3941	We do recognize that harvesting timber is an important tool for NF managers and that it can be used effectively to provide and enhance other resource values on NF lands. We do not support unjustifiably high levels of timber harvest as proposed under Alt 12, we do not support or advocate elimination of timber harvesting on the GWNF as proposed under Alt 3 In our opinion, Alt 8 provides for a sufficient level of timber harvest and a sufficient variety of harvest methods to allow the GWNF to achieve a wide range of resource objectives over the course of the next ten years.
Letter 3957	We applaud the Alt 8 reduction of timbering areas on the forest to those where terrain and soils are most suitable We also applaud the inclusion of 3 Wilderness Areas, the extended study of rivers for their recreational and/or scenic status, the large increase in roadless and recreational mgt areas, and the greatly expanded number of special biological areas
Letter 3958	Adopt Alt 8 of the Plan I believe this alt offers the best balance and utilization of the land
Letter 3966	The Board of the Roanoke Appalachian Trail Club wishes to be on record as supporting Alt 8 Alt 8 is a balanced plan It provides for timber harvest in a sustainable, responsible manner, creates a wide range of superlative recreational opportunities It fulfills the forester's mandate to preserve our precious supply of pure

water It will sustain an abundance of game animals and fish. We are most pleased with the added protection with the Appalachian Trail will derive

Letter 3970 — I support Alternative Eight It offers a good blend of balanced benefits and will provide a wide range of rec opportunities

Letter 4024 — Alt. 8 of the USFS plan gives responsible and sensible balance to the use of this area. It allows for some ORV and logging use, while trying to preserve the wilderness that is so rapidly vanishing in this nation. I urge you to consider carefully and choose alt. 8 of the USFS mgt. plan for the GWNF.

Letter 4049 — Alternative 8 has our strongest support because it minimizes logging, protects wildlife habitat and watersheds.

Letter 4247 — Alternative 8 is a balanced plan that serves multiple needs of the public

Letter 4264 — A balanced program will allow some progress for industry and ensure a recreational wilderness for our children Alt 8 best serves that purpose.

Response — Alternative 8 is considered in detail in the FEIS. It will be selected as the preferred alternative if the Regional Forester identifies it as the alternative that maximizes net public benefits

The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions This fact results in major disagreements over which alternative should be selected as the Revised Plan

The Regional Forester has identified Alternative 8A as the Forest Service preferred alternative in the FEIS. Alternative 8A was developed to respond to a wider array of uses, values, products and conditions including amenity values and environmental services.

Letter 91 — We congratulate you on a very thorough and thoughtful planning effort

Letter 146 — The draft plan and EIS are written more clearly and informatively than the muddled 1986 plan and accompanying environmental impact statement

Letter 1546 — Administrative Compliance Review: I found no deficiencies in this aspect of the document The length was excusable because of the complexity and scope of the project

Letter 1546 — What was really excellent about the draft EIS and accompanying draft plan were their graphs and charts of breakdowns of the effects of the alts. in numerous categories I also liked the detailed outlines of the different kinds of mgt areas and the mgt goals.

Response — NO RESPONSE REQUIRED.

Letter 2497 — I recommend alt. 8 be adopted and give future consideration to elimination of ATVs from the forest.

Response — Outdoor recreation, which includes motorized recreation, is one of the purposes for which National Forests are administered (Multiple Use - Sustained Yield Act of 1960, 16 U.S C 528) Executive Order 11644, as amended by Executive Order 11989, establishes policies and procedures for ATV use on public lands and recognizes such use as legitimate on federal lands to be controlled and directed so as to protect the resources of those lands It is on this basis that the ID Team must consider ATV use as appropriate

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Letter 2519 — I have looked at Alternative 8 and it seems to provide benefit above and beyond the current 12. Perhaps waiting to develop is the best thing to do.

Response	The ID Team has been unable to determine the point of this comment besides favoring Alternative 8.

Letter 2748	I support Alt. 8 I encourage you to maintain Alt 8 for 2 reasons· The Appalachian Trail is a trademark of the natural beauty to be found in the U.S., especially the eastern side. Once the designated areas of the trail are allowed for timber and other industrial uses, they are gone forever.
Letter 2750	I support Alt 8 as it would have a positive effect on the Appalachian Trail and the ecology of the surrounding areas
Letter 2894	Please support Alt 8 It offers many benefits not only for the Appalachian Trail but also for other environmental interests
Letter 2924	I support Alternative No 8, with the minor changes proposed by NBATC in their letter of March 26, 1992.
Letter 2934	Choose Alternative 8 in order to protect some of the areas of the Appalachian Trail
Letters 3425, 3426, 3427, 4156	Maintain the Appalachian Trail experience in its present state of beauty and wilderness for all generations to come
Letter 3466	I feel that Alternative 8 is a preferred compromise that would best serve my interests as a user of the Appalachian Trail.
Letter 3515	I support alternative 8 Alt 8 provides a realistic and in many areas more than sufficient allocation for all land uses "The [Appalachian] trail" must be protected to ensure our grandchildren have the opportunity to see the trail and surrounding forest in its natural state.
Letter 3650	I urge you to go with Alternative 8 Our church Boy Scout Troop enjoys hiking on the Appalachian Trail. I have seen the beautiful views from The Priest, Spy Rock, Three Ridges, etc., but it would be sad indeed if future scouts could not see the same beautiful sights
Letter 3663	I support Alternative 8 As a user of the Appalachian Trail System, I am very concerned about our future generations availability to experience these areas
Letter 3717	I support Alt. 8 The mgmt. of land for wilderness values and the preservation of existing roadless and undeveloped lands are important to the Appalachian Trail experience In Alt 8, 11,862 additional acres will be recommended for wilderness designation, including 14 mi of the AT, and 96% of existing roadless areas would *remain roadless*
Letter 3864	It appears that Alternative 8 has a better chance of allowing the AT to continue to provide rewarding wilderness experiences Consider this letter as one in support of Alternative 8
Letter 4233	There is already an over harvest of timber which is destroying the beauty and biological resources important to the [Appalachian] Trail experience Preservation of existing roadless and undeveloped lands is essential.
Response	Alternative 8 is considered in detail in the FEIS Alternative 8A has been identified as the Forest Service preferred alternative in the FEIS Alternative 8A provides a higher degree of protection to the Appalachian Trail foreground zone The ID Team has been working with representatives of the Appalachian Trail Conference to incorporate *different standards in Management Area 6*

Letter 1299	[Under] Alternate Plan 8 the forests would receive the kind of evenly proportioned management the public has wanted The reduction of clear cutting is perhaps the most important provision; also the recommendation for 49 areas in the forest with unique botanical or zoological interest to be managed for natural values
Response	The reduction in clearcutting and the establishment of special biological areas are two examples of how Alternative 8A is utilizing an ecological approach to managing the Forest

Letter 3923	The alternative with the least impact visually and physically is Alternative 8.
Response	Of the fourteen alternatives considered in detail in the FEIS, Alternative 3 would cause the LEAST visual, physical, and environmental impacts. Alternative 8A would cause more impact than Alternatives 3, 6, 9, 10, 11 and 13. It would cause less impact than Alternatives 2, 4, 5, 7, 12 and 14

Letter 1368	I am writing to reiterate our support of Alt 8 We believe strongly that forest mgt for ecological and biological values must be given AT LEAST equal value and consideration as timber and recreational interests. The proposed alt is a positive step in that direction
Letter 1684	Alt 8 will better preserve our Forest than past plans
Letter 1902	I am in agreement with Alt. 8 I am one who enjoys the natural beauty of GWNF and I believe that it is vital to retain these locales as respected wilderness areas. Once cutting is condoned, resulting in extensive depletion of trees and supporting life, there is no way to regain that which is lost
Letter 1991	I endorse Alt 8 This proposal offers the least environmental impact for the future of the NF
Letter 2456	Chose Alternative 8 No economic gain can be worth destroying our very means of physical survival on this planet
Letter 2579	Troop 326, Boy Scouts of America support Alternative 8 As Scouts we feel a vested interest in this Forest and trust you will do everything possible to preserve these Forests
Letter 2883	I am a firm backer of Alternative 8 and I urge those who back Alternative 12 to put down their chainsaws, step off of that 4-wheeler and just take a walk through God's country that has been untarnished by the sweep of man's hand
Letter 2939	I encourage you to adopt Alternative 8. This alternative will produce a wide range of quality recreational opportunities, preserve our precious supplies of clean water, protect game animal and fish populations, provide for the harvest of timber in a responsible manner, and concentrate resources on such important issues of the day as biodiversity and ecosystem management
Letter 3462	I feel very strongly that Alternative #8 be the preferred alternative Alternative 8 best serves the needs of many hikers like myself as well as preserves and maintains the wildlife and fish populations in a responsible manner.
Letter 3463	I urge you to support Alternative 8 as a plan for the forest The poor forest is under enough stress with acid rain, and this plan will help preserve the forest for us and for future generations
Letter 3482	Alternative 8 of George Washington National Forest Plan Draft accommodates a better plan of conservation of our natural resources which is a link of our heritage and insures better environmental protection
Letter 3484	Alternative No 8 is a rational balance of the possible uses of our forests. I believe this alternative is one which allows the minimum charges in our forest.
Letter 3484	Alternative No 8 is a rational balance of the possible uses of our forests I hope no more destructive alternatives will be approved.
Letter 3523	I advocate Alternative 8 It is vital that there be a balance between industry's needs and the need for conservation and preservation, few maintaining wildlife habitats.
Letter 3528	#8 will benefit the greatest number of people for the security of both our future and that of the ecosystem of the forest
Letter 3536	I support Alternative 8 It is a well balanced approach which allows for both recreational opportunities, resource development and ecosystem preservation

Letter 3641	We prefer Alternative 8. My wife and I commend the Forest Service for the importance placed on biodiversity and ecosystem management.
Letter 3667	*I prefer Alternative 8 for better wilderness experiences and preserving undeveloped lands Continue to help* preserve our natural resources.
Letter 3677	Support Alternative 8 This alternative allows for a balance of use between the timber companies, the OHV users and hikers/naturalists.
Letter 3690	I commend you and others involved in selecting Alternative 8 and urge you to continue to support this alternative. I appreciate the "balanced blend of benefits" offered in this alternative. It's important that we all recognize that the health of our forest ecosystem must come first.
Letter 3692	I would like to see Alternative 8 used I am a strong believer of natural environment protection for our Virginia wildlife and scenery
Letter 3725	We should continue to conserve our natural resources and protect our local ecosystem by harvesting timber slowly and minimizing clearcuts I would also like to limit the use of ORVs For these reasons I favor Alt. 8.
Letter 3830	Alternative 8 offers a balanced blend of benefits for all users of the George Washington NF, both recreationists and industry. This plan would preserve precious water supplies, animal and fish populations, and provide for timber harvest in a sustainable, responsible manner PLEASE STAND BY YOUR ALTERNATIVE 8, it is a good plan, fair to all interests
Letter 3835	I feel strongly that we need to preserve the forest ecosystem and the quality of our opportunities for backcountry experiences The plan proposed in Alt. 8 offers minimum degradation of the forest experience and I support this alt
Letter 3858	Alternate 8 is kind enough to the short sighted economic interests
Letter 3947	I support Alt 8 in the GW Forest Plan Draft Alt 8 would preserve precious water, protect wildlife, and still provide for reasonable harvest of timber.
Letter 3997	We support the Preferred Alt 8 This alt provides a framework for the conservation of biological diversity while promoting multiple resource mgmt of the GWNF resources. Moreover, Alt 8 established a management direction of each MA seeking to achieve goals toward a desired future condition.
Letter 4005	I favor Alt 8 It offers a well balanced approach to all, providing OHV use and timber harvesting in rational proportions while preserving the grace and beauty of our forests.
Letter 4009	*Your proposed Alt 8 is a fair compromise between the traditional and the progressive schools of forest mgmt*
Letter 4066	Alternative 8 is the best overall strategy for the GWNF to follow, given legal mandates of protection and management of the forest's biodiversity and the need to provide multiple-uses of forest resources. We believe that this alternative balances the many divergent viewpoints and demands on this public resource
Letter 4227	Virginia is one of the most beautiful places on earth Please do what you can to save it. ALTERNATIVE 8
Response	The Forest Service will use ecosystem management as the means to meet goals specified in the Revised Plan. Ecosystem management is the means to an end. It is not the end itself. The Forest Service does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the Forest Service, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems This is neither product-oriented bias nor a nature-oriented bias. In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing on a sustainable basis, resources that people need

Letter 2023 — I would strongly prefer the adoption of Alternative 8 rather than Alternative 12. Although logging brings jobs and income to our areas, so does tourism and recreational hunting and fishing. A balanced approach to forest management, giving equal consideration to all forest-users, will in the long-term, ensure the maximum economic well-being for our area.

Response — The many individuals, organizations and agencies who commented on the Draft Revised Plan and DEIS have philosophical differences on the management of the Forest. Naturally, there are disagreements over the degree that any alternative is equitable to the interests and concerns of these individuals, organizations and agencies.

National and regional Forest Service policy during the 90's has evolved to include a greater sensitivity for environmental concerns and a willingness to adjust priorities to ensure that National Forests are managed to provide values beyond the traditional goods and services offered in the past.

Alternative 8A has been formulated to find the appropriate mixture of uses, values, products and conditions that will be provided for the next ten to fifteen years in light of the realization that people want and need a wider array of uses, values, products and conditions from the Forest than in the past

Alternative 12 provides a mixture of goods and services that approximates those provided in the 1986 Forest Plan under revision. This alternative is generally viewed as more favorable by persons who are employed in the timber industry, by hunters concerned with early successional game species (especially white-tailed deer and ruffed grouse) and by persons who wish to enjoy off-highway vehicles on the Forest.

Letter 2708 — Adopt Alternative 8 The people are entitled to a fair price for the timber sold; road development should be minimized

Response — As discussed in detail in the process paper *The Concepts of Demand*, the demand for wood (stumpage) by the producers of wood-based products and services is rather "elastic" (The Forest provides only a small portion of the area's timber volume and changes in the price would be temporary as there are numerous other providers of timber). It is questionable if changes in the amount of stumpage offered on the Forest would cause more than a small, short-term increase in the price of stumpage The key point is that stumpage offered on the George Washington National Forest is a small percentage (8 5%) of the total amount of stumpage sold in northern Virginia and adjoining West Virginia

The amount of road construction needed to support the timber sale program in the Forest Service preferred alternative is estimated to be 5 to 8 miles per year Additional roads may be needed for a variety of reasons including access to new developed recreation sites and access to wildlife improvements

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Letter 3651 — I am favorable to cutting policy Alternative 8. We must keep cutting trees in the George Washington National Forest for the environment, for recreational benefits, and for the U S. economy since cutting on public lands costs taxpayers money ultimately

Response — No meaningful response can be provided.

ADEQUACY OF THE REVISION: Opposition to the Preferred Alternative

Letter 11 — The Forest Service's preferred Alternative, which embraces "biological and social values" just can't maintain the multiple use concept on the GWNF. It sounds like it was pre-written by the "Chief".

Letter 192 — #8 is an affront to the very concept of "multiple-use" It amounts to little more than an allocation of varying amounts of acreage to several individual uses.

Letters 374, 1428

Alt 8 is not in the best interest of the Forest or the people of the U.S. Simply carving up the forest and giving the most vocal user groups "their piece" is to abandon integrated multiple use mgt in favor of a political solution

Letter 382	I am adamantly opposed to Alternative 8 It is a single-use alternative that is contrary to the laws governing national forests
Letters 490, 2221	The Draft Plan is not a multiple-use plan and does not allow for proper stewardship and use of the wood products which the Forest produces
Letter 730	The Ruffed Grouse Society has grave reservations about the ability of the GWNF, if managed according to the guidelines set forth in Alt. 8, to provide the balance required on public lands to meet the needs of all forest users For this reason, the Society can not endorse Alt 8
Letters 747, 758	Many in our industry and in a variety of user groups believe that Alt. 8 is not in the best interest of the Forest or the people of the U S. Simply carving up the forest and giving the most vocal user groups "their piece" is to abandon integrated multiple use mgmt. in favor of the political solution.
Letter 1339	Alt 8 is not the correct method to maintain a multiple-use forest. The NFs were to be administered for outdoor rec, range, timber, watershed and wildlife and fish purposes Alt. 8 does not provide adequately for all these uses. Alt 8 will not support growth of the forest products industry and will not do enough to control the gypmo
Letter 1369	Biological values are important but should not be the ultimate goal in the mgt. of the GWNF. Alt 8 does not balance the multiple use needs of the forest. Neither does it maximize net public benefits.
Letter 1463	Alt 8 is a single use designation which cannot be considered
Letter 1467	Alt 8 doesn't properly promote the multiple use principle.
Letter 1638	I am strongly opposed to Alt 8 because it would not balance multiple use needs of the forest and does not maximize net public benefits
Letter 1678	I am opposed to Alt 8 as I do not believe it provides the mandated "Multiple Use" mgt.
Letter 1848	I oppose alternative #8 The reason for this is the lack of concern this alternative plan has for the multiple use concept
Letter 1857	I must express my displeasure with Alt 8 Alt 8 goes against everything I thought multiple use was
Letter 1983	Alternative 8 is broad based and yields to potentially productive land being unmanaged. This will create a preservation of acreage without multiple-use management practices
Letter 2186	Alt 8 moves away from multiple use mgmt Multiple use has allowed your neighbors to enjoy the resources you control
Letter 2187	I think Alt. 8 moves away from multiple use mgmt
Letter 2204	Alternative 8 poorly addresses the needs of the forest.
Letter 2319	The plans for the most part [are] bad for myself, for my home town (Clifton Forge), for Alleghany County, for Virginia, for the U S and for the world
Letter 2324	Alternative 8 would definitely not be in the best interest of the communities in Virginia
Letter 2357	#8 does little to promote the "Multiple Use" concept, and is instead a move toward creating a GW National Park
Letter 2388	Alternative 8 is nothing more than a plan designed to tie up additional public lands in the all too common preservationist style. I disagree with the plans objectives of setting aside 800,000 acres, nearly 80% of the forest, to be managed or more appropriately "preserved" as an old growth overmature forest This does not meet the multiple use criteria that our National Forest system supposedly run under The plan will virtually eliminate timber production management Without these vegetation manipulation activities the forest will decline in health and will be viewed by a majority of the public as being a wasteful use of timber and timberland.

Letters 2496, 2729	Alternative 8 is not anywhere close to a multiple use alternative
Letter 2504	I believe Alternative 8 is a single-use management that violates the laws and principles governing National Forests.
Letter 2537	This is not a management plan, not even a maintenance plan This is a preservation plan
Letter 2566	Alternative 8 does not balance the multiple use needs of the forest, it does not maximize net public benefits; and it does not best accomplish the mission of the Forest Service
Letter 2620	Alternative 8, does not balance the multiple-use needs of the forest, it does not maximize public benefits
Letter 2686	Alternative 8 is not a multiple-use alternative Wildlife populations will suffer as well as loggers who depend on a reliable timber supply.
Letter 2696	Alternative 8 places too much emphasis on below cost recreation programs
Letter 2703	The plan seems to have all but erased the concept of multiple use We need a balance of commodity production wildlife habitat enhancement and recreational opportunity which the proposed plan seems to lack
Letter 2727	Alternative 8 is a big change in your emphasis of providing something for everyone It provides little for the most and hands 1 1 million acres to the preservationists to squander My hunting will suffer greatly under Alternative 8 direction No soft mast and browse means reduced habitat for our game. Less road building means more areas unavailable to hunters
Letter 2734	Single use emphasis like preservation (alternative 8) provides little to most citizens and absolutely zero to the economy
Letter 2880	Alternative 8 more nearly serves the single purpose of turning the forest into a park
Letter 2882	I am distressed and dismayed that the Forest Service has chosen Alternative 8 Alternative 8 fails to adequately serve the public and the multiple-use concepts
Letter 3660	I do not like Alternative 8 I cannot accept this as a multiple-use alternative.
Letter 3755	Alt 8 is more of a "forest preservation plan" than a true multiple use forest mgt. plan
Letter 3779	Hardwood and softwood regeneration harvests are simply manipulating the forest in order to mine it for its values, and obliterating the multiple use concept
Letter 3890	I have difficulty comprehending Alternative 8 as a multiple-use management plan Preservation gets a strong boost.
Letter 3917	Alternative 8 does not allow for proper stewardship and use of the wood products Alternative 8 is not a multiple use plan.
Letter 3951	Alternative 8 is not a sound multiple-use alternative as stated in the proposed plan Alternative 8 is not the best management direction It appears to be a step back in the history of the management of National Forests
Letter 4019	I am opposed to the proposed revision of the mgt plan It does not reflect enough long-term concern for the health of the forest or for the future well-being of many wildlife species. The plan seems to have all but erased the concept of multiple use The plan reflects no attempt to compromise There is no longer a balance of commodity productions, wildlife habitat enhancement and recreational opportunity
Letter 4030	Alternative 8 tends to abandon "multiple use" forestry
Response	The Forest Service is finding that people need and want a wider array of uses, values, products and conditions from the Forest than in the past These additional multiple uses include environmental and social values not traditionally identified as multiple uses Such an identification, however, is not inconsistent with the definition of "multiple use in Section 4 of the the Multiple Use — Sustained Yield Act (MUSYA)

"Multiple use" means the management of all the various resources on the national forest so that they are utilized in the combination that best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions, that some land will be used for less than all of the resources, and harmonious and coordinated management of the various resources, each with the other, without the impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output"

Alternative 8A was developed in recognition that besides the traditional multiple uses of timber, wildlife and motorized recreation, the Forest Service needs to provide amenity values, such as aesthetics and remote, non-motorized recreation, as well as environmental conditions that promote healthy, diverse lands and water In providing this wider array, Alternative 8A is not fostering "single use management" but is a "multiple use" alternative

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Letter 20, 184

I oppose the Draft Revised Land and Resource Management Plan

Letters 66, 1315, 2374, 2864, 2876

I am against Alternative 8.

Letter 88 Alternative 8 should be eliminated as the preferred Alternative

Letter 94 I have several problems with Alternative 8 as the accepted 10-year plan for the George Washington National Forest

Letter 131 Wood Fiber Industries in Danville, VA, is opposed to the Draft Revised Land and Resource Mgt Plan.

Letter 138 I am writing to voice my objection to the selected option of the draft 10 year plan for the George Washington National Forest.

Letter 181 We are unalterably opposed to Alternative 8

Letter 183 Alternative 8 is a wasteful plan and does not represent responsible management.

Letters 136, 190, 527, 542, 543, 552, 553, 556, 751, 967, 1088, 1140,1432, 1617, 1807, 2051, 2235, 2243, 2571, 2655, 2663, 2739, 2880, 2919, 2923, 3544, 3739, 3773, 3775, 3956

I am (we are) in opposition of Alternative 8 of the George Washington Plan

Letters 327, 328, 379, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 588, 604, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1393, 1394, 1395, 1396, 1397, 1398, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1717, 1718, 1719, 1720, 1721, 1722, 1825, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2763, 3059, 3060, 3061, 3062, 3063, 3064, 3120, 3121, 3122, 3123, 3124, 3125, 3126, 3127, 3128, 3129, 3130, 3131, 3132, 3133, 3134, 3135, 3136, 3137, 3138, 3139, 3140, 3141, 3142, 3143, 3144, 3145, 3186, 4067, 4070

Alternative 8 is the one that I deem least desirable

Letter 380 Alternative 8 is the least desirable of all Forest should be conserved for private as well as commercial use

Letter 501 I feel that the Revised Land and Resource Management Plan that has been proposed would be detrimental to the George Washington National Forest

Letter 535	I oppose Alternative 8 because it will be bad for us in WV.
Letter 540	I oppose Alt. #8. #8 is a poor plan for sawmills and wood users and paper mills.
Letter 553	I feel Alternative 8 would not help our timber, wildlife, or schools what so ever.
Letter 714	The alt. which was selected (Alt 8) is one which I do not support.
Letter 739	I do not support Alternative 8 and have reviewed the pertinent differences.
Letter 741	As an employee in the forest products industry, I cannot support Alternative 8 regarding management of the George Washington National Forest.
Letter 852	I strongly believe Alt 8 is not the best choice.
Letter 864	I do not believe Alt 8 will serve the needs of all our people but is too linked to the narrow views of special interest group
Letters 886, 2576	I am not supportive of Alt 8
Letter 948	Please note my family's opposition to your GWNF draft plan.
Letter 1079	Alt 8 is neither in the best interests of nature enthusiasts, sportsmen, or businesses.
Letter 1165	I honestly think the plan proposed by your team is not beneficial and supportive enough for our forest.
Letter 1166	I have studied your preferred Alternative 8 as a Management Plan for the George Washington National Forest, and disagree with your choice
Letter 1252	After careful consideration of the new draft plan I have to say that Alt 8 is a poor choice.
Letters 1254, 1681	Alt 8 is not desirable.
Letter 1257	I disagree with the favored Alt I do not believe Alt 8 is the most practical or most beneficial mgt. plan for this forest.
Letter 1266	The #8 proposal causes great distress to my family.
Letter 1276	Please reconsider your decision
Letter 1281	The plan does not offer adequate protection to this treasured area (the GWNF).
Letter 1284	I very much disagree with the purpose of this plan.
Letter 1302	Please, I beg you as a taxpayer, Forest user, and most of all a Forest lover, to reject and not to use Alt. 8.
Letter 1303	I am writing to you to voice my concern and opposition to Alt 8
Letter 1304	The Virginia Forestry Association can not agree with Alternative 8
Letters 1307, 3649	I DO NOT favor Alt 8.
Letter 1312	I want to go on record as vehemently opposing your proposed forest mgmt plan
Letter 1359	Alt 8 does not serve my needs as an avid hunter, camper and hiker as well as one who is directly tied to the forest products industry

Letter 1425	I find Alt. 8 to outline a abysmal plan of action
Letter 1462	I cannot agree with Alt 8
Letter 1471	The alt. 8 I do not feel is the best plan.
Letter 1473	I cannot agree that the Alt. 8 is the best alt.
Letter 1564	I don't care for Alt 8
Letter 1610	I am very upset over Alt. 8
Letters 1613, 2216, 2906	Alt. 8 should not be considered
Letters 1614, 2185, 2225, 2288, 3995	I do not agree with Alt 8
Letter 1626	I have just been made aware of Alt 8 and I don't believe that it is an acceptable Mgt. Plan
Letter 1627	We should NOT support Alt 8
Letter 1640	I feel Alt. 8 is the LEAST appropriate option
Letter 1653	Alt. 8 is not a viable plan
Letter 1657	Alt 8 is not in the best interest of the forest or the majority of the public.
Letter 1663	The Executive Committee requests that the Forest Service reconsider the proposed Management Alternative 8 and that another alternative be selected that provides a more positive impact on the Greater Alleghany Highlands area
Letter 1815	It saddens me to think, what will be the end result if Alt 8 is allowed to be put in effect.
Letter 1831	I am against the use of Alt 8 to manage this forest or any other forest. I believe that by using Alt. 8 you are taking the easy way out to manage this forest, not the best way
Letter 1838	I am a professional forester and a sportsman and find your Alt 8 for mgt of the GWNF to be disturbing I cannot agree with a plan that reduces timber harvesting but does not make adequate provisions to protect the forest from gypmo.
Letter 1839	I find your proposed Alt 8 as a poor Alt
Letters 1877, 2279	Reject plan 8.
Letter 1882	I do not believe the alt. 8 is desirable
Letter 1970	Alt. 8 is not an acceptable solution
Letters 2175, 2176	I am not in favor of Alt 8
Letter 2226	I disagree with your decision to choose alternative 8

Letter 2300	I was disturbed to hear of your choice of Alternative 8
Letter 2342	I believe that much is at risk should plan 8 go into effect
Letter 2494	I do not agree that Alternative 8 is the right choice for the GWNF.
Letter 2526	After careful consideration and study, I have come to the conclusion that Alternative 8 is not in the best interest of the people of Virginia.
Letter 2531	It is strongly recommended and urged that Alternative 8 not be implemented
Letter 2623	I, as a sportsman and timberman, see no point in alt 8
Letter 2660	I do not agree with your choice that Alternative 8 is the best way to manage "our" forest
Letter 2669	Please consider rejecting Alt. 8
Letter 2700	I am disturbed by your choice of Alternative 8
Letter 2840	I am definitely opposed to Alt 8 of this plan
Letter 2842	Alternative 8 does not make good sense.
Letter 2891	Although I do not like Alternative 8, I can grudgingly support it only if there is no other alternative available.
Letters 3423, 3424, 3671	I disagree with Alternative 8 as a Management Plan for the George Washington National Forest
Letters 3445, 3446, 3632	Alternative #8 is both flawed and unacceptable
Letter 3489	I take exception to most of the plan
Letter 3504	I do not recommend [Alt 8]
Letter 3559	Alternative 8 is not desirable
Letter 3610	I can not endorse Alternative 8
Letter 3747	The Commission voted unanimously to express strong disapproval of the proposed Alternative #8, consisting in large measure of letting nature take its course
Letter 3760	We do not need any of the musty decay of the moth-eaten Alt. 8
Letter 3780	I am strongly against your using Alternative 8 for many reasons
Letter 3780	Consider another plan which would benefit everyone more evenly
Letter 3935	Alternative 8 is the one that I think least acceptable.
Letter 3968	I cannot go along with Alternative 8
Letter 3978	Alternative 8 does not provide for enough timber harvesting, implement Alternative 12
Letter 4020	Alt 8 is least desirable
Letter 4035	The selected alt is unacceptable.
Letter 4240	I am opposed to Alternative 8 management for the George Washington National Forest. This plan would eliminate some 800,000 acres of productive forest from timber management programs

Letter 4252	I cannot agree with your position on Alternative 8
Response	In the record of decision for the Final Environmental Impact Statement, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits

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Letter 269	I feel it is unacceptable to sacrifice jobs and revenue to my area, so I do not support Alt 8
Letter 376	Alternative 8 does not allow for enough timber production, will directly cause the loss of jobs in the timber industry, and surely a loss of jobs in other areas not directly involved in the timber community
Letter 532	Alternative 8 will limit the use and production of the forest land Besides the loss of many jobs and thousands of dollars in income
Letter 1300	Alternative 8 will cost more people their jobs
Letter 1407	If Alt. 8 is used, a great number of people will be out of work
Letter 1643	If people chose Alt 8, people who work at mills would be out of a job
Letter 1799	I ask you to drop Alt 8 Alt 8 takes care of the environment reasonably well, but does not take care of the people who live around and work in the Forest. Too many jobs and too much money will be lost under Alt 8.
Letter 1858	Alternative 8 significantly reduces jobs and benefits to local economies.
Letter 2202	Alternative 8 wants to destroy the local economy and put everybody on welfare
Letter 2206	I find Alt 8 inferior Only 59 percent of the existing timber demand will be met. 67 direct timber industry jobs will be lost Age class distribution will continue to worsen I deplore the thought of 252,000 acres of more wilderness
Letter 2233	I think Alternative 8 is inferior to Alternative 12 Many jobs will be lost in an industry that is so important to our local economy.
Letter 2301	You are trying to take jobs with Alternative 8
Letter 2517	I cannot accept Alternative 8 and the loss of jobs it will create.
Letter 2637	A loss of 67 jobs will result from implementing Alternative 8
Letters 2638, 2639	I don't like Alternative 8. As I understand it many timber industry jobs will be lost The timber industry is the largest industry in the state I feel that endangering jobs is poor management
Letter 2855	It would be very sad to see my husband or anyone loose their job due to inadequate log supply This could happen if Alternative 8 is chosen.
Letter 3826	I am deeply disturbed by your choice of Alt 8 as the preferred alt for managing the GWNF Now is not the time for the GS to be implementing plans which will have a net loss of jobs I support Alt 12 and its increase in jobs
Letter 3939	Alternative 8 states that there will be a loss in the number of direct jobs in the area which will further contribute to the high level of unemployment in the Forest zone of influence Alternative 8, as presented, has a negative impact on the economy and stability of the local communities.
Response	Appendix B of the FEIS has been rewritten to explain the assumptions inherent in the estimation of changes in employment and income displayed in Figure 2-34 and Table 3-23 of the DEIS. These are relative numbers and cannot be viewed as absolute changes in employment and income The increases or decreases in employment and income displayed in the FEIS should be viewed as potential for increases or decreases in employment and income. The Regional Forester will weigh this potential for gain or loss of employment and income as one of the factors considered in selecting the alternative to serve as the Revised Plan

Letter 167 Accordingly, based on this evaluation, the Board of Supervisors adopted the attached resolution R-92-18 at their regular meeting held on February 18, 1992 requesting that the Forest Service reconsider the selected Management Alternative (Alternative 8) and that another alternative be chosen that provides a full range of goods and services with more positive impacts on the economy.

Letters 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 601, 602, 603, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 726, 779, 780, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 798, 866, 917, 918, 919, 920, 975, 977, 1006, 1007, 1008, 1009, 1011, 1013, 1014, 1016, 1017, 1019, 1110, 1111, 1112, 1113, 1114, 1126, 1127, 1141, 1199, 1200, 1201, 1295, 1358, 1375, 1379, 1380, 1381, 1382, 1383, 1384, 1390, 1391, 1392, 1404, 1405, 1406, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1518, 1519, 1534, 1535, 1536, 1537, 1538, 1548, 1688, 1689, 1690, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1929, 1930, 1931, 1932, 1933, 2139, 2140, 2141, 2142, 2155, 2156, 2157, 2373, 2374, 2375, 2390, 2391, 2402, 2403, 2502, 2707, 3065, 3271, 3272, 3276, 3277, 3278, 3279, 3280, 3281, 3282, 3283, 3284, 3285, 3286, 3287, 3288, 3289, 3290, 3291, 3292, 3682, 3757, 3765, 3913, 4072, 4260, 4151

Alternative 8 is not desirable and does not serve the needs of the people

Letter 292 I believe your decision regarding timber management in the George Washington National Forest does not serve the interests of everyone, but only a few narrowly focused conversationists, who are willing to let trees grow forever at the expense of wildlife and recreation enjoyment of others

Letter 488 I oppose use of Alt. 8, aimed at satisfying a limiter number of user groups

Letter 707 The result you have come up with is a vast disappointment. You people have let the below-cost timber sale item adle your minds You have reduced timbering and clearcutting, which are the backbone to game and wildlife management, to almost nothing.

Letters 707, 3876

Go back to the drawing board guys and let's give it another try. Let's start with increasing the acreage available for timbering and clearcutting.

Letter 716 Alt. 8 does not seem to give the needed usage of our forest to serve the needs of the people

Letter 721 Alt. 8 doesn't serve the needs of the people and isn't desirable.

Letters 733, 734

I can not support Alt. 8 proposal for the NF This proposal does not serve the needs of our people

Letters 740, 2321

Alternative 8 does not serve the needs of the people

Letter 745 I do not believe Alternative 8 is desirable, because it does not serve the needs of the people

Letter 777 Alt. 8 does not serve the needs of the people and is therefore unacceptable.

Letter 893 Alt 8, the USFS preferred alt., is the one that I deem least desirable if these forests are going to best serve all of the people

Letter 1282 Alt. 8 is too restrictive and does not serve the needs of the people

Letter 1333 I do not feel Alt. 8 serves the needs of the majority of our citizens

Letter 1373 Alt 8 is least desirable if these forests are going to best serve all of the people

Letters 1422, 1423
Alt. 8 does not serve the needs of the people and would be detrimental not only to our family but to countless other families that depend on our country's forests

Letters 1798, 2162, 2908, 3588, 3589
Alternative 8 leaves a lot to be desired by all forest users

Letter 1858 National Forest land is managed as multiple-use and Alternative 8 is anything but multiple-use forest management.

Letter 2018 We believe Alt 8 does not adequately address the mgt of the Forest's true renewable resource - timber.

Letters 2018, 2914, 3730
We believe your proposed alt for the GWNF represents a divergence from responsible mgt.

Letter 2211 I am against Alt 8 This alt. does not provide multiple use, only preservation This alt. provides only for the few who want to turn all forest land into parks

Letter 2218 Alt 8 really comes up short Less road, less early successional habitat for wildlife and only 11% of the Forest dedicated for timber sales How many people will plan to take a Sunday drive to see dead trees?

Letter 2248 Alt. 8 is not in the best interest of most sportsmen/users

Letter 2258 I think Alternative 8 is more of a surrender to the highly visible and vocal environmental activists than it is a forest management plan

Letter 2335 Alternative 8 will have a negative effect on wildlife, farming, industry and people

Letter 2379 Alternative 8 is not in the best interest of the Forest or the people of the U S

Letter 2533 Alternative eight is the one that I deem least desirable if these forests are going to best serve all of the people.

Letter 2559 Alternative 8 does not provide for the needs of the greatest number of people

Letter 2610 Alternative 8 is not in the best interest of the Forest or the people of the United States

Letter 2629 I can not even consider alternative eight a reasonable form of management

Letter 2679 Alternative 8 is not in the best interest of the Forest or the people of the U S We cannot abandon integrated multiple-use management in favor of a political solution

Letters 2715, 2722, 2723, 2752
Alternative 8 is another attempt to preserve all federal lands and therefore be of little benefit to the American public.

Letter 2886 Alternative #8 does not provide a reasonable balance requested by various user groups, most especially those that reside or have businesses near the National Forest

Letter 2907 Alternative 8 poorly addresses the needs of the forest

Letter 2914 We believe your proposed alternative for the GWNF represents a divergence from responsible management

Letter 3489 It is the duty of the Forest Service to manage these valuable hardwoods to provide the maximum in benefits for today's users, and to perpetuate undiminished all the values and uses for future generations.

Letter 3489	The plan seems to have no relationship to what the Forest Service presented to committees as good multiple use management over a twelve year period
Letter 3622	I don't like your choice of Alternative 8 as the preferred alternative This plan has a lot for a few and little for the rest of we tax paying Americans I am concerned about any organization that runs entirely on politics. You can't manage a natural resource by counting votes
Letter 3660	First, you have to put people back into the equation Not realistic to discourage use or to limit use
Letter 3681	The choice of Alternative 8 as the preferred Management Plan must be the result of a system completely out of control.
Letter 3729	Your choice of Alt. 8 is not responsive to long-term National needs.
Letter 3730	Your proposed alternative represents a divergence from responsible management
Letter 3747	Alternative #8 is an abdication of the responsibility of the federal government to protect the timber resources, the natural beauty and the people of our state in managing the portion of the National Forest which lies in West Virginia
Letter 3814	I do not believe that Alternative 8 is in the best interests of either the forest itself or the people living and working in this part of the state
Letter 3816	This is not a management plan, not even a maintenance plan This is a preservation plan. It is a plan that wastes a renewable resource that could be used to create jobs in a depressed region of the country.
Letter 3833	Alternative #8 de-emphasizes the economic potential of the forest.
Letters 3808, 3865	Alternative 8, the U.S Forest Service preferred alternative is the least desirable of all 13 alternatives considered if these forests are to serve the best interests of all of the people
Letter 3898	The Forest Service is now managed by a vocal segment of our population that cares little of silvics, true diversity, and conservation. Alternative 8 supports all of these notions.
Letter 3919	I believe that the federal government must provide a balance between competing interest in utilization of our natural resources. In comparing Alternative No 8 to No 12 it is very apparent that this balance has not been achieved by Alternative No. 8.
Letter 3939	Alternative 8 appears to be a major step back in history in the management of this National Forest. It appears to be the management mode of the 1920's and 1930's It is not a multiple-use mode of management as stated in the Draft Plan but a "protection - custodial" mode of management.
Letter 3952	The acceptance of Alternative 8 would, I think, abrogate responsible stewardship of public resources. This alternative will change a productive, working forest into a park for the privileged few who have time and money to watch it grow old It will gradually become more uniform, less productive and of interest to few people
Letter 3952	Considering a holistic, multiple benefit and diversity enhancement combined with the basic biology of plants and animals, it seems that at least three other alternatives (5, 12, and 14) would serve the public and the resource far better than Alternative 8
Letter 3974	I am opposed to Alternative 8 I think the special interest groups are being catered to by the Forest Service in this Alternative
Letter 4060	Alternative 8 is the least desirable because it would result in less managed use of the Forest with undesirable results for wildlife and timber management
Letter 4069	Alternative 8 does not meet the needs of the majority of people
Response	The Forest Service is finding that people want and need a wider variety of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should respond to all of these needs and

wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

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Letter 382 — Alternative 8 severely restricts clearcutting, even though this is usually the optimum method for regenerating our oak forests (as stated in the previous plan).

Response — *The 1986 Forest Plan did not meet the legal requirement of identifying clearcutting as the optimum method* As discussed in Appendix A of the FEIS, the determination of optimality must be based on site-specific analysis and disclosure It is incorrect to assume that clearcutting is generally the optimum method. Such determination depends upon the resource objectives of a given management area.

Letter 325 — Under alternative eight, millions of dollars of timber will be lost to Gypsy Moth, biological diversity will be sacrificed, and people will be sacrificed, i e , reduction-in-force, for a visionary future that flies in the face of the Forest Service's own analysis of trends

Letter 488 — I oppose Alt. 8. I feel that is not in the best interest of the public as far as mgt. of the forest is concerned; it will not fight the gypmo problem, it will result in loss of jobs in a depressed economy; the loss of jobs will lower the tax base in the area, which will in turn lower the amount of money going into the school system This will harm the future education of our children

Letter 489 — Oppose the use of Alternative 8 It satisfies a limited number of user groups The number of campgrounds, areas designated for the use of all-terrain vehicles, hunting, fishing, and other outdoor activities appear to be limited There is a lower allowable cut of timber under this Alternative. With this reduction would come the loss of many jobs and the closing of businesses With the lost jobs and industry, the tax base obtained from the sale of timber would effect the local economies, schools, and social programs in these areas.

Letter 509 — I oppose Alternative #8 Alternative #8 does not cover enough protection against Gypsy Moths and actually weakens the National Forest environment Alternative #8 will hurt the local economy

Letters 510, 2678, 2714, 2733, 2907, 3576, 3579
Alternative 8 poorly addresses the needs of the forest. Timber harvest volume is drastically reduced at a time when it should be increased to provide gypmo-resistant oak reproduction Reduced harvest volume will also result in a loss of 67 jobs when unemployment continues to increase in the region Access to the forest is reduced when our population is aging Food available for game animals will decrease when population levels are at capacity levels Wilderness acreage will increase when existing areas have proven their worthlessness.

Letter 511 — I oppose the selection of Alternative 8 It will not manage the gypsy moth infestation. This Alternative will also eliminate much needed jobs in this depressed economy.

Letter 534 — I am opposing Alternative #8 because it will eliminate jobs, wildlife, and by not taking care of woods will cause the Gypsy Moth to run wild.

Letter 549 — I'm voicing my concern in this letter about Alternative #8 It has no gypsy moth control, jobs will be lost, wildlife will suffer

Letter 557 — I oppose Alternative 8 for the reason, if you don't cut some of the bad timber out and keep the gypsy moth from eating the trees you will not have a forest.

Letter 708 — Alternative 8 is not desirable. The jobs lost, ignoring silvicultural control (gypsy moth) decline of harvestable acreage, and timber stand management practices described by selecting Alternative 8 make little sense to me, a forester by education

Letter 750 — I am strongly opposed to Alternative #8 Alternative #8 would have a negative impact on the health of the forest, the wildlife population, as well as the timber industry.

Letter 860 — I am writing to express my extreme disappointment with the FS choice of Alt 8 as the most suitable plan for mgt of the GWNF. The Draft Plan --fails to provide adequate wildlife habitat due to reduced age class distribution; reduces total employment by 21 jobs according to FS figures I believe this figure underestimates the actual effect on the employment picture of a rural area, reduces distribution of receipts to counties by $69,000; fails

to meet current demand for timber This plan only meets 59% of current demand, fails to provide an aggressive gypsy moth control plan. A large percentage of the Forest will have no control measures available, reduces public access to a large portion of the Forest by recommending more wilderness and creating the new designation "remote highlands" which is useful to only a tiny fraction of our population; increases total budget to 18 898 million dollars while decreasing overall benefits to society. Our NF's are to be managed for multiple use benefits. I believe that an alt. which addresses multiple use in a much more comprehensive manner can be developed.

Letter 941 — Alt. 8's adoption will likely lead to needless destruction of the forest resource. It could deny legitimate economic and resource mgt. needs to harvest timber Most pernicious would be the refusal to treat acreage infested by the gypsy moth This could lead to massive timber loss and fundamental alteration of the native forest w/o justification.

Letter 984 — Alternative Plan #8 would cut out jobs and would not be in the best interest of the area or community. Timber will be lost in quality, will be reduced for the gypsy moth damage is ignored, and timber is not harvested soon after the damage.

Letter 1057 — Alt. 8 is not a multiple use plan for our forests. Timber mgt. provides benefits for all forest users. Access, habitat improvement, vigorous healthy stands of trees are a few benefits on top of the jobs created by harvesting. Your preferred alt. only considers 24% of the forest suitable for mgt Current mgt considers 60% suitable, a figure I presumed was too low This is not multiple use mgmt. and does harm to all forest users

Letter 1163 — A projection of 40 million bd ft per year is adjudged to be the ideal production figure; about 38 million is currently being cut, and the "new" plan calls for about 25 million. hardly heeding the economic indicators developed for maximum profit/use of the forest The entire process seems to cater to a small but vociferous minority in the form of the Wilderness Society, the Sierra Club, and other similar groups It is also ironic that, in their zeal to effect the construction of fewer roads in the forest, the "new" plan they so heartily endorse would actually result in MORE roads being build than under existing plans. I would like to respectfully request that the FS carefully reconsider this proposed "new" plan. It will not be good for people, birds, animals, or trees

Letter 1253 — Alternative 8 decreases jobs, increases costs, reduces productivity, and decreases benefits to the largest portion of society.

Letter 1374 — Alt. Plan 8 will allow gypmo to kill 25% to 30% of the NF That will reduce oak and most producing trees, which in turn will have a long range negative impact on game species, such as deer, turkey, grouse, and squirrel Alt. Plan 8 will reduce employment in a rural area which is heavily dependent on the forest. Alt. Plan 8 will reduce timber harvesting levels that will adversely impact critical habitat for grouse, deer, and turkey Please reconsider your proposal of Alt. Plan 8

Letter 1431 — I am writing to voice my opposition to alt. 8 of the LMP for the GWNF. The control of gypmo will be impossible with alt. 8. The use of ORVs will be severely limited by selection of Alt. 8

Letter 1433 — Because of the loss of valuable timber, habitat and feed for wildlife, erosion, etc , it would be a sad mistake to approve Alt. 8 for the GWNF. Be adamantly opposed to Alt. 8.

Letter 1441 — Alt 8 would harm both the ecology of the forest and our already poor economy.

Letter 1446 — I need not elaborate that less than 2/3 of existing timber demand would be met under Alt. 8; that jobs would be lost; that new jobs created as a result of adoption of Alt. 8 would likely be seasonal, that many non-timber enterprises would be impacted; that wildlife in general would be discriminated against and that the preservationists would move on to further conquests. I believe that Alt. 8 is seriously flawed, both as to long-term strategy and short-term tactics

Letter 1543 — I am opposed to the Forest Service preferred Alternative 8. Alternative 8 will drastically reduce the available timber harvest, put 67 people out of work, reduce payments to counties and set aside vast acreages to meet some vague and unidentified need for Remote Highlands.

Letter 1832 — Alt. 8 is designed to cater to one special interest group and is not designated to best serve all taxpayers, is not considering long term wildlife habitat or economic impact on the area by reducing proper timber mgt and harvest

Letter 1840 Alt. 8 is a poor selection as it does not adequately protect the forest from the exotic gypmo nor does it allow sufficient timber harvesting in a rural area dependent upon the forest resource

Letter 1844 We feel that Alt 8 would impose a much more detrimental effect on wildlife, as well as the citizens who utilize the Forest for their livelihood or recreation.

Letter 1914 I disagree with Alt 8. It wastes taxpayers money and would cause a reduction in jobs, especially for the timber industry It would neglect wildlife populations because of the reduction of age class distribution over the Forest

Letter 2000 Alternative 8 does not appear to support the intent of the system and obviously will have severe negative outcomes for game species such as deer, turkey, grouse, and squirrel, reduced employment in a rural area, and reduced timber harvesting levels and that will adversely impact critical habitat for grouse, deer, and turkey.

Letter 3955 Alt. 8 does not allow you, the professionals, enough latitude to be able to utilize all of the research or the tools at your disposal Nor does it meet the projected demand for timber in the year 2000 or allow you to actively practice forestry on over 75% of the Forest

Letter 2161 Alt 8 will provide little for wildlife, an ugly overmature forest and possibly the end of my company.

Letter 2188 Alt 8 is not anywhere close to a multiple use alt Alt 8 hardly even mentions gypmo control With only 24% suitable for timber production, wildlife populations will suffer

Letter 2192 Alt 8 wants to preserve biological diversity at the expense of jobs, money to counties, wildlife benefits from timber sales, taxpayer money to implement the alt., and reducing timber supply I am not in favor of this.

Letter 2193 I am appalled that you chose Alt. 8 Alt 8 wants to reduce the federal timber supply and money to counties for schools This alt will cost the taxpayers even more and essentially destroy our oak component in the forest. Where is the future timber supply coming from? It sure won't come from private individuals who probably only own 5-10 ac with a house in the middle of it I want some clearcutting to promote habitat for deer and turkeys. Let's do more than 300 lousy acres Don't even try those group selections Do you want to add to the below-cost issue?

Letter 2195 I am not in favor of alt 8. Alt. 8 wants to lower the timber harvest, reduce timber acreage, reduce jobs, add more land to wilderness, and doesn't plan for much acreage treated for the gypmo

Letter 2197 To me, Alt. 8 wants to do everything I'm against I'm against cutting back the amount of timber sales, adding any more wilderness or remote highland roadless areas, only allowing 21% of the forest for timber production, almost eliminating clearcutting, using only 39% of the forest for wildlife mgmt. emphasis, only trying to protect half the forest from the gypsy moth, the loss of 21 direct jobs and 67 direct timber jobs and costing taxpayers more money to implement this alt

Letters 2194, 2199

I oppose Alternative 8 This plan was written for the non-user Jobs, access, habitat improvement, vigorous healthy stands of trees are a few benefits on top of the jobs created by harvesting Alternative 8 only considers 24% of the forest suitable for timber management.

Letter 2208 Alt 8 does not reflect multiple use and net public benefit. Let's not ruin the economy of the area for sensitive species that can be protected in other ways Forget about these large vast areas classified as wilderness or remote highland areas.

Letter 2217 Alt 8 will allow gypmo to destroy large areas of the Forest, will reduce wildlife habitat and have an adverse effect on employment in an area heavily dependent upon the Forest

Letter 2219 I oppose Alt. 8 Alt 8 will allow extensive gypmo kill and reduce employment in local forest-dependent industries

Letter 2238 Alt 8 will have a negative impact on game species, reduce employment and reduce timber harvesting levels

Letters 2309, 2878, 3612

Alternative #8 does not adequately address the management of the Forest's true renewable resource - timber The large reduction of acres suitable for timber production is inappropriate All uses are not exclusive with regard to acreage Integration of activities should be pursued The greatly reduced allowable sale quantity does

not adequately meet the existing timber demand and causes loss of jobs. Alternative #8 also fails to allow for proper treatment of the Gypsy Moth

Letter 2312 I am opposed to Alternative #8. I do not believe that it adequately represents the issue of providing a continuous supply of timber or gypsy moth protection of the forest Alternative 8 would allow many thousands of acres of timber to be killed by the gypsy moth with no attempt at preventing the damage. Alternative 8 also reduces to an unrealistically low level the number of acres available for the timber harvest. Such policies will have a very adverse affect on both the GWNF and the economy of the area

Letter 2314 After hearing about the Forest Services support of Alternative 8 I can no longer remain part of the silent majority I believe Congress directed the National Forest to be a Multiple-Use forest The reduction of timber cutting would not only affect local economy but would take away a very effective wildlife management tool. It would also reduce the number of roads available for fire suppression and other land management operations.

Letter 2491 I do NOT support Alt 8 as proposed by the FS The agency needs to reconsider the amount of acreage classified as Remote Highlands Alt 8 identifies 176,166 ac as "Remote Highlands" and are unsuitable for timber production Mgt for these areas are "de-facto" wilderness and the agency should not take on such actions. Alt 8 decreases total employment

Letter 2494 Alternative 8 does not provide suitable amount of timber production I believe more land needs treatment for gypsy moth than Alternative 8 provides

Letter 2504 Some very important points are. the loss of 21 jobs, over 800,000 acres preserved for overmature forest, which most of that acreage will be destroyed by the Gypsy Moth because your hands-off policy (you will not be spraying these areas) This will have long range negative impact on game species, such as deer, turkey, grouse, and squirrels

Letter 2535 Biological implications of Alternative 8 virtually eliminates clearcutting from the silviculturist's tool chest, threatens biological diversity in the forest through harvest minimization; neglects many wildlife populations due to poor age class distributions likely to result in many portions of the Forest, and essentially ignores silvicultural control of the gypsy moth

Letter 2537 I find [Alternative 8] inferior in many key areas Only 59 percent of the existing timber demand will be met 67 direct timber industry jobs will be lost Age class distribution will continue to worsen 252,000 acres will become defacto wilderness

Letter 2538 Alternative 8 would cause a reduction in jobs within the timber industry [and] would adversely effect wildlife populations because of poor age class distribution over a high percentage of the forest. Gypsy Moth control would be hampered because of the lack of clearcutting as a control method. Less acreage would be provided for the protection, management and use of the Appalachian Trail and Scenic and Recreational Rivers. It is very bad for cash flow because it virtually eliminates clearcutting, the most economical and cost-effective method of harvesting.

Letter 2540 Alternative 8 is inferior Only 59% of the existing timber demand will be met 67 direct timber industry jobs will be lost. Age class distribution will continue to worsen 252,000 acres will become defacto wilderness This is a preservation plan that wastes a renewable resource that could be used to create jobs in a depressed region of the country.

Letter 2544 It is a gross waste to let Gypsy Moth destroy one of our natural resources Timber can be harvested along with making wildlife habitat better for many game species Also, timber harvesting done properly should not affect recreation To reduce timber harvesting levels would also affect many jobs which depend on timber operations To waste timber (which can be money) for recreation, wildlife, or by Gypsy Moth mortality is wrong to me

Letter 2635 Although there are many aspects of alternative 8 that concern me, none are of greater significance than its decreasing recognition of the forest's responsiblity to market timber, its reluctance to deal effectively with gypsy moth; and its "hands off" approach to much of the forest that will result in loss of much of its biological diversity.

Letter 2743 Your Alt. 8 plan to allow Gypmo to kill 25% to 30% of our forest, is not only unnecessary but totally absurd. This proposed new mgmt will only have a negative impact on our wildlife and timber harvest and the people who depend on timber harvest for employment

Letter 2831	Alternative 8 is inferior Only 59 percent of the existing timber demand will be met Jobs will be lost Age class distribution will continue to worsen We surely don't need 252,000 acres of more wilderness.
Letter 2841	Alternative 8 will have a severe detrimental impact on the hardwoods, reduce employment in these rural areas, and have a long-range negative impact on game species such as deer, turkey, grouse and squirrel
Letter 3440	The preferred alternative #8 would allow roadbuilding, clearcutting and road reconstruction on the forest This is unacceptable. The below-cost timber sales that are part of Alternative #8 will cost taxpayers over a million dollars a year its emphasis on even-aged timbering will adversely affect forest biodiversity
Letters 3585, 3816	After reviewing Alternative 8, I find it inferior in many key areas Only 59 percent of the existing timber demand will be met 67 direct timber industry jobs will be lost. Age class distribution will continue to worsen. 252,000 acres will be come defacto wilderness It is a plan that wastes a renewable resource that could be used to create jobs in a depressed region of the country
Letter 3639	I do not like nor can I accept Alternative 8 Remote Highlands need to be dropped altogether, suitable acres need to be raised by at least a factor of 2, and proposed timber harvest levels should be almost twice as high as proposed
Letter 3681	Alternative 8 does not balance the multiple-use needs of the Forest nor does it maximize net benefits. There are more than 259,000 acres (24%) of a forest the size of the George Washington that are suitable for timber production An annual timber Allowable Sale Quantity of 27 million feet cannot be considered adequate to provide a reasonable supply of timber in an area where the main source of employment is in the timber industry. A meager ASQ with only 300 acres of clearcuts cannot provide enough habitat manipulation for proper wildlife management The threat of Gypsy Moth devastation is real and must be dealt with There must be some concern that mortality (and growth) far exceed harvest and that our renewable natural resources are being wasted There must be some concern that if sources of revenue continue to decrease the USFS will put a huge burden on an already bloated Federal debt The GWNF has not changed dramatically since the original draft management plan was released in 1987, yet the proposals set forth in Alternative 8 have changed drastically.
Letter 3689	Alternative 8 provides for approximately 650,000 acres of "de facto" wilderness on a 1.1 million acre forest! This is ludicrous. Even more ludicrous is the 60,000 acres to be managed for timber production?!! Come on there's more "suitable" lands for economic timber sales
Letter 3780	My family depends on timber management and harvesting to survive. Alternative 8 plans to cut back on the amount of timber to be managed making it hard on us to keep work My family also hunts and feels that more land should be managed for wildlife than just 6% I pay taxes and therefore will be affected by the cost that Alternative 8 will require.
Letter 3837	Alt 8 is inherently flawed. The issue of biological diversity is not appropriately addressed It creates an unstable local economy It increases the road network, which will result in more loss of biodiversity It is a disgrace
Letter 3904	We OPPOSE ALTERNATIVE 8 because it would cause a reduction in jobs, the cost to manage the forest would be a lot more expensive, the management under ALTERNATIVE 8 will cause a deterioration of the resources on the forest and cost the taxpayer a lot more money
Letter 3914	Alternative 8 will not properly manage the natural resources of the George Washington National Forest and will subject it to the ravages of the Gypsy moth
Letter 3950	I feel Alt. 8 goes too far, allows too little flexibility, and is too narrow in focus ASQ is too low, suitable acres are too few, clearcutting is under-utilized, Remote Highlands designation has too many acres, too few acres are allowed for mgt of the gypmo, and cumulative impacts to the local economies and the future Forest is all but ignored
Letter 3951	Alternative 8, if implemented, will have a significant impact on the local counties and the natural resources of the area
Letter 3963	The Recorder, 27 Mar 1992 "Alternative 8 gives no consideration to people who sell logging equipment, gasoline, or people at Westvaco " Neither does it address the problem of gypsy moth

Letter 3975 Alternative #8 would adversely impact employment and wildlife habitat It would further restrict the program to kill Gypsy Moth

Letter 3994 It would reduce employment in rural areas already hard hit with today's bad economy and who are dependent upon the forest for jobs It would allow gypsy moth to kill 25-30% of the national forest which in turn would reduce oak and other mast producing trees which would in turn have a long range negative impact upon wildlife species native to that habitat.

Letter 4004 Alt. 8 reduces the number of jobs available, reduces money to counties, it increases the Forest budget and leaves large acres of the forest open for devastation from the gypmo.

Letter 4257 *Organic Act of 1987 [sic] says that the primary purpose of the NFs is "..to furnish a continuous supply of timber* for the use of the citizens of the United States." Contrary to the Act, Alt. 8 designates that 80 % or 800,000 ac be preserved as an overmature forest with little or no vegetative mgt The results of this action will be detrimental to a variety of wildlife and also could create a greater potential for fire as these overmature trees begin to die *and decay*

Letter 4267 Alt. 8 does not support the intent of the system and obviously will have severe negative outcomes for game species such as deer, turkey, grouse and squirrel, reduced employment in a rural area, and reduced timber *harvesting levels that will adversely impact critical habitat for grouse, deer, and turkey*

Response In the record of decision for the FEIS, the Regional Forester will document the rationale for the decision of which alternative will serve as the Revised Plan Points raised in opposition to the Forest Service preferred alternative *will be considered where such points are substantiated by the analysis and disclosure in the FEIS The specific* points raised in this comment are addressed in the responses to other comments in this appendix.

Letter 869 *Currently I feel that the proposed plan does not put enough restrictions on logging, clearcutting, watershed* protection and the amount of access by ATV users

Letter 972 The draft plan has several significant flaws. There are inadequate wilderness recommendations, too many miles of *unnecessary roads, improper expansion of incompatible off-road vehicle use and deficient streamside* protection Also, the plan falls short of incorporation adequate protection for non-game species

Letter 1259 Alt. 8 has many serious flaws which render it totally unacceptable Among these are entirely too many new proposed roads, lack of riparian buffer areas, excessive emphasis of ATV use, excessive timbering, and insufficient proposed wilderness areas.

Letter 1262 I have to voice my objection to the proposed Alt. 8 plan This plan does nothing to promote wilderness areas in the form of acres needed to maintain a habitat for wildlife. The timber cutting should be restricted to 1/4 to 1/2 mile of existing roadways. No new roads should be constructed. Existing roads total close to 5000 miles as it is A buffer zone of 75' to 100' should be required on each side of a stream, with no timber cutting. Regarding ATVs, they are incompatible to any NF and should be banned entirely

Letter 1330 The current draft plan for the GWNF includes significant flaws This flawed plan includes expansion of ATV use, construction of 200 miles of new roads for only the first decade, variable-sized riparian areas with so-called limited timber harvesting allowed, and inadequate wilderness designation

Letter 1556 The recommendations for wilderness designation are inadequate Of 26 roadless areas with a total area of 263,000 ac, only 3 with less than 12,000 ac are recommended At a minimum, Little River, Ramsey's Draft Add, Mt. Pleasant, Skidmore Fk and Laurel Fk should be added I would like to see all existing ATV trails closed (and no new ones opened). It is inappropriate for horses to share trails with hikers They cut up the trail too much and make it too muddy. No new roads should be constructed There are already too many roads (4,200 miles) in the Forest. Timber mgt. should move away from cutting for pulpwood to higher quality timber - this implies longer growth cycles.

Letter 3812 The FS's preferred alt #8 falls well short of adequately managing the Forest in the long term. The synopsis of Alt. 8 is extremely misleading. This proposed plan DOES NOT place emphasis on biological values. Attempting to sell the plan in this fashion is dishonest. The recommendations for wilderness are far too meager to protect biological values The habitats emphasized for black bear, turkey, deer, and grouse are thinly veiled disguises to allow timber harvesting on a sizable portion of the Forest

Letter 3980 — The draft plan flaws. Problems include· inadequate wilderness recommendations, miles of unnecessary new roads, timber harvest in the name of "wilderness (game) management"; expansion of off-road motor vehicle use (mainly ATVs), and deficient streamside protection.

Response — Alternatives 11 and 13 have been formulated by the ID Team to address these concerns. They were formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to better respond to biological issues

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Letter 1304 — Alternative 8 calls for 79 percent of the GWNF to be classified as unsuitable for timber This is contrary to what VFA promotes to our landowners as multiple-use The management practices outlined in Alternative 8 do not allow the flexibility necessary to enhance our future forest

Response — There seems to be an impression that multiple use management requires that lands be suitable for timber production This is a misinterpretation of the Multiple Use - Sustained Yield Act Lands not suitable for timber production are not "single use management" any more than lands suitable for timber production are

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Letters 490, 2587, 3976 — After studying the Alts and the GWNF itself, we find that Draft Alt 8 is too narrow in focus

Letters 510, 2378 — Alt 8 poorly addresses the needs of the forest

Letter 724 — I am opposed to Alt 8 because it does not follow good common sense guidelines in respect to forest mgt

Letter 1311 — Alt. #8 would have a critical impact on the NF

Letter 3926 — Alternative 8 doesn't reflect a real plan for the GW

Letter 4006 — Alt. 8 is not in the best interest of the Forest or the people

Letter 4017 — We do not feel that Alt. 8 is desirable

Letter 4022 — Alt. 8 would have a negative impact on the role the land would play which surround GWNF.

Letter 4202 — Your 10-year plan is hardly worthy of consideration

Response — The Forest Service is finding that people want and need a wider variety of uses, values, products, and conditions from the Forest than in the past. Not everyone agrees that the agency should respond to all of these needs and wants. The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

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Letter 178 — My appeal then is to you That you will make the wise choice for the forest, not one based on expediency

Response — Although public comment is one of the factors which influence the decision of which alternative will be the Revised Plan, other factors such as national and regional policy and the analysis of resource opportunities also play a role.

Letter 2616 — Annual clearcut acres are reduced from 4,555 to only 300. This makes Alternative 8 one of the worst alternatives with regard to a cash-flow

Response — Alternative 8A has been formulated so that it affords a better cash flow when compared with other alternatives without increasing the amount of clearcutting

Letter 2714	Alternative 8 poorly addresses the needs of the forest
Letter 4200	The Draft Proposal is stupid and done without any real thought to wildlife or nature
Response	*The Revised Plan was formulated to provide the appropriate mixture of uses, values, services and conditions* to meet the needs and wants of the public. The Forest Service will be using ecosystem management as the means to provide these multiple uses This ecological approach necessitates careful thought on the effects of all management practices on nature
Letter 3964	(Daily News-Record)· "The plan is 'an ecological travesty of misinformation and manipulation.' The EIS 'ignores the most basic scientific principles of ecology and falls short of meeting the biological requirements of a healthy forest ecosystem '" according to VfW/PAW
Letter 3964	(Washington Post·) "AFMG said the plan is aimed more at placating the public than encouraging efficient use of natural resources "
Response	NO RESPONSE REQUIRED.
Letter 73	The direction of the new plan seems to fly in the face of all that a forest manager would deem necessary in proper forest management
Response	In establishing management direction on the Forest to emphasize a different mixture of uses, values, products and conditions than in the past, Alternative 8A does not allocate different parts of the Forest to different management areas based strictly on silvicultural priorities nor by the desired future condition as defined by a forester
Letter 2059	I think Alt 8 would be a great loss for a lot of people
Response	The analysis performed by the ID Team and documented in Chapter 3 of the FEIS does not support this conclusion
Letter 167	*The Draft Land Management Plan does not "Maximize Public Benefits" for the impact zone of the George* Washington National Forest for the planned period (10-15 years).
Letter 936	The present Draft Plan does not "Maximize Public Benefits" in the selection of Management direction for the George Washington National Forest
Letter 2387	The present Draft Plan does not "Maximize Public Benefits".
Letter 2616	Alternative 8 does not balance the multiple-use needs of the forest, it does not maximize net public benefits, and it does not best accomplish the mission of the Forest Service
Letter 2926	Alternative 8 is clearly weighted towards non-timber uses to the detriment of the important benefits of maintaining a reasonable timber sale program Forest Service projection for timber demand is 45 5 million board feet. Alternative 8 falls well short of meeting this demand with only 27 million board feet Alternative 12 exceeds the projected demand for timber.
Letter 3728	It is apparent that the revised plan for the Forest is beyond the mainstream of public opinion and perverts the National Forest Planning process to produce a revised plan that is anti-management
Response	The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities.

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions. This fact results in major disagreements over which alternative should be selected as the Revised Plan.

Alternative 8A was developed to respond to a wider array of uses, values, products and conditions including amenity values and environmental services

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Letter 325 — I believe alternative eight to be the least desirable for the people and for the science and art of forestry

Letter 1298 — We are opposed to Alternative 8 because it appears to promote land management based on emotion rather than scientific principals

Letter 1544 — Foresters and other professionals in the Forest Service should be given the liberty of practicing their various professions. The Forest Service has adequate checks and balances to see that the greatest benefit to the greatest number of people is achieved

Letters 2741, 2746

This plan seems to be another preservation-type management decision of our federal government Do we have to preserve the National Forest too? Scenic highlands sounds like more bureaucratic terminology for preservation Who will benefit from such designation.

Letter 3489 — A few years ago when I received information that good professional management was being replaced by political management, I found it to be quite disturbing

Letter 3734 — The greatest tragedy of the new proposed plan is that employees of the US Forest Service, service to which they have pledged their best efforts, who have doctorate, masters, and bachelor degrees in Silva Culture, Biology, Economics, etc , with Civil Service grades to at least 16, will not be permitted to use their knowledge and other proven experiences in the best interests of a productive forest

Letter 3793 — Alt. 8 is a major step in reducing good forestry practices on our NF and I strongly oppose this alt

Letter 3822 — I am not at all pleased with the selection of Alternative 8 I feel that the selection of this Alternative was a semi-political decision in an effort to pacify the preservation-oriented environmental community. Alternative 8 ties the hands of your field foresters in the implementation of sound resource management practices

Response — The Revised Plan provides a framework for managing the Forest to achieve a wider array of uses, values, products, and conditions than in the past. Forest Service resource professionals will be applying the latest scientific principles to ensure that management practices are applied in an ecologically-sensitive manner to meet the goals, objectives, and desired future condition of the Revised Plan.

Letter 2664 — The VWTF strongly recommends that Alternative 8 be modified toward the levels of Alternative 12, e.g. more clearcutting, higher ASQ, more suitable acres, more acres available for wildlife management work and less new road construction

Response — Such a drastic change in Alternative 8 would invalidate the major goals and objectives of this alternative. Alternative 12 was formulated to address these concerns If identified as the alternative which maximizes net public benefits, then it will be selected by the Regional Forester to serve as the Revised Plan.

Letter 3660 — We need silviculture to dictate management prescriptions Not politics

Response — The Forest will be managed by using the appropriate management practices to achieve the desired goals, objectives and future condition described in the Revised Forest Plan Silvicultural practices are employed, in certain areas, to achieve these objectives These practices are NOT, however, applied for silvicultural purposes. Instead, the practices that best achieve the goals, objectives and desired future condition stated in the Revised Forest Plan are utilized.

Letter 171 The "preferred choice" is a deadduck (sorry, fowl language) #14 "looks" better, but it, too fragments the Forest

Response Alternative 8A, the Forest Service preferred alternative, has a management area allocation based on suggestions in public comments and from district employees. Many of the allocations in Alternative 14 have been included in this alternative

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Letter 718 The development and use of our National Forest should be more carefully considered than what Alternative 8 has to offer.

Letter 942 Alt. 8 preferred by the USFS is the least desirable if our forests are to be used wisely and in a way to preserve them and serve nature conservancy goals

Letter 2348 This Alt 8 is geared for the preservation, not the conservation and wise use of the forest. I totally disagree with alt 8

Letter 3645 I believe Alternative 8 is wrong and will not encourage the development and wise use of one of our most important renewable resources, our forest

Letter 3842 I am the owner of the North Fork Lumber Co in Goshen, VA, where timber is such a vital part of the economy. *It is absolutely critical that we develop our renewable resources. Alt 8, the USFS preferred alt, would seriously* inhibit our ability to do this

Response The degree that renewable resources are developed and "wisely used" must be balanced against other legitimate needs and values which are foregone with such development In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan

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Letter 2547 Alternative 8 would cause a $69,000 loss in distribution of revenues to counties Alternative 12 provides a $70,000 gain to counties. We need the products, job, and revenues provided by the timber industry

Response As discussed in Chapter 3 of the DEIS, counties receive funds from the Forest Service 25 Percent Fund and Payments-in-Lieu-of-Taxes (PILT). The "Estimated Change in 25 Percent Fund" in Table 3-16 is supplemented by corresponding changes in PILT Therefore, all of the alternatives should provide the same funding to the counties

In light of this fact, a decision has been made to remove the "Returns to Counties (M$)" in Table 1 (Page 9 of the DEIS) from the FEIS. The discussion under "Money Returned to Counties" on pages 3-85 and 3-86 of the DEIS has been supplemented in the FEIS to document this finding

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Letter 488 The number of campgrounds, areas designated for the use of ATV's, hunting, fishing, and other outdoor activities appear to be limited

Response Alternative 8A has an ambitious program of construction and reconstruction of developed recreation facilities. It also has a limited number of all-terrain vehicle routes This limitation on all-terrain vehicle opportunities is one of the trade-offs associated with selecting this alternative.

As displayed in Table 3-41 of the FEIS, Alternative 8A ranks fourth in providing habitat for black bear, third in providing habitat for wild turkey, and fifth in providing habitat for white-tailed deer

Alternative 8A and most of the other alternatives offer similar amounts of quality fishing opportunities

Letters 761, 1056, 1058, 2065

"New Forestry" is your preferred alt and I don't like it.

Response

The Forest Service preferred alternative should not be characterized as "New Forestry", although it does incorporate a number of "new perspectives" such as modified shelterwood

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Letter 1060

After careful review of the DEIS and Draft Plan, the (Southern Timber Purchasers) Council cannot support the Forest Service's decision to adopt Alternative 8 as the "Preferred Alternative"

Letter 2627

I am disturbed that Alternative 8 is so grossly inadequate from both ecological and economical perspectives

Letter 2892

I am in opposition to much of the proposed forest plan I feel that the entire plan needs an overhaul

Letter 3743

After our evaluation of the Draft Plan as well as the Draft Environmental Impact Statement, we cannot endorse Alternative 8.

Letter 3982

The selected Alternative is unacceptable.

Letter 3996

The plan that you have proposed does not meet my needs for wildlife and wilderness conservation.

Response

Responses to specific comments concerning the inadequacy of Alternative 8 are discussed under each specific comment

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Letter 1253

The Draft Plan increases the Total Budget to 18 898 million dollars while decreasing overall benefits to society.

Letter 3711

The budget in Alternative 8 is too high

Letter 3951

I find it hard to accept that this alternative [#8] will cost two million dollars more than an active management alternative.

Letter 4030

[Alternative 8] would return $78 million less to the U S Treasury than Alternative 12

Response

A common question that comes to most people's minds whenever something is proposed is· "How much is this thing going to cost?" The budget information in FEIS chapter 2 is intended to highlight the major cost differences between the alternatives In the DEIS, the Forest did recognize that the preferred alternative had one of the highest budgets In this FEIS, the budget has been updated to better reflect the money needed to implement each alternative.

The final decision will consider the budget needed to implement the Plan In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan However, no single factor, such as the budget, will lead to this selection.

The Forest will budget to implement the Revised Plan [1982 NFMA regulations at 36 CFR 219 10(e)]. Yearly, Forest budget proposals are aggregated nationwide by the Forest Service and submitted to the President These proposals then become part of the President's budget request to Congress

The Forest's annual budget, as authorized by Congress, may vary from that which is indicated in Plan Appendix F. The Plan will be monitored to provide the quality control necessary to ensure it is implemented properly The Implementation Monitoring Summary in the Plan's Chapter 4 provides for monitoring the budget. If annual budgets over time vary significantly from long-term direction, a Plan amendment may become necessary [36 CFR 219 10(e)]

Chapter 4 of the Revised Plan also discusses yearly budget proposals Plan Appendix F displays the detailed budget information needed yearly to achieve the Plan goals and objectives

Letter 558 — I am totally opposed to Alternative 8 because of the loss of revenue and fringe benefits a well managed forest provides for all type sportsmen and the lumber industry A forest sitting idle will soon deteriorate to the point where it will do no benefit to anyone including the wildlife

Response — Alternative 8A has been formulated to provide a wide variety of uses, values, products and conditions Timber and habitat for a variety of wildlife species are provided, but they are balanced against other uses, values, products and conditions desired by the public

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Letter 2173 — Alternative 8 is geared for the preservation of the forest If we try to preserve the forest, there will be dead trees for my children. Trees are renewable

Response — In managing the Forest to achieve a wider array of uses, values, products and conditions than in the past, the Forest Service has not abandoned its belief that timber and wildlife are renewable resources There are clearly circumstances, however, where timber and wildlife management are inconsistent with achieving other desirable uses, values, products and conditions

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Letter 3660 — Use the original conceptual plan as developed by VPI for management of the Scenic By-Way If you don't, then I am against this project

Response — There has been only one concept plan developed by the Community Design Assistance Center of Virginia Polytechnic Institute and State University It went through several draft stages with minor changes made each time The concept has always been to optimize the scenic driving experience while providing interpretation of natural and cultural resources and the management of them This remains the emphasis in the finalized concept plan

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Letter 2558 — I protest the implementation of the proposed revisions. There must be more consideration given to an even-headed management of forest resources, especially in ways that will provide adequate food and cover for all wildlife species now found in the forest

Response — The distribution of well-balanced age classes provides the optimum habitat for many of the game species. While the Forest Service believes that providing habitat for these species remains important, they should not be emphasized on every acre across the entire Forest

Analysis shows that most of the game species benefit from a variety of habitats, not just early successional stages Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 10, 11, 13, 14, 15, 16 and 17 Non-timber wildlife management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas

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Letter 3849 — The plan simply does not go far enough in protecting wilderness areas and effectively managing timber harvest

Letter 4198 — Please consider a more environmentally friendly alternative

Response — Alternatives 3, 6, 9, 11 and 13 provide a more positive response to these concerns that the Forest Service preferred alternative One of the alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 3939 — Upon close examination of Alternative 8 it is very clear that making modifications to it would be impossible and would only lead to the development of another new alternative and more confusion. Due to the flaws in Alternative 8 we must reject it and look for a better and more balanced alternative

Response — The many individuals, organizations and agencies who commented on the Draft Revised Plan and DEIS have philosophical differences on the management of the George Washington National Forest. Naturally, there are disagreements over the degree that any alternative is equitable to the interests and concerns of these individuals, organizations and agencies

National and regional Forest Service policy during the 90's has evolved to include a greater sensitivity for environmental concerns and a willingness to adjust priorities to ensure that National Forests are managed to provide values beyond the traditional goods and services offered in the past.

Alternative 8A has been formulated to find the appropriate mixture of uses, values, products and conditions that will be provided for the next ten to fifteen years in light of the realization that people want and need a wider array of uses, values, products and conditions from the George Washington National Forest than in the past

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Letter 2032 — Alternative 8 is not a valid consideration, as it allows only five (5) riding areas [for ORVs & motorcycles] in a 1.3 million acre forest!!

Response — It is acknowledged that the Forest Service preferred alternative offers limited opportunities for ATV use. This is one of the trade-offs associated with the selection of this alternative as the Revised Plan

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Letter 3815 — Alternative 8 will not meet the demand of timber that is expected of the George Washington National Forest

Response — It is acknowledged that the Forest Service preferred alternative will not meet the anticipated demand for timber. This is one of the trade-offs associated with the selection of this alternative as the Revised Plan.

Letter 862 — The advocacy of Alternative 8 would seem to be a retreat from multiple-use principles and indeed a withdrawal of active management in general If as stated, "Most Forest visitors expect to see an essentially unbroken forest canopy," then education should be a major part of the Plan rather than a retreat from forest management. It would seem that any area which is visible from a facility, road, trail or river has been removed from the production of timber products. This is a huge sacrifice to ask of the counties which have lost part of their tax base, the industry that has come to rely on the resource, or the people whose lives will be altered by the lack of work

Response — There seems to be a misconception that multiple use management requires that lands be suitable for timber production This is a misinterpretation of the Multiple Use - Sustained Yield Act Lands not suitable for timber production are not "single use management" any more than lands suitable for timber production are. Visual resource management does not preclude multiple use management.

A variety of management practices may occur in each of the four VQO classifications provided those practices are permitted within the specific management area Whether for wildlife habitat improvement, timber harvests, recreation or other resource management, these activities are carefully planned to meet the adopted VQO

Another point which appears to need clarification is the amount of funding paid to counties As discussed in Chapter 3 of the FEIS, counties receive funds from the Forest Service 25 Percent Fund and Payment-in-Lieu-of-Taxes (PILT). The "Estimated Change in 25 Percent Fund" in Table 3-16 is countered by corresponding changes in PILT Therefore, all of the alternatives provide the same funding to the counties

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Letter 2254 — There is something bad wrong with a plan that reduces the acreage suitable for timber production from 640,000 acres in 1986 to 259,000 acres in 1992. When our local citizens need employment and "below-cost" sales have become a leading issue, why reduce the timber sales budget from 49 million board feet to 27 million?

Response — The reduction was necessary to meet other multiple-use objectives as defined by the management areas allocated in Alternative 8A

Letter 2369 — Alternative 8 is not only a waste of our natural resources, but also an invitation to exploit the forest lands of third-world countries

Response — It is outside the scope of the revision to address this concern.

Letter 2687 Trees need to be thinned and harvested to keep stands healthy.

Response Several alternatives in the FEIS provide for these activities.

Letter 2900 Alternative 8 puts too much emphasis on timber cutting, game management, roadbuilding and ATV use. I feel there is no need to cut any timber in the GW National Forest or to build any more roads, indeed they should close some of the existing roads. We have enough deer in the East, more emphasis needs to be placed on non-game management ATVs should not be allowed on national forest land They are totally incompatible with what a national forest should be.

Letter 3555 Alternative 8 would only keep us cruising on the ugly road to a poorer, deader world.

Response *It is acknowledged that providing for biodiversity and large tracts of unfragmented, old growth habitat with an* ecological perspective towards management are some of the values that members of the public desire on the Forest. Alternative 3 was developed to explore the capability of the Forest to provide these values without providing for other uses such as timber, developed recreation, or wildlife habitat improvements

The philosophy of ecosystem management espoused by Alternative 3 is at odds with the national ecosystem management policy. The Forest Service does not manage ecosystems just for the sake of managing them or *for some notion of intrinsic ecosystem values. They are managed for specific purposes such as producing,* restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services and aesthetic, cultural or spiritual values.

Standards in the preferred alternative provide for maintenance or improvement of water quality for all beneficial uses, insure that long-term soil productivity is maintained, and require compliance with air quality regulations

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Letter 2627 [Management according to Alternative 8 would result in further decreases in the biological diversity of the area by] continuing below-cost sales of timber (every single planned timber sale on the GWNF will lose taxpayer's money).

Response The Forest Service will use ecosystem management as the means to meet goals specified in the Revised Plan Ecosystem management is the means to an end It is not the end itself The Forest Service does not manage ecosystems just for the sake of managing them or for some notion of intrinsic ecosystem values. They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services, and aesthetic cultural or spiritual values For the Forest Service, ecosystem management means to produce desired resource values, uses, products or services in ways that also sustain the diversity and productivity of ecosystems.

This is neither product-oriented bias nor a nature-oriented bias In some places, the emphasis is on ecological conditions and environmental services In others, it is on resource products and uses Overall, the mandate is to protect environmental quality while also producing resources that people need.

Taxes are used to have our national forests protected and managed for a mixture of multiple uses such as recreation, timber, water, wildlife, etc Timber receipts and other revenues collected help to offset the expense of managing the National Forest System. There would not necessarily be a "savings" if timber harvesting were eliminated

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Letter 547 I oppose Alternative 8 because it provides less money for wildlife programs

Letter 551 I oppose Alternative 8 because it would provide less money for wildlife programs It would finally close the forest to the users of it.

Response Alternative 8 substantially increases the wildlife program over current management, and most alternatives developed.

Letter 2674 — The FS recommendation is totally inadequate to provide for recreational needs and biological diversity for an area within close reach of northern VA and Washington, DC

Response — Despite its size, the 1 1 million acre George Washington National Forest cannot possibly meet the needs of all the citizens of northern Virginia and Washington D C

Letter 4040 — The short rotations the forest will be on under #8 are neither sustainable or profitable

Response — Our analysis shows that rotations are sustainable as required by law Profitability is not a major consideration in providing resources from the National Forests.

Letter 3660 — You must mandate that wildlife will get funding for habitat manipulation sales.

Response — This demand is beyond the scope of the revision

Letter 3489 — I wish to point out that it was past management practices that brought the George Washington National Forest to the condition that we value so highly today.

Response — Many of the resource values and conditions on the Forest are a result of the vegetation aging from past management practices before the land became a national forest

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Letter 1854 — There can also be expected to be a decline in tourism as the forest quality is lowered by Alternative 8, and a further erosion of interest and jobs

Response — The comment refers to the differences between Alternatives 8 and 12 Realistically, tourism is very likely not going to be affected one way or the other based on which of the two alternatives would be adopted The Forest quality is not lower in one alternative as compared to the other There may be a difference in the forest canopy type, say from oak to maple, but the average tourist could not care less about this Both alternatives call for an increased developed recreation program

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Letter 3995 — The Organic Act of 1987 states that the National Forests' purpose is to furnish a continuous supply of timber With Alternative 8, it does not look like this will happen

Response — Although the authority to cut timber (the Organic Act of 1897) was in place when the Forest was chartered (1918), timber was not a driving force behind the creation of the Forest From "The Lands Nobody Wanted" by Shands and Healy "Land for these forests, which would later be combined to form the George Washington National Forest, was acquired by the authority of the Weeks Act In order to be considered, the land had to have a direct impact on a watershed " And, paraphrased from "Impacts of National Forests on the Forest Resources of the South" by Young and Mustian· This damage to the watersheds led to the creation of the Act of March 1, 1911 – most commonly known as the Weeks Act. This act helped solve two problems it allowed land which was under private ownership to be purchased by the government, it also gave the government the authority to acquire land specifically for the purpose of watershed protection Paraphrased from page 30, "Origins of the National Forests" edited by Steen The first Weeks Law forest was established in 1916 Through 1923, ten more forests were established all justified on their value as protectors of water flows In 1924, the Clarke McNary Act added "the production of timber" as a purpose for forest acquisition, thus permitting the purchase of land beyond the headwaters of navigable streams

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Letter 3779 — Alt. 8 has an estimate of almost doubling the cumulative edge effect over Alt 2 (noted as the current management direction into the future, p 4) from 4 2 to 7 8%

Response — The Forest Service recognizes that habitat created and affected by "edge" is a benefit for some species and a detriment to others The effect and creation of edge habitat has taken on recent significance with relation to those neotropical migratory bird species which rely on forest interior habitat for nesting The revised Plan provides large blocks of unfragmented forest habitat in Management Areas 4, 5, 6, 8, 9, 18, 21, and portions of Management Areas 14 and 15

Letter 291 We cannot agree with the conclusion that Alternative 8 is the proper way to manage the GW for the next 10-15 years We feel that Alternative 8 will not provide adequate early successional habitat, especially in years with a partial or total mast failure (usually 3 out of every 4 years) Alternative 8 and the lack of clearcutting it promotes, will not provide enough cover necessary for wildlife to escape predators and/or disturbance We are also concerned that Alternative 8 will not protect our forest's oak component from devastation by the gypsy moth.

Letter 1153 I've looked at & commented upon a number of forest mgt. plans. Sadly, yours is one of the worst I have ever seen. The revised draft plan has made some progress toward ecological health & sustainability but it falls woefully short of these goals It is clear that the Forest Service continues to hide its real goals--timber mgt & road building--behind a cloak of loaded language The revised draft for the GWNF fails to take an ecosystem approach to forest mgt It conceals the decimation of forest ecosystems through the practices of clearcutting and habitat enhancement by changing the terms Rather than clearcutting terms such as "shelterwood cuts", "wildlife clearings" or "group selection" are substituted Altering language does not alter the ugly reality of destruction that is occurring in the GWNF It does not lessen the ecological impact of silvicultural techniques that are as devastating & violent as clearcutting

Letter 1278 Alt 8 is inadequate in many areas and refuses to recognize the most basic principles of ecology. Alt 8 puts no restriction on logging due to current gypsy moth defoliation and "potential" areas of gypsy moth defoliation, thus leaving timber available for salvage sales I further object to clearcutting and shelterwood cutting which in effect are the same as no designated areas are cited thus leaving the integrity of the forest at risk. There is also no reason to increase the road system as this will disrupt the fragile wildlife habitat as it exists presently, and will invite more polluting cars and people to sensitive areas Instead, increase the trail system which maintains respect to the environment and encourages people to meet nature on nature's terms. I encourage you to increase the amount of acreage designated for wilderness Alt 8 reserves 12,000 ac or less than 1% of the available land, raising the wilderness to only 4%, far below the 17% national average There is also no allocation for the restoration of damaged ecosystems

Letter 1279 I strongly oppose to Alt #8 This would have a negative impact on game species such as deer, turkey, grouse and squirrel

Letter 1337 This plan seriously undermines the long-term health of the GWNF through its failure to uphold basic environmental protection standards In the process, the forest's potential status as a substantial wilderness area is being neglected Some of the most troubling elements The plan actually places no ceiling on logging; permits road construction in "roadless areas", possibly removing them from future wilderness designation, only 3 of 27 roadless areas inventories (12,000 ac total) are being recommended for wilderness designation, a mere 3 PERCENT of the forest, compared to the national average of 17 PERCENT

Letter 1408 Alt 8 is not the proper way to manage the GW It will not provide the adequate successful habitat. We need to protect our wildlife, and with the lack of clearcutting, this won't provide enough coverage for wildlife survival

Letter 1549 Alt 8 will not provide enough successional habitat, and with the lack of clearcutting, will not provide adequate protection for wildlife to escape the dangers they must face. Alt 8 will not protect our forest's oak component from the gypmo.

Letter 1551 I urge you to revise the draft plan proposed for the George Washington National Forest. The plan is wholly inadequate in its protection of our natural resources

Letter 1563 I am quite concerned about alt 8 The destruction of oak and other mast is not in the best interest of deer and other wildlife population The VA and WV tourist industry will be affected adversely due to the reduction in hunting and trapping

Letter 1670 Alternative 8 reduces grouse management from the present level of 116,000 acres to 22,000 acres Even at present management levels -- we are losing grouse habitat

Letter 1670 With the great reduction of grouse habitat called for in Alternative 8, grouse are doomed even further

Letter 1854 If Alternative 8 is followed, there will be an increasingly large fraction of the forest represented by a poor age class of trees, which will lead directly to neglect of the forest, wildlife, and human use of them

Letter 2182	Alternative 8 is particularly bad in that it tries to hide destructive activities such as roadbuilding and euphemized clearcuts with scientifically invalid terms such as "habitat improvement" and "recreational accessability" Throughout Virginia today there is a vast amount of your "improved habitat" and no need for more.
Letter 2254	When deer, turkey, and grouse hunting is at all all-time high, gypsy moth is a mounting problem, and many of the stands of the forest are reaching maturity, why reduce clearcutting from 4,500 acres to 300? This not only practically eliminates your best method of hardwood regeneration but stymies your only method of salvage from insect damage
Letter 2322	Your most important commodity resource, at this time, in terms of cash value, is wildlife, not timber. For every man that wants to cut a tree there are a hundred want to shoot a deer or 500 want to catch a fish. I do not favor Plan 8 because it does not provide enough timber use to help both resources. Particularly clearcuts, which should not be removed from practice just because non-professionals scream "destruction". They don't have to be put on display as you did in your prized North River Road Zone.
Letter 2323	I oppose Alternative 8's restrictive land management proposals. Alternative 8 assumes the "Let Mother Nature Do It!" approach is best by utilizing a hands off management method for 80% of the forest area. Mother Nature is a hard taskmaster and at times treats the environment more harshly than people This plan also puts the U S. Forest Service in a police force status and ignores the well trained staff foresters' abilities. The forest community, too, is left out when computing the formula for Alternative 8
Letter 2330	Because proper management was not applied, I feel that Alternative 8 would kill our forest
Letter 2340	Alternative 8--is unacceptable. It places too much strain on the ecosystem.
Letter 2525	Alternative 8 will not provide adequate habitat needs for many wildlife species.
Letter 2532	I believe a forest plan that is as narrow in scope as the one now proposed for the George Washington will in fact degrade the forest by drastically curtailing timber harvest and in turn erode the forest's capability of supporting many wildlife species
Letter 2572	Alternative #8 charts a course for further fragmentation destruction of sensitive riparian areas and continued proliferation of game species at the cost of reduced biological diversity for forest interior species No areas are recognized or protected as migration corridors that would allow natural movement for species from one area of the forest to another.
Letter 2616	Wildlife populations will be neglected, impacted because of poor age class distribution over a high percentage of the forest [under Alternative 8]
Letter 2627	1) [Management according to Alternative 8 would result in further decreases in the biological diversity of the area by] increasing roadbuilding
Letter 2627	2) [Management according to Alternative 8 would result in further decreases in the biological diversity of the area by} continuing emphasis on wildlife management "openings" which fragment forests and eliminate forest interior species
Letter 2680	I don't like alternative 8 With its limited timber harvesting, not enough habitat will be provided for the deer population The deer will be forced onto we private landowners for us to feed
Letter 2744	I feel Alt 8 does not achieve a proper balance of uses; given the age and condition of trees on the GWNF, #8 includes too few acres to be harvested I believe that maintaining a range of age and size classes in the forest is one of the best ways of maintaining "biological diversity" in both trees and wildlife
Letter 2759	I don't like Alternative 8 With its limited timber harvesting, not enough habitat will be produced for the wildlife dependent on early successional vegetation
Letter 2890	I am rather disappointed with what I have heard about the new plan By reducing the timbering by such a large degree and increasing the amount of acreage dedicated to remote areas you are doing all hunters and other animals lovers (hunters are the biggest users of the forest, I think) a huge disservice

Letter 3489 This plan violates every basic principle outlined to the commission (Department of Natural Resources) by professionals in the fields of good professional forestry, the fields of wildlife, plant life, and other related fields.

Letter 3752 By reducing the timbering by such a large degree and increasing the amount of acreage dedicated to remote areas, you are doing all hunters and animal lovers a huge disservice

Letter 3779 And again· "The area is suitable for timber production. Even-aged timber harvest methods are used to meet wildlife requirements" Certainly not good for native diverse species that represent all levels of plants and animals found in a normal forest It is an obvious ploy to mine the forest and to favor a few game species

"Since many woodland species benefit from the temporary openings that timber removals create, half of the timber harvested is done in conjunction with habitat improvement in wildlife emphasis areas." Many species is a lie. white tailed deer of which there are already too many to the detriment of the total forest, and the parasitizing *birds who lay their eggs in warbler nests threaten many of these deep forest species of birds. p. 4*

"Management of sensitive, threatened and endangered plant and animal species receives top priority", is stated on p. 5. If this is so, why isn't Alt. 3 selected for the preferred plan?

Letter 3822 Biological diversity is not truly represented under the current management of the Forest or in Alternative 8. The G W.N F is in my estimation one giant oak-hickory monoculture. This vast forest type comprises about 80% of the forest cover in the G.W N F. The result of this immense unbroken forest type and the age of the forest is the rampant destruction of wood resources by insects such as the gypsy moth and diseases like armaleria root rot. This destruction of the forest has also led to burdens placed on wildlife species such as deer, turkey and bear that depend on good acorn production for their existence Alternative 8 only helps to increase the monoculturalism of the forest and decrease the overall health of the National Forest through overly restrictive harvesting guidelines. Limiting clearcutting to 300 acres is incomprehensible. Clearcutting can help to increase biological diversity and improve the health of the forest by stratifying age classes thus reducing the impacts of insects and diseases Young regenerated forests also attract wildlife species not found in mature oak-hickory forests

Letter 3994 Alternative Plan #8 would reduce the timber harvest levels and have an adverse impact on critical habitat for *grouse, deer, and turkey.*

Letter 4034 *The plan is criminally flawed in many areas, particularly in light of known scientific facts that prove the strongly* detrimental affects of "management" techniques outlined in Alternative 8

Response A major concern, as determined by the quantity of comments, centered around the level of habitat management (in the form of direct wildlife habitat improvements and timber sales). Many commenters expressed a desire to increase these forms of active habitat management Other commenters expressed a desire to reduce the levels of habitat management, preferring more emphasis to be placed on providing unfragmented habitats.

The preferred alternative does not maximize the potential value for either early successional or late successional unfragmented habitats It recognizes the value of both somewhat conflicting needs within a large forested area and provides for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

Unfragmented habitats, such as provided for in management areas 4, 6, 8, 9, 13, 22, and portions of several other management areas, are described in Chapters 2 and 3 of the Revised Plan

The Revised Plan recognizes the values of forest management and vegetation manipulation within the context *of multiple use management. Much of the timber harvesting will be conducted specifically to regenerate* portions of an aging forest to provide early successional habitats The amount of regeneration provided varies *among the twelve alternatives considered in detail in the FEIS Several factors come into play including the* values that unfragmented habitats and roadless areas provide, value of and need for forest products that can be provided, and the costs versus benefits derived from this action

Estimated white-tailed deer carrying capacity is maintained at present levels. Currently, in some areas of the forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some rare plant species are preferred as deer foods. Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters Based on past sales

declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas However, there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate. Grouse hunting accounts for approximately five percent of the hunting days afield on this Forest In light of a below cost timber program, it is economically difficult to justify an increased timber program to increase ruffed grouse hunting success rates

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest.

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2 under "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife

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Letter 1895

I do not support the proposal 8 I fear that if the new Alt 8 is applied, in a few years there will be no motor vehicles allowed in this area [Big Levels] and when I am close to sixty years old, my hunting days will be over And so will the hunting days of many other people my age

Response

The Revised Plan recognizes the Big Levels area as a Special Interest Area (SIA), Management Area 4, and as a candidate for possible designation as a Research Natural Area (RNA) Boundary changes have been incorporated between draft and final which better reflect past management practices and uses along with public input concerning the area. Neither designation of the area as a SIA, nor perhaps its future designation as a RNA, will affect traditional uses as they now occur such as hunting, berry-picking, hiking, or fishing These designations will not affect access for these activities, as it is now allowed, for the elderly or physically challenged Travel by foot is allowed throughout the area and by motorized vehicle on open roads.

Additionally, the Bald Mountain Road (FDR 162) is one of the OHV routes in Management Area 11 As such, it will be managed as an open road to provide OHV opportunities

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Letter 3779

Alt 8 is among those alternatives with the least Wilderness Recreation Capacity at 21 thousand RVD Alt. 3 is 258 thousand p 2-56

Response

Since the anticipated demand for wilderness recreation is only 14,000 RVDs, the ID Team does not believe that this factor is useful in determining which alternative maximizes net public benefits

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Letter 2627

[Management according to Alternative 8 would result in further decreases in the biological diversity of the area by] continuing use of pesticides and herbicides in cases where manual control would suffice.

Response

Decisions to use herbicides will be made on project level analysis Alternative mechanical controls will always be considered and usually employed

ADEQUACY OF THE REVISION· Alternative 8 Acceptable if Revised

Letter 3764 — I support concepts of biological diversity and as a balanced mixture of environmentally sound uses, as outlined in Alt 8

Response — Alternative 8 is considered in detail in the FEIS The Regional Forester has identified Alternative 8A as the Forest Service preferred alternative in the FEIS Alternative 8A was formulated in response to the belief that people want and need a wider array of uses, values, products and conditions from the George Washington National Forest than in the past

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Letter 1165 — Please use the plan submitted by the Sierra Club, as it will give the park far superior mgt and protection for our national forest

Letter 1308 — In general, I support Alt. 8 I would request that: ATVs be banned or limited to very few acres, road construction be greatly curtailed, more emphasis be placed on nongame habitats and mgt, more area be included as wilderness area

Letter 1639 — Even tho I basically support Alt 8, I suggest these modifications ATVs, which are destructive in many ways, should not be allowed, no new roads All timber harvest should be done along existing roads; riparian areas should be protected by a 100 ft buffer on each side of streams; less emphasis should be placed on game mgt, and more on unfragmented habitat for nongame species, Little River, Ramseys Dr Add, Mt Pleasant, Laurel Fk, Skidmore Fk & Kelley Mtn should be recommended for wilderness study.

Letter 1673 — I support plan 8. I support the "remote highlands" mgt designation because I feel these areas must be preserved for future generations Clearcutting should be used only as a last resort to achieve regeneration The amount of new roads in plan 8 is excessive Plan 8 does not provide adequate protection for riparian areas The current standards should be maintained I am opposed to ATV and 4WD abuse of our forests. The erosion, damage to flora and fauna, noise, and waste of precious fossil fuels is not compatible with responsible use of our forests. In particular, Jerry's Run, Archer, and Peter's Mill Run Trail are not suitable for this kind of use

Letter 1810 — Congratulations on your choice of Alt 8 as a reasonable compromise, given the political pressures bearing on you As steward of this priceless million-acre heritage which every day becomes more of an island in a sea of overdevelopment, would you nevertheless try even harder to KEEP THE FOREST AS NATURAL AS POSSIBLE? Especially· build no new roads, prohibit ATVs completely, study the Mt. Pleasant area for wilderness designation, limit the ASQ to 27 mbf.

Letter 1846 — Include all 8 proposed wilderness areas In particular, Little River and Mt Pleasant should be included The total annual timber cut should not exceed 27 mmbf The alt permits cutting for wildlife mgt, etc, and I see no ceiling on that type of cutting ATV use is detrimental in so many ways that it makes no sense to allow ATV use in the NFs There should be no salvage sales in roadless or biol areas Salvage sales should be limited to timber which is classified as sawtimber Riparian areas should be protected from logging for at least 100 ft on each side of a stream (and 200 ft for native trout streams). With these modifications, Alt 8 can be a greatly beneficial mgt plan for the GWNF

Letter 1849 — We support Alt 8, the FS preferred Alt., with revisions No ATV trails in the NF ATV rec is not compatible with other forest uses and forest biological values, no new roads built in the forest Roadbuilding means soil disturbance, which means erosion, which means water quality degradation, riparian areas receive protection, a minimum of 100 ft of buffer on each side of all streams, with 200 ft on each side of native trout streams. Each stream should be considered individually and buffer strips be planned accordingly, timber harvesting should take place near existing roads rather than building new roads All areas now designated roadless should remain as such

Letter 1873 — I wholeheartedly support the position and recommendations of the Sierra Club

Letter 2004 — Some suggestions for improvements of the Plan in this part (neighboring Beards Mountain) of the Forest would include 1) ATVs should not be allowed on the Forest 2) No new roads 3) Riparian areas should be protected by a 100 foot buffer on each side of streams

Letter 2021 Some modifications that would improve #8 are 1) The Riparian areas should be protected by a 100 foot buffer on each side of streams 2) More emphasis placed on unfragmented habitat for non-game species and less on game management 3) No new roads should be built and all timber harvest should be done along existing roads. 4) All terrain vehicles should not be allowed in the forests 5) Wilderness studies should be conducted at the following sites - Little River, Ramseys Draft Addition, Mt Pleasant, Laurel Fork, Skidmore Fork and Kelly Mountain.

Letter 2030 We strongly support Alternative 8 because it allows less timber to be cut and a larger wilderness study area. We urge that ATVs be prohibited No new road construction is needed More attention should be given to non-game wildlife species

Letter 2057 I hope that these areas could be strengthened in the plan. 1) ATVs should not be allowed on the Forest 2) No new roads. 3) River areas should be protected by a 100 foot buffer on each side of streams.

Letter 2266 Alt. 8 would be more ecologically sound if the following changes were incorporated Little River and Mt. Pleasant, have been included in MA13, a category which would place recreational concerns over biological value These should be included as WSAs While the plan calls for reducing the volume of timber harvest to 27 million bd ft, it is unclear whether this would include cutting for wildlife mgt purposes (for which no specified upper limit is given). The limit should include ALL timber harvested for ANY reason No new road construction within the forest. Any roads no longer necessary because of the reduction in timber harvest should be closed ATV trails should be prohibited, ATV use should be restricted to existing roads Use of ATVs within "backcountry" areas is incompatible with forest values and other recreational uses of the forest, and poses a potential hazard to hikers and wildlife Protection for riparian areas should include a prohibition of logging within 100 ft of each side of a stream, 200 ft for native trout streams There should be more emphasis placed on mgt. of nongame species Timber salvage should be prohibited in roadless or biological areas, and salvage should include only that timber certifiably valuable as sawtimber

Letter 2332 Give more consideration to non-game species Management directions seem to be entirely directed to game species The National Forest is a haven for many non-game species such as migratory birds which have been showing steady declines 2) No new roads should be built Alternative 8 now calls for 200 miles of new roads in 10 years 3) There should be no all-terrain vehicle trails permitted This type of recreation is incompatible with other forest uses and values 4) There should be more than three areas designated for wilderness 5) All areas presently classified as roadless should remain roadless 6) No timber cutting should be allowed in riparian areas or wetlands There should be at least a 100 foot buffer on each side of a stream. 7) Provide wildlife migration corridors 8) Emphasize primitive and non-motorized recreation values, e g , through environmental education 9) Under no circumstances increase the timber harvest to more than 27 million board feet annually

Letter 2474 Alternative 8 seems to be a good compromise management plan- allowing ample timber harvesting while stressing other values and "multiple uses" of the forest No ATV's in the forest! No new roads! Streams should be protected on each side with a 100 foot buffer zone

Letter 2508 I support the present draft plan With some revisions to strengthen protection for the forests· better protection of streams and rivers, revision so that timber harvest to be more cost effective (less emphasis on pulpwood), and reduction in the road building program

Letter 2594 I firmly believe that the wildlife, scenic beauty, and recreational values of the Forest deserve protection and preservation The proposed plan has commendable features, but does not go nearly far enough in this regard In particular Other areas deserving wilderness designations include the Little River, the largest roadless area in the GWNF; the Ramseys Draft Addition and the picturesque Mount Pleasant area The Skidmore and Laurel Fork areas also should be considered, to protect their watersheds, streams, and wildlife No additional roads should be built in the Forest Such roads constitute public subsidies of the timber industry, and are inappropriate uses of public funds and lands At the very least, existing roadless areas should remain so In order to protect wildlife migration corridors and riparian (stream-side) areas harvesting must be limited to the vicinity of existing roads in the GWNF, with a minimum buffer zone provided on each side of streams ATV's are inimical to the values for which the GWNF should be protected The best action would be to close all existing ATV trails and allow them to be reclaimed, at minimum, no additional trails should be opened in new areas

Letter 2690 Alt 8 is an improvement over past management practices in that it emphasizes many biological values However, there is still significant room for improvement First, ATVs should be banned In addition to the noise and air pollution, their tracks quickly become unsightly and develop into deeply erosive regions Second, riparian areas should be buffered by at least a 100-ft area on each side of the stream in which no cutting is owed

This protects the stream from silting in due to soil runoff. Third, there should be no net increase in roadways. All timber harvest should be done near existing roads, and should be limited to within one-half mile from roadside Roads that are not in current use should be allowed to grow back in Fourth, more emphasis should be placed on nongame wildlife. Wildlife migration corridors should be provided, and no roads should be built into turkey or bear habitat. Fifth, timber mgt should emphasize large, good-quality hardwood and softwood saw timber rather than lower-quality pulpwood. Sixth, more wilderness areas should be proposed. Specifically, these areas should be recommended for wilderness study: Little River, Ramseys Draft Add, Mt. Pleasant, Laurel Fork, Skidmore Fork, and Kelley Mtn The four other roadless areas should stay roadless and should be managed to protect biological and recreational values.

Letter 2693 I hope you will strongly consider alt 8. There are some very positive attributes of alt 8, including more protection for plants and animals and "remote highland" mgmt Possible scenic river designation is another very positive part of this plan I am most pleased with more emphasis to be put on improving bear and turkey habitat I hope you will consider several changes One would be a reduction in the 200 miles of new roads proposed for construction over the next decade. Alt 8 needs to better address protection of riparian areas, especially in regard to water supply and native trout fisheries.

Letter 2877 I support Alternative 8 however, I object to the use of ORV's in the Forest. They are noisy, intrusive, can be destructive, and are definitely disruptive to flora and fauna, not to mention serious lovers of the peace and tranquility the forest should afford. No new roads should be built. I encourage the designation of more wilderness areas in the Forest, specifically the Laurel Fork area of Highland County, Little River in Augusta, Ramsey's Draft in Augusta and Highland. Not enough emphasis is put on the importance of protecting NON-GAME species of wildlife.

Letters 2905, 4159, 4160, 4161, 4162, 4163, 4164, 4165, 4166, 4167, 4168, 4169, 4170, 4171
Some suggestions for improvements of the Plan in this part (neighboring Beards Mountain) of the Forest would include· 1. ATVs should not be allowed on the Forest 2. No new roads. 3. Riparian areas should be protected by a 100 foot buffer on each side of streams.

Letter 3502 I would like to have ATV's kept out of the forest. I see no reason to allow such destructive recreation in natural woodlands. I do not think new roads are necessary and I am for Alternative 8, but would like to see it changed in the above ways.

Letter 3600 The state must adopt the Sierra Club's Proposals

Letter 3657 I find the plan somewhat too ambitious in the following areas Roadbuilding· I have already seen new forest roads penetrate some of my favorite pristine areas within the last 10 years I say an adequate timber harvest can be maintained without construction of new roads Please, no new roads. ATV use. I understand that there are growing numbers of ATV users, and that their needs must also be considered. Heavy ATV use virtually destroys many of the qualities that allow for other, more "shareable" or compatible use (such as hunting and hiking) Please limit ATVs to the presently designated areas and take measures to keep them out of the rest of the Forest. I also find that the plan is seriously deficient in the area of wilderness protection I heartily agree that the 3 areas you have chosen should be protected, but I would like to see added Big Schloss, Mt. Pleasant, Ramseys Draft Add, and Southern Mass.

Letter 3718 I support selective timber cutting in areas away from the Appalachian Trail corridor, but clearcuts should be avoided altogether Don't spend any more of our tax dollars on unnecessary roads. Areas open to OHVs should be limited to areas near highways or developed areas No additional provisions for OHV use should be made.

Letter 3726 Overall, we think that Alt 8 is a reasonable compromise. A few items we would like to see changed in the Plan. If new roads must be built, old roads should be closed, so that there is no net increase in road miles. We would prefer much tougher regulations on timber harvesting along intermittent and perennial streams: a 100-ft easement on either side

Letter 3845 Even though I basically support Alt 8, I suggest the following modifications. ATVs should not be allowed on the forest. No new roads should be built All timber harvest should be done along existing roads Riparian areas should be protected by a 100-ft buffer on each side of streams Less emphasis should be placed on game mgt. and more on unfragmented habitat for nongame species The following areas should be recommended for wilderness study Little River, Ramseys Draft Add, Mt Pleasant, Laurel Fk, Skidmore Fk, Kelley Mt The Forest should be managed using uneven-aged silvicultural methods

Letter 3948 — I offer the following to be considered in crafting the final version of Alt. 8. Give more consideration to non-game species No new roads should be built There should be no ATV trails permitted There should be more than 3 areas designated for wilderness. All areas presently classified as roadless should remain roadless. No timber cutting should be allowed in riparian areas or wetlands There should be at least a 100-ft buffer on each side of a stream. Provide wildlife migration corridors Emphasize primitive and non-motorized recreation values Do not increase the timber harvest to more than 27 mmbf annually.

Letter 3993 — I am generally in favor of Alternative 8 However, I would like to see additional emphasis on wilderness protection, as well as a general reduction in human disturbance and consumptive use of the forest.

Letter 3993 — I am specifically opposed to additional road construction activity and to increased timber removal I am most emphatically opposed to off-road vehicle use of the forest.

Letter 4023 — I am firmly convinced that Alt 8 is a fair plan Some suggestions for improving the plan, particularly as it related to Beard's Mtn, would include. ATVs should not be allowed on the Forest No new roads Riparian areas should be protected by a 100-ft buffer on each side of streams

Letter 4033 — The preferred alternative (Alt 8) seems to be a very balanced one in terms of the multiple-use objective of the Forest and, overall, I would say it is the best one I would favor less road construction but it seems that 8 would retain the roadless condition of most areas even though they may not be considered for wilderness designation The timber sale volume of 27 mbf is a very reasonable figure considering the new understanding of the Forest as a renewable and sustainable resource while at the same time protecting its character and sensitive habitats and natural communities. I do have to question the accommodations made to ORV and ATV users. I don't see this use as being in any way compatible with what national forests ought to stand for. If allowed at all, there will be no way to control where they go and we'll all be the worse off for it.

Letter 4186 — I support Alternative 8 as described by the ATC I want to express my opposition to any additional road building and to the use of OHV's.

Letter 4230 — I support the Sierra Club's positions on the plan At least the 11 areas the Club has proposed should be designated as wilderness No new roads should be built in the Forest ATV use in the Forest must be stopped.

Response — Alternative 11 has been formulated by the ID Team to address these concerns It was formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to better respond to biological issues

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Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1399, 1400, 1401, 1402, 1403, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4172

I am pleased that the Forest Service chose Alternative 8, which emphasizes biological values and reduces the allowable sale quantity of timber I would like to suggest the following modifications.

Letters 971, 2692

I write to you to express my support for Alternative 8, with revisions

Letter 987 — I am in general agreement with Alternative 8, with the following reservations

Letters 1081, 1349, 1454, 2009, 2036, 2835, 3884
[We] support Alternative 8 but with the following modifications

Letter 1368 We recommend, with some modification, Alt 8.

Letter 1684 With the incorporation of the above recommendations, Alt 8 will be more conducive to the biological diversity of the forest and to its preservation

Letters 1888, 1889, 1906, 1963, 1964, 1965, 1966, 1967, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 3114, 3115, 3116, 3117, 3118, 3119, 3151, 3152, 3153, 3154, 3155, 3156, 3157, 3158, 3159, 3160, 3161, 3162, 3163, 3164, 3165, 3166, 3167, 3168, 3169, 3170, 3171, 3172, 3173, 3174, 3175, 3176, 3177, 3178, 3179, 3180, 3181, 3182, 3183, 3184, 3185, 4076, 4077, 4078, 4079, 4080, 4081, 4082
We support the general policy of Alternative which provides a balance of diverse uses of the Forest for the most part. There are several specific items that we cannot support and voice concerns in the following items

Letters 1953, 1954, 1955, 1956, 1957, 1958, 1959, 2067, 2068, 2768, 3058, 3146
I would like to support Alternative #8 with the following exceptions·

Letters 1980, 3883
I support Alt 8 with the following exceptions·

Letter 1999 I support Alternative #8 However, I recommend some minor changes to this alternative

Letter 2027 I would like you to consider some modifications [to] Alternative 8

Letters 2063, 4183, 4231
I basically support Alternative 8, but suggest the following modifications

Letters 1622, 1623, 1802, 1803, 2180, 2487
Our club supports Alternative #8 [with] some minor changes

Letter 2332 Consider the following issues when formulating the final version of Alternative 8

Letter 2380 Please register our comments on the draft management plan for the George Washington National Forest as being in favor of:

Letter 2487 Our club supports Alternative #8 [with] some minor changes

Letter 2609 In general, we support Alternative 8, which is a good biological alternative with its limited timber harvest and limited traditional game management

Letter 2666 The following modifications if incorporated into Alternative [8] will considerably improve the plan from the aspect of biological protection

Letter 2691 I believe Alternative 8 is a good place to begin It is one of the more balanced plans Still, there are issues that I believe must be addressed

Letter 2692 I support Alternative 8, with revisions

Letter 2701 Even though I basically support Alternative 8, I would like to suggest the following modifications

Letter 2755 While we generally support the concept of Alternative 8, we would like to suggest the following modifications·

Letter 2836 I ask that Alt 8 be made even more conservative by the following modifications.

Letter 2881 I am pleased that the Forest Service chose Alternative 8 I would like to suggest the following modifications.

Letter 2929 Although Alternative 8 possesses many valuable features, the Draft Plan still requires significant modification.

Letter 3478 I suggest the following modifications [to Alternative 8].

Letter 3527	I basically support Alternative #8, but would like to recommend the following considerations·
Letter 3546	Since alternative #8 stands a good chance of passing, I put forth the following modifications
Letter 3563	I encourage you to adopt Alternative 8 There are, however, some much needed changes
Letter 3566	We reluctantly agree to the adoption of Alternative 8, with slight changes
Letter 3640	I support Option #8
Letter 3661	Modify Alternative #8.
Letter 3665	Accepting the fact that Alternative 3 of the Revised Land and Resource Management Plan is not as favorable for wild plants and wild places, we would then endorse Alternative 8 proposed by the GWNF staff. There are some changes we would request
Letter 3680	Additional areas I would like to see considered are as follows.
Letter 3699	Move your direction of Alternative 8 to address these concerns
Letter 3705	Certain changes are needed in order to better implement the overall theme of this alternative to include:
Letter 3710	In general, NRDC is pleased that the draft plan responds constructively to many of the concerns raised by the comprehensive administrative appeal of the 1986 forest plan brought by conservation organizations and the Forest Service Chief's decision in that appeal Nevertheless, we recommend further revisions These modifications do not require that the draft plan be rejected but, rather, that certain aspects be improved. [Suggested modifications are listed under separate issues]
Letter 3750	The Sierra Club recommends the following modifications to Alternative #8.
Letter 3763	Alternative 8 [is] a step in the right direction However, some changes I'd like to see are.
Letters 3720, 2766, 3782	Alternative 8 appears to be somewhat better than past management plans, however, I would like to offer the following modifications
Letter 3847	We encourage you to proceed in adopting your preferred draft forest mgt plan, Alt 8, for the GWNF. In developing the final version of Alt 8, please consider the following recommendations
Letter 3848	We agree that Alternative 8 with certain modifications listed below best represents balance. We support the alternative that both protects the biological values of the forest while allowing for various human uses.
Letter 3861	I offer the following comments to improve Nr 8·
Letter 3927	I generally support alternative eight with the following exceptions
Letter 3938	Although I support the basic concept of Alternative 8, there are several areas where I feel varying degrees of revision are needed in the proposed management guidelines I offer the following suggested modifications·
Letter 3945	We believe that the following suggestions for re-study and evaluation could result in even further improvements to Alt 8
Letter 3977	In general I support Alternative 8. There are two shortcomings that could be amended easily without compromising other interests and uses

Letters 3985, 3986

I recommend changing several aspects of the Forest Service's preferred alternative

Letter 3998 The PATC is, however, troubled by some issues contained within the draft revised management plan.

Letters 4157, 4158

I support the George Washington National Forest Plan #8 with the following modifications·

Letter 4246 I support Alternative #8 and also consider changes recommended by the Natural Bridge Appalachian Trail Club

Letter 4249 *You are to be complimented on "choosing" Alternative 8.*

Letter 4266 I urge you to adopt Alternative 8 with some changes.

Letter 4268 We recommend that Alternative 8 be revised to include the changes detailed in our comments on the Plan.

Response Responses to specific comments on the changes requested for Alternative 8 are discussed under each specific comment

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Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 3720, 3766, 3782, 4068, 4073, 4074, 4075

Tighten up Remote Highlands, MA 9 in order to protect the wild character of roadless areas.

Letter 1684 Present roadless areas should remain roadless

Letter 2666 Remote highlands management area offers protection to present roadless areas in the forest. Roads in these areas should be closed and there should be no prescribed fire used in remote highlands management area Also, there should be no salvage operations nor manipulation for wildlife habitat These areas should be relatively undisturbed.

Letter 2755 We find the remote highlands management area developed in this plan to be a sensible way to protect the remaining roadless areas. We object to any roads being allowed to remain open in these areas Prescribed fire should not be used in the remote highlands management area. No additional "improvements" should be permitted for "overall wildlife objectives". No salvaging for any reason should be done in the remote highlands. Dead and dying trees provide homes for wildlife, enrich the soil as they decay, and hold the soil in place as new trees grow around them

Letter 3478 Tighten up Remote Highlands, Management Area #9 in order to protect wild character of roadless areas.

Letter 3732 All of the roadless areas not recommended for wilderness study in the final forest plan should be managed to maintain their roadless condition thus not preventing their designation in the future

Letter 3861 All currently roadless areas should remain so

Letters 3985, 3986

The management prescriptions for the "remote highlands" (#9) would be a satisfactory way to give most of the needed protection to remote, roadless areas if salvage sales for the gypsy moth and other commercial sales were excluded Continued personal firewood collection along existing roads could maintain sufficient "edge habitat" and openings in the contiguous forest canopy to provide some wildlife benefit and maintain a widely used economic benefit to GWNF's neighbors like myself

Letters 3985, 3986

Allowing continued timber harvesting on the margins of the 26 roadless areas including Crawford will decrease the opportunities for large areas of the forest to return to a natural state These areas should be managed with minimal intervention through wilderness recommendation or a modified version of the remote highlands management area that excludes commercial timber sales, mineral extraction, and new road construction or some other method that will enhance their potential for wilderness designation in the future.

Letter 4219 All MA 9 areas in which there are no open or restricted roads should be placed in MA 9A, not 9B. Any closed roads should be obliterated or allowed to revegetate naturally.

Response Alternatives 11 and 13 have been formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to respond to biological issues. Among these adjustments is the assignment of management area prescription 9A to all roadless areas not allocated to Management Area 8. Management area prescription 9A is a variation of the concept used in Remote Highlands with standards similar to areas recommended for wilderness study

Alternatives 11 and 13 are considered in detail in the FEIS and will be selected as the Revised Plan by the Regional Forester if one of them is identified as the alternative that maximizes net public benefits.

Letters 781, 782, 795, 796, 797, 799, 800, 915, 916, 1004, 1005, 1010, 1012, 1015, 1018, 1106, 1197, 1198, 1202, 1203, 1204, 1205, 1520, 1521, 1522, 1691, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1743, 1744, 1745, 1746, 1747, 1748, 1749, 1750, 1751, 1752, 1753, 1754, 1755, 1756, 1757, 1758, 1759, 1760, 1761, 1762, 1763, 1764, 1765, 1766, 1767, 1768, 1769, 1770, 1771, 1772, 1773, 1774, 1775, 1776, 1777, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1788, 1789, 1790, 1791, 1792, 1793, 1794, 1795, 2143, 2145, 2442, 2671, 3066, 3067, 3068, 3069, 3070, 3071, 3072, 3073, 3074, 3075, 3076, 3077, 3078, 3079, 3080, 3081, 3082, 3083, 3084, 3085, 3086, 3326, 3327, 3328, 3329, 3330, 3331, 3332, 3333, 3334, 3335, 3336, 3337, 3338, 3339, 3340, 3341, 3342, 3343, 3344, 3345, 3346, 3347, 3348, 3349, 3350, 3351, 3352, 3353, 3354, 3355, 3356, 3357, 3358, 3359, 3360, 3361, 3362, 3363, 3364, 3365, 3366, 3367, 3368, 3369, 3370, 3371, 3372, 3373, 3374, 3375, 3376, 3377, 3378, 3379, 3380, 3381, 3382, 3383, 3384, 3385, 3386, 3387, 3388, 3389, 3390, 3391, 3392, 3393, 3394, 3395, 3396, 3397, 3398, 3399, 3400, 3401, 3402, 3403, 3404, 3405, 3406, 3407, 3408, 3409, 3410, 3411, 3412, 3413, 3414, 3415, 3416, 3417, 3418, 3419, 3420, 3421, 3422, 4129, 4130, 4131, 4132, 4133, 4134, 4135, 4136, 4137, 4138, 4139, 4140, 4141, 4142, 4143, 4144, 4145, 4146, 4147, 4148, 4149, 4150, 4245

Alt 8 with revisions adequately provides for all multiple uses, and therefore is the alt I support.

Letter 1161 I understand that Alternative 8 is the current preferred choice, and I applaud that There are some additional changes that I believe would be beneficial

Letter 1448 I fully support Alt 8 of the study. I do this in the spirit of compromise If I felt a more restrictive Alt had even a remote change of being seriously considered, I would give that my support

Letter 1624 I support Alternative #8 I also support the two recommended changes to Alternative #8, as outlined by Mike McCormick, our club [Natural Bridge Appalachian Trail Club] president, in his letter to you dated March 26 To echo Mike's statement, the club is unanimously opposed to Alternative #12

Letter 1842 Alternative #8 seems the best choice

Letters 1843, 1863

I favor Alt 8 with the changes recommended by the Natural Bridge Appalachian Trail Club

Letter 1859 Please count this letter as a vote for Alt 8 (including the minor changes suggested by NBATC)

Letter 1905 I believe that alt 8, with some possible modifications, presents the most balanced approach to Forest use

Letter 2004 Alternative 8 seems to be a good compromise management plan.

Letter 2021 I was happy to hear that the Forest Service chose Alternative #8.

Letter 2251 We are basically in agreement with the Alternative No 8 with minor changes put forth in the letter to you from the Natural Bridge Appalachian Trail Club

Letter 2259 I have read most of the Alternative 8 plan drafted by the GWNF and basically am in favor of it I am in agreement with the two minor changes the NBATC has recommended concerning Rocky Row Run currently listed as Management Area 7 and also the area around Tar-jacket Ridge

Letter 2487 I support the position set forth in the Natural Bridge Appalachian Trail Club letter

Letter 2604 While I cannot endorse Alternative 8 in its entirety, I applaud your efforts to achieve a balanced strategy through it

Letter 2612	I urge you to support Alternative 8
Letter 2651	Support Alt. 8 as proposed by the USFS.
Letter 2671	Alt. 8 with revisions adequately provides for all multiple uses and therefore is the alt I support
Letter 2694	Basically, I am in agreement with alternative #8 I do not feel that it is necessarily the best management of the forest, but it does the best job of balancing the needs of all groups
Letter 2709	*Please insure that Alternative 8 is adopted and implemented*
Letter 3542	I support Alternative 8 for reasons explained by the Appalachian Trail Club
Letter 3557	I urge the acceptance of Alternative 8. Consider the two modifications requested by the Natural Bridge Appalachian Trail Club
Letter 3606	*We support Alternative 8.*
Letter 3680	Alternative 8 has areas that I find very positive for the future health and well-being of our Forest.
Letter 3686	Please follow Alternative 8
Letter 3705	The Conservation Council of Virginia (CCVA) endorses the overall concept of Alternative Eight (8).
Letter 3707	Alternative 8 is the alternative I support
Letter 3792	I support and commend your choice of Alt 8 with modifications supported by the Sierra Club
Letter 3825	I urge you to adopt Alternative 8, with revisions recommended by The Wilderness Society.
Letter 3901	*The Mountaineer Chapter is in full support of the position taken by the Virginia Council of Trout Unlimited* concerning the Draft Management Plan for the George Washington National Forest.
Letter 3907	I endorse Alternative #8 with "significant modifications "
Letter 3998	PATC strongly supports Alternative #8 We particularly appreciate and support the fact that concern for the preservation and enhancement of biological diversity are the underpinnings for this Alternative
Letter 3999	Alt 8 with revisions recommended by the Wilderness Society is more than adequate to provide for all legitimate uses on the GWNF It is, therefore, the alt I support
Letter 4213	I support Alternative #8 and the position of Potomac Appalachian Trail Club
Letter 4234	I feel there are weaknesses in Plan 8 as pointed out in Encl 2, but would certainly support it over Plan 12
Letter 4242	In general I support Alternative 8 There are two shortcomings to the existing draft that could be amended easily without compromising other interests and uses
Response	In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years. Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits

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Letter 4268	*Plan - The use of pesticides is discouraged in riparian areas to avoid potential impacts to water quality.*
Response	This concern is evaluated carefully during the preparation of an environmental assessment for any proposed treatment in riparian areas

Letter 3606	We support Alternative 8
Letter 3680	Alternative 8 has areas that I find very positive for the future health and well-being of our Forest
Letter 3686	Please follow Alternative 8.
Letter 3705	The Conservation Council of Virginia (CCVA) endorses the overall concept of Alternative Eight (8)
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Letter 4268	Plan - The use of pesticides is discouraged in riparian areas to avoid potential impacts to water quality.
Response	This concern is evaluated carefully during the preparation of an environmental assessment for any proposed treatment in riparian areas

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Letter 3658	I would like to see major changes made to alternative #8 These changes include more clearcutting, higher ASQ, more suitable acres, more acres available for wildlife management work and less new road construction
Response	Alternatives 2, 4, 5, 7 and 12 contain more suitable acres, a higher ASQ, more clearcutting, more acres available for wildlife habitat improvements and less new road construction than the Forest Service preferred alternative These alternatives are considered in detail in the FEIS and will be selected as the Revised Plan by the Regional Forester if it is determined that one of them "maximizes net public benefits".

Letter 2899	In general, I support the FS's proposed Alt 8 I believe it is an alt which would protect the biological resources of the forest. In particular, the establishment of areas designated as "Special Biological Areas" and "Remote Highlands". The unique biological communities represented in these areas should be preserved for future generations, and this is a job which can only be accomplished on public lands
Response	The establishment of special biological areas and the recognition of "Remote Highlands" are two of the best examples of how Alternative 8A is using an ecological approach to management

Letters 2453, 2454, 2455, 2625, 2795, 2796, 2797, 2798, 2799, 2800, 2801, 2802, 2803, 2804, 2805, 3091, 3092, 3248, 3249, 3250, 3251, 3252, 3253, 3254, 3255, 3256, 3257, 3258, 3259, 3260, 3261, 3262, 3263, 3264, 3265, 3266, 3267, 3268, 3269, 3270, 4152, 4153, 4154, 4155

Alternative 8 with revisions, recommended by The Wilderness Society, adequately provides for all multiple-uses.

Letters 2905, 4159, 4160, 4161, 4162, 4163, 4164, 4165, 4166, 4167, 4168, 4169, 4170, 4171

Alternative 8 seems to be a good compromise management plan -- allowing ample timber harvesting while stressing other values and the "multiple-uses" of the Forest.

Letter 4232 — Alternative 8 provides wise management of all the forest resources and is the one I support Do not increase the timber to be harvested.

Response — Alternative 8A was formulated in response to the belief that people want and need a wider array of uses, values, products and conditions from the Forest than in the past.

Letter 1558 — In the event that Alt. 3 is not chosen, we request that the preferred alt be modified to incorporate: 1) Manage all roadless areas so that they maintain their roadless status pending wilderness study or designation, especially Laurel Fork, Ramseys Draft Add, Little River, Mt. Pleasant, Skidmore Fork. 2) End roadbuilding in the GWNF and reclaim unnecessary roads. Roads fragment habitat and destroy the wilderness character of the forest. 3) Close all ATV trails and eliminate all plans for building more ATV trails. ATVs are a consumptive use of forest land incompatible with all other recreational uses. 4) Timber harvesting should be phased out over the life of the 10-yr plan. Logging should be immediately limited to areas adjacent to existing roads Only selection and group selection silvicultural techniques should be used. 5) Riparian areas should be protected from erosion by mandatory 100-ft buffer strips on each side of every stream. No exceptions permitting logging in riparian areas should be allowed 6) Wildlife mgt should not be narrowly tailored to game species In order to protect old growth and/or wilderness-dependent species, the GWNF should be managed to preserve all remaining old growth and provide as much uninterrupted roadless habitat as possible.

Response — Alternative 9 would accomplish these objectives This alternative is considered in detail in the FEIS and will be selected as the Revised Forest Plan if it is identified as the alternative that maximizes net public benefits

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Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 4068, 4073, 4074, 4075

No salvage in roadless or biological areas. Definition of salvage needs to be clarified. Salvage should consist only of timber certifiably valuable as sawtimber

Letter 2666 — The definition of salvage is "foggy" Salvage should take place only along existing roads and only high quality timber (saw timber) should be salvaged. Preemptive salvaging should be prohibited No one can accurately tell where they gypsy moth is going to strike, so why cut trees before the predator attacks them? No salvage activities should take place in Management Areas 4, 6, 8, 9, 10, 13, 14, and 18

Letter 2755 — No salvaging should be done in Management Areas 4, 6, 8, 9, 10, 13, 14, and 18. Salvaging should be done for high quality sawtimber only, along existing roads in other management areas Premortality salvaging should not be practiced, since no one really knows what the rate of mortality caused by gypsy moths will be Give a clear definition of salvage in the Plan.

Response — The standards for salvage have been changed in the Revised Plan to allow harvest to: 1. utilize high value products, 2. provide for public safety, 3 provide for scenic rehabilitation, and 4. meet demand for tag fuelwood. New standards describe restrictions in all or portions of several management areas.

Alternatives 11 and 13 have been formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to respond to biological issues Among these adjustments is the limiting of salvaging of timber to dead or dying trees along roadsides. The purpose of salvage is limited to (1) correcting safety hazards (preventing trees from falling into the road), (2) rehabilitating any severely damaged viewsheds and (3) maintaining or enhancing habitat for threatened, endangered, and sensitive species.

Alternatives 11 and 13 are considered in detail in the FEIS and one of them will be selected as the Revised Plan by the Regional Forest if it is identified as the alternative that maximizes net public benefits.

Letter 2755

In some of the game management areas the recommended open road density is too high. We suggest 1/4 mile per thousand acres. Adding roads will simply open the area to more poaching If existing roads exceed 1/4 per thousand acres, work toward closing some of these roads to comply with the standard. Reduce open road density in turkey habitat to one mile per thousand acres.

Response

Alternatives 11 and 13 have been formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to respond to biological issues Among these adjustments is the allocation of management area prescriptions in Management Areas 14 and 15 that contain different road standards. The open road density for Management Area 14 is no more than 1/4 mile per 1,000 acres and for Management Area 15 no more than one mile per 1,000 acres

Alternative 11 is considered in detail in the FEIS and will be selected as the Revised Plan by the Regional Forest if it is identified as the alternative that maximizes net public benefits

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Letter 4268

Plan - The need for wildlife openings should be considered within the context of the landscape, as well as, within the context of adjacent lands

Response

The need for wildlife openings is considered in the context of the overall habitat objectives of any management area and the existing habitat situation Considering private farmland as providing the needed habitat for early successional wildlife species is somewhat impractical Many farmers consider these animals as pests and strive to eliminate them from their lands. It is inappropriate to expect these landowners to provide habitat for species that are being hunted on the George Washington National Forest

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Letter 3941

Recommended changes are organized north to south along the A.T. and cross-referenced by letter to the specific map areas on the attached Map #2

Response

Management Areas are areas of the Forest "with similar management objectives and a common management prescription" (FSM 1905, WO Amendment 1900-91-3) The 1982 NFMA regulations define management prescriptions as practices permitted "on a specific area to attain multiple-use and other goals and objectives (36 CFR 219.3)" Forest Plans are required to contain "multiple-use prescriptions and associated standards and guidelines for each management area" [36 CFR 219 11(c)] In essence, Forest Plans establish management areas and associated direction (standards and guidelines) for particular areas of the Forest. For further discussion of management area prescriptions, the reader is encouraged to read FEIS Appendix B.

The concept of multiple use recognizes that not every multiple use can necessarily be accommodated on the same tract of national forest land In working with various individuals, groups, organizations and agencies, 22 management areas which emphasize different mixtures of management practices that compliment or enhance compatible resource values have been developed. These 22 management areas provided a broad range of prescriptions for the analysis.

Public input influenced land allocations to the 22 Management Areas These allocations vary greatly by alternative and strongly reflect public preferences. The public was afforded the opportunity to provide information on potential management area allocations which offered the best resolution of issues within different alternatives As a result of this effort, the maps attached to this FEIS show each alternative's management area allocations See also the FEIS, Chapter 2, for the acreage in management areas by alternative

Based on public comments, some management area boundaries or allocations were revised in Alternatives 6, 7, 8A, 9, 11 and 13. Responses to specific recommendations for changing a management area boundary or allocation of an alternative are discussed under each specific comment

In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan However, no single factor, such as management area allocations, will lead to this selection

Letter 2066 I believe Alternative 8 should be modified in various aspects to improve the balance between various multiple-use activities. I would not recommend moving to another alternative (such as Alternative 12)

Response The Forest Service is moving away from the concept that the national forests need to be managed based primarily on maximizing certain natural resource products. This concept is being replaced with the realization that national forest must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people.

The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past. Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

Alternative 12 provides a mixture of goods and services based on the traditional concept of multiple use management. In particular, timber management, motorized recreation use and providing habitat for early successional wildlife species are emphasized more than in the Forest Service preferred alternative

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan

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Letter 3699 Too great an expansion of off-road motor vehicle use.

Response Alternative 8A has been formulated in the FEIS The number of ATV routes has been decreased from five to four

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Letter 3977 The draft plan does not address the full potential for environmental education programming in the Forest The George Washington is to be commended for putting forth an ambitious interpretive program Further develop this into a serious environmental education mission. There is a critical need to develop both ecological literacy and an appreciation of stewardship in our society. A prototypical educational system might consist of· a leisure-based interpretive program, a technical extension program, and a school partnership education program This is consistent with the public policy intent of the recent Environmental Education Act and is a logical and necessary extension of the Forest's mission of public service and land management. Include a policy statement initiating the development of an environmental education program.

Letter 4242 The George Washington is to be commended for putting forth an ambitious interpretive program Further develop this into a serious environmental education mission There is a critical need to develop both ecological literacy and an appreciation of stewardship in our society A prototypical educational system might consist of· a leisure-based interpretive program, a technical extension program, and a school partnership education program This is consistent with the public policy intent of the recent Environmental Education Act and is a logical and necessary extension of the forest's mission of public service and land management I suggest that this Forest Plan include a policy statement initiating the development of an environmental education program

Response Environmental education is an important component of "Foundations", a collection of interpretive programs proposed in Appendix C of the Revised Forest Plan Goal #2 on page C-7 includes environmental education Three facilities are proposed to provide this type of interpretation. Lake Moomaw Interpretive Center (pg C-20), Powell's Fort Environmental Education Camp (pg C-36) and Augusta Springs Environmental Education Center (pg C-40) One intent of "Foundations" is that it will be a dynamic and evolving document in which material is added or deleted as new ideas are presented and considered. There will be further opportunities for public involvement and comment at the project level for the development of various interpretive programs and facilities

Letter 1162 We support Alt 8. However, we recommend some minor changes Liberty Univ requests that the Rocky Row drainage area of the Pedlar currently MA17 be changed to MA16 which will provide viewshed protection along the A T. on Little Rocky Row, Big Rocky Row, and Bluff Mtn. We would prefer that the area around Tarjacket Ridge, Maintop Mt, and Spy Rock be changed from MA1 to MA13 which would provide viewshed protection for the A T. and would provide opportunities for dispersed recreation

Letter 1672, 2222

With some minor modifications, Alt. 8 comes closest to serving the people's best interest. Change the Rocky Row Run drainage area from an area 17 to an area 16 This will help preserve the "nature experience" for the many recreational users of this area. Change the area around Spy Rock and Tarjacket Ridge from an area 1 to an area 13. This will help preserve this pristine area for future generations to experience. Change the area around Sherando Lake from an area 14 to an area 13 This is its present use and it is working very well

Letter 1999, 3542, 4246

I request that the Rocky Row Run drainage area of the Pedlar District currently listed as Management Area 17 be changed to MA 16 which will provide viewshed protection along the A.T. on Little Rocky Row, Big Rocky Row, and Bluff Mountain

Letter 1999, 3542, 4246

I prefer that the area around Tarjacket Ridge, Maintop Mountain, and Spy Rock be changed from MA 1 to MA 13 which would provide viewshed protection for the A T and would provide opportunities for dispersed recreation

Letter 2006 I am very strongly in support of Alt 8 with the following minor changes. The Rocky Row Run drainage area of the Pedlar Dist currently listed as MA17 should be changed to MA16, providing viewshed protection along the AT on Little Rocky Row, Big Rocky Row and Bluff Mtn. The area around Tarjacket Ridge, Maintop Mtn and Spy Rock should be changed from MA1 to MA13, providing viewshed protection for the AT and for opportunities for dispersed rec

Letter 2009 The Rocky Row Run drainage area of the Pedlar District be changed to MA 16.

Letter 2009 The area around Tarjacket Ridge, Maintop Mountain, and Spy Rock be changed from MA-1 to MA-13

Letter 2921 Modify Alternative 8 to improve viewshed protection along the Appalachian Trail in the Buff Mountain, Tarjacket Ridge, and Spy Rock areas

Letters 2261, 2570

I support Alternative No. 8 with several suggestions for minor changes. I request that the Rocky Row Run drainage area of the Pedlar District currently listed as MA 17 be changed to MA 16 which will provide viewshed protection along the A T on Little Rocky Row, Big Rocky Row and Bluff Mountain I prefer that the area around TarJacket Ridge, Maintop Mountain, and Spy Rock be changed from MA 1 to MA 13 which would provide viewshed protection for A T. and would provide opportunities for dispersed recreation.

Letter 3764 The Rocky Row drainage area should not be classified as MA17 If it were instead a MA16, viewsheds along the Appalachian Trail would be preserved along Little Rocky Row, Big Rocky Row and Bluff Mountain (3) If the areas around Tarjacket Ridge, Maintop Mtn and Spy Rock were to be classified MA13, they would provide a greater opportunity for dispersed recreation

Letter 3941 These lands are bounded by the Mount Pleasant area, the Priest Wilderness, and the Appalachian Trail, and they have a recognized potential for dispersed recreation Alternative #14 of the Draft Forest Plan proposes most of this area for designation as Management Area #13 Designation of these lands as Management Area #13 would encourage the Forest Service and private organizations involved in dispersed-recreation management to formulate and carry out projects to realize the potential of this area for accommodating dispersed recreational use

Letter 3941 This is particularly important where these areas are viewed from major viewpoints along the Appalachian Trail, such as Big Rocky Row, Fuller Rocks, and the summit of Bluff Mountain. This objective can be met by changing those sensitive sections to Management Area #16, which carries a partial retention VQO, or by including a standard in the management prescription for Management Area #17 to require partial retention VQOs in middleground areas viewed from the A T The only change would be a slight increase in the visual quality objective, resulting in little or no change in the timber outputs from this area (depending on harvest methods) and a significant increase in protection of the scenic values of the Appalachian Trail.

Response This recommendation is consistent with the overall theme of the preferred alternative. The management area allocation has been changed in the preferred alternative to correspond with the recommendation

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Letter 3707 I am concerned about capture of timber value from Gypsy moth defoliation and additional road construction within the Forest.

Response As discussed in Chapter 2 of the Revised Plan, the Forest Service preferred alternative permits salvaging in "roaded" areas where it is economically feasible and has a much smaller road construction program

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Letters 3985, 3986

The timber harvests which will be allowed on the margins of Crawford Mountain are unnecessary for wildlife habitat development as there are plenty of openings in the forest, edge habitat, and younger forest on the private lands surrounding GWNF

Response Prior to any timber harvesting for wildlife, an environmental assessment is prepared This analyzes current habitats and documents the needs and benefits provided for by a variety of potential actions

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THE MIX OF GOODS AND SERVICES: Multiple Use Management

Letter 3535 If you have any concern for the next generation, do not yield to the interest of one group of users

Response The Forest Service is finding that people want and need a wider array of uses, values, products and conditions from the Forest than in the past. Alternative 8A has been formulated to serve as a land and resource management plan that will provide the optimum mixture of uses, values, products and conditions consistent with federal laws, agency policies, resource capabilities and public issues.

Letters 760, 1886

Maximize protection of fish, birds, and wildlife; watersheds; non-motorized recreational values; and to minimize the destruction timber cutting causes to those values

Letter 867 I am writing to urge the USFS to manage the GWNF to give better protection of its fish, birds, and wildlife; to improve the care of watersheds, to further non-motorized values; and to reduce the damage timber cutting causes

Letter 1154 Wildlife, watersheds, and non-intrusive recreational uses are the primary resources and needs that deserve protection. ATV's and timbering interests need to learn to look primarily to private lands to satisfy their economic and recreational needs due to the environmental damage their activities create on national forest land

Response The Forest Service preferred alternative emphasizes late successional and remote wildlife habitat, watershed protection, and non-motorized recreation opportunities to a greater degree than in the past. This emphasis is accomplished, however, in a multiple use context where other uses, values, products and conditions are also provided.

Letters 20, 131

I think no more land should be placed in a single-use management category.

Letter 150 — I support a multiple use plan which would make the best use of the forest. This would allow the timber to be managed appropriately to produce a sustained yield of raw material while also permitting a wide array of recreational opportunities and other uses There is already too much land locked up under single use categories, which in the long run, will not be of benefit to anyone

Letters 3573, 3574, 3575

Alternative 8 is not a multiple-use plan Timber management provides benefits for all forest users. Your preferred alternative only considers 24% of the forest suitable for management.

Response — There seems to be an impression that multiple-use management requires that lands be suitable for timber production This is a misinterpretation of the Multiple Use — Sustained Yield Act Lands not suitable for timber production are not "single-use management" any more than lands suitable for timber production are.

Letter 2234 — More primitive roads need to be opened for motorized access These roads are true multiple-use items

Letter 2322 — Multiple use can only be served by access Even a park needs roads and trails.

Letter 3627 — I do not believe limiting the land base, to the level suggested in Alternative 8, for forest products is a wise choice. With sound forest management techniques, many resources can be managed simultaneously on the same acreage.

Letters 4244, 4256

The Forest should be managed for wise accessible use through multiple use management

Response — The concept of multiple use management recognizes that not every multiple use can necessarily be accommodated on each acre of the national forest. Forest access is one of the major issues which will be considered in deciding on the alternative to be the Revised Plan

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Letter 2 — Keep the forest open for MULTIPLE USE MANAGEMENT

Letter 73 — We must also resist attempts to put large acreages of land into single-use designation To do so would allow exclusion of many users against federal mandates and hinder many facets of forest management

Letter 74 — (Draft Plan) would be placing too much land in a single use mgmt. category

Letter 136 — We are now looking at single use as the prevailing policy Let's maintain multiple-use; the national forests are publicly owned, taxpayer owned, and should be demonstration areas that include something for everyone

Letter 184 — Multiple-use, when practiced properly, is an excellent idea We are seeing more and more acreage being put into single-use management with harvesting forbidden in these areas People need to realize that harvested areas can have multiple uses Absolutely no more land should be placed in single-use management categories

Letters 383, 768, 769, 770, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1305, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

Alternative 8 is not in the best interest of the Forest. Simply carving up the forest is to abandon integrated multiple-use management in favor of a political solution

Letter 765 — Alt 8 would merely carve up the forest This would abandon integrated multiple use mgt and turn to a simple political solution

Letter 861 The multiple-use concept should not be sub-divided into separate alternative plans If this happens, a Forest is no longer managed by resource experts who make resource decisions and judgments, it is only "overseen" by caretakers

Letter 874 I am a National Forest user interested in the multiple benefits derived from a well-managed forest. I have ridden my mountain bike on closed timber sale roads and I have seen the biological merits of clearcutting, thinning, and shelterwood harvests. I have seen turkey, grouse, deer, and bear browsing in these silviculturally manipulated areas

Letter 1060 The Council recommends selection of Alternative 12 which provides a much better opportunity to meet the forest's multiple-use goals.

Letter 2635 By apparently giving in to the popular perception that varied uses must be exclusive, the Forest Service *abdicates a professional responsibility to plan for the integration of uses to the greatest extent possible to* provide maximum net benefit to the public at large In choosing to dedicate a small portion of the forest to timber *harvesting, rather than to plan for integration of harvesting with other uses, a tacit decision is made to deprive* a region dominated by federal ownership of badly needed jobs and economic development opportunity

Letter 3831 Allow multiple-use management on all the forest except SMAs and existing Wilderness Areas.

Letter 3976 I support Alternative #12 I abhor the view that our National Forest are to be managed with the view that all uses must be exclusive without regard to acreage, and submit to you the notion of integration of all forest activities on the entire forest Through management and planning we can maintain both biological values while practicing some level of economic benefit.

Response Section 4 of the MUSYA provides the following definition.

> "Multiple use" means the management of all the various resources on the national forest so that they are utilized in the combination that best meet the needs of the American people; making the most *judicious* use of the land for some or all of these resources or related services over areas large enough to provide *sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that* some land will be used for less than all of the resources, and harmonious and coordinated management of the various resources, each with the other, without the impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output."

Thus, the concept of multiple use recognizes that not every multiple use can necessarily be accommodated on the same tract of national forest land

In working with various individuals, groups, organizations and agencies, the ID Team has developed 22 management areas which emphasize different mixtures of management practices that complement or enhance compatible resource uses Rather than carving up the Forest based on a simple political solution, these management areas contain mixtures of compatible resource practices. They are integrated in the sense that all of the compatible management practices (with associated standards) in any management area prescription are designed to achieve the objectives of that management area In some of the management areas, regulated timber harvesting, system road construction and/or motorized recreation use may not be useful in achieving the "desired future condition" of the given management area This does not mean that such management areas *should be labeled as "single use management"*

Letter 4030 Neither alternative allows for sustained yield; however, plan 12 is the lesser evil of the two

Response Section 4 of the Multiple Use — Sustained Yield Act (MUSYA) provides the following definition.

> "Sustained yield of several products and services" means the achievement and maintenance in perpetuity of a high level of annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the land "

Recent litigation has resulted in the ruling that the Forest Service is under no legal obligation to offer timber The following paragraph from a decision on an appeal of a land and resource management plan presents the agency position on this matter

"The National Forest Management Act then tied the Secretary of Agriculture's broad discretion to sell timber to the multiple-use concept Thus, in order to achieve the purposes of the Multiple-Use Sustained-Yield Act, the Secretary *may* sell timber In addition, the court held the National Forest Management Act and the MUSYA indicate that the National Forests are not to be managed primarily to produce economic benefits."

Letter 145 — Timber harvesting, far from being exclusive of other, equally valid uses of the forest, makes a positive contribution to those uses Modern forestry values the multiple-use concept where in timber harvesting is integral to creation of wildlife habitat, dispersed and concentrated recreation, and the maintenance of overall biological diversity Westvaco's own success in applying intensive timber management while providing wildlife and recreation resources on our own lands is testimony to the practicality of this concept

Letter 181 — The plan does not provide for an integration of compatible uses, i e , blend.

Letter 949 — I can see no reason why the practice of good forestry cannot enhance our wood industry, wildlife, wilderness, air, soil, water, hunting, fishing, birding, and hiking Maybe with stringent administrative control, even range and mining and ATVs

Letter 2241 — All the other uses of the forest can be compatible with this use

Letter 2338 — Timber harvesting makes a positive contribution to the other valid uses of the forest through modern forestry which emphasizes the concept of multiple-use wherein timber harvesting is integral to creation of wildlife habitat, dispersed and concentrated recreation, and the maintenance of overall biological diversity.

Letter 2610 — Timber harvesting, far from being exclusive of other, equally valid uses of the forest, makes a positive contribution to those uses Modern forestry values the multiple-use concept wherein timber harvesting is integral to creation of wildlife habitat, dispersed and concentrated recreation, and the maintenance of overall biological diversity

Letter 2914 — Massive withdrawals of potentially productive land should not take the place of diligent planning and management that maintains the desired biological values while producing some level of goods and services Integration of activities should be pursued.

Response — The Forest has been working closely with individuals, groups, organizations and other agencies to develop management areas that permit management practices which are compatible with management area objectives There are clearly situations where certain management practices are incompatible with some management area objectives Timber harvesting, road construction and motorized recreation use are either partially or wholly compatible with management areas that emphasize timber, wildlife (predominately game species) and motorized recreation They are either incompatible, or compatible in limited circumstances, with management areas that emphasize remote recreation, area-sensitive species, unique biological communities, wilderness and special management areas

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Letter 1061 — In reviewing the other alternatives, number 12 represents the best for multiple-use as more efficient cutting system (more volume) and less acres

Letter 1253 — An alternative which addresses multiple use in a much more comprehensive manner can be developed Alternative 12 is one such alternative

Letter 1257 — I urge you to reconsider the GWNF recommended alt , or alter it to include much more timber harvest This alt is not a compromise plan, and the lack of balance in the plan will only harm the forest, the wildlife and the people who use it

Letter 1544 — Our National Forest have been and should continue to be managed for multiple-use forest resources Only Alternative 12 comes close to providing a full range of goods and services including timber, recreation, wilderness, minerals, range, and wildlife habitat

Letter 2694 — Our area [Pedlar District] is isolated from the rest of the forest, and the plan does not offer a balance of management options to these citizens Around 75% of all National Forest acreage should be managed primarily for wildlife, timber, and recreation

Letter 3831 — Place a heavy emphasis on the recommendations made by the people whose livelihood depends on your forest.

Response — The Forest Service is moving away from the concept that the national forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization that national forests must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people

The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the George Washington National Forest must be balanced against the needs and values which are foregone with such development.

Alternative 12 provides a mixture of goods and services based on the traditional concept of multiple use management. In particular, timber management, motorized recreation use and providing habitat for early successional wildlife species are emphasized more than in the Forest Service preferred alternative

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan.

Letter 1074 — The Draft Plan includes unnecessary new roads, excessive allowance for timber harvesting and insufficient protection for wildlife and streams.

Response — A range of alternatives were developed which covers the spectrum of providing for multiple uses. The preferred alternative was chosen to provide for the best mix of uses, products, values and conditions desired by the public.

Letter 1424 — What has happened to the sustained yield-multiple use plan for the forest? That was a good plan for everyone

Response — The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past The 1986 Plan emphasized the traditional mixture of multiple uses It was not sufficiently responsive to the changes in public needs and wants. It also is not in concert with emerging national policies that have led to the agency priority on ecosystem management

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Letter 186 — Alternative 12 could provide for multiple uses if reasonable levels of timber production were included

Letter 2306 — National Forests should furnish a continuous supply of timber

Letter 3734 — I support multiple-use and maximum timber harvest in the GW National Forest, using proven forest management principles

Response — A given level of timber harvesting is not de facto an indication of multiple use management. The alternatives provide different mixtures of multiple uses, but each alternative complies with the Multiple Use - Sustained Yield Act

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Letter 3742 — As currently written, MA 17 is a single use prescription for the GWNF, and may violate the Multiple-Use/ Sustained Yield Act. It should either be rewritten to provide for multiple use management or it should be dropped from use

Letter 3840 — There should not be a MA 17 for timber only - this does not relate to Alt. #8 philosophy. De-emphasize MA 17 and change to MA 15 and MA 16 instead

Letter 3840 — As written in MA 17 appears to suggest a single use concept rather than a multiple-use view

Letter 3840 — If MA 17 finds its way into the new plan by some distortion of Alt #8 philosophy then - no new roads in MA 17, do all logging off existing roads using temporary roads and skid trails

Response	Management Area 17 is not any different than any other management area in concept It features timber management on the higher quality accessible sites but also provides for wildlife habitat, early successional species, and a variety of recreation uses for non motorized and motorized users, including hunting and viewing scenery. Not every use has to be provided for in every management area
Letter 4022	I am an advocate of multiple use and sustained yield mgmt. and for taking a good look at the economic impact, as well as, environmental impact of decisions affecting our natural resources
Letter 4241	The Wilderness Society is encouraged by the Forest Service's use of New Perspectives on the GW.
Response	NO RESPONSE REQUIRED
Letter 73	The national forests are supposed to be working forests which provide for the activities of a wide array of users and provide timber sales which directly benefit the local area They are not parks where everything is to be untouched and unused.
Letter 2329	Manage to maximize the long term needs of both the industrial community and the recreational community
Response	The Forest Service is finding that people want and need a wider array of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should respond to all of these needs and wants.
Letter 366	Timber management and wildlife with proper management both will still be here for generations to come. Timber is a renewable resource.
Response	In managing the Forest using an ecological approach, the Forest Service has not abandoned its belief that timber and wildlife are renewable resources There are clearly circumstances, however, where timber and wildlife management are inconsistent with achieving other desirable uses, values, products and conditions
Letter 983	I fully support the mgt of the GWNF being based on the multiple-use concept.
Letter 985	I am particularly interested in maintaining a policy of allowing multiple uses of our forest land and I am concerned with the limitations of suggested Alt 8 of the plan
Letter 1066	We have a good rapport with all the people using the forest under the multi-use concept and feel it should be continued, where at all practical.
Letter 1285	I am in favor of providing a full range of services including timber production, recreation, wildlife habitat and other uses that are compatible with the forest
Letter 1361	The GWNF should be providing a complete range of multiple uses to all users
Letter 1338	Alt 8 falls short of addressing all the vital resource concerns of the GWNF. This alt plan does not adequately address the mgt of the Forests' single most important renewable resource - timber The large reduction in acreage suitable for timber production is inappropriate.
Letter 1372	I do think the NFs should be managed for multiple use to benefit citizens
Letter 1464	Alt 8 is a single-use designation which goes against the FS's multiple use principle
Letter 2025	We believe the National Forests should be managed for multiple use
Letter 2198	I want the forest to be managed for multiple use, not for biological diversity, sensitive species, and the minorities

Letter 2569 Our public forests must be managed responsibly to serve multiple purposes that are compatible and balanced

Letter 2662 Alternative 8 requires single-use management that violates the laws and principles governing national forests.

Letter 3683 A forestry plan should incorporate both the concept of conservation and the concept of multiple-use management of all the natural resources of the area in question. We do not believe Alternative #8 does this

Letter 3711 The Board supports the multi-use concept

Letter 3751 The NF should be managed for the multiple use

Letter 3941 In general, the App Trail Conf is pleased with the Alt 8 plan of action chosen by the Forest and detailed in the draft plan We feel that this plan offers a balanced blend of mgmt that produces a range of benefits for the "owners" of this public land--the present and future generations of American citizens. We believe that a number of refinements could be made to clarify the forest plan's intent.

Response The Forest Service is finding that people need and want a wider array of uses, values, products and conditions from the Forest than in the past These additional multiple uses include environmental and social values not traditionally identified as multiple uses Such an identification, however, is not inconsistent with the definition of "multiple use in Section 4 of the the Multiple Use -- Sustained Yield Act (MUSYA).

> "Multiple use" means the management of all the various resources on the national forest so that they are utilized in the combination that best meet the needs of the American people, making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources, and harmonious and coordinated management of the various resources, each with the other, without the impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output "

Alternative 8A was developed in recognition that besides the traditional multiple uses of timber, wildlife and motorized recreation, the Forest Service needs to provide amenity values, such as aesthetics and remote, non-motorized recreation, as well as environmental conditions that promote healthy, diverse lands and water In providing this wider array, Alternative 8A is not fostering "single use management" but is a "multiple use" alternative

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Letters 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

Timber harvesting is integral to creation of wildlife habitat, dispersed and concentrated recreation, and the maintenance of overall biological diversity

Letter 936 The use of modern forest management practices will positively impact recreation, biological diversity and positively impact economic gain in the [Rockbridge] County.

Letter 2891 Timber harvesting does not conflict with many other uses of the forest that I support These including hiking, backpacking, horseback riding, mountain bicycling, hunting and fishing

Letter 3617 The use of modern forest mgt practices will positively impact wildlife habitat, dispersed and developed recreation, biological diversity and positively impact economic gain in the county.

Response Timber harvesting is one of the most cost effective ways of creating early successional wildlife habitat. Timber harvesting does not contribute directly to creating dispersed or developed recreation opportunities. Timber harvesting can be used to maintain species richness (one of the components of biological diversity), but it has limited application in maintaining genetic, species or landscape biodiversity

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Letter 2574 Until and unless the ORV and logging communities commit themselves to keeping the forest as a long term "land of many uses" their access and use of the forest must be curtailed

Response — The Revised Plan recognizes that OHV use and timber management are legitimate multiple uses that need to continue on the Forest

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Letter 369 — Multiple-use mgmt.. Alt 8 sets aside over 800,000 acres (or 80% of the Forest!) to provide for an isolated, overmature forest with little or no vegetative manipulation Only 60,000 acres (<6%) will be managed for timber production. This is single-use mgmt It will be detrimental to the health of the Forest, the diversity of wildlife, the economies of surrounding communities, and the visitors to the Forest

Response — Lands not suitable for timber production are not "single use" management Responses to the concerns over the health of the forest, diversity of wildlife and the economies of surrounding counties are contained in Chapter 2 of the Revised Plan and Chapter 3 and Appendix B of the FEIS

Letter 14 — I don't want to see anymore areas closed to motorized recreation, as special management areas, wilderness, etc. Since Congressman Olin refused to introduce to wilderness legislation, the proposed wilderness areas should be released for full multiple use management We want the forest managed for wise accessible use through multiple use management

Response — Although the Revised Plan can allocate roadless areas to a variety of management areas with different goals and objectives, it cannot "release them to multiple use management" First, roadless area management, non-motorized recreation, wilderness, and special management are all part of multiple use management as much as is motorized recreation, timber harvesting, wildlife management, and watershed protection. Second, release language has traditionally been included in wilderness legislation It would not be appropriate or legal for the Revised Plan to attempt to accomplish this

The Regional Forester will select an alternative to serve as the Revised Plan that maximizes the net public benefits with consideration of all parts of multiple use management, including motorized and non-motorized recreation, vegetation management, range, wildlife, watershed, soils, and cultural resources

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Letter 1060 — The Council fully supports the concept of multiple-use management as outlined in the 1960 Multiple-Use Sustained-Yield Act and subsequent laws However, the agency must present the correct historical facts to insure that the public recognizes the importance and reaffirmation repeatedly by Congress, of providing the "continuous supply of timber for the necessities of citizens of the United States" (U S C. Section 475) a mission which has existed for over 100 years The Council is concerned that the agency seems to be drifting away from its mission, which has been clearly articulated and reaffirmed over the years The consequences of this abandonment on dependent communities, companies, and the national interest cannot be ignored

Response — A quote follows from a letter from the Chief of the Forest Service to all Regional Foresters and Station Directors: "*Throughout the transition to ecosystem management, forest plan goals, objectives, standards and guidelines*, along with timber outputs and other targets, are still relevant We must continue to meet forest plan direction and the intent of Congress Furthermore, let me reiterate, ecosystem management is not an end in itself It is the means we will use to meet society's needs in ways that also restore and sustain healthy, diverse, and productive ecosystems"

Letters 74, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 141

I strongly support the multiple-use concept which includes a well planned timber harvesting program

Letter 730 — It is imperative that the GW be managed to provide benefits to individuals and groups representative of viewpoints across the full spectrum of user ideologies These benefits must include wood fiber, watershed protection, habitat enhancement for all species of forest wildlife, protection of unique resources and recreational opportunities

Response — Timber management is recognized as one of the multiple uses permissible on the Forest The Multiple Use – Sustained Yield Act, however, does not mandate any particular level of timber harvesting The Forest Service preferred alternative is designed to manage the Forest to accomplish multiple use management using an ecological approach The issues and concerns of individuals, agencies and organizations are used to help determine the appropriate mixture of uses, services, products and conditions that will be offered These

concerns, however, have to be balanced against agency policies and the ability of the Forest to provide desired multiple uses while maintaining the diversity and sustainability of ecosystems.

Letter 3660 This is not a multiple-use plan You provide way over 100% of demand for recreation, yet only 79% of big game demand, and 59% of timber demand This must be balanced out.

Response Alternative 8A is designed to provide for a wider array of uses, values, products and conditions than traditionally recognized as multiple uses. In deciding on the appropriate mixture of multiple uses, the ID Team considered values and environmental conditions which cannot be measured in terms of "demand" To conclude that portions of the Forest should not be allocated to Management Areas 4, 5, 6, 7, 8, 9 or 12 simply because they are not needed to meet the demand for "primitive non-motorized" recreation use ignores the fact that these areas are also providing biological values and conditions desired by the public and that development of these areas would require extensive roading that cannot be economically justified on a Forest with a below-cost timber program.

Letter 2740 I want to see national forest land closed to fireworks, artillery practice, and ATV's and motorcycles. None of these belong in a forest!

Response Fireworks are not permitted on the Forest. Military use and OHV use are legitimate uses of the Forest.

THE MIX OF GOODS AND SERVICES: Wildlife Habitat Management

Letter 891 We need to protect our wildlife.

Response Refer to Chapter 3 of the FEIS

Letters 987, 1314
Non-game wildlife deserves greater emphasis.

Letters 1094, 1169, 1982
More mgt. emphasis on nongame species; there is too much forest area to be managed for game species.

Letters 1167, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1730, 1731, 1732, 1943, 1944, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 3087, 3088, 3147, 3148, 3149, 3150, 4093
Give more consideration to non-game species. Management directions seem to be entirely directed to game species. Migratory birds need to be taken into account These populations are showing steady declines.

Letter 1250 Overemphasis on game mgmt to the detriment of nongame wildlife While hunting is an important recreation, mgt must balance game and nongame needs

Letter 1260 All wildlife is integral to the survival and function of the wilderness, not only the game animals

Letter 1310 Too much emphasis is placed on game mgt. You should do much more for the nongame wildlife We do not need more areas managed for deer Virginia has more deer than it needs

Letter 1318 We need to look at species on the decline and work more aggressively to maintain all species, game and nongame

Letter 1439 Give more consideration to non-game species

Letters 1634, 2925
Want more consideration given to nongame species; i e , migratory birds

Letter 1671 Give more consideration to non-game species Migratory birds, showing steady declines, need to be taken into account

Letter 1884 Emphasis should be on providing maximum habitat for NON-GAME species. Habitat alteration practices that fragment the forest and create edge should be discontinued First consideration should be given to habitat for interior-dwelling species such as neotropical migrant birds and the black bear.

Letter 2189 More attention must be given to non-game wildlife, including the protection of migration corridors.

Letter 2738 Non-game animals and their habitat need to be given more consideration than is presently planned.

Letter 2892 Wildlife management, particularly non-game wildlife, is insufficient.

Letter 3567 There should be less emphasis placed on synthetic habitat manipulations which are directed to game species, especially deer An emphasis on unfragmented habitat and other non-game species would be more balanced

Letter 3744 Less game species management. Focus on "non-game" species and on the intact ecosystems

Letter 3981 EIS 3-134, paragraph 2 - This discussion of game management - wildlife openings is absolutely inadequate. Plenty of clearings are created by natural processes - what studies indicate more are needed? How many average acres of openings are created per year by tree senescence? Fire? Ice damage? Storms? Disease? Gypsy Moth? How many board feet of timber are to be hauled away from the 6,900 acres proposed to be manipulated under Alternative 8? What biological criteria are used to determine the size, number, and location of these areas? How do the environmental impacts differ as a consequence A discussion of fragmentation at different scales from a conservation biology perspective is necessary here What about adverse edge effects? Increased numbers of nest and hatching predators result from openings - what are their impacts? There is an enormous amount of literature pertaining to these matters and nationally renown experts are a phone call away. Why weren't these sources consulted?

Letters 737, 1150, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1387, 1388, 1389, 1532, 1533, 1723, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2146, 2147, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2760, 2761, 2762, 3089, 3090, 3293, 3294, 3295, 3296, 3297, 3298, 3299, 3300, 3301, 3302, 3303, 3304, 3305, 3306, 3307, 3308, 3309, 3310, 3311, 3312, 3313, 3314, 3315, 3316, 3317, 3318, 3319, 4068, 4073, 4074, 4075

More mgt. emphasis on nongame species, there is too much forest area to be managed for game species

Letters 887, 888, 923, 924, 925, 926, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1174, 1206, 1207, 1208, 1209, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1349, 1399, 1400, 1401, 1402, 1403, 1459, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1968, 1974, 2027, 2063, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2701, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2836, 2881, 2901, 3093, 3094, 3096, 3097, 3098, 3099, 3100, 3202, 3203, 3204, 3205, 3206, 3207, 3208, 3209, 3210, 3211, 3212, 3213, 3214, 3215, 3216, 3217, 3218, 3219, 3220, 3221, 3222, 3223, 3224, 3225, 3226, 3227, 3228, 3229, 3230, 3231, 3232, 3233, 3234, 3235, 3236, 3237, 3238, 3239, 3240, 3241, 3242, 3243, 3244, 3245, 3246, 3247, 3517, 4094, 4095, 4096, 4097, 4098, 4099, 4100, 4101, 4102, 4103, 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4112, 4113, 4114, 4115, 4116, 4117, 4118, 4119, 4120, 4121, 4122, 4123, 4124, 4125, 4126, 4127, 4128, 4157, 4158, 4172, 4183, 4231

Less emphasis should be placed on game management and more on unfragmented habitat for non-game species.

Letter 1684 In addition to game mgt, consideration must also be given to mgt of nongame species such as owls, songbirds, salamanders and various plant species Viable populations of these also require unfragmented habitat in order to thrive.

Letter 2666 Game management is emphasized over management for nongame species Make a change in the direction of nongame emphasis

Letter 2755 The plan seems to emphasize game management to excess We would like to see more emphasis on non-game species

Letters 3478, 3720, 3766, 3782

More management emphasis on non game species

Letter 3527 — Too much emphasis is placed on game management There are many other species that benefit from undisturbed habitat and this should be equally emphasized

Letter 3546 — Management of nongame wildlife should be increased

Letter 3661 — More habitat protection for non-game species Our forests are ecosystems of many plants and animals Maintaining bilogical diversity should be given highest priority.

Letter 3750 — Minimize wildlife management practices that are intended to increase the population of game species. Emphasis should be placed on protecting unfragmented and undisturbed habitats for all wildlife and restoring those habitats that have been damaged and destroyed

Letter 3847 — - Promote wildlife mgt and concern for nongame species, including migratory wildlife Provide migration corridors

Letter 3861 — Wildlife species of all types are parts of the Forest ecosystem and valuable You do not give enough emphasis to nongame species or to migration

Letter 4009 — There should be more emphasis on managing for nongame species as well as game species of wildlife

Response — Alternatives 11 and 13 have been formulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to respond to biological issues Among these adjustments is the increased emphasis on non-game species through the use of management area prescriptions that result in less vegetation manipulation, road construction, and acres where game animals are emphasized than the Forest Service preferred alternative.

The Forest Service preferred alternative emphasizes both game and non-game species. This alternative contains the appropriate mixture of emphases given the wide array of uses, values, products and services needed and wanted by interested and affected publics

The suggestion to emphasize non-game species is not one that leads to easy analysis. "Non-game" can refer to a wide diversity of animals including small mammals, birds, and other species that live in a variety of habitats including forest openings The majority of the people making this comment are concerned for those animal and plant species that require older habitat, particularly those animal species that are sensitive to fragmentation.

There is a good deal of disagreement over the subject of "fragmentation" and resulting "edge effects" The Forest Service recognizes that fragmentation of habitat for proposed, threatened, endangered and sensitive species or unique biological communities is a real concern that needs to be addressed in the Revised Plan. The Forest also recognizes that there is an opportunity to provide habitat for "area-sensitive" species (such as neo-tropical migratory birds) that require relatively large and undisturbed late successional forested habitats for survival. The Forest does not, however, accept the premise that large tracts of unfragmented and connected habitats are necessary for the survival of every plant and animal species. Habitat for species that are area-sensitive where reasonable opportunities exist has been incorporated. The ID Team has also worked with representatives of the USDI Fish & Wildlife Service and state agencies to ensure that habitat conditions favorable for the recovery and enhancement of threatened, endangered, and sensitive species and unique biological communities are maintained and restored, and, where feasible, enhanced

There is very little area (virtually only small, isolated pockets) of the George Washington National Forest that has not been fragmented by past human activities. In many areas, the old roads and timber harvests have regenerated and recovered to a state where there is minimal, if any, fragmentation of habitat Some of the largest blocks of this "unfragmented" habitat lie within the roadless areas The Forest Service preferred alternative has allocated most of the roadless area acreage to management areas where further fragmentation will not occur Although there will be some vehicular use on existing roads and some salvaging and fuelwood gathering in the immediate vicinity of system roads, these activities will not increase the amount of edge or affect the unfragmented core of these roadless areas

The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat which provide for the movement and continued viability of plants and animals

In particular, Management Areas 4 and 8 provide a 33 mile long corridor on the upper elevations of Shenandoah Mountain where relatively unfragmented habitat is needed to maintain and enhance habitat for the Cow Knob Salamander Also, Management Area 9 has been allocated to the western side of the Pedlar Ranger District to create a relatively unfragmented corridor from the James River Face Wilderness and Three Sisters Roadless Area to the St Marys Wilderness. The Forest does not support the designation of lands solely for migration corridors Long term viability needs vary considerably by species Habitat corridors are provided in all management areas depending on the species being considered

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Letter 2664

More of the GWNF should be available for wildlife and timber resource work directed by sound forest and wildlife management practices The VWTF believes that a diversity of age classes and physiographic matrix of vegetation covering the entire range of early to late succession species creates and maintains biological diversity, for both plants and wildlife and a healthy ecosystem. This cannot be accomplished by putting nearly half of the GWNF in hands off management, and declaring only 21 percent of the land area suitable for timber harvest (Using harvest methods dictated by public opinion instead of silviculture and economics) and restricting wildlife management work.

Response

Alternative 8A in no way erases the wildlife habitat management activities of the past. It is true that the Virginia Department of Game and Inland Fisheries (VDGIF) is abandoning much of the wildlife openings that have developed over the decades, due to budget and employment constraints, this is a state agency decision that is taking place regardless of the alternative selected

The Revised Plan actually more than triples the annual acreage of habitat management to be performed by the Forest Service This habitat management will be done to benefit sensitive, threatened, endangered and sensitive species, non-game, and game species

The Revised Plan does not maximize the potential value for either early successional or late successional habitats It recognizes the value of both, somewhat conflicting needs, within a large forested area and provides for both habitats. To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

Estimated white-tailed deer carrying capacity is not reduced Currently, in some areas of the Forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some rare plant species are preferred as deer foods Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters Based on past sales declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan.

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas, but there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives probably do provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate Grouse hunting accounts for approximately five percent of the hunting days on this Forest In light of a below cost timber program, it is economically hard to justify an increased timber program to increase ruffed grouse hunting success rates.

The amount of habitat for bear, pileated woodpecker, and gray squirrel are increased in relation to Alternative 12, and an estimate of carrying capacity for bear (and wild turkey) shows that these species' population levels are higher in Alternative 8A in comparison to Alternative 12

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2, "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife

Letter 177 — I have been informed that only 24% of the GW can be used for timber management. This is an unacceptably small percentage and overlooks the multiple-use principle of forest management. Most species of animals need a more diverse type of forest

Letter 187 — Only 24 percent of the George Washington National Forest is being classified as suitable for any type of timber management That means no system of timber management can be put in place on three-quarters of the forest If, as thoughtful conservationists, we believe that all wildlife species are equally important, then we must believe that our forests have to provide a diversity of habitat where all woodland wildlife of the Allegheny and Blue Ridge Mountain can thrive To make this happen, the only economically feasible tool available to resource managers is the well-regulated timber harvest.

Letter 370 — With reference to the Forest Service's recent decision to classify only 24% of the George Washington National Forest as suitable for any type of timber management, controlled land use, including timber management, results in various stages of forest growth which encourages a variety of wildlife species that cannot exist in mature forest

Response — The distribution of well-balanced age classes provides the optimum habitat for many of the game species While the Forest Service believes that providing habitat for these species remains important, they should not be emphasized on every acre across the entire Forest.

Analysis shows that most of the game species benefit from a variety of habitats, not just early successional stages Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 10, 11, 13, 14, 15, 16 and 17 Non-timber wildlife management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas

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Letter 1064 — Preserving and enhancing recreational hunting and fishing should be a top priority in overall and specific mgmt plans Decisions concerning roads, timbering, ORVs, minerals, etc , should be tempered toward this goal

Response — While each alternative studied has a particular set of interests that are emphasized, all alternatives recognize the need to preserve quality wildlife habitat Alternative 7 is designed to provide the largest acreage where wildlife habitat management is emphasized and may be selected by the Regional Forester for the Revised Plan if it is determined that it maximizes net public benefits, based on evaluation of management for all resources This includes consideration for hunting and fishing as well as other activities mentioned in the comment, timbering, ORV's, minerals, etc

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Letter 3699 — No cutting for the sake of "wildlife (game) management"

Letter 3732 — Benefit all wildlife in the Forest and also reduce the Forest Service budget by discontinuing all wildlife management practices that are intended to improve habitat for game species

Response — Each alternative developed provided for different mixtures of goods and services, and consequently, provided for wildlife in different ways At least one alternative incorporated your suggestion The Plan does provide for wildlife management (including game management) This meets the desire of the general public.

Letter 146 — The draft plan represents a better balance between game and nongame wildlife management than the discredited 1986 plan

Letter 182 — I am writing to urge you to continue the management philosophy that you have had in the past by allowing logging to be done on National Forest properties I do not think that I need to tell you that this creates exceptionally good habitat for much of our wildlife and is essential if we are to continue to have good, healthy numbers of wildlife in the future

Letter 187 — I encourage you to continue your current forest management practices with an emphasis on those practices which promote habitat development for ruffed grouse and other wildlife species Among others, the ruffed grouse, white-eyed vireo and chestnut-sided warbler simply can't exist in vast stretches of unbroken forest

Letter 189	As a concerned sportsmen/conservationist I urge you to reconsider your decision and develop a more biologically sound and multiple use oriented plan for your forest
Letter 191	We urge the Forest Service to rescind this decision and return to the sound forestry practices which have served Virginia's wildlife so well
Letter 1156	Manage our NF's in a way that protects non-game wildlife as well as game mgmt.
Letter 2012	The plan must also give concern to both game and non-game wildlife
Letter 2497	Adopt alt 8 and give future consideration to a realignment of emphasis on species mgmt. The current emphasis strongly favors game species There needs to be more of an emphasis on unfragmented habitat for non-game species
Letter 4053	Provide habitat for non-game wildlife as well as game Both need human protection.
Response	The Forest Service preferred alternative attempts to find the appropriate emphasis on game and non-game species The Forest Service believes that management for game species remains a priority for the American public The management for non-game species, especially those requiring unfragmented habitat, has assumed a greater importance under the new agency ecosystem management policy.

Letter 189	It has come to my attention that you have decided to allow timber management on only 24 percent of your National Forest and managing only 2 percent as early succession habitat I am writing to you to express my displeasure with this decision as it will be devastating to many species of wildlife in your area for many years to come
Letter 191	We would like to express our concern over the recent decision by the Forest Service to classify only 24 percent of the George Washington National Forest as suitable for any type of timber management We are also concerned that this same decision limits to 2 percent the forest area to be managed for early successional habitat
Letter 290	As I understand it, only 24 percent of the George Washington National Forest will now be classified as suitable for timber management, and only 2 percent is to be managed as early successional habitat.
Response	Analysis performed shows that most of the game species benefit from a variety of habitats, not just early successional stages Although only one-third of the Forest is suitable for timber production, this acreage is interspersed with acres unsuitable for timber production in Management Areas 7, 10, 11, 13, 14, 15, 16 and 17 Non-timber management practices (such as prescribed burning, creation of waterholes and creation of wildlife openings) will enhance habitat for game species in these and adjacent management areas. It is incorrect to refer to the acres regenerated under even-aged management as the only early successional habitat on the Forest Very few wildlife species live only in the openings created by regeneration harvests Most early successional species require a mixture of habitats including openings These species also benefit from prescribed burning, wildlife openings and openings created by other forms of timber harvests.

Letter 189	Without the vegetation diversity provided by a well balanced age class distribution in your forest, many species of wildlife will suffer from loss of appropriate habitats
Response	The distribution of a "well-balanced age class" is a recognized way to optimize habitat for most game species This does not mean that the Forest will not produce abundant habitat for these species under other scenarios. It is not necessary to harvest timber everywhere in the name of wildlife habitat manipulation

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Letter 370	I am especially concerned about the ruffed grouse population and other game birds which will not be found in the National Forest if it only consists of mature trees
Response	Management Area 16 has been formulated to emphasize ruffed grouse and other species that favor early successional habitat Management Area 17 will also provide excellent habitat for these species Management

Area 15 has been formulated to emphasize wild turkey. Approximately 43% of the Forest has been allocated to these management areas in the Forest Service preferred alternative.

Letter 877

The Plan must provide for adequate and protective habitat for all nongame wildlife as well as game wildlife Wildlife migration corridors must be preserved

Response

The fact that the preferred alternative does not allocate any lands to Management Area 2 does not mean that there are not linkages of habitat which provide for the movement and continued viability of plants and animals. In particular, Management Areas 4 and 8 provide a 33 mile long corridor on the upper elevations of Shenandoah *Mountain where relatively unfragmented habitat is needed to maintain and enhance habitat for the Cow Knob* Salamander. Also, Management Area 9 has been allocated to the western side of the Pedlar Ranger District to create a relatively unfragmented corridor from the James River Face Wilderness and Three Sisters Roadless Area to the St Marys Wilderness

The Forest does not support the designation of lands solely for migration corridors. Long term viability needs vary considerably by species Habitat corridors are provided in all management areas depending on the species being considered

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Letter 1265

We would encourage priority consideration to identification of those isolated tracts that have small game mgt potential It is also our desire that no alternative would be chosen to preclude manipulation of the habitat to maintain early successional stages beneficial to small game We would also recommend an alt that would provide adequate interspersion of habitat types adjacent or near the identified small game habitats In the Foothills and Mountains, native quail respond favorably to clearcuts For these small game considerations, we recommend either the modification of the recommended Alt 8 or the adoption of another alt such as Alt 12, which would allow a higher percentage of timber harvest under the clearcut system

Response

Management Area 22 was created for the Revised Plan This management area stresses small game and "watchable" wildlife management

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Letter 3643

The dispersal of clearcuts over the suitable timber land would provide a habitat management program for *white-tailed deer and ruffed grouse. To optimize the habitat for ruffed grouse, the timber land base should be* divided into forest management blocks of 80 to 120 acres Each block would be subdivided into four harvest units One harvest unit should be clearcut every 25 years Once the four timber stands have been logged, the rotation would begin again with harvest unit number one This management strategy would provide a continuous rotation of early- and mid-successional forest habitats, while supplying a continuous supply of wood products Further, it would also benefit white-tailed deer populations

Response

This is an idealized scenario that may be desirable, but not necessarily achievable Given the terrain, suitability, and other factors, significant modifications to your suggestion might have to be made Standards and guides for Management Area 16 were developed in conjunction with State Wildlife Agencies, and provide for good grouse management

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Letter 3643

To effectively manage for turkey populations, the Forest Service could maximize the dispersal of their clearcutting operations over the total 120,308 acres of suitable timber lands Dispersal of clearcuts, in combination with logging operations on adjacent private and state fish and wildlife lands, would provide numerous openings for turkey poults.

Response

Standards in the Revised Plan provide for dispersion of regeneration harvest units

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Letter 3643

We also recommend the elimination of plans to create small openings for wild turkey, grey squirrel (Sciurus carolinensis), and the pileated woodpecker (Dryocopus pileatus). We agree that small openings are beneficial *to turkey poults, but we are not aware of references in the scientific literature that document the benefits of small* openings to grey squirrel and pileated woodpecker populations.

Response

The Revised Plan does not identify small openings as being necessary for the gray squirrel or the pileated woodpecker.

Letter 3643 — The carrying capacities of the forest habitats for black bear (Ursus sp), white-tailed deer (Odocoileus virginianus), and wild turkey (Meleagris gallopavo) under Alternative 10 are comparable to Alternative 8 (Forest Service preferred alternative)

Response — Several alternatives provide for similar carrying capacities for deer, bear, and turkeys

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Response — Alternative 3 contains no habitat manipulation for game species Any such manipulation is limited to that needed to retain threatened, endangered or sensitive species Alternative 3 is considered in detail in the FEIS and will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

Letter 2628 — The deer population on the George Washington National Forest should decrease over current populations The populations of turkey should increase over the current populations on the G W N F. The bear populations should increase over current populations on the G W N F The populations of neotropical warblers requiring closed canopy habitat should increase over current populations on the G W N F

Response — As displayed in Chapter 3 in the FEIS, Alternatives 6, 8A, 9, 10, 11 and 13 provide higher carrying capacities for black bear and wild turkey and lower carrying capacities for white-tailed deer than Alternative 2 Alternatives 6, 8A, 9, 10, 11 and 13 are considered in detail in the FEIS One of these alternatives will be selected as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 2273 — I would suggest that existing wildlife areas be aggressively maintained, and additional areas be developed as funds permit The necessary inclusion of these areas into large management areas that may preclude their existence can be remedied by allowing (encouraging) diversity within all areas Wildlife clearings can be designed so as not to interfere with migration corridors (ridgetops and riparian areas)

Response — The Revised Plan provides for the maintenance of existing openings and development of new openings

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Letter 2273 — An example of lost opportunities would be the old homestead site on the east slope below the Great North Mountain electronic site Under Alternative 8 this land is classified as Area 15, which is managed to "maintain or enhance habitat for wildlife favoring a more mature forest environment" Although Area 15 allows small grassy areas, I am not convinced that the maintenance of this area will continue in the same manner under this classification An even worse example is the large wildlife clearing at Slate Lick Run near the Shoemaker River This area will fall under Area 1, "managed at a minimal level" Would this area ever be bushhogged or burnt again? There are perhaps hundreds of similar areas throughout the Forest that may fall under favorable classifications

Response — The Revised Plan allows for maintenance of old homesteads Slate Lick is new in Management Area 22 See Chapter 3 of the Revised Plan

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Letter 3545 — Management for deer habitat should reflect a recognition of the intermingling of Forest lands with private lands where an over-abundance of edge effect and deer already exist

Response — This can occur during the plan implementation phase through an Environmental Assessment

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Letter 3884 — Plan needs to justify its "bear non-management" with a credible study (including census) If no study is referenced, an area (Elliott Knob/Crawford Mt) favored by bear should be protected Let FS meet its statutory (MUSY Act, 1960) responsibility for "Wildlife" as an EQUAL multiple use

Response — The Revised Plan provides for vast acreages of quality bear habitat Creating bear "sanctuaries" where they cannot be hunted is a function of state wildlife agencies

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Letter 3884 — Plan must specify how the Forest intends to establish reliable population/location estimates for bear, at least twice during the ten years of this Plan

Response	Please refer to the monitoring schedule in Chapter 5 of the Revised Plan
Letter 3840	"Bear" habitat calls for permanent openings that remain at the same location where as "Turkey" habitat gives latitude for continually developing new openings - why this difference?
Response	The Revised Plan allows for maintenance of existing openings and creation of new ones in both management areas.
Letter 3840	Question biological justification for 306,752 acres in "Turkey" habitat
Response	Management area 15 is not just "turkey" habitat It provides for management of other game and non-game species, motorized and non-motorized recreation, timber products and firewood.
Letter 3940	Plan. Page 2-2, Paragraph 2· Only about 25% of the forest is considered suitable for timber management. Because traditional wildlife habitat manipulation commonly occurs via timber management on suitable lands, the wildlife budget should be increased to accomplish wildlife habitat objectives on land unsuitable for timber production.
Response	The proposed wildlife budget to implement the Revised Plan is substantially larger than the current wildlife budget.
Letter 2738	The priorities should be maximum protection for wildlife and habitat, for riparian areas and a ban on ATVs on the trails. When timber cutting will be destructive to any of these priorities, it should be curtailed
Response	The Revised Plan provides well for wildlife habitats, and for riparian areas. ATVs are allowed only on designated trails Timber management is integrated into multiple use management so that it is compatible or complementary to other goals
Letter 2628	Private lands should be used to calculate habitat needed for bear, turkey, deer, and closed canopy neotropical warblers.
Response	This can occur during the plan implementation phase through an environmental assessment.
Letter 2664	A major consideration in determining the appropriate timber harvesting method for optimum wildlife benefit should be the capability of the harvest technique to regenerate the oak/hickory forest type presently found on the Forest
Response	Maintaining oak and hickory in regeneration areas is a goal of the Revised Plan.
Letter 3929	The fact that a stand of white oak will die due to heavy gypmo damage does not necessarily justify its harvest--especially thru clearcutting Dead trees, regardless of the cause of death, are part of the wildlife habitat that we now need to protect rather than to merely exploit for consumption and private profit
Response	Salvage is a small part of the timber program. In light of the vast acreages of forested areas impacted by the gypsy moth, the Revised Plan deems it reasonable to invest some of the more accessible and valuable dead and dying trees
Letter 2664	If no inventory exists, the GWNF should catalogue all existing wildlife openings and those that require periodic maintenance, inventory existing water sources that provide a water source 365 days a year, and also inventory grape arbors for future management opportunities

Response	This is a desirable goal (inventory) that is underway
Letter 2822	The NFMA requires that wildlife resources and wildlife-associated recreation be considered a major component of the NF mission and planning process Despite this, wildlife was not considered one of the major issues guiding the development of this Plan. Wildlife mgt will be emphasized on only 415,241 ac (39%) of the Forest. This represents a 37% decline The Plan requires that an excessive amount of the Forest be managed as unfragmented habitat. Very little wildlife mgt. will be permitted on these areas. As a result, the development of beneficial wildlife enhancement projects will be severely restricted over much of the Forest's land base
Response	There were several different wildlife related issues and the public (as with many issues) had a wide range of opinions for "wildlife management" Therefore, wildlife and associated issues were addressed by both the Biodiversity Issue and Vegetation Management Issue
Letter 4012	PATC opposes any cutting that obliterates trails used by the hiking public Our concern is that, by authorizing the clearing of areas of from one to 25 acres, this clearing amounts to clearcutting areas to provide browse that favors these species over others
Response	Cutting will not take place immediately next to hiking trails
Letter 3981	EIS 3-134, paragraph 3 - Stated that "There is no overall shortage of cavity nest sites for wildlife " Documentation please. In a forest with so many stands of young small trees this conclusion is hard to believe
Response	Approximately 80% of the Forest is 70 years old or older On the Forest, this is sufficient age to develop snags Over a quarter of the forest is a century or older Wide spread tree mortality due to the gypsy moth has greatly accelerated snag development on this Forest.
Letter 3981	EIS· 3-132, paragraph 6 - This sentence needs clarification - "popular" for what, to whom - to those who like to kill them? Paragraph 3 - Add "The GW also serves as a refuge for the timber rattler, an important predator currently under consideration for ESA listing "
Response	The bear and deer are "popular" in that they are large mammals in which the public has much interest in. They are both popular "game" and "non-game" species. The timber rattlesnake inhabiting the GW is not under consideration for ESA listing
Letter 1686	Alt. 8 is acceptable only if expanded to place more emphasis on sound, proven wildlife mgt. practices.
Letter 3934	Strengthen Management Area objectives and desired future conditions that emphasize scientific wildlife management practices. Consideration should be given to all silvicultural systems and methods of cutting, but we wish to emphasize the values associated with properly designed even-aged timber management. Silvicultural systems should be selected that maximize the regeneration of intolerant hardwood mast species, especially oaks The WVCTWS advocates minimal new road construction, thereby reducing disturbance to wildlife and stream sedimentation.
Letter 3981	EIS 3-133, paragraph 2 - To first sentence add ", or to maintain their present unnatural (e g former farmland) state " This is the case and a public document should disclose all the facts (such as Paddy Knob) Paragraph 4 - Strike "improvements" and insert "alterations and suppression" What biological criteria are used to justify maintaining unnatural habitat patches on the Forest (e g Hidden Valley and Shenandoah River), especially habitat types (farmland, edges, early succession) that are in great abundance elsewhere off the GW? The economic benefits of allowing these to progress to forest (while used as research areas) as proposed under Alternative 3?
Response	These letters contained numerous specific comments relating to suggested wording changes, deletions, additions, corrections, and clarifications in relation to wildlife Most comments were directed towards Management Areas 4, 9, 14, 15, and 16, and to Common Standards

These comments were carefully analyzed, and revisions have been made. Management Area 4 now contains 38 biological areas, the home range for the Cow Knob Salamander, the Little Laurel Run RNA, two geologic areas and ten historic sites Management Areas 4, 9, 14, 15, and 16 have been edited and reflect the input of the public comments In many cases there were conflicting recommendations For example, a variety of different opening size limits were recommended for Management Area 16 In Management Area 9, some publics wanted more management restrictions, some wanted less It is not possible to accommodate all recommendations. Therefore, revisions were based on the Revised Plan theme, management area emphasis, biological needs and compatibility, and implementability

To better accommodate the wishes of the public, a new management area was created. Management Area 22 contains small portions of the Forest that are to be managed very intensively for wildlife Chapter 3 of the Revised Plan presents the new descriptions for these management areas Common Standards as well as Management Area standards have been revised

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Letter 2665 — Note the decreasing demand (EIS, 3-88) for wildlife as defined by the decrease in hunting licenses issued in VA for successive years 1990-91 The huge increase in wildlife management is unjustified Natural occurrences provide sufficient populations of "game" wildlife, biological parameters are not used in wildlife population analysis (EIS, 3-89), none of these species qualify for protection under Endangered Species Act. It is inappropriate to assert "wildlife benefits" from the timber program (EIS, 2-35) The entire program should be eliminated

Response — The requested change was explained in at least one alternative. Due to the continued demand for wildlife habitat management (both game and non game) the plan provides for both wildlife management along with large area of "unmanaged" lands

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Letter 136 — In order to maintain a viable wildlife population, a diverse habitat needs to be encouraged and timber harvest is the best way to manipulate habitat A climax forest is a virtual biological desert

Letter 187 — The decision limits to 2 percent the forest area to be managed as early successional habitat This is the type of habitat preferred by ruffed grouse and dozens of other forest wildlife species

Letter 290 — I strongly support the efforts of the true conservationists who promote forest management for a variety of wildlife as well as recreation

Letter 381 — Clearcut areas are the single most effective way in giving Ruffed Grouse a better food supply and good cover.

Letter 486 — I am very concerned that we are making a major mistake in reducing clearcutting and timbering from roughly 65% of the forest to a basic suitable land base of only 24% To effectively manage for wildlife more acreage needs to be added to the suitable land base for all types of timbering

Letter 709 — The new plan demotes wildlife mgt of habitat to a bare minimum The old plan called for 62% of the forest to be managed for some kind of wildlife Under the proposed plan this will be reduced to 35%. Get back to the business of clearcutting and other timbering that benefits wildlife on a larger share of the GW Forest.

Letter 730 — The only cost-effective strategy to promote the continued availability of early-successional habitats is to combine a wildlife habitat objective with a timber harvest operation Unfortunately, if 76% of the Forest is identified as unsuitable for timber management initiatives, this common-sense approach to resource mgt on the GW will be replaced by a system that myopically identifies only single-use objectives, rather than multiple-use mgt. fostered by a land ethic vision

Letter 854 — Our forests MUST be managed to provide a diversity of habitat for all woodland wildlife and multiple use

Letter 945 — Upon looking over the various plans that have been proposed it seems to me the one selected offers very few benefits to the largest user group of the forest, namely hunters and wildlife lovers By deemphasizing clearcutting and other timbering the quality of our wildlife habitat will certainly diminish

Letter 945 — I would like to suggest that either one of the other alternatives be selected that is more wildlife habitat oriented or this one be revised to allow for fewer acres devoted to remote areas and more acreage be used for wildlife management for game animals thru more clearcutting and timbering

Letter 1069	Please expand the wildlife management plan to include non-game animals
Letter 1074	Wildlife should be a top priority
Letter 1081	Management efforts should be directed at nongame instead of game, except for bear, there is little question that game populations are abundant, even too abundant, but neotropical migrant populations, for example, are dropping throughout the east
Letter 1082	I don't understand why cutting is done to "improve" wildlife habitat. Not all wildlife are game animals Many animals make their homes and get their food from dead and down trees There are lots of open spaces already created by timber cutting - why create more?
Letter 1086	Habitat should be preserved for non-game wildlife as well as endangered PLANTS.
Letter 1153	All vegetative manipulation, commonly justified by Forest Service biologists as "wildlife enhancement" should be eliminated "Wildlife" as defined by the forest service virtually always refers to a featured few "game" species such as deer, bear, turkey & grouse The broader & true definition of the term should be adopted to include ALL non-domesticated species
Letter 1163	Timber production under the "new" plan appears to be reduced to about one-fourth of the forest, which is not near enough for providing adequate wildlife habitat
Letter 1258	[Emphasize protection of] animals and birds
Letter 1292	The true definition of the term "wildlife" should be interpreted to include all wild species of flora and fauna
Letter 1297	Maximize protection of birds and wildlife and their habitats
Letter 1313	Your plan does not go far enough in protecting wildlife
Letter 1317	Throughout the forest, the wildlife mgt plan should provide sufficient habitat for all wildlife, not just the game species.
Letter 1364	Lets find a way to promote all types of habitat, for all kinds of wildlife for all people to enjoy.
Letter 1429	The argument that cutting and harvesting timber improves wildlife is NOT TRUE It it were, why was there more wildlife in the forest before ANY timber was harvested?
Letter 1445	Eliminate cutting in the name of wildlife mgt Emphasize nongame species!
Letter 1610	I am writing you to urge that you adopt a multiple use plan that will allow reasonable timber harvesting Grouse, deer, turkey, many songbirds, and other animals require early successional habitat
Letter 1661	I would like to see more emphasis put in protecting our wildlife.
Letter 1835	We do not need MORE deer - as might happen if there's more cutting
Letter 1861	The plan should reflect balanced ecology and diverse wildlife and support WILDLIFE mgt , not GAME mgt
Letter 1864	Protect wildlife.
Letter 1981	Habitat for non-game species should be protected
Letter 2026	Consider all wildlife, not primarily game wildlife
Letter 2273	A review of Alternative 8 has left me with the impression that it strongly favors old growth Management Area 16 [is] early successional growth Alternative 8 has the lowest acreage of any alternative which included any Area 16 acreage
Letter 2273	I believe that a monoculture of old growth can be as detrimental as to the overall ecology as any other imbalance Besides deer, grouse and turkey, many non-game species may benefit from early successional

habitat. These include the Loggerhead Shrike, the brown headed cowbird, and the common flicker. I don't think it is prudent to base a management plan on the basis of a few minor species at the exclusion of a larger variety I believe it is necessary to maintain a diversity of habitat and species for continued ecological well-being.

Letter 2273 Has the pendulum swung too far? Edge habitat was once deemed desirable. Now Edge has become the evil "fragmentation"

Letter 2273 Alternatively, additional lands otherwise classified could be reclassified as Area 16 or for timber cutting to obtain the desirable habitat

Letter 2273 A review of Alternative 8 has left me with the impression that it strongly favors old growth Management Area 16 [is] early successional growth Alternative 8 has the lowest acreage of any alternative which included any Area 16 acreage

Letter 2273 I believe that a monoculture of old growth can be as detrimental as to the overall ecology as any other imbalance Besides deer, grouse and turkey, many non-game species may benefit from early successional habitat These include the Loggerhead Shrike, the brown headed cowbird, and the common flicker I don't think it is prudent to base a management plan on the basis of a few minor species at the exclusion of a larger variety. I believe it is necessary to maintain a diversity of habitat and species for continued ecological well-being.

Letter 2285 Protect the hardwoods and manage the forests for all wildlife and plant life.

Letter 2464 I [am] apposed to scaling back timbering If anything, timbering should be increased The resultant regrowth would be a mecca for small game and many other types of wildlife currently becoming more and more scarce

Letter 2512 The plan must put more emphasis on providing habitats for non-game wildlife. Diversity of habitat is equally important as protection for threatened and endangered species Both deserve full protection

Letter 2524 Alternative 8 does not place enough emphasis on wildlife management

Letter 2529 Place greater emphasis on habitat preservation for non-game species and bio-diversity

Letter 2530 My concerns have to do with a number of disturbing trends. One is to allow more tree cutting for lumber than is consistent with the needs of wildlife for suitable habitat Once all or most of the trees are cut, what is left?

Letter 2732 Wildlife should be managed to maintain populations under natural conditions The number and size of wildlife clearings should mimic their natural occurrence as a result of lightning strikes and other natural events If anything you should be trying to decrease the deer population Deer are so plentiful they pose a serious traffic hazard and cause substantial damage to agriculture

Letter 2755 Do not plan a horse camp at Camp Todd This area is located in the flood plain of the North River between two roadless areas, Ramseys Draft Addition and Little River All the trails nearby are too steep for use by horses.

Letters 2758, 2759
Alternative 12 looks more productive for we wildlife lovers.

Letter 2809 Forget this "featured species" business and let nature be. She'll work out homes in the GWNF for everyone - not just the deer and turkey and grouse

Letter 2822 Timber mgt will be concentrated on the highest quality sites which support the best quality of wildlife habitat Concentrating timber mgt on these better sites will adversely affect many wildlife populations and reduce habitat diversity throughout the Forest The FS should consider all silvicultural techniques designed to accomplish timber and wildlife mgt objectives

Letter 2822 Uneven-aged timber mgt favors shade-tolerant vegetation over oaks and other mast-producing timber species. Wildlife species associated with the oak-hickory timber type (e g , turkey, pileated woodpecker, southern flying squirrel, deer, bear, and gray squirrel) may be adversely affected. The development of 20 miles of new roads each year could negatively impact bear and turkey populations on the Forest, and result in increased soil disturbance and stream sedimentation The Plan applies restrictive VQOs and ROS classifications to areas of the forest emphasizing wildlife mgt. This action will severely limit the type and amount of habitat enhancement projects that can be implemented in these areas

Letter 2887	By de-emphasizing clearcutting and other timbering, the quality of our wildlife habitat will certainly diminish. The dramatic increase in the amount of "remote" areas doesn't make any sense either. Allow for fewer acres devoted to remote areas and more acreage be used for wildlife mgmt. for game animals through more clearcutting and timbering
Letter 2889	The old plan called for 62% of the forest to be managed in one form or another for some kind of wildlife. Under the proposed plan, this will be reduced to 35% This is too big a reduction Let's get back to the business of clearcutting and the timbering that benefits wildlife on a larger share of the GW Forest. The Forest Service has done a wonderful job in the past of creating wildlife habitat. Let's not let years of hard work go back to seed.
Letter 2890	I vehemently disagree with the cut back in timbering and ask that you revise the new plan prior to its implementation to include more cutting in order to continue to enhance wildlife habitat in the George Washington National Forest.
Letter 2902	Eliminate wildlife mgt. for all featured species with the exception of naturally occurring disturbances.
Letter 3545	Management for biological diversity should reflect a concern for all wildlife, with an emphasis on preserving habitat for species with declining or threatened populations The GW definition for wildlife seems to be "huntable animals", with little recognition of species which are threatened by fragmentation of the Forest
Letter 3558	Timber cutting for wildlife management should be specifically limited
Letter 3598	I disagree with the choice of Alternative 8 As an avid hunter and fisherman it angers me to see that Alternative 8 will remove an additional 250,000 acres to the use of sporting men and women We through taxes and our sporting licenses pay to further game biology research and fish hatchery rearing and stocking programs which I feel will be hurt by this proposal
Letter 3633	Proceed with game habitat development
Letter 3635	Habitats for both game and non-game wildlife should be protected and preserved
Letter 3637	We favor an alternative that maximizes wildlife benefits to the sportsmen for the three big game species. By far the most hours of use of national forest lands on the George Washington National Forest is put in by hunters. According to the records kept by the VA Department of Game and Inland Fisheries big game populations are on the rise We want to continue this trend through cooperative management with the state game agencies and continued timbering practices that benefit wildlife
Letter 3660	The vast majority of the Forest should be managed for wildlife
Letter 3660	You must stress more acres for grouse and woodcock needs
Letter 3660	Forest should strive to maximize turkey populations
Letter 3699	Inadequate recommendations on wildlife
Letter 3676	We do not need additional turkey habitat as we have turkeys without it
Letter 3701	Protect non-game wildlife
Letter 3728	The emphasis on wildlife currently takes place on 63% (663,940 ac) of the Forest Under the draft Plan this will be reduced to 39% of the total Forest Area, or on only 415,241 ac We oppose such a drastic reduction in wildlife mgt. emphasis on the Forest
Letter 3796, 3797	More emphasis should be placed on preserving unfragmented habitat for non-game wildlife
Letter 3822	Alternative 12 provides for more acres dedicated to active wildlife management

Letter 3827 More mgt emphasis on nongame species

Letters 1557,3863

More habitat should be encouraged for non-game wildlife

Letter 3870 *I do not agree with the draft plan's emphasis on game management to the exclusion of non-game wildlife.* Acreage must be provided to protect wildlife migration corridors.

Letters 3873, 3874

Upon looking over the various plans that have been proposed, it seems to me the one selected offers very few benefits to the largest user group of the forest, namely hunters and wildlife lovers. By de-emphasizing clearcutting and other timbering, the quality of our wildlife habitat will certainly diminish The dramatic increase in the amount of "remote" areas doesn't make any sense either. Is not one-third of the forest now devoted to "remote" areas?

Letters 3873, 3874

I suggest that either one of the other alternatives be selected that is more wildlife habitat oriented or this one be revised to allow for fewer acres devoted to remote areas and more acreage be used for wildlife management for game animals through more clearcutting and timbering

Letter 3880 I am deeply concerned about the impact on wildlife if harvesting is cut to bare minimum I urge you to promote and establish a balanced timber harvesting program for the well-being of all wildlife in the G.W. National Forest. The proposed plan takes away both wildlife and potential revenues from the sale of timber.

Letter 3892 The plan must emphasize providing unfragmented habitat for non-game wildlife. The plan should provide a suitable percentage of acreage to protect migration corridors and allow non-game wildlife to continue to move about unmolested within the borders of the park

Letter 3899 Wildlife management should concern itself not only with game animals, but ALL wildlife

Letter 3934 The draft revision inadequately addresses wildlife issues The plan does not adequately address hunting and fishing Existing traditional and time-proven wildlife management programs have been de-emphasized in favor of newer, overused, and grossly misunderstood concepts of "unfragmented habitat" and "biodiversity "

Letter 3940 Plan Page 2-2, Paragraph 6 We'd like to emphasize that the Forest has the opportunity to provide large blocks of continuous habitat for non-game and area-sensitive species It is the largest single public landowner in Virginia

Letter 3942 Alternative 8 is very generous in the amount of acreage allotted for wildlife management. In my opinion, in these areas the real motivation for cutting is for the timber, and wildlife habitat improvement is used as a justification *The focus on habitat work has definitely been on game animals. I encourage the Forest Service to place more* emphasis on non-game wildlife Although many people enjoy hunting, it is very important to preserve biodiversity and to manage for a wide variety of species In most cases, the best form of management is to simply leave large tracts of forest undisturbed

Letter 3951 Wildlife and Fishery Management - Keep as in Alternative 12 An active timber management program will take care of most of the needs and is the most economical method to use in the management of these resources

Letter 3981 Eliminate wildlife management (unless for PETS) and allow all present artificially maintained openings to proceed with natural forest successional processes.

Letter 3984 *There is plenty of open habitat available for deer, turkey, and other game species. Eliminate the use of timber* sales for wildlife habitat improvement

Letter 3984 The Draft EIS seems to contain within it a distorted definition of the term "wildlife" If you can't get a license to shoot at it, your management team doesn't seem to regard it as wildlife deserving protection.

Letter 4268 Plan - Many of the activities already occurring on the Forest can, by default, provide such habitat

Response A major concern, as determined by the quantity of comments, centered around the level of habitat management (in the form of direct wildlife habitat improvements and timber sales). Many commenters expressed a desire to

Increase these forms of active habitat management. Other commenters expressed a desire to reduce the levels of habitat management, preferring more emphasis to be placed on providing unfragmented habitats

The preferred alternative does not maximize the potential value for either early successional or late successional unfragmented habitats It recognizes the value of both somewhat conflicting needs within a large forested area and provides for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient

Unfragmented habitats, such as provided for in management areas 4, 6, 8, 9, 13, 22, and portions of several other management areas, are described in Chapters 2 and 3 of the Revised Plan.

The Revised Plan recognizes the values of forest management and vegetation manipulation within the context of multiple use management Much of the timber harvesting will be conducted specifically to regenerate portions of an aging forest to provide early successional habitats The amount of regeneration provided varies among the twelve alternatives considered in detail in the FEIS. Several factors come into play including the values that unfragmented habitats and roadless areas provide, value of and need for forest products that can be provided, and the costs versus benefits derived from this action

Estimated white-tailed deer carrying capacity is maintained at present levels. Currently, in some areas of the forest, deer are inhibiting regeneration of preferred timber species Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some rare plant species are preferred as deer foods. Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters. Based on past sales declines, a slight annual decline is predicted throughout the next decade. Increasing the deer herd, therefore, is not a long term goal of the Revised Plan

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas However, there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate. Grouse hunting accounts for approximately five percent of the hunting days afield on this Forest. In light of a below cost timber program, it is economically difficult to justify an increased timber program to increase ruffed grouse hunting success rates

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest.

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2 under "ISSUE 1 – BIODIVERSITY" and in "ISSUE 8 – VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the forest as they pertain to wildlife

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Letter 1809 — We really need uninterrupted buffer zones of at least 150 feet without timbering or motorized trails as a barrier for wildlife

Response — In many cases, buffers are afforded to wildlife From a planning standpoint, their appropriateness and width is determined on a project level basis

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Letter 3981 — EIS. 3-132, Paragraph 7 - Add "Though statistics disclose that only 10% of Virginia's hunters use these lands " (1/2 of 20%)

Response — Paragraph 7 has been rewritten based on information provided by the Virginia Department of Game and Inland Fisheries to read as follows. "Approximately 80,000 hunters hunt on the Forest annually " Twenty percent of Virginia hunters hunted on the Forest in 1991

Letter 3981 — Plan 2-2, paragraph 5 - Over 95% of the GW's lands are open to so called "wildlife management". "Enhancing" habitat for some creatures degrades it for others Change this sentence to "Approximately 96% of the forest is open to management alterations of wildlife habitats "

Response — Page 2-2 of the Draft Revised Plan does not contain this statement It is true that habitat manipulation which is beneficial for some species may be detrimental to others. Habitat for all plant and animal species inhabiting the forest can not be provided for on every acre of the Forest. Wildlife habitat management is allowed throughout a majority of the Forest, but the actual portion of the forest that will annually be treated is a small fraction of one percent. This includes habitat management for sensitive, threatened and endangered species, and non-game management, as well as game management

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THE MIX OF GOODS AND SERVICES: Dispersed Recreation Use

Letter 88 — By the Forest Service's own Visitor Use figures on Appendix C-6, there has not been any increase in Visitor Days reported since 1975 For this reason alone there is no justification for setting aside 800,000 acres for dispersed use

Response — The 711,000 acres of the Forest that are unsuitable for timber production were not "set aside" for dispersed recreation. Most of the land unsuitable for timber production is located in lands where biological values (including habitat for game animals) are emphasized. Only unsuitable lands within Management Areas 6, 10, 11, and 13 are in areas of the Forest where dispersed recreation is emphasized.

Letter 2029 — Concentrated recreation activities are perhaps necessary However, the standards of MA 13 almost suggest the kinds of facilities one would anticipate in a "Yogi Bear" campground Such facilities are already available outside the Forest I would urge MA 13s to more strongly reflect the "outdoors" and the treasures harbored by the Forest. I question statements along the longs of -- additional wildlife habitat improvements so long as they achieve overall wildlife objectives Again, I wonder if that means manipulation for enhancing populations of only a select few species.

Response — Management Area 13 contains lands that vary in size and recreation use intensity. They generally provide for species preferring remote habitats

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Letter 2665 — No primitive recreational opportunities are provided in the Plan (EIS, 1-4).

Response — The ID Team is uncertain of the reason for this remark There is no such disclosure on page I-4 of the DEIS.

Letter 64 — It was recently mentioned at our club that Hang Gliding has been dropped from the proposed Land Use Plan. I am aggrieved to hear this, and I hope it will be reconsidered, as we are a responsible group

Letter 130 — I am deeply concerned that pending re-definition of LRMP and EIS will effectively make it impossible to fly my Hang Glider in the George Washington National Forest, apply for consideration or approval to develop new launch sites, or even keep open, use, or maintain the existing site at Woodstock

Letter 130 — I am writing this letter in the hope that you might consider adding wording to allow establishment of tiny special recreation site(s) in these areas for the purpose of hang glider launch.

Letter 130 — Please don't close the park for our sport (hang gliding) Please work with our clubs, CHGA and CVHGA to allow us the privilege and freedom of flying in this beautiful area to continue.

Letter 133 — We wish to express our support for the forthcoming proposal to amend your Land and Resource Management Plan which is being submitted to you by the Central Virginia Hang Gliding Association (CVHGA).

Letter 133 — Our sport has low-impact and its beauty can be appreciated by observer and participant alike. Launch sites are accessible to anyone and make good scenic vistas

Letter 170 — I do not object to particular mountains being accessible only by foot trails, but to designate all mountain tops in the George Washington National Forest as restricted management areas would prevent hang gliding from well suited areas

Letter 176	I have been informed that HANG GLIDING activities have not been specifically included in the new plan This is of great concern to me and my fellow HANG GLIDER pilots, as there are an alarming lack of launch sites available to us outside the National Forest. Our gliders are powered by purely natural means. We launch our HANG GLIDERS into the air by leg-power and the wind currents do the rest. HANG GLIDING is a quiet, beautiful, and non-intrusive way for us to enjoy our natural treasures.
Letter 287	As a member of the hang gliding community, I was distressed to learn that the proposed management plan for the George Washington National Forest does not adequately represent our sport We would simply like to continue to fly and enjoy the sites as we have throughout the past And we would like to be equally represented in the new plan
Letter 365	I would like to request that the new Management Plan recognize the sport of hang gliding as a legitimate use of these public lands and that it provide for continued access to suitable mountain top launch sites for the purpose of hang gliding.
Letter 368	The purpose of this letter is to express support for the Central Virginia Hang Gliding Assn proposal for changes in the Plan. All we want is access and sufficient room to launch our gliders safely. Our use of the Forest does not infringe upon other users The George Washington National Forest offers more badly needed opportunities for recreational flying than can be found elsewhere on the East Coast
Letter 385	I request hang gliding to be resubmitted on the Forest Mgmt Plan We take care of the forests and promote environmental safety and welfare Some of WV sites are used by bird watching groups who keep statistics on bird wildlife.
Letter 853	The Capitol Hang Gliding Assn of which I am President supports the proposal prepared by the Central VA Hang Gliding Assn regarding hang gliding as not adequately being represented in the draft
Letter 855	I am writing to express my concern over the alleged deletion of Hang Gliding as an activity covered by the Land Use Plan Several of our very best and safest sites are located on National Forest, and loss of these sites would be a near-crippling blow to the sport in this region Our environmental impact is minimal
Letter 1145	Under new Land and Resource Management Plan, the sport of Hang Gliding has not been adequately considered and may even have been unfairly discriminated against.
Letter 1145	There are a very limited number of flying sites outside of National Forests, to lose even one would be a tragedy, I would like to see an increase in the availability of land for more launch sites, not fewer
Letter 1267	I'm writing this letter to support the Central Virginia Hang Gliding Association and its proposal to open access to potential mountain locations for Hang Gliding site development and to keep open the sites we now have Hang Gliding pilots would like to continue using our National Forests.
Letter 1837	I urge you to support the Central Virginia Hang Gliding Associations's proposal Hang Gliding has a very low environmental impact, does not interfere with other activities, and does not require exclusive access I believe Hang Gliding in the GWNF is entirely compatible with virtually all other users. To discriminate against Hang Gliding would be unfair and inconsistent with State and Federal natural resources management policy
Letter 1837	Foot launched Hang Gliding requires mountainous terrain for launching and soaring Options outside of public areas such as the national forests are extremely limited
Letter 2017	The sport of hang gliding has been excluded from the proposed plan I think (this) is a mistake. The sport of hang gliding has a very low environmental impact We do not interfere with others who are also enjoying the wilderness areas Please include the sport of hang gliding in your Plan
Letter 2267	The Land and Resource Management Plan has excluded Hang Gliding and I object to this exclusion Hang Gliding is one of the most incredible ways of enjoying our wilderness without having negative environmental impact on our forests Our sport does not intrude on other forest users We depend on the National Forests to allow us access to areas to be able to fly We need more public access to our forests and park lands for hang gliding
Letter 2632	Blanket language stating that hang gliding is permitted in all management areas 1, 4, 6, 7, 8, 9, 11, 12, 14, current language regulating management area not withstanding Specifies small clearings less than 2 acres

Letter 2632	Management Area 6 (pg 2-38). Under recreation add after element 88· Hang gliding, as a primitive non-motorized recreation, will be accommodated because of the lack of suitable sites within less restrictive management areas Very limited vegetation manipulation of up to two acres may be necessary.
Letter 2632	Management Area 7 (pg 2-42)· Under recreation add after element 118 Hang gliding will be accommodated Vegetation manipulation of up to two acres that will also accommodate scenic views and some road construction in concert with scenic road objectives will be permitted.
Letter 2632	Management Area 9 (pg 2-63) Under recreation add after element 274. Hang gliding, being low impact, will be accommodated because of the lack of suitable sites within less restrictive management areas. Very limited vegetation manipulation of up to two acres and some limited road reconstruction to minimum OHV standards may be necessary
Letter 2632	Management Area 12 (pg 2-91)· Under recreation add after element 444. Hang gliding will be accommodated where possible Minimally developed recreation areas will be established with roads to minimum OHV standards and vegetation manipulation of up to ten acres for launching and landing hang gliders
Letter 2632	Page 2-1, fourth paragraph, second sentence Amend to include hang gliding
Letter 2632	Page 2-11, last paragraph, first sentence Change from, "Additional facilities might be provided--" to, "Additional facilities will be allowed for--"
Letter 2632	Management Area 14 (pg 2-106) Under recreation add after element 530 Hang gliding will be accommodated where possible Minimally developed recreation areas may be established with roads to minimum OHV standards and vegetation manipulation of up to five acres for launching and landing hang gliders, and consistent with wildlife clearings
Letter 2632	Management Area 11 (pg. 2-77) Under recreation add after element 377 Hang gliding will be accommodated Vegetation manipulation of up to ten acres suitable for launching and landing hang gliders, and road construction to minimum OHV standards will be permitted.
Letter 2632	Management Area 8 (pg 2-56) Add element after element 226 Hang gliding, being low impact, will be accommodated because of the lack of suitable sites within less restrictive management areas. Very limited vegetation manipulation may be necessary
Letter 2632	Management Area 1 (pg 2-24)· Under recreation add after element 8 Hang gliding will be accommodated because of the lack of suitable sites within less restrictive management areas Very limited vegetation manipulation of up to two acres and some limited road reconstruction to minimum OHV standards may be necessary
Letter 2632	Management Area 4 (pg 2-29)· Under recreation add after element 25· Hang gliding, being low impact, will be accommodated because of the lack of suitable sites within less restrictive management areas. Very limited vegetation manipulation of up to two acres and some limited road reconstruction to minimum OHV standards may be necessary.
Letter 3468	I request that the new Land Resource Management Plan be amended to include hang gliding as a recreational activity I understand that this plan is based on a new Environmental Impact Statement which did not cover hang gliding
Letter 3731	It is my hope that existing hang gliding launch areas be preserved and that future launch site development options remain open
Letter 3784	Include hang gliding within The George Washington National Forest Usage Plan as an activity that can be permitted
Letter 3844	I would like to express my concern of a proposed change in the revised forest plan for the GWNF. In the existing plan, hang gliding is an activity that is specifically addressed as an appropriate use for the GWNF. The new plan does mention of this activity I hope hang gliding will be considered an appropriate recreational use for the GWNF
Letter 4010	The Hang Gliding community does not feel the public lands of the George Washington Forest (GWNF) are adequately accessible to meet our needs The management of terrain required for Hang Gliding as proposed

by the Draft Revised Land and Resource Management Plan (DLRMP) is restrictive to the degree that it could amount to exclusion of Hang Gliding from public lands This is unacceptable and unfair for an activity that is legally sanctioned, is minimally intrusive on the environment, and does not require exclusionary use of forest resources. We request modification to the DLRMP and the Draft Environmental Impact Statement (DEIS) such that Hang Gliding has a fair opportunity for access to public lands

Letter 4010 — Hang Gliding seems to have been excluded from representation in the drafting process of the current plan. Only 13 "major" interests were represented and Hang Gliding was not allowed direct representation. Hang Gliding was required to "piggyback" onto one of the 13 groups provided with direct representation. Under this arrangement, Hang Gliding interests were ignored during the formulation and discussions of the 13 primary interests

Letter 4010 — We request Blanket language stating that Hang Gliding be permitted in Management Areas 1, 4, 7,9, 11, 12, 14, 15, 17, current language regulating each management area not withstanding It is imperative that all of the management areas stated above be included Any single management area may contain up to 60% of our flying opportunities, thus striking any one management area could destroy most of the few suitable options available. An example of possible language "Hang Gliding as a primitive non-motorized recreation, will be accommodated due to a lack of suitable sites within less restrictive Management Areas. Limited vegetation manipulation of up to two acres may be necessary. Where available and open, ORV roads will be considered suitable access "

Response — The consideration of hang gliding was inadvertently omitted in the revision process. This error has been pointed out numerous times. This has been corrected and a discussion of hang gliding is included in the Revised Plan We looked at sites throughout the Forest as proposed by the Central Virginia Hang Gliding Association considering suitability factors such as elevation above potential landing sites, prevailing winds, surrounding topography, and proximity to users. Additionally, we considered manageability factors such as land ownership, conflicting uses, and rights of way for access While not all of the sites are suitable or even manageable for hang gliding launch sites, several appear to have potential Three existing sites and one that appears ready are identified in the Revised Plan (refer to Management Area 12 in Chapter 3)

Letter 91 — We strongly support your plans to protect critical resources and to expand recreational opportunities

Letter 146 — The discredited 1986 plan proposed only 7 areas for special management for recreation in which no timber harvesting would take place The current draft plan proposes to manage approximately 1/4 of the total forest for roadless or for dispersed recreation This represents a great improvement.

Response — NO RESPONSE REQUIRED

Letter 89 — The Forest Service should spend more time and effort in enforcing laws and regulations in the National Forest.

Response — Law enforcement is an integral part of management of the Forest The 1986 Plan recognized the need to reduce violations of laws and regulations. To address this issue, the number of law enforcement personnel was increased and new rules and regulations were issued to protect the Forest and its users A Special Agent was also hired Prevention of criminal violations, most commonly through education, is the law enforcement program's first priority. Every opportunity is taken through day-to-day contacts with people to explain the laws

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Letter 138 — My vision for the forest includes networks for trails shared by ORVs, motorcycles, mountain bikes and hikers Dispersed trail usage, in the long run, will have the least impact on the forest A well designed trail network will provide recreational opportunity for persons desiring a days worth of recreation or a weeks worth.

Response — Motorized and non-motorized use of trails have been found to be incompatible for the most part. The Forest will emphasize non-motorized multiple user trails to the extent safety and manageability allow Some of the trails developed in Management Area 11 specifically for unlicensed vehicle use will be open for motorcycles and larger 4x4 vehicles

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Letter 176 — I am as concerned about the environment as anyone, and it is easy to see that HANG GLIDING has a negligible impact on the natural balance of the forest

Letter 365	Hang gliding is an "environmentally friendly" activity Development of some hang gliding launch sites may require the removal of very limited number of trees but these launch sites can and often do serve the double function of hand glider launch site and scenic overlook Access to suitable launch sites on private lands are very limited to continued access to sites in the National Forests and other public lands is critical to our sport
Letter 3731	Hang gliding is an extremely low impact, nonpolluting, silent sport which most of the public seem to find visually pleasing.
Letter 3731	Modifications are visually unobtrusive enough to be difficult to detect from the valley below
Letter 3731	Launch areas are popular with other users who enjoy watching hang gliding activities
Response	Hang gliding has a minimum impact on the natural resources. Identified launch sites will be studied on a site specific basis as to impacts of access and other developments

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Letter 279	[Suggest] dispersed recreation emphasize backpacking, horseback riding, hiking, and primitive camping.
Letters 1439, 3931	The plan should emphasize non-motorized recreation values Response Such non-motorized recreation is emphasized in Management Areas 6, 8, 9, 13, and 21 and is acceptable in most other Management Areas.
Letter 279	[Suggest] existing trail system be maintained and/or reconstructed A few new trails may be permitted where there is a clear demand for their use, such as completing the Allegheny and Massanutten West Trails and an interconnecting trail between the Big Blue and Allegheny Trails. The Big Blue Trail, the Allegheny Trail, the Trimble Mtn Trail, and the Massanutten Mtn Trails [should be] designated as National Recreation Trails
Letter 284	Allow more recreation areas, particularly for hiking
Response	Appendix B of the Revised Plan contains a list of trail construction and reconstruction projects. This list does not vary by alternative Priorities for constructing individual trails will change Individual projects will be selected on an annual basis depending on available funding and public demands

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Letter 869	There should also be an emphasis to increase hiking trails and primitive areas for camping.
Response	The Revised Plan recognizes the importance of hiking and dispersed camping. Management Areas 9 and 13 specifically emphasize such opportunities with other management areas likewise offering many nonmotorized opportunities

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Letter 884	I would like to see trails managed for non-motorized recreational vehicles I do not support the building of any new ATV trails and would like to see stricter enforcement and penalties upon persons using ATVs in unauthorized areas
Response	With the exception of the Appalachian Trail and trails in wilderness, the vast majority of Forest trails are open to nonmotorized recreational vehicle use Alternatives 3, 7, 9, 11 and 13 do not designate any motorized trails, effectively eliminating opportunities for legal ATV use on the Forest. These alternatives are considered in detail in the FEIS One could be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits. The question of law enforcement and penalties for unauthorized use by ATV's is outside the scope of the revision

Letters 933, 1167, 1429, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1671, 1730, 1731, 1732, 1943, 1944, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2400, 2401, 2764, 2765, 2766, 2767, 2892, 2925, 3087, 3088, 3147, 3148, 3149, 3150, 4093
Primitive and non-motorized recreational values should be emphasized.

Letter 1297 Promote non-motorized recreation.

Letter 1443 The trails and recreation in the GWNF should emphasize primitive and nonmotorized recreation values

Letter 2327 Promote low-impact recreational activities

Letter 2675 The plan for this forest should emphasize primitive recreation and wilderness areas, and all recreation should be non-motorized

Letter 2705 Non-motorized recreational use within the Forest should be stressed

Letter 3619 The plan should emphasize primitive and non-motorized vehicle trails which would provide for non-degrading forms of recreation.

Letter 4050 Passive, low-impact recreation should be encouraged

Response All alternatives recognize primitive and non-motorized recreation values Alternative 3 was specifically formulated to emphasize primitive, non-motorized recreation This alternative is considered in detail in the FEIS and could be selected by the Regional forester as the Revised Forest Plan if it is identified as the alternative that maximizes net public benefits

The Revised Plan recognizes the importance of nonmotorized dispersed recreation Management Areas 6, 9 and 21 specifically emphasize such opportunities with other management areas likewise offering many nonmotorized opportunities Management Area 8 contains wilderness and wilderness study areas, the most primitive dispersed recreation opportunities on the Forest

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Letter 982 Although the Plan calls for trail sharing, it should clearly and unequivocally specify NON-MOTORIZED and primitive recreational use. Horses should definitely be allowed, but their trails should have a generally durable base and suitable grades to reduce erosion

Response The Forest Service has found that motorized and non-motorized use of trails are not compatible. ATV trails are limited to those lying in Management Area 11 OHV use is not permitted on other system trails with the exception of the Neals Gap trail for persons with disabilities Horses are allowed on most other trails on the Forest The Appalachian Trail is the notable exception, it is for foot traffic only.

Letter 3968 Through public awareness and education, multiple use and shared recreation can be achieved. It is imperative that the Tread Lightly! program be implemented even more so in the multiple-use prescriptions and associated guidance for each management area.

Response Experience has shown that motorized and non-motorized use of trails are incompatible The Multiple Use — Sustained Yield Act of 1960, while directing that National Forests be managed for multiple uses, recognizes that not every use may occur on every piece of land This holds true for trails

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Letter 1069 Trail sharing between hikers, bikers, and horseback riders is not practical Each type of recreation needs a different trail-type and trails should be developed with this in mind

Letter 1073 I oppose permitting the use of mountain bikes on trails to be used for hiking Mountain bikes can be a nuisance and should be confined to roads wide enough to allow them to safely pass hikers They should not be permitted on narrow mountain trails

Response Though there are differing needs among the various user groups, experience has shown that shared use of non-motorized trails can be quite successful Nationwide, the Forest Service is committed to a share-the-trail concept We acknowledge that there are conflicts between user groups, but feel that the public is better served by accepting and minimizing these conflicts rather than eliminating them Thus, a far greater system of trails is

available to a far greater number of people We do separate motorized and non-motorized use Mountain bikes are prohibited in the wildernesses and on the Appalachian Trail Horses are prohibited on the Appalachian Trail

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Letter 1078 *Though trail sharing may be appropriate in some instances, the plan should emphasize primitive and nonmotorized* recreation values and insure that trail where horses are permitted have sufficient hard surface and suitable grade

Response The respondent is encouraged to contact the Ranger Districts and identify specific trails that may be hardened with suitable grades for equestrian use Trail construction and reconstruction priorities will be determined on an annual basis once funding is received and priorities are determined

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Letter 1086 Emphasize nature as God gave it to us--trails for hiking, but NOT for motorized vehicles. I seek solace when I hike in the Forest, not the noise which I have every day in the city

Response The Forest Service recognizes the conflicts between motorized and non-motorized use. For this reason, the uses are separate in the preferred alternative Motorized use is allowed only on trails developed for such use in Management Area 11 The vast majority of Forest Trails are for non-motorized use only. There is tremendous opportunity for getting away from motorized vehicles in all alternatives

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Letter 1143 *As motorcyclists, we promote sound, environmental management*

Response Experience has shown that motorized and non-motorized use are generally not compatible and for this reason the uses are separated in the preferred alternative Nationwide, the Forest Service is emphasizing the share-the-trail concept and it is adopted for non-motorized use on the Forest

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Letter 1143 *We also support multiple-use of compatible uses, logging trails, mountain bicycles, ATVs and motorcycles can* share with hikers and equestrians given some common understanding and mutual respect

Letter 1149 Trails in the forest must primarily be those for foot travel. Any trail upon which horses are allowed must be such that erosion is minimized

Letter 3695 Emphasize non-motorized and self-sufficient recreational values Horses can severely damage trails, please consider the appropriate trails when using this designation

Response Nationwide, the Forest Service is committed to the share-the-trail concept However, this is not to be taken that all users will use every mile of the Forest's system trails. In fact, the vast majority of over 900 miles of trails are *suitable for foot travel only Equestrian users have demonstrated by their comments and cooperation that they* are concerned with preventing erosion as well as the safety of their animals.

Letter 1156 Emphasize non-motorized recreational trail use to reduce trail degradation and protect wildlife

Response The vast majority of the Forest's over 900 miles of trail are managed for non-motorized use. Motorized trails are *allowed only in Management Area 11.*

Letter 1250 Trail sharing by hikers, horses and bicyclists is not possible unless the trail has a hard surface Horses are *particularly hard on primitive trails, and must be banned or have separate trails.*

Response We understand the conflicts among non-motorized users, but disagree that they are a major problem Nationwide, the Forest Service is committed to the share-the-trail concept. In reality, this does not mean that equestrian users, mountain bikers, and backpackers will all want to use the same trails It has been the experience of the Forest that the horseback riders have a very strong concern for the safety and well being of their animals and want to stay on the trails that are most suitable to them. The Revised Plan calls for the development of several campgrounds designed with facilities for equestrian users These will be developed in cooperation with individuals and groups who are most interested Shared trails with an emphasis on design and construction for use by horseback riders should be part of this

Letter 1260	All trails should emphasize primitive and non-motorized recreation, horses do a lot of damage to people trails and should be limited to those trails that are sufficiently hard packed and graded appropriately.
Letter 1652	The plan needs to emphasize primitive and non-motorized recreation values. Any trails on which horses are allowed should have sufficient hard surface and a suitable grade
Letter 3647	Emphasize primitive and non motorized traveling Horses should not be allowed on steep grades or soft surfaces as it causes erosion!
Letter 3962	Appendix B, Trail Construction There is only one horse trail in the trail list for five new horse camps With heavy horse use, people will avoid the trails
Letter 4052	We support multiple-use of the trails We have no problems with the hiker's use of these trails We believe this is the best use of the forest and also the most economical.
Response	Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized trails However, this is not to be taken that all users will use every mile of the Forest's system trails. Equestrian users have demonstrated by their comments and cooperation that they are concerned with preventing damage to trails as well as the safety of their animals. By virtue of their needs, horseback riders are expected to stay primarily on trails that are suitable in surface treatment and grade
Letter 1313	Your plan does not go far enough in protecting trails & rec
Response	Trails and recreation play an important role and are protected in all alternatives discussed in the FEIS. Anticipated demand for recreation activities, dispersed and developed, is met or exceeded in all alternatives. The Forest Service has been and will continue to be the largest supplier of outdoor recreation in the nation
Letter 1323	Some trails for mountain bikes are acceptable
Response	Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized use of trails Mountain bicycles are permitted on all trails except those in wilderness and the Appalachian National Scenic Trail, yet it is realized that not all trails are suitable or desirable for their use There are expected to be minimal conflicts between non-motorized users
Letter 1661	The only trails that should be built are horse trails
Response	Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized use Trail construction and reconstruction projects have been listed in the Revised Forest Plan but have not been prioritized Several of the trails listed are to be constructed primarily for horseback use, but are not intended to be solely for horseback use Funding for trail construction is received on a year-by-year basis and the trails to be constructed will be determined each year once funding is received and priorities are determined
Letter 2036	We would like to see the plan further emphasize its support of horse trails [through] three additional strategies
Letter 2036	The production of more horse trails, especially loop trails that can be ridden in one afternoon or one day
Letter 2036	The 65 mile Roanoke/Botetourt/Rockbridge County Horse Trail through the Glenwood District of the Jefferson National Forest could be coordinated with a Horse Camp in the Pedlar District Extend this trail over the James River, through the Pedlar District, and onto the Sherando Lake area

Letter 2036 [Include] horse camps in the James River and Pedlar Districts.

Letter 2036 Plan a similar trail on the western slopes of the Valley from the Clifton Forge area to the Woodstock area.

Response The three additional strategies presented in the comment are discussed individually below:

(1) Appendix B of the Revised Plan lists trail construction and reconstruction projects. Several of these are proposed to be constructed for use by horseback riders. Priorities for construction are not determined to allow for change over time Funding for trail construction is received on a year-by-year basis. Therefore trails to be constructed will be determined each year once funding is received. Nationwide, the Forest Service is committed to the share-the-trail concept for non-motorized use However, it is realized that horses have special needs in surfacing and grade.

(2) Proposed horse camps for the James River and Pedlar districts have been included in the Revised Forest Plan. These will not be for exclusive use by equestrian users, but will have facilities to accommodate horses

(3) The possibility of constructing trails to connect with existing or proposed trails on the Jefferson National Forest should be presented at the ranger district level Several of the proposed trail construction projects listed in Appendix B of the Revised Plan lie in the areas mentioned by the comment and could most likely be constructed to accommodate horses.

It is acknowledged that loop trails that can be ridden in an afternoon or a day are preferred

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Letter 2048 Enhance the use of the forest by hikers and campers and similar other recreational uses.

Response The Revised Plan will enhance the Forest Trail system with numerous trails proposed in Appendix B Priorities for construction of these trails will be determined on a yearly basis as funding becomes available. An expansion of the developed recreation program is likewise included The Forest Service provides more outdoor recreation opportunities than any other agency or organization in the nation and this is not expected to change

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Letter 2347 Promote low-impact activities like primitive camping and hiking rather than motorsport.

Response Non-motorized, dispersed recreation has traditionally made up a large part of use on the GWNF This trend will continue Management Areas 6, 8, 9, and 21 specifically promote non-motorized, remote recreation use and several other management ares offer similar opportunities

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Letter 2498 Trails that allow horses should have a hard base.

Response Trails constructed for equestrian use will have a suitable base and grade.

Letter 2513 Plan to increase wilderness area recreation opportunities and reduce the ATV areas (all recreationists would be better off in the long run, including the present ATV owners).

Response The Revised Plan seeks to balance the recreation opportunities of the Forest maximizing net public benefits. This entails a balance of all resources including wilderness, and non-motorized recreation as well a motorized recreation

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Letter 2613 [The] plan fails to adequately address the demand for primitive recreational experiences by the general public, and the increasing detrimental effects of overuse on the limited number of established wilderness areas in both GWNF and Shenandoah National Park

Response Remote, non-motorized recreation opportunities are specifically emphasized in Management Areas 6, 8, 9, and 21 Several other Management Areas likewise offer similar opportunities within the emphasis of the individual areas

Overuse of existing Congressionally designated wildernesses likely results from easy access rather than wilderness designation Addressing the detrimental impacts is appropriate on an area by area basis in management This is not a land management planning question

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Letter 4053 — Due to the high air pollution level in some park areas, non-motorized recreation should be encouraged.

Response — Air pollution from on-Forest motorized recreation is insignificant when compared to air pollution from off-Forest sources.

Letter 2755 — Trimble and Hankey Mountains are heavily used for recreation and should be unsuitable for timber. Trimble Mountain is located across the road from Todd Lake and is a popular trail for campers. Section C of the Wild Oak National Recreation Trail goes along the crest of Hankey Mountain, and is included in many of the commercial hiking guidebooks

Response — The high recreation value of these trails is recognized While some timber activities may be present to salvage dead or dying trees, rehabilitate or enhance scenic vistas, or provide wildlife habitat, it is to be done in such a way as to minimize impacts to the trails

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Letter 3728 — Comments re Appendix B We recommend deletion of the Devil's Garden new construction due to conflict with a major bobcat denning area. We recommend deletion of the Racer Camp new construction to protect the native trout fishery in the headwaters

Response — The trail construction and reconstruction projects in Appendix B will be prioritized on an annual basis as funding allows All new construction projects must go through an environmental analysis to determine impacts on resources in the area This project level analysis will address such issues as the bobcat denning area in the Devil's Garden area and protection of the native trout fishery of Racer Camp

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Letter 3731 — These small clearings probably benefit the ecology of the areas by enhancing the growth of low tolerance flora and encouraging species diversification.

Response — The benefits of small openings in the Forest are known to provide valuable habitat for certain wildlife species

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Letter 3685 — I strongly encourage you to maximize the acreage set aside for wilderness and less intensive recreational use of the forest, such as hiking and backpacking, and to minimize the acreage used for clearcutting and other extractive and aesthetically damaging activities.

Response — Non-motorized dispersed recreation has traditionally made up a large part of the Forest Service recreation program and this will remain so in the future under all alternatives. The Regional Forester will select the alternative that maximizes net public benefits with a consideration for the needs of all resources, recreation, wildlife, timber, water, soil, etc

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Letter 3840 — Areas adjacent to all forest campgrounds should be managed with hiking trails, interpretive trails, wildlife viewing areas Intrusive practices should be prevented from occurring such as Highly, motorized use routes, ATV-ORV trails, timber cutting, etc [This] should also apply for areas identified with any recreational concept such as 13A, 13B, trail corridors, etc

Response — Where possible and appropriate, many areas adjacent to developed recreation areas have been allocated to Management Area 13 which emphasizes dispersed recreation with such activities as hiking and wildlife viewing Motorized recreation such as ATV use is restricted to Management Area 11 and are not likely to impact developed recreation areas unless the site is specifically managed as a staging area for an ATV trail

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Letter 3840 — Draft talks about horse camps only, with no mention of trails - should address trail suitability issues and user group conflict issues

Response — Trails are discussed in Appendix B. Several of these are to be developed with horse use as an emphasis Priorities for construction will be determined on an annual basis as funding allows It is acknowledged that there are conflicts among non-motorized user groups on trails These will be dealt with on a project level basis.

Letter 3840 — South Fork Shenandoah River - Adjacent forest lands. No new timber management projects in river corridor or adjacent 13B area May maintain existing wildlife clearings, fields, etc This is probably one of the most highly visited places on the forest due to the canoe outfitters services

Response — In the Revised Plan, timber management is not emphasized in areas adjacent to the South Fork of the Shenandoah River

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Letter 3883 — Low-cost recreation with little or no adverse impact on the wilderness experience should be made available to all citizens Extensive unbroken wild areas should be defined and preserved for this purpose

Response — Remote, non-motorized recreation opportunities are emphasized in Management Area 6, 8, 9, and 21 with other areas offering similar experiences within the emphasis of the particular management area. The extensive areas mentioned in the comment are provided in these management areas Management Area 13, located primarily adjacent to developed recreation areas, has several areas of concentrated use that serve as a staging area for the recreation opportunities in the area

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Letter 3887 — We are pleased that the upper section of the [North] river is under the heavy dispersed recreation designation This is appropriate given the accessibility for forest visitors and extent of current use

Response — NO RESPONSE REQUIRED

Letter 3892 — Include plans for upgrading and adding to trails for non-motorized recreational vehicles, such as bicycles and horses

Letter 3911 — The proposal should include plans for upgrading and adding to trails for nonmotorized recreational vehicles, such as bicycles and horses These types of vehicles are significantly less damaging to the forest and the corresponding trails far less obtrusive than those of ATVs The GWNF plan should acknowledge the increase in demand for bike paths rather than for new ATV trails.

Response — Appendix B of the Revised Plan contains trail construction and reconstruction projects This list includes mostly non-motorized trails that would be suitable for shared uses as mentioned in the comment This is not to say that every trail will be suitable for every type of use, bikes, hiking, or horses Priorities for construction will be determined on an annual basis as funding allows The Forest acknowledges the demand for bike use on trails ATV's will be allowed only on trails that are constructed for and designated specifically for their use by Forest Supervisor's orders

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Letter 3962 — A section on trails [should] be added since human travel is principally on system trails. Add standards 283-290 to this section.

Response — Trails in Management Area 13 are managed in accordance with Common Standards at the end of Chapter 3 of the Revised Plan A reformated section on desired future conditions discusses trails

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Letter 3962 — Primitive and non-motorized recreational opportunities should be emphasized in all Management Areas in the Plan

Response — Dispersed non-motorized recreation may occur in every management area However, it must conform to the management emphasis of each management area

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Letter 3962 — Corridors should be created for all trails to protect them from destruction by timbering These corridors would provide small wildlife migration corridors

Response	Trail corridors are protected as appropriate considering the use of each individual trail and the management emphasis of each management area Many of the trails naturally serve as a migration route for wildlife
Letter 3984	Increase the area available for dispersed non-motorized recreation. The forest is making a terrible mistake in catering to the wishes of the All-Terrain Vehicle and other off road vehicle crowd.
Response	The vast majority of the forest is available for dispersed non-motorized recreation ATV's are restricted to trails specifically designed and constructed for ATV use and designated by Forest Supervisor's Orders for their use and occur only in Management Area 11. Motorized use as mentioned in the comment is a legitimate part of outdoor recreation and is part of multiple use management.
Letter 4010	We request that 10 sites be added within the next 5 years A list is attached showing potential sites and should be considered an integral part of the proposed changes We have broken out the sites into 3 categories. (1) preferred (2) secondary "good sites" and (3) alternative "sites with potential problems" We request wording that would guarantee that 5 sites from the primary list and 5 sites from the secondary or the alternative list be opened within the next 5 years.
Response	The list mentioned in the comment has been reviewed with each Ranger District with each site evaluated Working with the Central Virginia Hang Gliding Club, the Forest has identified the most promising sites but cannot make a guaranty as requested There are sites identified in the Revised Plan for hang gliding launch areas Continued cooperation and work with the club will likely identify additional suitable sites
Letter 4010	Beginning in 1985, Hang Gliding managed to obtain three sites within the GWNF These three sites represent only a fraction of our current needs, a status quo is unacceptable The locations now available to Hang Gliding tend to be overcrowded which poses severe restrictions on the growth of our sport To have fair access commensurate with other user groups, Hang Gliding must be allowed to expand by easing some of the management restrictions on National Forest terrain that is necessary for our activity.
Response	Hang gliding is recognized as a legitimate use of National Forest lands Potential hang gliding launch sites have been reviewed as to suitability, accessibility, and availability The Forest intends to continue work with the Central Virginia Hang Gliding Association in identifying suitable sites Hang gliding is a very low impact sport However, it does require easy access, appropriate height above a suitable landing field, proper wind direction, and no conflicts with existing uses such as electronic sites It's not always a question of "easing restrictions".
Letter 4052	The members of the Valley Saddle Club support the idea of a horse camp in the George Washington National Forest, especially in the Camp Todd area
Response	The Revised Plan contains provisions for several campgrounds with facilities for keeping horses in Management Area 12. Specific reference to Camp Todd has been removed to allow for a broader scope of possible sites on the Dry River Ranger District Site specific analysis will be completed for the design and construction of these campgrounds
Letter 4052	The Camp Todd area is an ideal spot for a horse camp because it is very accessible and there are a variety of trails in the area
Response	It is recommended that the commenter work with the Dry River Ranger District in developing a campground with facilities for horses either at Camp Todd or elsewhere on the District

Letter 4052 The other areas which are ideal also are Deerfield, Warm Springs, and the Edinburg Gap.

Response Each of the Ranger Districts concerned have proposals for campgrounds with facilities for keeping horses

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THE MIX OF GOODS AND SERVICES: Developed Recreation

Letter 279 [Suggest] existing developed rec areas be maintained and provided with full accessibility to persons with disabilities, and no additional highly developed sites, like Sherando Lake, be created A few additional small, relatively unimproved rec sites [should be] permitted where there is a clear demand for their use

Response All developed recreation sites will be accessible to persons with disabilities No major recreation areas are planned, however, several are scheduled for expansion or enhancement to meet existing, known demands A few may be provided in the dispersed areas of the Forest in areas of concentrated public use, primarily to protect the resources of the area or to serve as a staging area for the dispersed activities

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Letter 285 I would like to comment on the Camp Todd Horse Camp proposed in the GWNF Draft Management Plan. This location is not appropriate for a horse camp. First of all, it is along FSR 95 in the flood plain of the North River Second, the Wild Oak Trail crosses FS 95 at Camp Todd The only alternatives for trail riding from this site are up the Wild Oak to Big Bald in the Ramsey's Draft Addition roadless area or across the North River and up the Wild Oak Trail to Little Bald in the Little River roadless area Both trails are VERY steep and inappropriate for horses A horse camp in this location would invite more use, and this increase would be detrimental to the resources in this area Please consider either dropping this Horse Camp from the plan or finding another more suitable location

Letter 2755 Do not plan a horse camp at Camp Todd This area is located in the flood plain of the North River between two roadless areas, Ramseys Draft Addition and Little River All the trails nearby are too steep for use by horses

Response Specific reference to a horse camp at Camp Todd on the Dry River Ranger District has been removed from the Revised Plan However, there has been much interest expressed in construction of a campground with facilities for horses to be located somewhere on the Dry River District and provision for such a facility is included in Management Area 12. The Forest will work with interested users in selecting a site and site specific analysis will be completed to determine the impacts and feasibility of the selected site

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Letter 91 We are gratified to learn of your very ambitious plan for an expanded interpretive program We hope that our programs will be mutually supportive and complementary

Response We, too, recognize the importance of our agencies working together and coordinating our efforts so that our programs are complementary and provide maximum benefits to the public and to the resources in our charge.

Letter 279 Interpretive programs should include the discussion of ecosystem restoration, forest ecology, conservation biology, and island biogeography.

Letter 3940 Plan. Page 2-11, Paragraph 7 As part of interpretive programs, state the objectives of the different management areas and the management practices used to attain those objectives Tell the land management and multiple-use stories -- illustrate and explain clearcutting, shelterwood, group selection, prescribed burning, recreation, etc. Don't hide management practices Use the practices as an opportunity to educate the public about them

Letter 3643 The Department also recommends that the Alternative 8 developed recreation program be substituted for the Alternative 10 program We believe the Alternative 8 developed recreational program balances public use with habitat protection By adopting the expansion of developed recreational sites for Alternative 10, the Forest Service costs would be increased. However, the Forest Service can minimize the additional cost of developing, maintaining, and administering these camping facilities by reducing costs in other program areas This would be partially accomplished by eliminating or substantially reducing the prescribed burning program for maintaining early successional vegetation. We do recommend that the program be maintained for the 100-300 acres per year that may need to be burned to preserve the special Biological Areas in a natural state Prescribed burning does not provide substantially different habitats than clearcutting We believe that the prescribed burning funds

would be better spent on the development and administration of camping facilities as planned under Alternative 8

Letter 3643 — Substitute the Alternative 8 developed recreation program for the Alternative 10 program

Response — The developed recreation program in Alternative 8A has been added to Alternative 10

Letter 4035 — Interpretation plans flawed - The interpretive program in Draft Plan Appendix C fails to lay the groundwork of a plan that would explain multiple use to the public It fails to use interpretive tools to foster user cooperation

Response — "Foundations", found in Appendix C, is a collection of proposals for interpretive programs The intent is that this will be a dynamic, evolving document in which material is added or deleted as new ideas are presented and considered (P. C-12). Interpretation of multiple-use management, including timber management, is included along the Highlands Scenic Tour (P C-32 and 33) There will be further opportunity for the public to comment on a project by project basis

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Letter 4035 — Planning should focus on how facilities and interpretation can encourage shared use

Response — The comment is consistent with the interpretive goals provided in Appendix C of the Revised Plan The proposed facilities for interpretive use are generally suggested for existing facilities or new developments in developed recreation areas

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Letter 4035 — I strongly protest the interpretive concept cited in "Highlands Scenic Tour Forest Mgmt " It states, "The Task of managing a forest to benefit both man and nature is very difficult. Efforts to utilize some natural resources while improving other aspects of the environment are complex and difficult to achieve " This negative approach to managing resources and multiple use has no place in an organization which has been given this mandate Forest Management interpretation should emphasize the benefits of multiple use and the successes of stewardship

Response — There was no intention to take a negative approach in interpreting resource management The sentence has been changed to better reflect our intent The fact is that the Forest Service is finding that people need and want a wider variety of uses, values, products and services from the national forests than in the past Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development

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Letter 1546 — There is no description of the camping and recreational facilities and whether they are or will be blended into the surrounding area Are they made of materials found on site?

Response — A description of recreation facilities to be developed is inappropriate for the Revised Plan or FEIS It is not likely that any recreation facilities will be constructed with materials found on site The exception might be the use of native stone for walls and building facades Be assured that all facilities will be designed and constructed to maintain a quality Forest Service design ethic

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Letter 2632 — Appendix, page C-30, under Highlands Scenic Tour Natural Resources, end of page add fourth bullet. "Allow and enhance recreational opportunities "

Response — Appendix C, The Interpretive Plan, is a collection of proposals Each will be reviewed and planned individually on a project level basis The Interpretive Plan will be a dynamic, evolving document in which material is added or deleted as new ideas are presented and considered

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Letter 2823 — We support the emphasis placed on developed recreation that is proposed in alternative 8 Those proposals should be included in the final plan regardless of the alternative selected

Response — Developed recreation emphasis in each alternative is in accord with the underlying philosophy of each individual alternative Where such a developed program is appropriate, it is included, but it is not appropriate in every alternative.

Letter 3637 — Additional lakeside camping should be promoted on Coles point in Alleghany County

Response — Coles Point has been developed as a swim site, boat launch site, and picnic area There is no room and therefore no plans to add a campground there Camping on Lake Moomaw is at nearby Morris Hill and Bolar Mountain

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Letter 3637 — We want to see handicapped and childrens fishing opportunities promoted at Lake Moomaw We feel that fees collected at Lake Moomaw should be used to construct these facilities and improve the present ones.

Response — As funding allows, such facilities will be developed on Lake Moomaw User fees generated from facilities on the Lake are but a small portion of the necessary funding The rest will have to come from appropriated funds in the budgeting process controlled by Congress

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Letter 3660 — I wholeheartedly support the construction of rifle ranges on each District

Response — To the extent that cooperating individuals and groups as well as funding allows, rifle ranges will be constructed.

Letter 3689 — Recreational development, especially motorized, should have low priority

Response — Recreation development in each alternative is as appropriate with the underlying philosophy of each individual alternative The Regional Forester will select the alternative to serve as the Revised Forest Plan that maximizes net public benefits. The trade-offs among the resources, including opportunities for motorized recreation, must be considered in making the selection

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Letter 3840 — Horse camps and trails need to be very carefully located as to user conflict and trail damage. Elizabeth Furnace and Camp Todd are both poor suggestions for horse camps. Trails are very steep, subject to considerable damage and erosion with a 1200 lb horse Horse camps should be placed with consideration as to riding opportunities on old forest roads with gentler grades and away from intensive use areas where user conflicts are impossible not to occur

Response — It is agreed that care must be taken in locating and designing campgrounds with facilities for horses Before any such work is done, site-specific analysis will be completed so as to determine impacts Specific design and construction will be done to minimize unacceptable impacts to the resources of the land as well as the safety and well being of the horses The Forest will work with cooperating user groups to ensure the best development of the campgrounds

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Letter 3940 — Plan: Page 2-8, Paragraph 4 Developed recreation needs to be aligned with the objectives of the other management areas The desired future conditions should be to provide a variety of recreational opportunities. Don't leave this open-ended by simply saying "to meet the public demand " Other considerations are necessary

Response — Facilities to provide developed recreation opportunities will be constructed only as needed as indicated by demand It seems pointless to construct facilities for which there is little or no demand. There are a broad range of considerations to take into account before development occurs

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Letter 3951 — Developed Recreation - Keep the acres at about 1800 acres Install electric hookups at the larger campgrounds. Construct two group campgrounds at Lake Moomaw (one on each side of the lake). Construct a "western gateway information station" on I-64 near Jerrys Run with a 25-30 family unit campground Complete the campground at Longdale Recreation Area and add some type of display to commemorate the CCC construction of the Facility (for minorities at that time). Keep the northern gateway on I-81 proposal Work with the Corps of Engineers on displays at their Visitor Center at Gathright Dam Work with the VDGIF on providing access on the

major rivers within the Forest Proclamation Boundary for all users, including the handicapped Provide for expansion of family campgrounds as demand develops

Response

Each of the recommendations in this comment is worthwhile and will be considered on an individual basis as funding allows Realistically, funding constraints will preclude most of this However, some of the these recommendations are included in the Revised Plan Electric hookups are planned for larger campgrounds. Two group campgrounds are planned for Lake Moomaw, one on each Ranger District The Forest is working with VGDIF on river access Several campgrounds are proposed for expansion

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Letter 3962

MA 12. 2-87 Minimally developed sites. It seems unusual that all 4 new sites are horse camps. Heavy day use at Edinburg Gap does not necessarily indicate the need for overnight use. Is this need real for horses or is it for ATV users? Horses and hikers don't mix on trails The Camp Todd camp does not appear to have existing adequate trails for horses Both trails that leave this area are steep Adequate horse trails, both in width and slope, should be built before any overnight facility is constructed. Camps on the Deerfield and Warm Springs District should follow the same guidelines Build suitable trails first, then overnight facilities. 2-94 Highly developed sites. Where are the horses that use the proposed Bear Wallow Camp going to go? The only trail that might be suitable is the Bear Wallow Big Blue trail. This is heavily used by hikers. The proposed camp will encourage heavy horse use on the adjacent trails, and will make a lot of hikers mad Horse trails should be built before the camping facility is built.

Response

The "horse camp" wording has been changed These are sites that have facilities for keeping horses, but are not exclusive to equestrian uses Users groups at Edinburg Gap have indicated a need for overnight facilities for both equestrian users and ATV users Specific reference to the Camp Todd horse camp has been removed Rather, it is proposed that camps with facilities for horses be built on each of the districts as appropriate to meet demand Demand is indicated by the many cooperating groups and individuals with interests in outdoor recreation opportunities This does not mean that the Forest will meet all demands Environmental assessments as to resource impacts and user conflicts must be completed for each project This includes all of the proposed new development in Management Area 12, minimally developed, highly developed and specialized.

Letters 3985, 3986

Increased developed recreational opportunities such as motorized camping should encouraged on private lands surrounding the forest where they will contribute the most to the local tax base and be discouraged on GWNF land

Response

It is outside of the scope of the Forest Planning process to encourage increased developed recreation opportunities on adjacent private lands However, the States of Virginia and West Virginia evaluate the needs for such recreation opportunities in the Statewide Comprehensive Outdoor Recreation Plans (SCORP) that each completes for funding under the Land and Water Conservation Act. State, federal, and local agencies as well as private groups, individuals, and businesses have input in to the development of the SCORP

Letter 3998

PATC is also concerned about the proposed construction of a horse camp at Elizabeth Furnace campground The trails adjacent to this are are, in the main, narrow, steep and rocky

Response

Before any campground with facilities for keeping horses is constructed, an environmental assessment must be completed This will include a discussion of the trade-offs among the various resources and activities as to impacts Impacts mentioned in the comment will be considered at the project level

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Letter 4001

Developed rec sites should be maintained unless they impact on the wilderness or special areas of the forest Any new developed sites should be located on the periphery of the forest to avoid such impacts Short loop trails should be built around developed sites so that human impacts are concentrated there rather than dispersed throughout the wilderness

Response

Developed recreation facilities will not be constructed that will cause any impact on wildernesses

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Letter 4268

Plan - Management Area 12 outlines proposed developed recreation sites EPA recommends that these sites be evaluated for construction based on a clear analysis of need Direct and indirect impacts associated with

these sites range from water quality issues, waste management, increased impact from Forest users and habitat alteration.

Response — Before construction or expansion in developed recreation areas, appropriate environmental trade-offs must be considered. The issues mentioned in the comment are considered. The Regional Forester will select the alternative to serve as the Revised Plan that maximizes net public benefits The developed recreation resource is but one of the resources considered in this selection.

THE MIX OF GOODS AND SERVICES: Grazing

Letter 2636 — The economics of the range program should be outlined clearly in the EIS. If the cost of the program is greater than the receipts and benefits, the program should be terminated.

Letter 4001 — Grazing of livestock should be phased out as there is more than enough private land available for this purpose

Response — The 250 acres of clearing along the South Fork of the Shenandoah River and Cedar Creek are being maintained to provide a pastoral scene and unique habitat. Granger-Thye grazing permits are the most cost effective means to accomplishing this objective This subject is discussed in more detail in the final pages of the process paper *Addressing Issues and concerns in the Revision of the Land and Resource Management Plan for the George Washington National Forest*

Letter 3840 — Grazing - severely limits use of land. Not in public interest Better habitat uses and recreational uses.

Letter 3981 — Remove all domestic livestock from the GWNF

Response — Grazing is used as a tool on a very small portion of the Forest (about 250 acres) to maintain an open "pastoral" setting. These areas have historically been pasture or farm lands and are all fenced No open woods grazing is allowed. Some alternatives eliminated grazing, but the Revised Plan allows for continued grazing at current levels.

Letter 3951 — Range - Keep as in Alternative 12

Response — The Revised Plan maintains the same grazing program as Alternative 8.

Letter 3728 — The current grazing program should be expanded wherever possible or whenever the opportunity to do so is presented

Response — Many wildlife/recreation conflicts arise when open woodland grazing is allowed It can also impact rare flora, and cause erosion If tracts of land are purchased that are open and have historically been grazed or farmed and it is desirous to maintain this open pastoral setting then grazing could be one option considered to maintain this condition Such a scenario would be analyzed on a case-by-case basis

CULTURAL RESOURCES

Letter 1836 — Plan, page 2-25. We appreciate that cultural resources are included as a specific category under Management Area 4

Response — NO RESPONSE REQUIRED

Letter 1546 — As for cultural resources, the EIS made no mention of coordination with an Advisory Council on Historic Preservation There was an inadequate discussion of how the Forest intends to handle cultural resources with the Smithsonian.

Response — The protection and management of Cultural Resources on the Forest does not vary by alternative The plan recognizes the requirements of the Historic Preservation Act of 1966 which established the Advisory Council on Historic Preservation There are no specific provisions for handling Cultural Resources with the Smithsonian Institution This is outside the scope of the planning process and may be handled on a case by case basis if the need should ever arise

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Letter 1836 — Plan, Appendix C We recommend that under the sub-theme "Man's Influence on the Land," consideration be given to early historic settlement in the highlands of Western Virginia This specifically refers to those inhabitants of the mountains prior to the development of the iron and forest-products industries

Response — "Foundations" in Appendix C is a collection of proposals for interpretive programs The intent is that this will be a dynamic, evolving document in which material is added or deleted as new ideas are presented and considered (pg. C-12). There will be further opportunities for public involvement and comment at the project level for the various interpretive programs

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Letter 1836 — Plan, Appendix C· In our letter of February 17, 1992, we request that archaeological investigation be "temporarily terminated" following completion of project-specific work at Warwick Mansion We feel that sufficient archaeological information has been obtained to allow your interpretive plans to proceed without further excavation A complete analysis of data gathered to date should provide the framework for interpretation and possible future archaeological efforts

Response· — At this time the archaeological work at Warwick has ceased pending the evaluation of artifacts found at the site. Following the analyses, a report will be published and a determination will be made as to the necessity of further investigation at the site

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Letter 1836 — Plan, Appendix C Highlands Scenic Tour - While we do not object to the concept being proposed, use of an area where "there are countless historical remnants" and "many mines and furnaces" needs to be designed in a sensitive manner that ensures protection of the cultural resources. A controlled use of the tract is preferable over unrestricted "partying, camping, and dumping" Given the fact that archaeological survey work is now being conducted by Washington and Lee University, we request that the GWNF initiate consultation on this undertaking through the Section 106 process

Response· — One of the objectives of the interpretive program is to have visitors gain an appreciation for natural and cultural resources In the event that a cultural resource is threatened, appropriate steps will be taken to avoid damage and protect that resource The archaeological work being done by Washington and Lee University is still in its initial stages The George Washington National Forest will seek consultation with the Commonwealth of Virginia and complete the Section 106 process at the appropriate time

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Letter 1836 — Plan, Appendix C Augusta Springs Environmental Education Center-Detailed information concerning this undertaking should be submitted for review through the Section 106 process as soon as possible It is likely that identification surveys and cultural resource evaluation will be necessary so that the effect of your proposal on the historic resort complex can be determined

Response — The George Washington National Forest will seek consultation with the Commonwealth of Virginia and complete the Section 106 process at the appropriate time

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Letter 1836 — Plan, Appendix C Charcoal Iron Furnace - We are interested in receiving specific information regarding this project once the subject furnace sites have been selected Stabilization of the ruinous structures, controlled use, and interpretation are preferable to unrestricted access and continued deterioration

Response — One of the objectives of the interpretive program is to have visitors gain an appreciation for natural and cultural resources In the event that a cultural resource is threatened, appropriate steps will be taken to avoid damage and protect that resource The Forest will seek consultation with the Commonwealth of Virginia regarding the selected charcoal iron furnaces prior to development of that interpretive program

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Letter 1836 — Plan, page 2-30 For Standard No 36, the reference to MOMM should be deleted and replaced with the Advisory Council's "Preparing Agreement Documents" (September, 1989)

Response — The reference has been changed in the Revised Plan

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Letter 1836 — Plan, page 2-31 Excavation of archaeological resources by GWNF staff and/or vocational groups (Standard 37) should be undertaken only through the Section 106 consultation process This comment is specifically restricted to voluntary archaeological excavation projects and does not include efforts necessary for mandated resource identification and evaluation

Response — *Wording of the standard has been changed to include reference to Section 106*

Letter 1836 — Plan, page 2-85 For Management Area 12, any development of an historic property as a recreation area must include protection of the resource The development must be consistent with The Secretary of Interior's Standards of Archeology and Historic Preservation (48 FR 44716 - 44742)

Response· — *The standard has been changed to reference the Secretary of Interior's Standards*

Letter 1836 — Plan, page 2-56 For Standard 226, please revise the statement to include qualified professional architectural historians and historians for the "inventory of cultural and historic resources "

Response· — This standard has been removed It is understood that compliance with Section 106 of the National Historic Preservation Act as amended will involve qualified professionals in all fields as necessary

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Letter 1836 — Plan, page 2-30 The inclusion of Camp Roosevelt and Elizabeth Furnace in Management Area 12 is not objectionable, however, use of those resources should be in a manner consistent with the practices outlined in Management Area 4 Please note that the reference to Appendix E (minerals) is not accurate for the cultural resources noted in the text The appropriate appendix appears to have been omitted We suggest the final document include an appendix describing the known significant historic properties.

Response. — *Historic resources at Camp Roosevelt and Elizabeth Furnace will be protected Reference to the appendix has* been removed Other documents adequately describe historic properties

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Letter 1836 — Plan, page 2-3. For the discussion of cultural resources, the reference to E O. 11593 should be changed to Section 110 (a)(2) of the National Historic Preservation Act of 1966, as amended (1980) Specifically, we recommend that the text read "the cultural resources inventory is completed as required by the National Historic Preservation Act of 1966, as amended, Section 110 (a)(2) "

Response: — The reference to EO 11593 has been removed and a reference to Section 110 (a)(2) of the National Historic Preservation Act of 1966 as amended (1980) has been included in a Common Standard

Letter 1449 — Plan, p. C-24 & C-26· Massanutten VIS Center Plans for geological interpretation, but no geologist shown to be responsible for such

Response: — Personnel at the Massanutten Visitor Center will be responsible for coordinating programs with the appropriate resource specialist on the Forest

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Letter 1449 — Plan, p. C-32, C-34, & C-35 Highlands Scenic Tour No provision for geologist responsible for stated geology program.

Plan, p. C-36, C-38, & C-39· Powells Fort Environmental Camp No provision for geologist or hydrologist...most significant!

Plan, p C-54, C-55, C-56, & C-57. Charcoal Iron Furnace No provision of geologist input

Response· — During project level development of interpretive programs, the appropriate resource personnel on the Forest will be consulted.

Letter 1836 — Plan, page 2-62. Please include Standards 220-226 as applicable standards for Management Area 9.

Response: — Laws specific to National Forest System wildernesses apply to Management Area 8 The cultural resource standards included in Management Area 8 (in addition to the COMMON STANDARDS) are there to clarify the Forest Service interpretation of how the wilderness laws and the cultural resource laws work together. The additional standards for lands in Management Area 8 are there to insure that when significant cultural resources are in NFS wildernesses, they will be maintained, preserved, or protected in some manner Otherwise, laws governing NFS wildernesses may require that structures, for instance, be allowed to deteriorate naturally. Management Area 9 lands are not subject to the Wilderness Act and therefore, have no need for standards beyond the COMMON STANDARDS

Letter 1836 — Plan, page 2-149. Please note that for Standard 811, permits are now issued under the Archaeological Resources Protection Act (ARPA) rather than the Antiquities Act of 1906

Response — Antiquities was used in a general sense rather than as a reference to the act. To clarify, the standard will be prefaced with· "Under applicable Laws, antiquities permits "

LANDS

Letter 89 — Give top priority to surveying and marking the boundary between the National Forest and private land A marked boundary would be of mutual benefit in preventing unlawful trespassing and facilitate timber harvesting.

Response: — The Revised Plan provides for the establishment of all landlines by the year 2000 and maintenance at 10 year intervals This will provide good property lines for all users

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Letter 2060 — Under the considerations of landownership adjustment (Appendix E-1), I believe the Forest Service needs to be much more aggressive The goal set in the appendix of acquiring just 200 acres/year is simply much too small A more realistic number would be 2000-3000 acres/year so that at the conclusion of the 10-15 year period of this plan, about one-half of the authorized acreage would have been obtained

Response. — The land acquisition program represents a realistic program that can be accomplished based on past history of tract and funding availability Acquiring lands to block in the area to the Forest Proclamation Boundary is not the intent of the acquisition program The intent is to consolidate existing holdings

Letter 2060

I am very concerned about the exchange program. Except for lands that may be adjacent to an established community and needed for public service type of operations, no lands should be deeded without restrictive covenants on development to prevent habitat modifications detrimental to the Forest itself. Significant scenic and conservation easements should be placed upon all transfers

Response:

Lands are exchanged on an equal value basis. If offered lands have restrictive covenants, federal lands will also have the same and vice-versa. Exchange is done to consolidate federal ownership and improve public accessibility to federal lands. Most federal tracts that are exchanged have very limited or non-existent access. When special conditions dictate, restricted covenants can be utilized, but these will be the exception rather than the rule.

Letter 2636

The Plan standards should clearly state the conditions under which military use of the land may take place The 9/30/88 Master Agreement between the Secretaries of Agriculture and Defense should be included in these standards.

Response:

The Master Agreement describes the procedures for military use It is not an appropriate standard for inclusion in the Revised Plan

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Letter 2636

Because of the sensitivity of land exchanges those taking place should be outlined clearly in the Plan or an appendix to the Plan.

Response:

Appendix E of the Revised Plan describes exchange procedures The details of tracts available for exchange and the priorities for exchange are available in the Forest Land Adjustment Map on file in the Forest Supervisor's Office.

Letters 3537, 4241

We recommend that utility rights-of-way be managed to reduce the edge effect and reduce herbicide application. Innovative approaches to rights-of-way management for this region are recommended by Gates (1991. Powerline corridors, edge effects, and wildlife in forested landscapes of the Central Appalachians In: Wildlife and habitats in managed landscapes, Rodiek and Bolen, editors Island Press, Washington, DC.) Alternatives to mowing and broadcast herbicide applications are published (Niering and Goodwin 1974, Creation of relatively stable shrublands with herbicides· arresting "succession" on rights-of-way and pastureland. Ecology 55· 784-795). And successful demonstration projects of alternative vegetation management for powerlines exist in Maryland (see Vegetation management technique enhances wildlife habitat on powerline rights-of-way, USDI, Fish and Wildlife Service, Research Bulletin No. 89-09, January 1989).

Response

The Desired Future Condition of Management Area 20 (Utility Rights-of-Way) has been rewritten to indicate desired rights-of-way management which is compatible with this request

Referenced sources of information will be passed on to District administrators to be used in the required preparation of utility right-of-way management plans.

Letters 3985, 3986

GWNF should continue to acquire lands which come on the market in an effort to fill out its authorized boundaries and emphasize on acquiring areas adjacent to and within currently owned lands. A large portion of the GWNF budget should go to land acquisition

Response

All alternatives have a land exchange program on a willing buyer - willing seller basis They differ in the amount of funding available for purchasing property. Alternative 3 has a large budget for land acquisition aimed at accomplishing this objective

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Letter 4268

Plan - For all management areas, utility corridors should be constructed along existing corridors whenever possible in an effort to reduce further habitat fragmentation

Response

The Desired Future Condition for Utility Corridors has been rewritten to suggest expanding existing rather than creating new areas.

Letter 4268 Plan - Maintenance of utility corridors should be being done with physical means rather than chemical (herbicides) whenever possible.

Response This is the usual practice Utility companies have greatly reduced use of herbicides

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OTHER COMMENTS: Comments Supporting an Alternative Other Than the Preferred Alternative

Letter 2177 I support Alternative 12 instead of Alternative 8. Alternative 12 provides for true multiple-use.

Letters 2195, 2212, 2870
I support Alt. 12 because it provides for true multiple use

Letter 2669 True multiple use is good mgmt It balances age class and provides food for wildlife That's why I like Alt. 12. It is a multiple use alt.

Response It is erroneous to refer to any alternative as the "true" multiple use alternative All of the alternatives comply with the Multiple Use - Sustained Yield Act.

Letter 13 I suggest that option 12 may be a more equitable choice for the general public

Letter 60 Just from what I know of the forest, it appears that either Alt 12 or a combination of 8 and 12, would be more practical or realistic

Letter 88 Alternative 12, with some changes, is my preferred Alternative

Letter 145 We urge the Forest Service to adopt a final management direction for the George Washington patterned after Alternative 12 We will be pleased to work with National Forest staff and other interested parties in identifying modifications to Alternative 12, which would bring it to the fullest level of public support and scientific soundness

Letter 280 Based on experience and professional judgement, Westvaco has identified alternative 12 as the preferred alternative, and we are actively working with sportsmen and loggers encouraging public support of alternative 12.

Letter 291 After studying your documents, we have determined that an alternative similar to Alternative 12 will do a much better job of managing our National Forest's resources.

Letters 95, 190, 326, 329, 366, 431, 433, 442, 444, 445, 446, 485, 494, 506, 540, 550, 552, 556, 708, 719, 751, 771, 773, 774, 852, 864, 879, 881, 883, 889, 943, 955, 956, 967, 975, 1068, 1080, 1092, 1140, 1159, 1271, 1272, 1289, 1294, 1302, 1307, 1315, 1316, 1324, 1325, 1326, 1327, 1333, 1335, 1336, 1356, 1339, 1362, 1376, 1377, 1385, 1425, 1426, 1427, 1428, 1432, 1433, 1436, 1442, 1444, 1457, 1465, 1467, 1470, 1474, 1547, 1550, 1564, 1565, 1567, 1568, 1570, 1607, 1614, 1617, 1618, 1635, 1641, 1643, 1646, 1648, 1649, 1668, 1674, 1683, 1799, 1805, 1807, 1813, 1814, 1818, 1834, 1840, 1844, 1853, 1856, 1860, 1867, 1872, 1894, 1903, 1907, 1960, 1961, 1962, 1970, 1977, 1979, 1993, 2008, 2016, 2025, 2041, 2042, 2043, 2058, 2102, 2103, 2104, 2105, 2184, 2198, 2201, 2209, 2217, 2233, 2243, 2246, 2248, 2249, 2252, 2257, 2258, 2263, 2264, 2270, 2279, 2288, 2293, 2294, 2297, 2298, 2303, 2305, 2310, 2356, 2359, 2369, 2371, 2373, 2374, 2379, 2458, 2459, 2495, 2507, 2516, 2544, 2549, 2550, 2552, 2555, 2559, 2568, 2583, 2596, 2610, 2642, 2643, 2644, 2645, 2646, 2653, 2655, 2668, 2679, 2728, 2739, 2810, 2830, 2832, 2849, 2855, 2880, 2906, 2933, 3320, 3486, 3494, 3507, 3551, 3554, 3609, 3622, 3751, 3760, 3822, 3833, 3857, 3877, 3889, 3891, 3960, 3971, 3995, 4025, 4054, 4059, 4063, 4069, 4236, 4237
We support Alternative 12

Letter 373 Alternative 12 is much more acceptable than Alternative 8

Letters 374, 769
We have identified Alternative 12 as our preferred alternative

Letter 437	Please put forest plan 12 to use
Letter 440	Article 12 is a good idea
Letter 524	I am supporting Alt. 12 because of wildlife management and gypsy moth control
Letter 725	Alternative #12 appeals to more individuals who take part in Forest activities Therefore, I feel the adopting Alt. 12 would be in your best interest And also the majority of the people, not the minority.
Letter 743	I have to urge you to use Alternative 12 because fellow workers, friends and family would suffer if you changed to Alternative 8
Letter 775	I strongly support Alt. 12. Alt 12 is the best alt offered
Letter 778	I favor Alt 12 which will increase the food for game
Letter 859	I cannot agree with Alt 8, I feel Alt 12 is much better suited for managing our NF's Excessive and stringent rules on forest mgt that are not necessary would put undue hardships on the people and the economy
Letter 943	I feel the wisest use of our natural resources and timberlands is met under the guidelines of Alt 12
Letter 980	I support Alternative 12 instead of 8, because my job and family depends on living money
Letter 1151	Please enact Alt 12 It is the most beneficial to man and the forest
Letter 2751	I support Alternative 12 as proposed by the Virginia 4-Wheel Drive Association
Letter 3590	I support Alternative Twelve as modified by the Virginia Four Wheel Drive Association
Letter 1164	We do support Alternative 12 of the draft LRMP and would endorse a renewed start of planning for this LRMP with Alternative 12 as the preferred alternative, even if that would mean that planning would be delayed.
Letters 893, 1084, 1251, 1618, 1664, 1890, 1891, 1892, 2575	Alt 12 appears to be the best alt
Letter 1256	I feel Alt 12 seems the most acceptable
Letter 1270	We support Alt 12 concerning the mgt plan for the GWNF This plan seems to be the most reasonable in providing for the concerns of the environmentalists and the ability of firms, like ourselves, to survive in the future.
Letters 1321, 1322,	I would like to express my disapproval of Alt #8. I approve and support Alt 12.
Letter 1331	I find that the people who live near the Forest support Alt 12 and I would like to support their cause.
Letter 1334	I support Alt 12, asking that NFs be managed for use by all citizens.
Letter 1407	I work for Ga -Pacific, I believe that Alt 12 is best for everyone concerned.
Letter 1408	Alt. 12 will do a much better job
Letter 1441	The only reasonable action is to support Alt 12 and correct flaws therein over the next 10 years
Letter 1452	The best choice from all standpoints would be Alt 12

Letter 1468 I feel that Alt. 12 would best suit the economy and the timber industry.

Letter 1469 Alt. 12 is the most responsible and productive of all the alts.

Letter 1627 The best plan seems to be Alt. 12 which will benefit all citizens.

Letter 1653 Under Alts 12 or 2 the amount of wilderness would stay the same, thus not catering to a very small percentage of user's single-minded desires and at the same time the majority of the users wouldn't suffer loss. I support Alt 12 or 2.

Letter 1659 Alt. 12 would better serve our forest and me as a sportsman.

Letter 1677 We support Alt 12. We need lumber to support our economy.

Letter 1682 Alt. 12 is a much better plan.

Letter 1800 Select Alt. 12. 42% suitable is more multiple use than 24%.

Letter 1817 You should change your preferred alternative to Alternative 12.

Letter 1831 Alt. 12 should be used instead of Alt. 8 because it benefits all citizens who may be concerned.

Letter 1833 I support Alt. 12 for multiple use.

Letter 1854 For our forest, animals, and jobs, please support Alternative 12, NOT 8.

Letter 1882 I feel that alt. 12 is in the best interest of the most people.

Letters 1890, 1891, 1892
Alternative 12 is the best choice.

Letter 2011 Please support Alternative #12 and give ATV riders and others their rights to enjoy National Forest.

Letter 2019 Choose Alternative 12, it takes care of people and the environment.

Letter 2211 Alt. 12 provides multiple habitats for many different species. I hereby cast my vote for alt. 12.

Letter 2221 Georgia-Pacific supports a final mgt. plan based on Alt. 12 versus Draft Alt. 8 which is too narrow in focus.

Letter 2231 Alt. 12 should be the basis for the new GWNF plan.

Letter 2238 We support Alt. 12, to ensure that our NFs benefit all citizens.

Letter 2241 I urge you to take a less restrictive approach by instituting Alternative 12.

Letter 2256 Alternative 12, although still short of the timber volume that should be cut, comes closer to the ideal and should be adopted.

Letters 2275, 2284, 2306, 2338, 2535, 2731, 3660, 4030,
I favor Alternative 12.

Letter 2286 We feel it is necessary that this forest remain a constant source of logs for us and for the furniture industry in general in VA and NC. Therefore, we ask that you adopt Alternative #12.

Letter 2342	I am convinced that Alternative #12 would be better for us all. I urge you to support Alternative #12.
Letter 2357	I support Alternative 12, which comes much closer to having "something for everyone "
Letter 2465	I am in favor of Alt. 12 for recreation use on the GWNF
Letter 2478	I think you should support Alternate 12 like I do and keep our forests always as beautiful as they are now.
Letter 2521	Please reconsider and designate Alternative 12 as the preferred alternative My children's future depends on proper stewardship of the National Forests.
Letter 2522	I support Alternative 12 as amended
Letter 2538	I urge you to support Alternative 12
Letter 2623	I hope you will consider the options and look at alt 12, for better forestry methods
Letters 2642, 2643, 2644, 2645, 2646, 3320	I support Alternative 12
Letter 2660	I strongly urge you to reconsider and choose Alternative 12 or something similar instead of Alternative 8
Letter 2661	Choose Alternative 12, a much more reasonable approach to managing the GWNF
Letter 2676	I don't agree fully with any of the alts , however, alt 12 seems to be the least objectionable for the GWNF.
Letter 2689	I think alternative 12 does a better overall job of managing the Forest than does alternative 8.
Letter 2848	Our forest should be protected under the Alternative 12
Letters 2864, 2876	I am in support of Alternative #12 because Alternative #12 will look after the future timber and the loggers.
Letter 2926	Although I find each of the alternatives lacking significantly in at leas one area, on balance I believe Alternative 12 is the best alternative.
Letter 3423	I support Alternative 12 for several reasons
Letter 3500	Enclosed are letters from some of our employees and loggers in support of Alternative 12
Letter 3506	We would like to see Alternative #12 enacted to protect the Forest.
Letter 3556	Alternative 12 can be the basis for a far more defensible management direction. Adopt Alternative 12.
Letter 3649	I support Alt 12 and wish to see Alt 8 done away with
Letter 3659	After reviewing your Preferred Alternative Plan No 8, I conclude that Alternative Plan No. 12 is a much better plan to get the maximum benefits from the Forest.
Letter 3672	Alternate 12, would in my opinion, be a much wiser choice!
Letter 3804	I looked over your alternatives and decided Alternative 12 is the best way to manage the GW.
Letter 3741	If political alternatives must be accepted #12 is far more desirable.

Letter 3890 Adopt Alternative 12

Letters 3919, 3939
We support a final plan patterned after Alternative 12

Letter 3953 It seems Plan 8 and 12 are most acceptable but would encourage timber harvest and ALL OTHER mgt. to remain about as is

Letter 3994 I ask you to support management Alternative Plan #12, instead of the Alternative Plan #8

Response In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits

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Letters 145, 190, 875, 1373, 756,
We agree with the Forest Service characterization of Alternative 12 in that it "Provides a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat " In doing so, this alternative also meets the objective of maximizing net public benefit

Letter 369 The WV Forestry Assn has identified Alt 12 as our preferred alt Compared to Alt 8, Alt 12 better meets the objective of maximizing net public benefits by providing a well-balanced multiple-use approach with no single use dominant

Letters 327, 328, 374, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 588, 604, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1138, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1393, 1394, 1395, 1396, 1397, 1398, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1717, 1718, 1719, 1720, 1721, 1722, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2533, 2763, 3059, 3060, 3061, 3062, 3063, 3064, 3120, 3121, 3122, 3123, 3124, 3125, 3126, 3127, 3128, 3129, 3130, 3131, 3132, 3133, 3134, 3135, 3136, 3137, 3138, 3139, 3140, 3141, 3142, 3143, 3144, 3145, 3186, 4067, 4070
Alternative 12 "Provides a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat " This alternative also meets the objective of maximizing net public benefit

Letters 379, 384, 1428, 2220, 3939
Alternative 12 meets the objective of maximizing net public benefit

Letter 490 Georgia-Pacific believes that the FS, as a large landowner, should manage the GWNF for "maximization of net public benefit " As stated in Alt 12, it "provides a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife " This approach truly maximizes net public benefit.

Letter 758 We share the FS objective of "maximization of net public benefit" in selecting a mgt direction for the GWNF With our shared objective in mind and based on experience and professional judgment, we have identified Alt. 12 as our preferred alt We ask that you also support Alt 12 as providing the most appropriate mgt. direction for the Forest

Letter 1091 Alt 12 gives us the best option to maximize net public benefit and practice forest CONSERVATION

Letter 1355 I agree with the FS characterization of Alt 12 in that it "Provides a full range of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat " In doing so, this alt also meets the objective of maximizing net public benefit In these days of an uncertain economy, we should be encouraging high employment and the development of our renewable natural resources, not the reverse

Letters 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419

Alt. 12 is the more balanced approach to managing all resources This approach would unquestionably maximize net public benefit by providing a full range of goods and services including timber, recreation, minerals, wilderness, and wildlife We are requesting that you will decide in favor of Alt 12

Letter 2018

Big Walker SWCD believes that Alt 12 comes closer to implementing the multiple-use concept and maximizing net public benefit Therefore, we strongly urge you to select Alt 12

Letter 2317

The forest should be managed for "maximization of net public benefit" Alternative 12 would accomplish this by providing a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife

Letters 2499, 2662, 3904, 4257

We support Alternative 12 because it more closely meets the objective of maximizing public benefits and provides a balanced multiple-use approach

Letter 2587

The Forest Service, as a large landowner, should manage the George Washington National Forest for "maximization of net public benefit." A final management plan based on Alternative 12 would seem a logical choice.

Letter 2663

I support Alt 12 because Alt 8 doesn't balance the multiple use needs of the forest, it doesn't maximize net public benefits, and it does not best accomplish the mission of the Forest Service, whereas Alt 12 provides "a full range of goods and services, including timber, recreation, minerals, wilderness, range and wildlife habitat "

Response

The Regional Forester will select the alternative which he believes "maximizes net public benefits" based on the analysis documented in the FEIS, national and regional policies, and comments received on the DEIS and Draft Revised Forest Plan This identification is a complex process which cannot simply be based on a goal statement for any alternative

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Letters 373, 376, 718, 728

Alternative 12 seems to address all of societies' needs yet maintains a timber harvest at acceptable but conservative levels

Response

Based on meetings with different individuals, groups and organizations, as well as comments on the DEIS and Draft Revised Forest Plan, the ID Team believes that Alternative 12 may not address all of society's needs or necessarily be the alternative that "meets the needs of the public".

Letter 369

Alt 12 allocates 2342 acres more to Appalachian Trail mgt and 905 acres more to Scenic and Recreational River mgt than does Alt 8

Letter 1628

I strongly urge you to consider Alt 12 as a plan that provides better protection for our important nontimber resources and better utilizes the vast potential of the GWNF to supply wood products vital to the local economy than does Alt 8 Under 12, acreage dedicated to Appalachian Trail protection, scenic river mgt and wildlife habitat maintenance is significantly higher than under Alt 8 The demand for timber products is met under Alt 12 whereas only about 60 percent of the demand is met under Alt 8 Alt 12 would increase jobs by 194 compared to Alt. 8 which would decrease jobs by 21 This is significant! With the implementation of Alt. 12 it will be possible to increase both employment and the conservation of our natural resources for the greatest public good

Letter 2538

More acreage would be provided [in Alternative 12] for recreation activities such as hiking, camping and boating on the Appalachian Trail and Scenic Rivers

Letter 3743

This alternative [#12] supplies additional acreage over Alternative 8 in the "protection, management, and use of the Appalachian Trail " Alternative 12 grants extra acres (14,337) set aside to manage Scenic and Recreational Rivers, compared to Alternative 8 (13,432)

Response

The rationale for the decision of which alternative will serve as the Revised Plan will be documented in the record of decision for the FEIS In making this decision, the Regional Forester will consider points raised by the public in their response to the Draft Revised Plan and DEIS

The Forest has serious concerns over the assertion that Alternative 12 " provides better protection to important non-timber resources " The fact that there is more acreage in Management Area 6 and Management Area 10 should not be misconstrued to mean that the Appalachian Trail or rivers qualifying for wild and scenic river designation are receiving a higher degree of protection.

All alternatives allocate the Appalachian Trail corridor to Management Area 6 except where it lies within a roadless area recommended for wilderness study Portions within roadless areas recommended for wilderness study are allocated to Management Area 8 Management Area 8 affords at least an equal degree of protection as Management Area 6.

Management Area 10 is the least protection that can be afforded to rivers qualifying for designation as recreational or scenic rivers Any alternative with less acreage in Management Area 10 is providing equal or more protection, not less, by assigning river corridors to other management areas with more restrictive standards

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Letter 192 Plan #12 is better for wildlife, recreation and the control of the gypsy moth It also contributes more significantly to the needs of the economy and people for employment and goods and services from the forest.

Letter 289 I support Alt 12 Alt 12 provides for multiple uses, and provides more money to the local economies than Alt 8

Letter 293 Alternative #12 seems to let you have the best shot at actual management of the forest I believe that you will need its flexibility to harvest some of the Gypsy moth damage, and to clearcut some areas for wildlife habitat

Letter 325 Alternative 12 will allow controls In West Virginia, the cost-benefit ratio of protecting with Dimilin, for example, is about 40 1 Only by harvesting can we preserve biological diversity, maintain a variety of wildlife habitats and keep a maximum number of our fellow citizens working Alternative 12 has 38% more money for the counties than does alternative eight Twelve also increases total jobs over eight by 215, and the timber industry alone by 145 The total budget under twelve is nearly 15% less, a significant $2,750,000 And, annual road construction is 25% less and, allowable sale is up under 12 Yet, there is nothing under 12 that will detract from the maintenance of soils, water, recreation, aesthetics and wildlife The mileage of scenic rivers actually increases under alternative 12

Letter 326 Alternative 12 provides 1) Sustained yield 2) Reasonable return of revenue of the U S Treasury and local government 3) Adequate employment opportunities for local citizens 4) Balance in the "multiple use" concept of forest management 5) Adequate natural resource protection

Letter 382 While providing few multiple-use benefits, Alternative 8 costs $2,749,000 more per year to implement than Alternative 12. Alternative 8 projects decreased payments to counties, while Alternative 12 projects increased payments Alternative 8 projects (far too conservatively) job losses, Alternative 12 projects job gains

Letter 427 I would like to see Alt 12! This would help me and benefit wildlife through timber sales

Letter 428 #12 would be best Alt because it would protect the wildlife and recreation as well as the jobs of the people

Letter 432 Please select plan #12 It will allow timber to be managed properly while helping wildlife and recreation

Letter 434 I am interested in plan 12 because it will help everyone interested in the timber industry and will help wildlife and hunters, also camping

Letter 435 I am in support of Alt 12 I want the forest managed to produce timber and jobs

Letter 436 Alt 12 would be good for timber, wildlife, recreation and all concerned

Letter 438 I would like to see a management plan that would benefit the economy, people, wildlife, timber, recreation I feel Alternative 12 would be the best

Letter 441	I am concerned about the future supply of timber Alt 12 would be best
Letter 488	I favor Alt 12, it will do a better job of fighting the gypmo infestation This alt. will keep the same amount of jobs, and possibly increase jobs in the area
Letter 488	Support the use of Alt. 12 It takes into account a larger number of user groups, maintains the number of acres suitable for timber harvesting, gives protection of the NF from a looming threat in the form of the Gypmo
Letter 489	Support the use of Alternative 12 This represents a larger number of user groups It also maintains the number of acres suitable for timber harvesting Along with this alternative comes the protection of the National Forest from a looming threat in the form of the gypsy moth.
Letter 497	Alt 12 would utilize the forest for maximum public benefit and at a lower budget Other key advantages of Alt 12 over Alt 8 are: Adds jobs in the private sector, gives higher return to the counties, meets the current demand for timber products. Perhaps the most important difference is that Alt 12 recognizes that the gypsy moth is "for real"
Letter 510	Alt. 12 meets the needs [of providing gypmo-resistant oak reproduction, providing jobs, allowing an aging population access to the forest, providing food for game animals, and limiting wilderness acreage] while also paying more to county budgets and creates 87 more direct jobs Scrap Alt 8 in favor of 12
Letter 511	I support Alternative 12 This Alternative will increase jobs without major destruction to the forest Alternative 12 will manage the gypsy moth infestation as well as manage the streams and forest This will not hurt the wildlife, in fact it will help the deer.
Letter 512	I believe Alternative 12 is a more balanced approach to managing the resources. With the economy the way it is I can't see the forest being wasted by the Gypsy Moth and people put out of work
Letter 513	I am in support of Alt. 12 because I think it will be better for the economy #(1) create more jobs and will increase recreational areas and increase tourists
Letter 514	I am supporting #12 because (it) provides more dollars into wildlife programs benefitting hunting, provides more money for schools and provides good forestry practices to minimize the impact of the gypsy moth
Letter 515	I like #12. The wildlife of the state would prosper It would create more jobs in the state, take care of the gypsy moth, they would not destroy the timber as they do now
Letter 517	I support Alt 12 in regard to the help it will give the forest wildlife This in turn will create jobs without hurting the existing wildlife It will help control the gypsy moth infestation.
Letter 519	I feel Alternative 12 would be the best choice because it provides for more jobs to be created from harvesting timber and because more acreage would be made available for all-terrain vehicles
Letter 520	Alt. 12 is best suited for the environment Alt 12 would create more jobs Also, big game hunting would benefit more
Letter 522	I support Alternative #12 for the following reasons 1) Better wildlife management 2) Better timber harvest 3) Better revenue for communities and schools 4) More recreational areas
Letter 523	I support Alternative #12 over Alternative #8 Alternative #12 will do more for wildlife and recreation while providing a stable timber supply and help with the fight against Gypsy Moths.
Letter 525	I support Alternative 12 because it helps jobs in the future and helps wildlife It will have more areas for camping and fishing
Letter 527	I support Alt 12 because a properly managed forest will provide maximum benefits for the public Lumber & wood products are vital to the WV economy Also gypsy moths will destroy the timber if it is not harvested and their population will grow rapidly if the forest is not allowed to be managed properly
Letter 529	I support Alt 12 because I feel the NF's need better mgt for timber harvesting and recreational opportunities, particularly for the keeping of jobs for the local economy

Letter 531	I support Alternative 12 because I feel it will bring more money into the state, and because I need all the logs we can get so I can stay working, and I feel it better supplies our wildlife with things to eat
Letter 533	I prefer Alternative 12 because of the use for hunting and jobs for the surrounding area and recreation the forests should be used by the public which it was set up for
Letter 534	I support Alternative #12 because it will supply jobs, will provide more recreation, will help wildlife, will provide more money for public education, and will stop the spread of Gypsy Moths
Letter 535	I support Alternative 12 because it will save jobs that are very badly needed I believe Alternative 12 will be great for wildlife, because there will be more food and protection. I believe that Alternative 12 will bring in more revenue to our state
Letter 537	I support Alternative #12 for better forest control of gypsy moth, timber regulation, better regulation of wildlife, hunting, and fishing More jobs and funding for schools and wildlife
Letter 538	I support Alternative #12 instead of Alternative #8. My reason for the above is #12 would give a needed timber supply for the local economy and create much needed jobs. Also, more money would be available for local school systems
Letter 539	I feel that Alternative #12 is more suited to the best interests of all concerned Alternative #12 would maintain or promote much needed jobs for the local economies as well as generating income for these economies It is better suited for the management of timber for wood using facilities and also for wildlife. The gypsy moth program is much more addressed in Alternative #12 than Alternative #8.
Letter 541	I'm for Alternative 12 Provide jobs, less unemployment Good for the community and more camping areas.
Letter 542	I support Alternative 12 because it will help the wildlife and manage the gypsy moth It will help keep people in jobs in our state.
Letter 543	It is my opinion that #12 is a much wiser management of the land to preserve wildlife, jobs and protection of the forest from the gypsy moth and other threatening plagues of the forest
Letter 544	I support Alternative 12 because of the wildlife, and we need more timber for jobs.
Letter 545	I support Alternative 12 instead of Alternative 8 Alternative 12 would help create badly needed jobs and better habitat for wildlife
Letter 546	I support Alternative #12 because it provides more revenue for county schools thru timber sales, provides more dollars into the wildlife program, provides more recreational acres, provides good forestry practices to minimize the impact of gypsy moth, and provides and maintains more jobs
Letter 547	Alternative 12 will provide more money for wildlife and may help keep jobs more abundant in our state
Letter 548	I support Alternative #12 because it provides better management, more jobs, gypsy moth control, and more tax revenue for recreation.
Letter 549	I think Alternative #12 would be the best choice as it offers moth control, more jobs, better timber management
Letter 550	Alternative 12 better meets the needs of wildlife and forest industry
Letter 553	The reason why I support Alternative 12 is to try to protect timber jobs and to maintain wildlife, and to protect our timber from gypsy moth, and also supply more money for our school systems
Letter 554	Alternative 12 is much more reasonable for the economy
Letter 555	I support Alternative 12 Alternative 12 will provide and maintain much needed jobs and enhance wildlife management and provide for access to the forest by a wider segment of the public

Letter 556 Alternative #12 is better for wildlife management and supports more badly needed jobs

Letter 557 I support Alternative 12 for the reason, control the forest Make more jobs for the people and keep our schools open

Letter 558 Alternative 12 would provide more use of the forest lands for more types of sports activities and provide resources for the timber industry

Letter 704 I chose #12 because I feel it will go further towards providing a quality habitat for wildlife, as well as limiting the potential catastrophic effects of the gypsy moth

Letter 705 Alternative 12 will be a good plan to help protect jobs that rely on the use of wood and will also help protect *our forests and the wildlife habitat*

Letter 722 I support Alt 12 because it's better for wildlife and the moth will be destroyed and there will be more jobs in West Virginia

Letter 723 I would like to express my support for Alt 12 This option would open more forested areas for hunting and fishing purposes This alt will also provide as well as keep more jobs for the communities affected by this decision

Letter 724 I support Alt 12 due to the fact that it not only better addresses the Gypsy Moth problem, but it also utilizes a better over-all approach for forest mgt that will better suit the general population's needs for the forests

Letter 729 I like Alt 12 We should be encouraging the development and wise use of our renewable natural resources, not the reverse We must stop the Gypsy Moth or lose our hardwood forests as we know them today

Letter 736 I believe that Alt 12 does the best (job) in addressing a balance among competing values and will support your position that this alt provides a full range of goods and services and meets the objectives of maximizing net public benefit

Letter 742 You should adopt #12 as the best of the lot Our goal should be high levels of employment and the development of our natural resource - not the reverse

Letter 747 We share the Forest Service objective of "maximization of net public benefit" in selecting a mgmt direction. Alt. 12 "provides a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat" and also meets the objective of maximizing net public benefit We have identified Alt 12 as our *preferred Alt Alt 12, while providing a small fraction of the wood which could be produced from the forest, does* allow for development of the regional forest economy The alt is clearly sensitive to the "below cost" sales issue Gypsy moth is a reality for the GW that will be with us for the foreseeable future We support, and believe that Alt 12 will accommodate, the use of effective pesticides to combat the spread of the moths We also recognize that in lieu of pesticides, specified timber harvests are an absolutely essential tool

Letter 749 I find Alt. 12 to be more desirable Along with providing for higher levels of timber production which provide much needed jobs and revenue to counties, it allows the harvest of high value sawtimber stands that are susceptible to Gypsy Moth defoliation Alt 12 will provide the maximum benefit to all segments of the public. It will provide for timber, recreation, minerals, wilderness, water, and wildlife habitats

Letters 761, 1056

Alt 12 is the multiple use plan that satisfies the demands of the most forest users My industry can live with a 50 mmbf ASQ, although 60 mmbf would be ideal Gypsy moth problems can be better addressed with Alt. 12. Alt 12 also doesn't include 251,978 ac for "remote highlands" We have too much wilderness already

Letter 770 The National Forest has the capacity to contribute to regional economic stability by actively marketing wood raw materials in a reliable fashion Alt 12 does allow for development of the regional forest economy. The alt. is clearly sensitive to the "below cost" sales issue and only contemplates annual harvest on slightly less than 0 6% of the forest Timber harvesting is integral to creation of wildlife habitat, dispersed and concentrated recreation, and the maintenance of overall biological diversity We have identified Alt 12 as our preferred Alt Alt. 12 will accommodate the use of effective pesticides to combat the spread of the moths Forest managers must be able *to prescribe timber harvests BEFORE infestations take place in order to preserve tree species diversity*

Letter 862	Alternative 12 established apparently adequate areas for the other demands on the Forest, when those needs are not compatible with active forest management practices Multiple-use instead of use exclusion. Another attractive aspect of Alternative No 12 is the more aggressive approach to both fire management and gypsy moth control
Letter 866	Alt. 12 adequately provides for all multiple uses It also provides pesticide protection from the gypsy moth which we so need I am supportive of Alt 12, not Alt. 8
Letter 869	I feel Alternative 13 would best be suited for GWNF and save the taxpayers a considerable sum
Letter 870	Alt 12 is the multiple use plan that satisfies the demands of most forest users My industry can live with a 50 mmbf ASQ. Gypsy moth problems can be better addressed w/Alt 12. Alt 12 also doesn't include 251,978 ac for "remote highlands" We have too much wilderness already
Letter 879	Alt. 12 will allow area communities to enjoy a stable economy while at the same time allow for expanded use by recreational visitors
Letter 882	We support the use of Alt plan #12; this plan is the best for protection against the gypsy moth Jobs will be created and preserved in the forest industry
Letter 890	I support Alt 12. The development and wise use of our renewable natural resources can only be done by supporting Alt 12. Alt. 12 will increase jobs
Letter 946	I support the selection of Alternative 12 management plan. Reasons are Reasonable volume of timber and pulpwood production, while most effectively protecting some scenic, recreational, wilderness areas, and wildlife species, and providing most practical program against gypsy moth intrusion
Letter 947	We believe Plan 12 to be the best plan by far This plan we feel is a plan that everyone can live with, and not work hardships on anyone In these times of economic hardships we do not need the loss of any more jobs, nor do we need to lose the tax income to the localities.
Letter 985	Alternative 12 would effectively increase the number of timber related jobs in my area, would pay more money to localities than Alternative 8 and would meet the market demand for timber products I encourage you to give serious consideration to this alternative
Letter 1057	Alt 12 is the best of the listed alternatives It comes up short in harvest volume and should call for treating all gypsy moth areas, not just those suggested It comes closest to multiple use mgmt. and should be the preferred alt.
Letter 1060	There are some management techniques which can be utilized and reduce the costs However, the agency selection of Alternative #8 will only increase the costs associated with the forest timber sale program. Specifically, Alternative 8 will shift forest management to a heavy dependence on "group selection" which is more costly than even-age methods of regeneration because one must go further for less volume Major shifts in harvest methods, as proposed by Alternative 8, do not help the financial picture and may not be the best decision from a professional forestry position. Adopting Alternative 12 will not increase the harvest levels beyond the forest's ability In fact, under Alternative 12, less than one percent of the forest will be harvested annually In addition, the shift in harvest methods proposed by Alternative 8 requires more roads and more frequent entries into an area Under Alternative 8 new road construction will total 20 miles per year Alternative 12 lowers that requirement to 15 miles per year
Letter 1063	Alternative 12 is clearly a better proposal Counties, citizens, and wildlife will prosper with Alternative 12 Management of the budget for the forest is not only less, more of the demand for timber products will be met. A species called a gypsy moth will be controlled in a greater volume I am in favor of Alternative 12
Letter 1088	I totally support Alt 12 It adequately provides for all multiple uses and would create more jobs for our already hard hit area
Letter 1141	We believe Alternative 12 adequately provides for all multiple uses, and therefore is the alternative we support Alternative 12 will increase jobs in the area

Letter 1263 Alt. 12 adequately provides for all multiple uses and therefore is the alt I support. I do not support Alt. 8. Alt. 12 is much more favorable for my future employment interests! We should be encouraging the development and wise use of our renewable natural resources, not the reverse. In addition, my family enjoys the use of the recreational facilities, which we feel Alt 12 is better for also.

Letter 1264 We endorse Alt. 12 for the following reasons: offers best overall plan for multiple use mgmt ; allows for increased timber harvesting while maintaining a properly managed forest; increased jobs within and outside the timber industry; provides more acreage for the protection, mgt , and use of the Appalachian Trail, provides more acreage for mgt. of the Scenic & Recreational Rivers. Provides more acreage for wildlife species and wildlife habitats; increases revenues to respective counties while decreasing the total annual budget for the forest.

Letter 1266 The #12 proposal is more beneficial to the Timber Industry because it will provide more timber sales, less road construction, less change in employment, and better suited for many multiple use mgt

Letter 1303 Alt 12 will do more than maximize the public benefit of these lands. The silvicultural practices outlines in the plan will do more to protect the forest from the gypsy moth infestation, support the economic needs of the timber and other associated industries, and at the same time, provide for recreational use. In addition, as a taxpayer I support Alt. 12 because it provides more value to more citizens at a budget cost that is $2.75 million less than Alt 8 For these reasons, I urge you to select Alt 12.

Letter 1305 We have identified Alt 12 as our preferred Alt Alt. 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the regional forest economy. The alternative is clearly sensitive to the "below cost" sales issue and only contemplates annual harvest on slightly less than 0.6% of the forest Alt 12 will accommodate the use of effective pesticides to combat the spread of the moth. Forest managers must be able to prescribe timber harvest before infestation takes place in order to preserve tree species diversity. Alt 12 meets the objective of maximizing net public benefit.

Letter 1319 I support Alt 12. Alt 12 will increase jobs and provide cost-effective methods of harvesting Alt. 12 also better meets the demands for timber products.

Letter 1338 Alt 12 represents a more thorough, balanced plan It provides true multiple use mgt and maximizes net public benefit

Letter 1342 I urge you to use Alt 12 as the final plan for the forest We are located in an area where wood use is of vital economic importance to our area and Alt. 12 provides all the multiple use and still allows for economic stability for our area

Letter 1361 I prefer Alt 12 because it comes closer to providing the best mix of goods and services Alt. 12 does a much better job of treating the gypmo problem.

Letters 1379, 1380, 1381, 1382, 1383, 1384, 1404, 1405, 1406, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1689, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1929, 1930, 1931, 2155, 2156, 2157, 2402, 2403, 3276, 3277, 3278, 3279, 3280, 3281, 3282, 3283, 3284, 3285, 3286, 3287, 3288, 3289, 3290, 3291, 3292, 4151
Alt 12 adequately provides for all multiple uses, and therefore is the alt I support We need to support the economy of our area because Alt 12 will increase jobs in the area.

Letter 1431 I would like to see Alt #12 selected to maintain a timber sale program which will provide stable employment to the wood product plants and their employees in VA and WV These sales will continue to produce revenue for local school systems in both States Better wildlife mgt will result from Alt 12, insuring better hunting in both States

Letter 1446 I recommend that your group review, re-evaluate, propose, and adopt Alt 12 for the next 10-yr period By your own analysis, Alt 12 will cost less, earn more, and provide equally as much in other benefits as will Alt. 8

Letter 1447 The Pendleton County Commission supports Alt 12 Not only will it generate more revenue for the counties, but will create jobs It is pro-business and this is synonymous with the efforts of our development authority

Letter 1459	I feel that Alt 12 would be the wisest and overall best plan for the future of the forest, and the economy likewise
Letter 1460	I support #12 because we need timber so we can have jobs to support our families and the wildlife
Letter 1461	Plan 12 is the best, it will give people jobs and give revenue to counties. The revenue would provide for better education, and create more jobs The State of Virginia would also benefit from the sale of hunting licenses
Letter 1466	I strongly support Alt. 12 instead of plan 8 because timber can be harvested as well as being able to preserve wildlife and keep the economy in good standing
Letter 1471	I think we should use Alt 12 It is better, both from the standpoint of jobs and also because of hunting I think you can timber land and also use it for other things as well Timber is a renewable product
Letter 1543	I strongly urge the Forest Service to consider Alternative 7 and 12 Alternative 12 provides a balance of multiple-use benefits Alternative 7 provides a high level of timber products, creates the most jobs, and returns the second highest level of distributions to the counties
Letter 1549	The FS should change the Preferred Alt from 8 to 12 Alt 12 will go further towards providing a quality habitat for wildlife, limit the potential effects of the gypmo, and will do a much better job of managing our NF's resources
Letter 1562	I do feel that Alternative 12 is the best of the 13 presented I feel that an annual harvest on slightly less than 0 6 percent of forest area is too small [because of the poor economy and] because of the presence of the Gypsy Moth.
Letter 1577	I think that alternative 2 should stay in effect because it is not putting a major dent in our environment and profits and benefits are very good
Letter 1578	The way I see it, the #2 alternative is the best It is the existing plan and I think it has been very successful It provides jobs for the loggers and there is still room for ATV development, recreation, wilderness use, and new road construction It has been successful and I think it can and should continue
Letter 1588	I chose Alternative #9 because it wants no ATV development With the soil that we have in Bath County and all the moisture in the ground it would make the forests very muddy Also, it wants a lot of land to use for wilderness
Letter 1590	I favor Alternative #10 because it doesn't make anyone too happy or too mad By providing the wood industry with 15 million board feet, the wood business might not get all the wood they want, but it is better than nothing It doesn't cost the taxpayers a lot compared to some others It also allows for 2 more miles of roads to be built It allows for 758 acres of clearcutting and 6,000 acres of burning For those who really love the outdoors, it provides 127,141 acres for ATV trails
Letter 1595	I am in favor of Alternative 11 This Alternative would allow only 500 acres to be burned and more to be cut and sold to Westvaco But not as much to hurt it's beauty
Letter 1597	I chose alternative #4. I think more roads should be built, because if we build more roads then more tourists will come to VA. We can ride and see the parts of our forests that we haven't seen
Letter 1598	Alternative 9 is the best choice Prescribed burning is only 500 This would cut down on pollution and save more land for our animals
Letter 1601	I chose alternative 2 because it is the one in progress They are doing a darn good job with it It also has a fair amount for timber and recreation
Letter 1604	I chose Alternative #9 because there is no ATV development Also, there would be lots of land going towards wilderness areas Also, not as much land would be used for timber, and none for clearcutting
Letter 1609	Alt 12 will protect jobs, provide adequate acreage for timber harvesting, protect the forest from the gypsy moth, provide more opportunities for outdoor recreation and create significantly more habitat for wildlife species such as the black bear, pileated woodpecker and ruffed grouse Please consider Alt 12

Letter 1613 Alt 12 is the alt I support because it maximizes net public benefit It is the true multiple use alt It increases timber production, which helps the local economy It costs tax payers less money by the total annual budget being less and gives more money to counties for schools It calls for no more wilderness

Letter 1620 *We would like to voice our approval for Alt 12 It would not only be protective of the animal population but still* provide the needed employment and recreation for all citizens

Letter 1625 If it is indeed true that Alt 8 will negatively impact many game species due to loss of oak and other mast-producing trees, that Alt 8 will reduce rural employment, and that Alt. 8 will result in the reduction of timber harvesting levels, then may I request your close attention to Alt 12 which to my untrained eye would seem the more supportable approach from a multiple use standpoint Register my support of Alt 12

Letter 1626 It appears to me that Alt 12 continues to manage and administer the NF in a proper, reasonable and ethical use for wildlife and fish, watershed, range, timber and outdoor recreation purposes I would especially be concerned about the control of the oncoming gypsy moth I strongly encourage the use of Alt 12 to maintain the philosophy of the multiple-use forest concept

Letter 1629 Looking at Alt 12 I see a much more usable use and protection of our forests (gypsy moth etc) than Alt 8 Therefore I support Alt 12 - with some reservations that is clearcutting, I would hope, would be done only in very select conditions and places

Letter 1635 *Alt 12 provides better support for the multiple-use concept of the forest by providing economic support for* industry and small business people as well as providing for the concerns about recreation, range, watershed *and wildlife and fishing purposes*

Letter 1637 We support Alt 12 which we understand means more tax revenue for counties, more jobs for timber industry, meets all demand for timber products, less total acreage affected, more acreage available for gypmo treatment, and more efficient use of gypsy moth infested acreage

Letter 1654 I support Alt 12 Jobs are more important than preservation, but Alt 12 addresses both

Letter 1657 Alt 12, while only providing a small fraction of the wood which could be produced from the forest, does allow for development of the forest economy We strongly support Alt 12 Alt 12, with the use of pesticides, will effectively combat the spread of gypsy moths and in lieu of pesticides, specified timber harvest are an absolutely essential tool in order to preserve tree species diversity.

Letter 1666 Alt 12 will offer better protection against Gypsy Moth infestation in the GWNF, support the economic needs of the timber and other associated industries, and provide a better habitat to support the wildlife in the area Alt *12 provides more value to more citizens at a budget cost of $2 75 million less than Alt 8*

Letter 1675 *We support Alt 12 Other alt plans will greatly reduce employment We also feel the wildlife habitat will suffer* considerably

Letters 1798, 2162, 2908, 3588, 3589
Alternative 12 is the multiple-use plan that satisfies the demands of the most forest users My industry can live with a 50 mmbf ASQ, although 60 mmbf would be ideal Gypsy Moth problems can be better addressed

Letter 1812 Local communities surrounding NF's have naturally based their economies on resources that come off those forests Alt 12, while falling unnecessarily short of the supply capabilities of the forest, does allow for development of the regional forest economy Timber harvesting, far from being exclusive of other uses of the forest, makes a contribution to multiple uses, not the least of which is to supply the FS with a large portion of their budget Timber harvesting is also an integral ingredient for wildlife habitat, recreation and biological diversity We ask that you support Alt 12

Letter 1825 Alternative 12 "Provides a full range of goods and services including timber, recreation, minerals, range, wilderness and wildlife habitat" Alternative 12 also meets the objective of maximizing net public benefit We should be encouraging high employment and the development our renewable natural resources not doing the *opposite*

Letter 1839 *I support Alt 12 which will allow for spraying of the gypmo and will provide a full range of goods and services,* including timber, recreation, minerals, wilderness, range and wildlife habitat

Letter 1852	The best forest management should be the top priority to perpetuate timber production and provide for the food and shelter for wildlife, soil and water quality protection forever Alternative 12 seems best for this kind of future
Letter 1866	I favor Plan Alt 12 which benefits more people--including ATV riders, hunters, local economies It creates more jobs.
Letter 1871	Alt 12 benefits more people, ATV riders, hunters, local economies - it creates more jobs Adopt Alt. 12 for the future of the Forest.
Letter 1877	Plan #12 is the Plan you should adopt because of opportunities available to me and many other ATV drivers, hunters, etc. Plan 12 would boost the local economy by allowing hunting and all people who own ATV's to ride on the GWNF.
Letter 1881	I favor Plan #12, which benefits more people - including ATV riders, hunters and local economies - it creates more jobs.
Letter 1995	I favor Alternative #12 It seems to be much more equal to hunters, hikers, ATV riders and people who enjoy the great outdoors. I believe it would attract more individuals to enjoy our National Forest It would also help stimulate the local economy
Letter 2000	Alternative 12 is more appropriate since it supports the overall forest system better, will not cause the negative impacts cited above for game species and rural local people, and since it will provide a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat
Letter 2001	I favor alt 12 Alt. 12 benefits more people, including ATV riders, hunters, local economies, and it creates more jobs
Letter 2028	I support Alternative #12. I think it does the best job of using the Forest wisely and will increase jobs in the area.
Letter 2164	Alt. 12 does a better job of regenerating our oak forest in a cost-effective way and also creates 215 more jobs It also doesn't include additional wilderness, something we surely don't need anymore of
Letter 2165	Alt 12 is the multiple use plan that satisfies the demands of the most forest users My industry can live with a 50mmbf ASQ, although 60 mmbf would be ideal Gypmo problems can be better addressed with alt 12. Alt 12 also doesn't include 251,978 ac for "remote highlands" We have too much wilderness already
Letter 2169	I believe Alt. 12 is a proper direction for the Forest Service to take The summary says this is a "Multiple Use" alternative Isn't that your mandated objective? Cut 50mmbf and we'll all benefit There is more at stake than jobs Wildlife needs browse and soft mast and cover provided by the 2900 clearcut acres per year
Letter 2170	Alternative 12 adequately provides for all multiple uses. That is the alternative that I support [It] will increase jobs in the area. If you cut back on USFS timber sales, I cannot buy enough timber to keep my operation going.
Letter 2171	I support Alternative 12 Alternative 12 provides for all multiple uses and still protects the environment It creates jobs.
Letter 2172	I support Alternative 12. It provides for all multiple uses Alternative 8 is not desirable and does not serve the needs of the people Alternative 12 provides for a sensible forest plan
Letter 2173	I favor Alternative 12. Alternative 12 provides a $70,000 gain in distribution of revenues to counties, considers the most acreage for gypsy moth treatment, and raises the average annual sale quantity
Letter 2174	Alternative 12 insures that there will be jobs in my community, money for schools, and a healthy forest for the future Let's conserve our forest, not preserve it
Letter 2178	I support Alt 12 instead of Alt. 8 because it's a multiple-use alternative and will increase jobs in our area
Letter 2179	I support At. 12 for the main reason it will increase jobs, cost taxpayers less to implement and also return funding into our schools Alt. 12 will serve the needs of the people!

Letter 2185 I support alt. 12 Alt. 12 provides for more jobs, wise use of our natural resources, less wilderness areas, more returns to counties, a higher level of timber harvest, and true multiple use

Letter 2186 Alt 12 is the most beneficial It creates jobs that are so desperately needed. 145 families would enjoy a better life and the wildlife will too

Letter 2188 Alt. 12 is the multiple use plan that satisfies the demands of the most forest users. Gypmo is treated on more acres. Alt 12 also doesn't include 251,978 acres for "remote highlands" Alt. 12 better manages our Forest.

Letter 2190 I support Alt 12 because it maximizes net public benefit. I support increasing the timber production to 50 mmbf. Future timber demands need to be met by the USFS Timber mgt is an essential part of wildlife mgt. Alt 12 increases employment opportunities and provides money to county schools

Letter 2193 I support Alt. 12. That will keep our forest healthy. Let's promote jobs because our economy sure needs them.

Letter 2196 I support alt 12 because it has a true multiple use theme. It has a reasonable timber ASQ, promotes wildlife mgt, cuts back on wilderness areas, costs taxpayers less money, and gives counties more revenue for schools and roads. It is the only alt. that uses proper forest mgt. and insures a continuation of a healthy forest. We need clearcutting for deer, wildlife and turkey habitat. I want the forest to be managed for multiple use, not for biological diversity and sensitive species

Letter 2197 I'm all for the local economy, timber jobs, higher amount of timber sales, no more wilderness areas and promoting wildlife I prefer Alt 12, it is for multiple use.

Letter 2202 I support Alternative 12 because it increases jobs in our area, provides a $139,000 gain to counties for schools and roads, and costs taxpayers less to implement.

Letter 2204 Alternative 12 meets these [access to the forest and food for game species] needs while also paying more to county budgets and creates 87 more direct jobs. Favor 12.

Letter 2205 I like Alt. 12 Not only because it has one of the highest ASQ's but because it's the true multiple use one. It cares about the local economy, timber demand, wildlife and the everyday needs of the common people.

Letter 2206 Alt 12 would do a better job Payment to counties is increased The gypsy moth can be better controlled.

Letter 2208 Alt. 12 supplies the demands of the forest resources of the GWNF. It provides more money for schools and takes less money to implement. I support Alt. 12

Letter 2209 Alternative 12 is the multiple use alternative which allows for more jobs in the area, a higher amount of timber sales which should help the local economy because of the labor intensive occupation, promotes schools for my children and insures we have future timber to cut and for others to see.

Letter 2214 Alt 12 provides for multiple use It gives additional wood products for the timber-dependent public. It will also help the local school system through additional revenues to counties and will cost taxpayers less to implement. I feel Alt 12 would be a better forest plan.

Letter 2216 I choose Alternative 12 because of the higher ASQ and how it helps the local economy, schools, and the environment.

Letter 2224 Alt. 12 is the only alternative that makes sense Allowing a higher timber sales quantity would help the local loggers acquire stumpage and keep their workers employed, not on welfare. Alternative 12 would supply a $139,000 gain to counties for schools and have a 4-billion-dollar increase in total area income It would allow additional acreage to be treated for gypmo to keep our forest healthy It would reduce the amount of acres set aside for wilderness or roadless areas, because we have enough now

Letter 2226 I prefer alternative 12 [It is the] multiple use alternative. It allows for a higher timber sale quantity, more jobs, more money to counties for schools, and the wise use of our natural resources. It supplies the demands of the forest resources. Where is the future demand for wood products coming from? I don't see any increase coming from private landowners

Letters 2236, 2244	I favor Alt 12 Alt. 12 benefits more people - including ATV riders, hunters, local economies - it creates more jobs
Letter 2245	I prefer Alt 12 because it provides more timber and jobs for our area.
Letter 2247	I prefer Plan 12 over Plan 8 as it would help older hunters and benefit more people
Letter 2265	I support Alt. 12 which "provides a full range of goods and services" Not to follow such a course of action would make the wildlife biologists' work over the last 25 years be for naught. Also, what about the little cross-road towns that border the forest and their livelihoods that depend on healthy wood products, hunters' revenues, and tourists
Letter 2268	I urge the implementation of Alt. 12 It should help to preserve employment and will provide a forest products supply and is in keeping with the law which regulates the use of this forest
Letter 2287	Please adopt Alternative 12 The increased costs of managing the total resource in a politically motivated decreasing arena only encourages the opportunity for "below costs" activists Furthermore, other uses, requiring years of preplanning and timely application, are foregone The health of wild turkey, ruffed grouse, black bear and numerous non-game species requires habitat diversity, not continuity
Letter 2295	I favor Alt 12 because it more closely meets the multiple use mandate and it is more economically viable
Letter 2302	Alternative 12 is the most balanced of multiple use plans It is important for the forest to be used as timber supply, not just recreation The organic Act of 1897 states the primary purpose of National Forests is to furnish a continuous supply of timber The gypsy moth needs to be controlled and Alternative 8 doesn't allow for enough spraying.
Letter 2311	I favor Alternative 12. It is a much more balanced and fair approach Alternative 12 benefits more people-including ATV riders, hunters and local economies, it creates more jobs.
Letter 2312	Alternative 12 appears to be a much better management plan It addresses timber harvest and gypsy moth with good forest management
Letter 2315	Alternative 12 has a better plan of managing our National Forests resources which will provide a quality habitat for wildlife, as well as limiting the effects of the gypsy moth Adopt Alternative 12
Letter 2333	Alternative 12 does almost everything 8 does in a better way Alternative 12 protects the environment, looks after the special areas, and protects the special plants and animals There is a long list of what both plans do the same The big difference is in cutting trees Alternative 12 cuts trees when they get old This is smart Please consider 12 because it looks after people too
Letter 2335	I opt for Alternative 12 It not only serves all of the needs of National Forest usage under the Multiple-Use sustained yield act but it also helps protect our oak trees from Gypsy Moth infestation and provides for more ground cover and food for wildlife
Letter 2351	Alt 12 cuts more trees and gives us more jobs I hope this is what you decide to do
Letter 2357	#12 best approaches the multiple use concept, and also provides for better control of the approaching invasion of the dreaded gypsy moth
Letter 2365	Alt 12 would be the best choice for multiple use and a good wildlife habitat I support Alt. 12
Letter 2378	I feel Alt 12 better meets these needs while paying more to County budgets and creates 87 more direct jobs
Letters 2451, 2452	I feel Alternative 12 will provide jobs for the area and use the natural resources very wisely It will provide money for the areas involved and help the economy in these areas
Letter 2494	I ask that the Forest Service use Alternative #12 I provides more jobs, and is better balanced for wood, recreation and wildlife

Letter 2499 Alternative 12 will result in a gain of 194 jobs, have necessary vegetative manipulation tools available, opens 83% of the forest for treatment of gypsy moth and is more economically viable

Letter 2500 We support Alternative 12 because it adequately provides for all multiple uses Alternative 12 encourages the development and wise use of our renewable natural resources

Letter 2526 I think the Forest Service should adopt Alternative 12 as the best solution Alternative 12 provides much more utilization of the forest's recreational environment and industrial opportunities It will also provide many more jobs in the area

Letter 2535 *Alternative 12 allows the silviculturist to retain the scientifically viable tool of clearcutting, promotes biological* diversity by providing needed disturbances in the forest ecosystem; manages 60% of the forest to emphasize wildlife species; and allows the silviculturist options to battle the gypsy moth in order to maintain vistas, habitat and resource value

Letters 2537, 2540

Alternative 12 would do a better job of managing the GWNF Payment to counties is increased as well as increases in road building and allowable sale quantity Gypsy Moth can be better controlled with this alternative

Letter 2541 Having less than 30% of the forest suitable for timber management is an abdication of the Forest Service's professional duty Alternative 12 is much better even though it only makes 45% suitable. The economy of our region depends on timber from the George Washington So why does #8 only offer about 60% of the expected demand? Again #12 is better. Number 8 spends more money than #12 Our national treasury can't afford that. *Please designate Alternative 12 as the preferred alternative*

Letter 2545 I support Alt. 12 Alt 12 offers the best mix of goals for the forest and the best opportunity to protect the entire forest while preserving special ecosystems It also provides for the continued survival of local communities and economies within and surrounding the GW

Letter 2547 I support Alternative 12 Economic factors favoring Alternative 12 are that it would cost the Forest Service less to implement, would increase employment, and provide 4 billion dollars in area income Alternative 12 provides room for modification The Land Management Plan would be in effect for 10 to 15 year periods, therefore such measures are needed

Letter 2563 Alternative 12 would create both a habitat for wildlife and raw materials to keep people in the work force

Letter 2565 *I support Alternative 12 The forests would then benefit all citizens and keep all game and timber plentiful*

Letter 2571 I endorse Alternative 12 Alternative 12 would provide more jobs and return more funds to the counties and the U S. Treasury

Letter 2589 *I support Alternative 12 Responsible forest management in our National Forests must include managing for* continuous timber supply, watershed, wildlife, and recreational opportunities. Alternative 12 offers the best option for responsible forest management in the George Washington National Forest.

Letter 2592 I support Alternative #12 This alternative provides a full range of benefits and maximizes net public benefit Alternative 12 provides more income to counties, increases jobs and allows timber harvesting on a larger percentage of the forest Under Alternative 12, 83% of the forest is available for Gypsy Moth control compared to only 50% under Alternative 8 Alternative 12 requires a smaller budget and is more cost-effective losing less *money than Alternative 8.*

Letter 2611 Allowing the Gypsy Moth to destroy 25%-30% of this forest (as Alternative 8 proposes) would be devastating to the economy, the timber industry, and the wildlife of that area Alternative 12 takes into consideration these negative effects and will provide a full range of goods and services that will be of benefit to everyone I am asking you to support proposed Alternative 12

Letters 2638, 2639

I favor Alternative 12 because it creates jobs and is a multiple-use plan The Forest can provide something for everybody.

Letter 2672 The timber industry needs more than the 27 million feet of Alternative 8, that is the reason W R Deacon & Sons Timber supports Alternative 12

Letter 2678 Alt. 12 meets the needs of the Forest while also paying more to county budgets and creates 87 more direct jobs Scrap Alt 8 in favor of 12

Letter 2683 I like Alt 12 It provides access we need for our older citizens to enjoy the forest It provides for additional jobs

Letter 2687 You need to manage the forest like alternative 12 Its increased harvest level would better manage this overmature tract.

Letter 2689, 2941
Alternative 12 does a better job of regenerating our oak forest in a cost effective way and also creates 215 more jobs that are badly needed in the area around the George Washington It also doesn't include additional wilderness, something we surely don't need anymore of

Letter 2697 Alt 12 is better Under alt 12 over 190 jobs will result Alt 12 meets the objective to maximize benefits as well as a multiple-use approach As for the gypmo, Alt 12 would allow for 80 percent of the forests to be sprayed giving more control to the population and not allowing it to go rampant and infect private land.

Letter 2704 I favor Alt 12 Cutting timber offers numerous benefits to wildlife and the general condition of the forest

Letter 2714 Alternative 12 meets these needs while also paying more to county budgets and creates 87 more direct jobs

Letters 2715, 2722, 2723, 2752
I like Alternative 12 because it better manages resources and 194 extra jobs are created

Letters 2716, 2721, 2734
We need Alternative 12 It creates jobs and is a multiple-use plan

Letter 2724 I support Alternative 12 Emphasis should be given to timber production to help keep housing costs reasonable for all americans Alternative 12 is a much more balanced plan Besides providing additional timber, which keeps down inflation, it provides more employment and requires a lower net Federal outlay to manage the forest Also, the local counties rely on the funds received from the timber sales Cut-over land regenerates and provides much more habitat for game than mature forests

Letter 2729 Alt 12 is the best of the listed alts It comes up short in harvest volume and should call for treating all gypmo areas not just those suggested It comes closest to multiple use mgt and should be the preferred alt

Letter 2733 Alternative 12 meets these needs, increased harvest volume to provide gypsy moth resistant oak reproduction, forest access for aging population, food for game animals, while also paying more to county budgets and creates 87 more direct jobs

Letter 2753 You need to manage the forest like Alt 12 Its increased harvest level would better manage this overmature tract.

Letter 2831 Alternative 12 adequately protects the environment and allows for more jobs

Letter 2842 Alternative 12 is a more realistic approach Even though this Alternative suggests fewer acres to be harvested annually (6263 acres) than Alternative 8 (8550 acres), the harvest would produce more volume Thus more revenue and more cash flow for the forest service This plan also calls for more acres to be set aside to manage scenic and recreational rivers, more acres in management area 14 for black bears, gray squirrels, and pileated woodpecker habitat Also, more acres will be enhanced for white-tailed deer and ruffed grouse.

Letter 2873 I prefer Alternative #12 Alternative 12 does a reasonable job of addressing the various mandated uses of National Forest lands, and would allow forest managers more flexibility in meeting public demand for both forest products and recreational opportunities It would allow more flexibility in dealing with the gypsy moth problem, and have more favorable impact on jobs and businesses in local communities It would also cost the Forest Service a not inconsiderable sum of about 2 3/4 millions of dollars a year less to implement

Letter 2907 Alternative 12 meets the needs [of timber harvest volume, access to the forest, and food for game animals] while also paying more to county budgets and creating 87 more direct jobs

Letter 3488 I agree with Alternative 12 It will provide some jobs and won't destroy the land or be a waste.

Letter 3504 I recommend Alternative 12 which seems to me would give a higher level of timber production. With sound forest management it will be capable of producing badly needed wood products during the coming years with an increase in employment of people, increased tax support for the surrounding area, and will provide recreational areas, essential water sources and help improve air quality and a healthy environment with less support of Gypsy Moths

Letter 3519 I favor Alternative #12 Alternative #12 benefits more people - including ATV riders, hunters, local economies - it creates more jobs

Letter 3560 Alternative 12 better addresses employment, returns to counties, demand for timber, suitable acres, gypsy moth management, grouse management, clearcutting, and multiple-use In addition, Alternative 12 is cheaper to implement and has a better return than Alternative 8.

Letter 3569 I support Alternative 12 over 8 because it has something for everyone. It provides jobs for timber folks, more animals for hunters, more protection from gypsy moths, and more money for local economies.

Letters 3576, 3579

Alternative 12 meets these needs while also paying more to county budgets and creates 87 more direct jobs.

Letters 3583, 3584, 3585, 3636

Alternative 12 would do a better job Payment to counties is increased as well as increases in roadbuilding and allowable sale quantity Gypsy Moth can be better controlled

Letters 3586, 3587

Alternative 12 does a better job of managing the Forest than Alternative 8 Alternative 12 does a better job of regenerating our oak forest in a cost effective way and also creates 215 more jobs. It also doesn't include additional wilderness, something we surely don't need anymore of

Letter 3596 I believe Alternative 12 is a proper direction for the Forest Service to take Cut 50 mmbf and we'll all benefit. There is more at stake than jobs Wildlife needs browse and soft mast and cover provided by the 2900 clearcut acres per year.

Letter 3598 I believe Alternative 12 to be a better choice to benefit not only Virginia residents, but sportsman and tourists from surrounding states as well The increase of 78 jobs proposed in Alternative 12 would be a great boost to the Economy of the community in these hard times

Letter 3618 I support Alt 12 12 meets the objective of maximizing net public benefits It is more of a multiple-use alt than 8. The GWNF has a responsibility to the many communities it dominates with regard to forest resources and economic impact Alt. 12 does allow for some promotion of the forest economy of the area About 75 to 80 percent of what I harvest annually comes from GWNF land Alt. 8 only provides for about 59% of the demand that the Forest Planner estimates exists today on the GWNF Alt 8 states that this shortfall can be easily made up from other sources without any analysis that show it would be possible to do so I do not believe that this is possible Alt 12 will create employment which will have a positive impact on the local economy

Letter 3638 I'm fully convinced that Alternative 12 would be a better management plan I feel that it would be of the greatest value to the general public, wildlife and the health of the forest

Letter 3670 Alt 12 does a better job of regenerating our oak forest in a cost-effective way and also creates 215 more jobs It also doesn't include additional wilderness, something we surely don't need anymore of

Letter 3681 I prefer Alternative 12 as the most balanced of those proposed Alternative 12 includes an ASQ of 40 million feet from 42% of the forest acres, allows for more clearcutting and better wildlife management, and is much more flexible in addressing the Gypsy Moth problem It provides for more jobs and increases payments to localities in lieu of taxes It allows the USFS employees a better opportunity to manage the forest properly

Letter 3704 I choose Alternative 12 because it would create 194 more jobs and create additional revenue to our communities It gives more access to the forest which our tax dollars paid for. The gypsy moth problem would get more attention There would be 7% more acreage for management of Scenic and Recreational Rivers.

Letter 3719	Alt 12 offers a more balanced Mgt. Plan. Alt 8 seems ineffective and inefficient. Forest suitable for timber production is down There is a total acreage of land for mgmt as if wilderness of 284,247 ac Only 59% of the existing timber demand is met Mgt. of wildlife populations will be neglected Gypmo control will be ignored or limited over a high percentage of the forest Millions of bd ft of timber will go to waste.
Letter 3753	I urge the FS to adopt a mgmt approach patterned after Alt 12. In addition to allowing balanced use of our shared resources, it will reduce the total forest budget by $2,750,000
Letter 3774	I support Alternative #12 This alternative provides a good diversity in wildlife, recreation, and good income potential from timber harvesting and will provide jobs to many people in the areas surrounding the forest This plan also allows for control of the gypsy moth
Letter 3775	I am requesting that Alternative 12 be considered It will provide new jobs and be less costly to the taxpaying citizens It also will provide more money for the counties. It will keep loggers and the forest industry going
Letter 3791	Alt. 12 is the better alt Alt 12 increases jobs by 194 which is 215 more jobs than Alt 8, and it increases the timber industry employment by 78 jobs (145 more than Alt 8) 110 percent of the demand for timber products is met, 60 percent of the forest is managed to emphasize wildlife species, and the annual road construction is reduced to 15 miles
Letter 3813	To get the forty five million feet demand, I feel we need Alt. 12. To cut down on new roads being made in the forest, we need Alt 12 To have more clearcuts for feeding wild animals also for an even growth forest we need Alt 12 Alt 12 will provide a more multiple use of the forest for everyone involved
Letter 3816	Alternative 12 would do a better job of managing the GWNF Payment to counties is increased as well as increases in roadbuilding and allowable sale quantity Gypsy Moth can be better controlled with this alternative
Letter 3854	I choose Alt 12 because it has a more realistic timber harvest, it combats the gypsy moth, cost taxpayers less money, does away with any new Wilderness and helps the local economy
Letter 3886	I support timber cutting, wildlife, what's best for the local economy, combating the gypsy moth, no more Wilderness or Remote Highlands, wildlife habitat and helping the fellow man All of the above are reasons why I support Alt 12
Letter 3902	I support Alternative #12. It does the best job of using the forest wisely and will help save jobs in the area.
Letter 3914	I urge the Forest Service to adopt [Alternative 12] Alternative 12 will protect jobs, provide for adequate timber harvesting, protect the forest from the gypsy moth, offer more opportunities for outdoor recreation and create significantly more wildlife habitat
Letter 3935	I support Alternative 12 The GWNF is capable of endlessly producing many times the amount of wood products suggested in Alternative 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses.
Letter 3972	Under Alternative #12 the money going to local governments will increase by about $70,000 while under Alternative 8, there will be a reduction of $69,000 to local government Alternative 12 will gain a total of 194 direct jobs besides the indirect jobs that will be gained Alternative #8 will cause a reduction of 21 direct jobs as well as a loss of 67 direct timber jobs
Letter 3975	I endorse Alternative #12 which would allow the forest to be managed for multiple-use and avoid [adverse effects on employment and wildlife habitat]
Letter 4004	Alt 12 provides a well balanced multiple use approach that results in more jobs, more money paid to counties, a smaller budget, and it allows 60% of the forest to be managed to emphasize wildlife and provides for gypmo treatment for 83% of the forest
Letter 4017	Alt 12 adequately provides for all multiple uses, as well as supports the economy of our area
Letter 4025	The gypsy moth must be brought under control if we are to have any forest left to manage and Plan 12 would allow effective pesticides to be used Also, the average tax paying people like myself, would benefit more from

Plan 12 as the costs involved are less The economy would be bolstered by Plan 12 which would create more jobs in certain areas

Letter 4039 — I favor Alternative 12 It provides a more multiple-use stance Our wildlife needs more vegetation manipulation like that in 12 also

Letter 4240 — Alternative 12 represents the enlightened, progressive alternative According to The Organic Act of 1987, the primary purpose of National Forests is "to furnish a continuous supply of timber for use of the citizens of the United States" The management plan Alternative 12 would adhere to this directive while creating jobs and healthy forests The public and our forests would be better served by Alternative 12 I urge you to support this plan

Letter 4260 — Alt 12 adequately provides for all multiple uses, as well as supports the economy of our area

Letter 4267 — Alt 12 is more appropriate since it supports the overall forest system better, will not cause the negative impacts for game species and rural local people, and will provide a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat Adopt Alt. 12 as a better and appropriate mgt. plan for the benefit of the system, game species, local rural people, sportsmen, and citizens in general

Response — In the record of decision for the FEIS, the Regional Forester will document the rationale for the decision of which alternative will serve as the Revised Plan Points raised in favor of any alternative will be considered where these points are substantiated by the analysis and disclosure in the FEIS The specific points raised in this comment are addressed under the responses to other comments in this appendix.

Letters 327, 328, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 588, 604, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1393, 1394, 1395, 1396, 1397, 1398, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1717, 1718, 1719, 1720, 1721, 1722, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2763, 3059, 3060, 3061, 3062, 3063, 3064, 3120, 3121, 3122, 3123, 3124, 3125, 3126, 3127, 3128, 3129, 3130, 3131, 3132, 3133, 3134, 3135, 3136, 3137, 3138, 3139, 3140, 3141, 3142, 3143, 3144, 3145, 3186, 4067, 4070

In these days of an uncertain economy, we should be encouraging high employment and the development of our renewable natural resources, not the reverse

Letter 505 — I agree with Alternative 12 The local economy depends heavily on the forest products industries and alternative 12 is more favorable in this respect These resources must be used wisely and not wasted. As long as the strategy is sustainable, I believe that we should fully utilize this resource base.

Letter 711 — I feel that our National Forest should encourage the development and wise use of our renewable natural resources

Letters 733, 734

We should be encouraging the development and wise use of our renewable natural resources, not the reverse Therefore, I am supportive of Alt 12

Letter 740 — We should encourage wise use of our renewable natural resources, not wasteful preservation I support Alternative 12.

Letter 741 — I support Alternative 12 because it promotes a more prudent course of action in developing and utilizing this wonderful forest Alternative 12 clearly serves my needs and, I think, the needs of everyone who cares about our renewable natural resources

Letter 746	I live in Alleghany County and more than fifty percent of the Forest land is owned by the National Forest. We must find the best and wisest use for our renewable natural resources -- move forward, not backward.
Letter 752	I support Alt 12 After reviewing I believe it better suits the needs of our area and people and does more for the wise use of our natural resources
Letter 886	Alt. 12 encourages the development and wise use of our renewable natural resources and provides for multiple uses of the GWNF I am supportive of Alt 12
Letter 1865	Our national resources need to be managed wisely I believe that Alt. 12 is the best plan for managing the GWNF for everyone concerned
Letter 2321	Alternative #12, not alternative #8, best supports responsible environmental management of the George Washington National Forest I support Alternative #12 because I feel we should be encouraging the development and wise use of our renewable natural resources.
Letters 270, 2917	I am supportive of Alternative 12 because the development and wise use of our renewable natural resources should be encouraged
Response	The degree that renewable resources are developed and "widely used" must be balanced against other legitimate needs and values which are foregone with such development In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan

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Letter 528	I support Alt 12 because it provides more recreational possibilities than Alt 8
Letter 2306	I support Alternative 12 because recreational use will be enhanced
Letter 3939	Alternative 12 comes closer in meeting [4-wheel drive and ATV] demand than Alternative 8 does
Response	Alternative 12 does offer more opportunities for off-highway vehicle use (particularly for the use of all-terrain vehicles) than Alternative 8A

Letter 4	There are vast amounts of prime Virginia wilderness deserving protection and linkage with other areas through wilderness corridors I hope you will support the Virginia Wilderness Committee's immediate proposals and will work towards a future goal similar to the one outlined in Alternative 3
Letter 21	I deplore the practice of selling off National Forests to timber companies Frankly, I support Alt 3, the draft plan proposed by Virginians for Wilderness Wildlife mgmt is a tricky thing, I know, but I don't see how more roads will help And ATV vehicles are one of the most destructive forms of "recreation" in a forest that there is
Letter 134	Alternative 3 - This, the Wilderness/Corridor alternative, proposed by Virginians for Wilderness, leads all alternatives in 1) net revenue, 2) Wilderness, 3) visual quality, 4) lowest soil erosion, 5) lowest cost of implementation, 6) semi-primitive non-motorized recreation, 7) unfragmented habitat, 8) habitat for shy, rare and endangered species, 9) old growth forest, 10) water conservation and stream protection, 11) lowest pollution and highest pollution abatement, 12) benefits to climate, and 13) contribution to planetary survival
Letter 171	I ask that you take (another?) look at "The PAW Proposal" I believe that Alternative #3 complements the philosophy of "descriptions of management areas" for the Pedlar Locally, it adds flavor to the Park Service lands along the Parkway, this could be construed as "inter-agency co-operation" and should benefit both agencies--and the land Regionally, it would promote landscape diversity, this would address species, habitats, and ecosystems throughout the Blue Ridge Mountains
Letter 171	Alternative #3, "The PAW Proposal", is supported by Forest Service documentation in the Environmental Impact Statement It gives "the present" back It favors the land, the air, and the water--because of their intrinsic values It halts the demise of wilderness-the concept and the place There is no other alternative, it's time to re-create the Pedlar, the GWNF, the Appalachians and beyond

Letter 185 Our view coincides with one becoming increasing popular -- that National Forests be managed as ecosystems with all commercial forestry banned. In the pending Draft Forest Plan for the George Washington National Forest, this view is embodied in Alternative 3, the Wilderness/Corridor alternative, which is based on the Conservation Biology We ask support in making this alternative a reality.

Letter 372 Since the GWNF best serves the region's purposes by being a watershed, I hope you will consider Alternative #3

Letter 375 I'm writing to express my support for the GWNF Management Plan Alternative 3. This plan is the only one that will restore and maintain an acceptable level of ecological integrity and biodiversity in the forest.

Letter 863 I strongly support mgmt of the GWNF guided by Alt 3 I understand the 6 primary points of this alt. and their orientation toward the maintenance of the present level of ecological integrity and biological diversity of the GWNF.

Letters 986, 2054, 3850
It is important that the concepts presented in Alternative #3 are incorporated into the Final Plan.

Letter 1104 Alternative #3 is definitely environmentally sound, but is economically beneficial as well It would have no increase in tax payments and stimulate logging in the private sector I urge you to support Alternative #3

Letter 1148 Adopt Alt 3 Stop building roads, stop logging and other mining activities in the forest where there are roads, and reforest the areas damaged by human activities Those unroaded areas should immediately be preserved as wilderness, pesticides and herbicides be forbidden

Letter 1153 Alt. 3 is the only mgt plan that addresses the health of the forest itself Its advantages are many It protects native biodiversity, creates large intact wilderness areas with connecting corridors for the free exchange of genetic material It virtually stops erosion Eliminates habitat fragmentation--a major cause of mass extinction It protects streams & conserves water It increases revenue from nonconsumptive recreational uses, while providing an aesthetically pleasing forest. It features the lowest cost of implementation And is virtually non-polluting. It is the only alt soundly based upon scientific findings

Letter 1261 I received a copy (in full) of your 10-yr Land and Resource Mgt Plan for the GW and I was hopeful that finally we would sensibly take care of the forest and stop abusing it with logging and overuse Unfortunately, the loggers and other special interest groups (ATV, roadbuildings, miners, etc) have been campaigning for the same old abuse of OUR public land In a nutshell, I oppose it Furthermore, I am opposed to any more below-cost timber use, ATV use, road cutting, mineral extraction, chemical and pesticide use, and "mgt" which favors featured species like deer and turkey and ignores endangered species AND, I support Alt #3, the ecological concept, or even Alt (#8?), vegetation manipulation.

Letter 1274 I am writing in support of Alt 3, the wilderness alt. While I am not an expert in forest ecology I am a taxpayer I resent my tax dollars going to the decimation of my NFs I am opposed to clearcutting and all logging operations in the GWNF I fully support the complete protection of all NFs through the creation of wilderness

Letter 1275 The only alt that supports the wisest use of the GWNF is Alt 3 In addition to its ecological strength, it would virtually eliminate erosion It would eliminate habitat loss through fragmentation It would foster the process of natural evolution and halt the process of mass extinction It is also the least expensive to implement. It provides for the highest visual quality It would not lose taxpayer's money by subsidizing below-cost timber sales like the old Plan

Letter 1278, 4262
Alt 3 as proposed by Virginians for Wilderness offers a viable solution for a long-term plan as well as being more economical, which is paramount in a recession The limits on logging will not hurt our economy as the slack will be picked up by private land owners The recreation opportunities will increase and the wildlife habitat will be preserved

Letters 1286, 1287
I am writing to express my strong support of Alt 3 I believe this plan to be environmentally sound and absolutely essential to the true preservation of the GWNF

Letter 1292 Alternative #3 is the only plan that guarantees the health of the forest I urge you to implement it. The Plan makes good sense from many perspectives It would create and maintain large intact wilderness areas It would curtail erosion and allow for the recovery of native biodiversity It provides a high quality visual experience No one likes to go hiking and camping in clearcuts It does not lose taxpayer's money by subsidizing welfare timber sales, as does the current plan, and it costs the least to implement it.

Letter 1296 I am in favor of Alt. #3 With a large metropolis so close to the GW Forest, people need a sanctuary from the stress of work.

Letter 1363 I support most measures outlined in Alt 3 I strongly support strict limits on ORVs, and only licensed use, the elimination of all new roadbuilding and construction, clearcutting, "salvage sales", wildlife mgt and mineral extraction in roadless areas; and the designation of all 26 roadless areas of the forest as wilderness study areas.

Letter 1386 I write to tell you of my strong support for Alt #3 because it ensures the protection of a healthy forest ecosystem & biological, native diversity.

Letter 1458 With regard to the vanishing natural world (only 3% of the GW and 8% of the Monongahela have been set aside as wilderness), we the undersigned petition you to adopt Alt 3 which we feel best serves the long term interests of all living things on this planet.

Letter 1546 I support Alt 3. All 26 roadless areas should be designated as wilderness. It is costing taxpayers to log in the GW so I believe all logging should be eliminated All roadbuilding should be eliminated. All use of chemical pesticides, herbicides and defoliants should be eliminated We need wilderness to protect a healthy forest ecosystem that is dedicated to the protection of natural native biological diversity.

Letters 1561, 2055, 3620
The plan should designate all 26 roadless areas as wilderness study areas and eliminate all logging on the GW Salvage sales, wildlife management and mineral extraction should also be eliminated in the existing roadless areas New road building and reconstruction must be stopped and all off-road and unlicensed vehicle use eliminated Chemical pesticides and herbicides and defoliants should no longer be used Also, provide for reforestation of forest ecosystems damaged by human activities

Letter 1574 I think you should go with Alternative #3

Letter 1558 We urge you to adopt Alt 3 of the draft 10-yr LRMP for the GWNF This alt best promotes the biological diversity and wilderness values

Letter 1593 I think Alternative #3 is the best one because I don't want anyone to cut down our beautiful forest There might be a cure for a disease that just needs to be found

Letter 1605 I choose Alternative #3 because there would not be any burning allowed, it would not be made into any new roads, no acres for ATVs, and will be no clearcutting allowed

Letter 1687 I have read about Alt 3 and I would like to see this plan put into action I want logging to be eliminated in the GWNF I am for the elimination of all chemical herbicides, pesticides, and defoliants now being used in this area Human intervention should be eliminated I would like to see the forest restored in places where it was damaged by human intervention

Letter 1847 Only Alternative 3 is based upon sound ecological principles Adopt Alternative #3 as the preferred Alternative

Letter 1862 I am in favor of Alt 3 This approach guarantees biological diversity and must be incorporated into the final plan It calls for the elimination of logging, new development, chemical pesticides, unlicensed vehicle use, as well as mineral extraction in roadless areas

Letter 1885 Alt 3 provides the type of approach that would protect the forest watersheds (as mandated in the establishing of NFs), and as a NF ecosystem contributing to the health and stability of our region and, to some degree, the rest of the world Eliminate all new roadbuilding and reconstruction, so as not to fragment the remaining relatively undisturbed areas Eliminate salvage sales and all other logging in existing roadless areas, and designate all 26 roadless areas as wilderness study areas Eliminate all use of chemical pesticides and herbicides and defoliants Provide for restoration of forest ecosystem damaged by human activities Alt 3 provides for all these, so I'm urging that it be adopted

Letter 1896 I support Alt 3 The proper role for the USFS as steward should take precedence over that of a facilitator of unsound, uneconomical and excessive exploitation of our forest resources

Letters 1909, 1910, 2826, 2987, 3187, 3188, 3189, 3190, 3191, 3192, 3193, 3194, 3195, 3196, 3197, 3198, 3199, 3200, 3201, 4092
Alternative #3 is the only alternative that views the forest from an ecological perspective Alternative #3 *provides the highest protection for biological diversity, air quality, water quality, soil retention and poses the* lowest risk of fire It is also the only alternative that allows for "primitive recreation" as an essential part of the total forest recreational spectrum Alternative #3 would have no effect on current payments to counties in lieu of taxes and would result in no change in either supply or demand for forest products or forestry-related jobs Alternative #3 has the lowest budget of all alternatives and is the only alternative which would eliminate taxpayer-subsidies for below-cost timber sales All 26 roadless areas should be recommended for wilderness study areas.

Letter 1913 I think Alternative #3 is the best because we should let the land grow on its own and leave it alone.

Letter 1971 Eliminate all offroad and unlicensed vehicle use and eliminate timber harvesting.

Letter 1987 As small business owners dependent upon tourism for much of our work and as members of a rural community which looks to tourism for its future economic development, we would like to recommend that you give serious consideration to proposed Alt 3 as the best approach for guiding the future mgt. of this priceless national treasure (GW) Alt 3 provides the highest levels of protection for biological diversity, air quality, water quality, soil retention and fire safety These are the basic building blocks of our future welfare and prosperity.

Letter 1998 I urge you to adopt Alt 3 for the 10-year Land and Mgt Plan. Designate all 25 roadless areas as WSAs. Eliminate logging on the GW Eliminate wildlife "mgt" for all featured species with the exception of naturally occurring disturbances Eliminate all salvage sales, wildlife mgt. and mineral extraction in existing roadless areas Eliminate all new roadbuilding and construction Eliminate all use of chemical pesticides, herbicides, and defoliants Provide for restoration of forest ecosystems damaged by human activities Eliminate all off-road and unlicensed vehicle use

Letter 2020 We support Alternative 3 We have adopted a formal position opposing all logging and off-road vehicles in the public forests We urge you to consider suggestions of Virginians for Wilderness

Letter 2033 I do not favor any management plan for the national forest which involves logging I prefer Alternative #3, which would eliminate wildlife management for all featured species with the exception of naturally occurring disturbances, in order to accomplish this, old growth forest would have to be protected and ecosystems restored.

Letter 2045 I would like to express my firm support for Alternative #3 In addition to having a very low budget, it is based on conservation biology and applied restoration ecology

Letter 2054 All 26 roadless areas should be designated as wilderness study areas Logging in the GW public lands should be eliminated, as should wildlife management, mineral extraction, and salvage sales in wilderness areas. Eliminate all road building and reconstruction, the use of chemical pesticides and herbicides, and all off-road *and unlicensed vehicle use*

Letters 2055, 3620

Alternative #3 of the Plan provides for all of the listed suggestions

Designate all 26 roadless areas as wilderness study areas

eliminate all logging on the GW

Salvage sales, minerals extraction and wildlife management should also be eliminated in the existing roadless areas

New roadbuilding and reconstruction must be stopped and all off road and unlicensed vehicle use eliminated.

Chemical pesticides and herbicides and defoliants should no longer be used

Letter 2056 Limit or eliminate commercial exploration of the forest by timber, mining, or other ecologically degrading interests

Letter 2060	The highest and best use of the George Washington National Forest would be to adopt a no action alternative, allowing nature to reclaim the forest and, with few exceptions, allowing natural processes to continue uninterrupted. All clearcutting should be discontinued In a transition phase, small group selection could be continued with the provision that no opening in the forest canopy exceed two lengths of mature tree height
Letter 2215	I urge you to adopt alternative [3], or at least incorporate its main thesis in the preferred alternative
Letter 2227	Alternative #3 should be incorporated into the final
Letter 2269	I urge adoption of Alternative #3
Letter 2269	The approach of Alternative #3 is essential to a healthy forest ecosystem that is really dedicated to protection of natural native biological diversity.
Letter 2271	There needs to be LESS LOGGING, especially clearcutting, which should not even be used There needs to be fewer roads built; they are fragmenting the forest ecosystem There needs to be more wilderness set aside. There needs to be a MORE ECOLOGICAL and LESS EXTRACTIVE mgmt plan for the GWNF so that natural species health, occurrence, and survival can take precedence over board feet I support and urge you also to support Alt 3
Letter 2290	I think that the plan should be Alternative #3. 26 roadless areas designate as wilderness study areas If these areas are designated as such the amount of true wilderness will be at 4% The national average is 17%. It seems that this land could be spared. Another thing that should be done is the elimination of logging in GWNF. If you are going to allow logging, make some rules which will control run off into the streams No new roads should be built. All a road does, is break the wilderness up Financially "Alternative #3" is the cheapest.
Letter 2308	Alternative Three (3) is my preference, the living forest, not developed, with its superior air quality, water conservation and pure water, multiplicity of native species plant and animal, diversity of habitats needed by innumerable creatures, constant opportunity to protect rare, threatened and endangered species both flora and fauna, preservation of genetic reserves of micro organisms elsewhere being destroyed indiscriminately, and continuing opportunity for essential study of the processes of nature uninterrupted by the actions of man, will far exceed in worth to human and all other life any major man-made development on the forest
Letter 2340	This letter is to register the support of the Alliance for a Paving Moratorium for alternative #3.
Letter 2363	Please support Alternative plan number 3, which is very far sighted We are very concerned that the forest will be damaged by ATV's and loggers It will be utilized for short-term and recreational gain without thought for the future of the planet
Letter 2460	My husband and I are in favor of the Alternative 3 of the proposed management plan for the National Forest. In other words we want no timber harvesting in the forest!
Letter 2551	I am for Alternative 3 I am against clear cutting. I am not sure I even like timbering on National Forest Land. The roads are terrible!
Letter 2617	Alternative 3 should be adopted Too much timber cutting in OUR National Forest has taken place already
Letter 2619	I favor Alternative plan 3 which calls for no timber harvesting, except for fuelwood gathered by individuals.
Letter 2627	I support Alternative 3 [because] management guided by Alternative 3 would 1) eliminate all off-road and unlicensed vehicle use, 2) eliminate all below-cost timber sales, 3) reduce fragmentation by eliminating openings, 4) eliminate management in "roadless areas" and designate all 26 roadless areas as wilderness study areas; 5) eliminate all new roads, 6) eliminate the use of chemical pesticides and herbicides; 7) provide for the restoration of damaged ecosystems
Letter 2665	Alternative #3 does all of these things, such as, eliminate all off road and unlicensed vehicle use, eliminate timber harvesting on the GW, eliminate wildlife management for all featured species with the exception of naturally occurring disturbances, eliminate all salvage sales and wildlife management in existing roadless areas and designate all 26 roadless areas as wilderness study area, eliminate all new roadbuilding and reconstruction, eliminate all use of chemical pesticides and herbicides and defoliants, provide for restoration of forest ecosystems damaged by human activities Adopt Alternative #3

Letter 2740 I want the selected alternative to be as close to Alternative 3 as possible

Letter 2757 I urge you to consider Alternative #3 and the following recommendations. eliminate all off-road and unlicensed vehicle use; eliminate wildlife management for all featured species with the exception of naturally occurring disturbances; eliminate all new road building and reconstruction; provide for restoration of forest ecosystems damaged by human activities, designate all existing roadless areas as wilderness study areas; eliminate all use of chemical pesticides and herbicides and defoliants; eliminate all salvage sales, mining and wildlife management in existing roadless areas; eliminate commercial logging.

Letter 2840 Alt 3 of the proposed plan should be adopted Of all the plans it does the most to retain the integrity of the forest which should be paramount in your plans Too much timber cutting in our NFs has already taken place. It must be stopped now!

Letter 2902 I support Alt. 3. It is important that the concepts presented in Alt 3 are incorporated into the final plan.

Letters 3438, 3439, 3440
Alternative #3 will provide the strongest protection of biodiversity, air, water and soil quality. It also poses the lowest risk of fire

Letter 3438, 3439, 3440
Alternative #3 is the economical and foresighted choice

Letters 3445, 3446, 3632
We believe that Alternative #3 provides the best framework from which an ecologically and economically sound forest plan can be derived.

Letter 3492 *We are asking that alternative 3 be adopted. We would like to see a number of areas receive "Wilderness"* designation More unfragmented wildlife habitat must be protected. We ask that there be no new roads, and no new timber cutting Cutting that is done should be selective and not clear cutting. Please do not increase access for all terrain vehicles.

Letter 3555 I encourage you to [choose] Alternative #3 We need more roadless areas and less clearcuts.

Letter 3616 I support Alternative #3 because it gives the maximum protection for biological diversity, air and water quality, and soil retention.

Letter 3628 Alternative #3 is clearly the best selection Try to see beyond the short range greed for "resources" and the feds of contemporary recreational desires and understand that the forests need to be preserved in as large and undisturbed a condition as possible

Letter 3655 I urge you to support Alternative #3, which gives the maximum protection for biological diversity, air & water quality, & soil retention.

Letter 3837 Without question, alt. 3 is the only acceptable choice It leads all alts in· net revenue, wilderness, visual quality, lowest soil erosion, lowest cost of implementation, SPNM rec, unfragmented forest, habitat for shy, sensitive, T&E and interior-dependent species, old growth forest, water conservation and stream protection, lowest pollution and highest pollution abatement, benefits to climate, preservation of evolutionary integrity, contribution to planetary survival. I strongly encourage you to adopt alt 3.

Letter 3903 My vote is Alternative #3 When all logging stops, road building ends, all mining and harvesting ceases, then the Forest will be able to recover from years and years of abuse

Letter 3981 An acceptable management plan must incorporate the precepts, provisions and direction offered by Alternative 3

Letter 3987 Adopt Alternative 3 This plan meets the multiple-use concept and it is the only alternative that does not impair the productivity of the land, in accordance with the sustained yield concept

Letter 3989 I'm writing to urge you to support and promote Alternative #3. Among the alternatives, it is the only one that has thoroughly considered conservation biology and applied restoration ecology and that includes migratory corridors

Letter 4040 — I am in favor of Alt 3 Alt 3 actually has a plan for larger primitive areas, forest interior protection, wildlife corridors, clean air, clean water, and the things we need The EIS itself admits that the amount of timber harvesting eliminated is small Private landowners would benefit The loss could be totally offset

Letter 4061 — I strongly urge you to adopt alternative #3 as the preferred plan in the "10-Year Land and Resource Management Plan for the George Washington National Forest."

Letter 4189 — I strongly oppose more logging, for recreational activities in the George Washington National Forest - I vote for Alternative 3!

Letter 4211 — I urge you to pass Alternative 3

Letter 4250 — We support Alternative 3 We have adopted a formal position opposing all logging and off-road vehicles in the public forests We urge you to consider suggestions of Virginians for Wilderness

Response — Alternative 3 was formulated to address issues and concerns about biodiversity, ecosystem management, conservation biology and landscape ecology It is predicated on the assumption that the primary role of the George Washington National Forest should be to provide ecosystems not available on private land

The philosophy of ecosystem management espoused by Alternative 3 is at odds with the agency ecosystem management policy The Forest Service does not manage ecosystems just for intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services and aesthetic, cultural or spiritual values

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Letter 95 — Number 12 more properly provides for multiple use and will give the USFS more freedom to practice their profession of managing this valuable national forest

Letter 167 — [T]he Board feels that Alternative 12 provides these goods and services and provides for balanced management of the resources on the George Washington National Forest with a positive impact to the economy, and the Board . supports Alternative 12 and requests that it be selected in the Final Plan as the Preferred Management Alternative.

Letter 183 — Alternative 12 is the best management plan for the wise utilization of these very valuable renewable resources

Letter 186 — I believe Alternative 12 is the best management direction for meeting the needs of a variety of interests I urge you to pattern your final plan after Alternative 12

Letters 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 380, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 493, 508, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 601, 602, 603, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 711, 713, 714, 721, 739, 740, 776, 777, 779, 780, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 798, 917, 918, 919, 920, 977, 1006, 1007, 1008, 1009, 1011, 1013, 1014, 1016, 1017, 1019, 1110, 1111, 1112, 1113, 1114, 1126, 1127, 1199, 1200, 1201, 1254, 1295, 1358, 1375, 1390, 1391, 1392, 1422, 1423, 1518, 1519, 1534, 1535, 1536, 1537, 1538, 1548, 1688, 1681, 1690, 1932, 1933, 2139, 2140, 2141, 2142, 2390, 2391, 3065, 3271, 3272, 2373, 2374, 2375, 3559, 3682, 3757, 3765, 3913, 3925, 4072
Alternative 12 adequately provides for all multiple-uses, and therefore is the alternative I support

Letter 288 — We should use our National Forest, not lock them away so they are of no use except for recreational purposes Alternative 12 provides for multiple uses which I support

Letter 325 — Alternative 12 "provides a full range of goods and services "

Letters 349, 350, 351, 352, 353
I would prefer to see Alternative 12 because it would be more beneficial for everyone concerned in the lumber industry

Letter 369 Under Alt 12, 42% of the Forest is suitable for timber production, 60% is managed for wildlife, and 83% is available for gypsy moth treatment

Letter 373 Alternative 12 not only protects wildlife and recreation, it also allows a fair timber harvest

Letter 382 I support Alternative 12 because it is a well-balanced, multiple-use alternative

Letters 327, 328, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 588, 604, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1393, 1394, 1395, 1396, 1397, 1398, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1717, 1718, 1719, 1720, 1721, 1722, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2763, 3059, 3060, 3061, 3062, 3063, 3064, 3120, 3121, 3122, 3123, 3124, 3125, 3126, 3127, 3128, 3129, 3130, 3131, 3132, 3133, 3134, 3135, 3136, 3137, 3138, 3139, 3140, 3141, 3142, 3143, 3144, 3145, 3186, 4067, 4070

A high level of timber production from the GWNF, based on sound, scientific forest management, is in the best interest of all the people The George Washington National Forest is capable of perpetually producing many times the amount of wood products suggested in Alternative 12, while at the same time adequately providing for taking good care of wildlife, aesthetics, soils, and all other uses

Letter 429 I want you to pick plan 12 It will be best for timber and people

Letter 439 I support Alternative #12 Because of its wide range, it would be better for the industry

Letter 499 I would like to state my support for Alt 12 since it appears to provide the greatest benefits to the most people

Letter 509 Alternative #12 will strike even balance with economy and the environment

Letter 521 Alternative #12 provides for true multiple use Alternative #12 provides a balance between recreation, wilderness, timber harvesting, wildlife management, mineral resources and range, whereas Alternative #8 is largely a single use plan providing for vast areas of wilderness Alternative #12 would benefit large numbers of people in many different areas, where Alternative #8 would meet the needs of only a few

Letter 706 I'm in favor of Alternative 12 because I think it provides for better uses and therefore I support this alternative We should develop and renew our natural resources so I believe Alternative 12 does a better job, not 8.

Letter 710 To give a balanced benefit to our citizenry, I am in favor of Alternative 12.

Letter 712 This letter is written to express my support for Alt 12 It is inconceivable in my judgment to restrict the harvesting of trees that provide jobs and in so doing condemn those trees to the ravages of age, decay, and the gypsy moth This should, it would seem, certainly be a consideration in an area where the growth rate far exceeds the current cut rate This policy will surely subject the forest to greater risk of fire and further waste a valuable resource

Letter 715 I believe the best plan to be Alt 12 This plan provides a workable program suited for multiple uses while Alt. 8 does not suit the needs of the people

Letter 716 I support Alt 12 Alt 12 provides adequate uses in the GWNF

Letter 717, 2323

I am compelled to write and show support of Alt 12. I feel it will provide for the needs of the people within our community, whereas Alt 8 will not

Letter 720 Alt. 12 provides for all multiple purposes and serves the people's needs better than Alt 8 The main reason I support Alt 12 and not Alt 8 is because, as a company we should encourage the development and positive use of our Natural Resources

Letter 726 Alt. 12 adequately provides for all multiple uses, and therefore is the alt I support We should be encouraging the development and wise use of our renewable natural resources, not the reverse

Letter 727 I support Alt 12 as a forest mgt plan Multiple usage is better served with this alt. Alt 12 is better suited for mgt than is alt. 8.

Letters 745, 754, 1650, 1855, 2502, 2829, 2200, 2213
I support Alternative 12 because it provides for multiple uses

Letter 746 Alternative 12 would be best for the overall general public

Letter 750 Alternative 12 should be chosen Alternative 12 provides for a more efficient and equitable plan of managing the forest based on multiple use principles

Letter 764 We support Alt 12 which we feel allows an adequate amount of timber cutting and supports designated wilderness and recreational use

Letter 860 Alt 12 is one such alt which would benefit our society far more than the draft plan, both now and in the future

Letter 861 The alternatives for management represent a wide view of ideas, but to manage a National Forest the way it was intended and to incorporate the wise use of all the disciplines in the Forest, Alternative 12 comes the closest

Letter 864 I believe Alt. 12 offers the best choice for the competing interests in how our resources are best used

Letter 865 Mgt Alt 12 seems to be a more wise and balanced approach toward resource allocation

Letter 880 It is my belief that of the alts suggested, Alt 12 represents by far the best and most reasonable method of maintaining a balance of forest conservation, usage and of obtaining the most benefits for the citizens of the area as a whole

Letter 936 NOW, THEREFORE, BE IT RESOLVED BY THE ROCKBRIDGE COUNTY BOARD OF SUPERVISORS, that a request is made to the appropriate representatives to reconsider the management alternative selected and choose another alternative that, provides a full range of goods and services including Timber, Recreation, Minerals, Wilderness, Range and Wildlife Habitat The Board believes Alternative 12 provides these goods and services, and does support Alternative 12 with the condition that no more than one thousand (1,000) acres of the George Washington National Forest be clearcut

Letter 937 Although these writings are directed toward the Monongahela National Forest, they certainly are a philosophy that should apply to management of the GWNF and the support of Alternative #12 On the Monongahela we have set aside almost fifty percent of the forest for either no timber harvest or for little timber harvest . As a result, the amount of sunlight is insufficient for most of our valuable tree species to thrive This also applies to most of the shrubs, flowering plants and other vegetation The result is a decline in both consumptive and non-consumptive usage of our forests In essence, we should not make decisions affecting our forests that drastically limit the forest's potential to provide the many benefits of which it has the capability of furnishing We should make decisions that maximize all of the uses of the forest

Letter 941 I write to urge in the strongest possible terms the adoption of Alt 12 of the draft of the revised mgt plan of the GWNF Alt 12 meets every criterion for good stewardship of the forest It allows for wilderness and wildlife values, it allows for recreational uses, the harvest of timber and protection of the timber from excessive damage from the gypsy moth The concept of multiple use mgmt is embodied in Alt 12 and is, in my view, the ONLY mgt concept acceptable to a diverse democratic society

Letter 942 I agree with the FS preferring Alt. 12 because it more nearly provides the full range of services including timber, wildlife, recreation, wilderness

Letter 969 I support Alt 12 as the best alt to support the needs of all the people

Letter 1058 Alternative 12 is the multiple use plan that satisfies the demands of the most forest users.

Letter 1079 I firmly believe that Alt 12 provides for the best overall use of our renewable natural resources

Letter 1093 No 12 Alt. seems to be the best for the most people

Letter 1095 Alt. 12 is the best alt to allow the development and wise use of our renewable natural resources

Letter 1096 Alternative #12 reflects the present and future needs and uses of the forest much more than the chosen Alternative.

Letters 1142, 3745, 3898
I believe Alternative 12 is a proper direction for the Forest Service to take The summary says this is a "Multiple Use" alternative Isn't this your mandated objective? Cut 50mmbf and we'll all benefit

Letter 1147 I recommend that you use Alternative 12, it bothers me to see timber production removed from our National Forests. Our National Forests should be working forests which provide a full range of benefits

Letters 1279, 1060
Alt 12 provides a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat.

Letters 1280, 1284, 1345, 1559, 1631, 1827, 1874, 1893, 1897, 1898, 1899, 1900, 1901, 2470, 2482, 2518, 3684
I believe that National Forests should be managed for multiple use to benefit all citizens, and, therefore, support Alt. 12

Letter 1282 The ultimate consideration has to be the protection and nurturing of the resource This can best be accomplished by allowing multiple uses of the Forest The more users you have, the more support the NF will have If wise use of renewable resources is not allowed, you will eliminate the need of the users of these resources to protect and nurture their interests Alt 12 adequately provides for multiple uses and therefore is the one I support.

Letter 1298 We support Alternative 12 and the use of clearcutting as a silvicultural tool to provide future generations high quality forest stands. Our national forests need to be managed in ways that are consistent with the conservation ethic of the greatest good for the greatest number for the longest period of time Alternative 12 is the best means of accomplishing this goal

Letter 1300 Alternative 12 best suits the demand on both sides of the fence

Letter 1304 Alternative 12 better meets multiple-use objectives [than Alt 8]

Letter 1309 Alt 12 provides for all multiple uses and at the same time protects our future, both from an economical and recreational standpoint We firmly support Alt 12

Letter 1312 I strongly urge you to implement Alt 12 which provides for multi-use of the forest and forest products

Letter 1332 I support Alt 12 because I feel that our NF's should be managed for multiple use

Letter 1339 I recommend the FS reconsider its approach and adopt Alt 12 instead Alt. 12 is more consistent with the multiple use forest concept

Letter 1340 As a concerned sportsman and timber harvester I would like to express my support for proposed mgt plan 12, as I feel this will benefit all citizens who use our NF

Letter 1347	I support Alt. 12 plan, which will benefit all citizens and wildlife alike
Letter 1348	I believe Alt 12 would help more people and businesses
Letter 1351	Alt 12 would be a more comprehensive and constructive approach to mgt for the mutual benefit of the forest, wildlife and rec, and should be managed for multiple use and benefit of all citizens
Letter 1352	I support a final plan patterned after alt 12 Timber harvesting makes a positive contribution to the other equally valid uses of the forest. Good forestry values the multiple-use concept wherein timber harvesting assists in the creation of wildlife habitat, dispersed and concentrated recreation and biological diversity.
Letter 1366	Alt. 12 is the best balanced alt for all forest users.
Letter 1369	I recommend Alt 12 as the best means to provide a balanced approach to all multiple use needs of the GWNF. Alt 12 is capable of producing major commodity outputs at a higher level than Alt. 8. It has a workable ASQ of 50 million board feet, which is not extreme and does not exceed the Forest's long-term sustained yield.
Letters 1371, 3994	Alt. 12 provides a full range of goods and service including timber, recreation, mineral, wilderness, range and wildlife habitat That is the alt mgt. plan that most people would support.
Letter 1409	Alt. 12 would allow the best mgt of the forest This plan is better suited toward a multiple use plan which is good for the economy. Too much land is already tied up Please use Alt 12
Letter 1411	Please use Alt 12 Alt 12 looks like the best option for multiple uses such as recreation, wildlife and timber.
Letter 1421	There has been enough land and timber for everyone That is the reason I am for Alt. 12
Letter 1455	I believe the GWNF can benefit more from Alt 12, including timber and rec lands and wildlife
Letter 1463	To promote multiple use on the GWNF use Alt 12
Letter 1563	I support Alt 12 Alt 12 best reflects the desires and needs of all of us
Letter 1571	I support Alt. 12 Our NF's should be managed for multiple use.
Letter 1619	I do believe that Alt. 12 would provide a very large range of services including timber, rec, minerals, wilderness, range and wildlife You have my support 100%
Letter 1640	I strongly favor Alt 12 I feel this has the best chance of providing the best mix of benefits to the local community and to society as a whole.
Letter 1647	I support Alt 12 so that everyone can benefit from the many things that the National Forests have to offer now and in the future
Letter 1658	I find only Alt 12 to be providing a truly multiple-use perspective Alt 12 appears to achieve the necessary balance of providing opportunities for the uses of the forest resources while protecting the soil, water, timber and overall aesthetics of the mgmt. areas.
Letter 1665	I prefer Alt 12 Alt 12 will provide more uses and services, such as wildlife habitat and range, wilderness areas, recreation, and also control timber and mineral harvests
Letter 1678	I prefer "Alt 12" because it provides a better "Multiple Use" mgt plan
Letter 1797	I ask that you change your preferred alternative to one more in line with multiple-use concepts, specifically Alternative 12

Letter 1804 Please continue to manage our National Forests for multiple use, and consider supporting Alternative #12

Letter 1815 It is my feelings that proposal Alt 12 - providing multiple use would benefit the citizens of VA & WV greatly

Letter 1819 I agree with Alt. 12 as opposed to the less desirable Alt. 8. Alt. 12 "Provides a full range of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat" If our forests are going to best serve all of the people, they should be conserved rather than preserved With sound, scientific forest mgt they should be allowed to provide the products that best meet the needs and interests of all the people

Letter 1821 I encourage you to adopt Alt 12 for multiple use and to provide for a full range of services such as timber, recreation, minerals, wilderness, range and wildlife habitat.

Letter 1826 I hope that you will support Alternative 12 and provide the full range of services, [including] good wildlife habitat.

Letter 1828 Alternative 12 would be the best choice to make because it is a management plan for multiple-use to benefit all citizens, and provide wildlife habitat for the animals

Letters 1829, 1838, 2024, 2566, 2841, 3617, 3722
Support Alternative 12 which provides a full range of goods and services including Timber, Recreation, Minerals, Wilderness, Range and Wildlife habitat

Letter 1830 Our NF should be managed for multiple use to benefit us all I support the Alt 12 Plan.

Letter 1832 Alt. 12 appears to be a much wiser choice in that it maintains the concept of providing a full range of goods and services These objectives seem to benefit a much broader range of the taxpaying public A high level of timber production from the GWNF, based on sound, scientific forest mgt, is in the best interest of all the people

Letter 1848 Alternative #12 is by far a more viable plan under which to operate the public mandate The dedication of acreage to the specified diversity of land uses, in this alternative plan, are vastly more productive than of the other alternatives

Letter 1851 I support Alt 12 which contains a healthy mix of programs which will benefit all

Letter 1857 I support Alt. 12 as it comes closest to fulfilling the mission of the USFS

Letter 1858 Choose Alternative 12 today so we can reap the benefits of sound multiple-use management practices in the future

Letter 1880 [I] support "Alternative #12" which provides a fair, and balanced approach to managing the forest

Letter 1914 I support Alt 12 because it meets the demand for future wood products With the approaching gypsy moth, I am in favor of salvaging as much timber as possible We meed the higher timber quantity to meet this goal.

Letter 1983 Alternative 12 provides the best solution both economically and environmentally for the continuance of Multiple-Use Sustained Yield Forest Management practices

Letter 1990 Alleghany County fully supports Alternative Management Plan 12 Alternative 12 gives the best level of multi-purpose use of our National Forest resources Not only does it promote jobs and economic development as far as the timber and paper industries are concerned, but it promotes recreation, wildlife and other outdoor activities which are so important to our overall economy and quality of life in this region.

Letter 2034 I favor Alt 12 It serves the forest well It serves the people of the nation and western VA well

Letter 2037 I support Alternative 12 as the "Preferred" Alternative Consideration should be given to providing the widest range of goods and services to meet the demands of the public without harming the resource. It should reflect the renewability of the resources such as timber and wildlife The alternative should protect the forest from insects and disease I believe that Alternative 12 best fits these criteria

Letter 2051	[I] support Alternative #12 which will provide multiple use to benefit all citizens
Letter 2065	Our national forests should be managed for multiple use to benefit all citizens, both today and into the future, and therefore [I] support Alternative 12
Letter 2166	You are only harvesting 38 mmbf now, and the forest continues to age til it is overmature Looks like you would want to harvest more not less A cut of 50 million seems reasonable. Alt 12 would be the ideal choice It would be good for the timber and the timber industry
Letter 2175	I am in favor of Alt 12 It represents more realistic multiple use and sustainable timber harvest levels.
Letter 2176	I am in favor of Alt 12 Alt 12 provides for true multiple use and serves the needs of the people
Letters 2191, 2496	Alt 12 is the multiple use plan that satisfies the demands of the most forest users Alt 12 better manages our resources.
Letter 2192	I say let's use the renewable resources to ensure their future presence I support alt 12 - the multiple use alt.
Letters 2914, 2199	Alternative 12 is the best of the listed alternatives It comes up short in harvest volume and should call for treating all gypsy moth areas, not just those suggested It comes closest to multiple-use management and should be the preferred alternative
Letter 2219	While not perfect, Alt 12 is a more desirable plan It appears to provide the most to a greater variety of users of these public lands
Letter 2225	I prefer Alt 12, instead It is the multiple use alt and does the most good for the most people
Letters 2228, 2923	Alternative #12 is a much more balanced and fair approach to managing the forest, it benefits more people and still protects the environment
Letter 2278	We should get back to using the forest for what a forest is intended for and that is to be harvested in a correct manner Let's get with it on Alt 12
Letter 2306	Closely meets the multiple-use mandate of national forests and more economically viable
Letter 2309	Alternative #12 seems to present a more balanced approach implementing the multiple-use concept and maximizing net public benefit
Letter 2314	I hope that you will adopt Alternative 12 which provides for true Multiple-Use plan so the greatest number of our citizens can enjoy these resources
Letters 2316, 2620	Alternative 12 will go further toward providing a full range of goods and services including timber, recreation, minerals, wilderness, range and wildlife habitat
Letter 2323	The Alternative 12 plan considers the entire forest communities well being Many people are working diligently and successfully with these forests and must be considered an integral part of any management plan Let the foresters do what they do best, manage the forest for its maximum, continuous productivity
Letter 2324	I urge you to adopt Alternative 12 which would provide a full range of multiple use opportunities for the benefit of all citizens
Letter 2330	I support Alternative #12 as a management plan for the George Washington National Forest Although it is not perfect, it does permit a wide variety of uses for this land, plus a decent habitat for the wildlife
Letter 2387	Reconsider the management alternative selected and choose another alternative that provides a full range of goods and services including Timber, Recreation, Minerals, Wilderness, Range and Wildlife Habitat The [Town] Council believes Alternative 12 provides these goods and services, and does support Alternative 12 with

the conditions that no more than one thousand acres of the George Washington National Forest be clear cut, and that the number of acres available for all terrain vehicle development remain as is and not be increased.

Letter 2388 Alternative 12 is a workable multiple use plan which better reflects the goals and objective of our National Forest system Under Alternative 12, we can better manage the GWNF for all natural resources including timber, water, wildlife, fish, soils, and the list goes on

Letter 2488 I believe that Alternative 12 is the choice It provides a full range of goods and services including timber

Letter 2504 I believe if you look at Alternative 12 more carefully, you will find it will also more closely meet the objective of maximizing public benefits and provides a balanced multiple-use approach This approach will (by law) well furnish a continuous supply of timber and be a lot closer to meeting the multiple-use scheme of conservation, not preservation I hope that you will consider Alternative 12 for your new management plan

Letter 2528 I fancy plan #12 it is much more balanced and a fair approach to manage the forest.

Letter 2539 I support Alternative 12 because it more closely meets the multiple-use mandate of national forests and it is more economically viable

Letter 2542 Everything possible should be done to prevent and suppress uncontrolled fires and damaging insects and disease The forest can provide lumber, pulpwood, fuel and wood while at the same time providing all of the other multiple uses without degrading the environment For these reasons and the reasons that follow we endorse a modified version of Alternative 12

Letter 2561 Alternative 12 provides for a cooperative effort between the Forest Service and the wood industry that would meet the goal of management of one of our best natural assets wood I support Alternative #12.

Letter 2581 Adopt Alternative 12 This alternative comes closer to meeting the needs of all users

Letter 2608 We believe that Alternative 12 presents the best balanced approach to implementing a true multiple-use concept and provides a full range of forest uses including wilderness, wildlife habitat, recreation and timber management.

Letter 2629 I KNOW ALTERNATIVE TWELVE is the best alternative available. It offers, by far, the best balance to all considered, keeping in mind the reason for our National Forests is multiple use.

Letter 2634 Since Alternative 12 appears to more closely parallel to what I believe to be the Congressional intention under the Multiple-Use Sustained Yield Act, as a taxpayer and as an elected member of the Virginia General Assembly, I strongly support Alternative 12.

Letter 2635 I join many of my constituents in proposing that your planning team reconsider its preferred alternative. Alternative 12, while certainly not a perfect choice, provides a reasonable basis for developing the plan which will establish the direction for the George Washington It has broad support among numerous interests who are willing to work together for a healthy and productive forest that will meet the needs and desires of generations of Americans - present and future

Letter 2662 Alternative 12 will provide a well-balanced multiple use approach.

Letter 2682 I support Alt 12 because it seems to provide the best mix of goods and services to all concerned. It provides for timber harvesting as well as other uses such as· recreation, wildlife, minerals, range, and wilderness If we are to practice good forest stewardship, we must USE our renewable natural resources and not let them go to waste! When timber harvesting is carried out in the proper manner, it not only creates jobs and boosts the economy but renews the forest, creating biological diversity that is desirable for both recreation and wildlife.

Letter 2686 Alternative 12 is the multiple-use plan that satisfies the demands of the forest resources

Letter 2718 I believe Alternative 12 is a proper direction for the Forest Service to take This is a "Multiple Use" alternative Cut 50 mmbf and we'll all benefit.

Letter 2731 The forests can be better managed through timber harvesting [with Alternative 12] This is a tool that we need to use in order to have a more productive forest

Letter 2743 Support Alt 12 Our NF should be managed for multiple use

Letter 2744 I believe that of the 13 alts presented, Alt 12 is the one that should be adopted A mgt plan should encompass all uses of the forest, including wildlife, recreation, watershed protection, and timber production

Letter 2745 Our NFs should be managed for multiple use to benefit all citizens, and for future generations to come Therefore, I support alt 12

Letter 2828 I support Alternative 12 for the management of the George Washington National Forest It best serves the needs of everyone. The ultimate goal is to use a plan to benefit the majority of people, wildlife and natural resources.

Letter 2833 I support Alternative 12 Alternative 12 will facilitate and benefit recreation, wildlife habitat, watershed management and timber production

Letter 2870 [Alternative 12] emphasizes timber cutting, the gypsy moth, wildlife, the local economy and the best for our forest Please support Alternative 12

Letter 2893 Alternative 12 provides a better multiple-use resource balance for job opportunities and public use benefits.

Letter 2893 [I] hope that Alternative 12 will be adopted to reaffirm the multiple-use management stewardship mandates for national forests with timber production as a primary purpose, as opposed to national park administrative scenarios which emphasize recreational use

Letter 2897 We wish to advise that we have reviewed the Draft Management Plan proposed for the George Washington National Forest and would urge that Alternative 12 be adopted It is our opinion that Alternative 12 would best serve the needs of our area

Letter 2898 Alternative #12 with only slight modifications, may be the most likely to satisfy the wide diversity of opinions

Letter 2898 The alternative that best meets the environmental, economic, timber and other resource concerns appears to be Alternative #12, which emphasizes all of these multiple-uses I urge you to strongly consider the implementation of Alternative #12 for the long-term benefit of the area, not just short-term political gain

Letter 2903 I support and urge you to adopt Alternative 12, which gives fairer representation to the motorized trail user community and which also represents economically a better plan for the people living in and around the forest

Letter 2919 Alternative 12 provides the best mix of goods and services to the taxpayers who own the resource, and the industries affected by its management which provides jobs and economic activity

Letters 3423, 3424
To balance the management of the forest for a multiple-use forest

Letter 3505 We support Alternative 12 Alternative 12 best meets the mandate for multiple use management

Letter 3560 Review Alternative 12 more closely and implement it in place of Alternative 8

Letters 3573, 3574, 3575
Alternative 12 is the best of the listed alternatives It comes closest to multiple-use management and should be the preferred alternative

Letters 3580, 3581, 3582
Alternative 12 is a proper direction for the Forest Service Cut 50 mmbf and we'll all benefit

Letter 3610 I believe that Alternative 12 presents a much more balanced approach to management of the forest

Letter 3621 Our National Forest should be used for the benefit of the greatest number of people without diminishing the integrity of the Forest Alternative 12 does this by adding to the options for larger number of users

Letter 3645	I believe Alternative 12 will be the most beneficial overall for the public, business, and wildlife sectors
Letter 3689	I cast my vote in this political process for the multiple use of the Forest and for Alternative 12 (those darn ATV's and ORV's excepted!)
Letter 3706	I support Alternative 12 Alternative 12 best provides for multiple-use management which will benefit the majority of the public It is important that the George Washington continue to provide a full range of opportunities including timber harvesting, recreation, and wildlife management In addition, Alternative 12 will continue to provide for local employment
Letter 3729	Alt 12 is the best balanced plan and comes closest to responding to national needs, though I would place a greater acreage of the land suitable for timber under mgt for timber production
Letter 3730	Alternative #12 seems to present a more balanced approach It "Provides a full range of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat "
Letter 3743	We recommend the adoption of Alternative 12, which best matches the needs of the region as well as society
Letter 3755	A better balanced plan would be Alt 12, even though I have reservations about the small percentage of the GWNF that would be managed for timber
Letter 3758	Reconsider the management alternative selected and choose another alternative that provides a full range of goods and services including timber, recreation, wilderness and wildlife habitat The Augusta County Board of Supervisors supports Alternative 12 with modifications to include the expansion and improvement of developed recreational facilities throughout the Forest including those at Sherando Lake, Todd Lake, and Braley Pond In addition, the Board requests consideration be given to limiting the use of clearcutting in areas where such a practice would be visually displeasing to area residents, as well as tourists
Letter 3773	Alternative 12 best suits the needs of everyone, including both the lumber industry and the public in general
Letter 3781	I support Alternative 12 because timber, recreation, minerals, wilderness, range and wildlife habitat would be managed by the National Forest Service
Letter 3793	Support Alt. 12 which is a much more realistic approach to good stewardship
Letter 3805	We believe that Alt 12 more clearly meets the multiple-use concept for forest mgt
Letter 3814	Alternative 12 does a much better job at managing the forest under multiple-use
Letter 3815	I think Alternative 12 provides a much better multiple-use of the forest for all users involved
Letter 3842	Alt 12 provides a much more balanced approach to the use of our NFs I am in favor of a plan to conserve our NFs, but I am not in favor of plans which would turn our NFs into parks The forest is capable of perpetually producing many times the amount of wood products suggested in Alt 12, while at the same time providing for taking good care of wildlife, aesthetics, soils, and all other uses
Letters 3808, 3865	Of all the alternatives suggested in the draft revisions, Alternative 12 is the one which comes the closest to maximizing the potential of the Forest and deserves support from all concerned
Letter 3912	I urge the use of Alternative 12 over Alternative 8 because it more closely follows the multiple use approach of forest management that was originally intended for the National Forest woodlands Alternative 12 provides a more balanced management approach while Alternative 8 follows a single use approach that conflicts with the principles governing the management of the National Forests
Letters 3917, 3950	I support a plan based on Alternative 12, not Alternative 8 Alternative 12 is a more balanced approach to managing the resources of the George Washington National Forest

Letter 3926	I support Alternative 12 Alternative 12 supplies the demands of the forest resources of the GW National Forest
Letter 3951	Alternative 12 is the best multiple-use alternative Even it should have some modifications.
Letter 3955	The best balance of all of the uses is Alt 12
Letter 3968	I would emphasize Alternative 12, since it makes the forest more accessible It could be tailored to provide good economical potential along with providing the needs and desires of the people
Letter 3974	Alternative 12 suits me and my family better We hunt, fish, and hike on the forest and feel this alternative would better meet our needs as well as those local people who live in and around the Forest
Letter 3990	I support Alternative 12 There are so many beautiful acres of wilderness for the animals for all sorts to roam and thrive I don't want to see that destroyed
Letter 3991	I feel the adoption of Alternative 12 would provide more opportunities for the communities and increase the benefits for all citizens I support the adoption of Alternative 12
Letter 4011	Alt 12 would best address the needs of the people of VA, WV, and the Nation
Letter 4016	Alt 12 embodies a feasible and responsible mgt plan and I support it Alt 12 provides forest products for use by man and is responsive to the habitat needs of native species
Letter 4036	We feel that Management Alternative #12 is best for a multiple use forest for all to enjoy
Letter 4060	Alternative 12 provides the best means to manage the George Washington National Forest according to multiple-use, allowing managed use of its resources while conserving them for the future
Letters 4064, 4065	I feel that the most people benefit for multiple use than any other Land management strategy That's why I like Alternative 12.
Letter 4071	I believe that an alternative which addresses multiple use in a much more comprehensive manner can be developed Alternative 12 is one such alternative which would benefit our society far more than the draft plan, both now and in the future
Letter 4180	I believe in a well managed balanced use of the national forest like Alt #12.
Letter 4181	I believe there can be a well-managed multiple-use for these forests like Alt #12.
Letter 4223	I support multiple use of national forests and would be thankful for your consideration on Alt. #12.
Letter 4252	I encourage you to support Alternative 12 It best serves the multiple-use concept
Letter 4263	We favor Plan Alternative #12. It is a much more balanced and fair approach It benefits more people - including ATV riders, hunters, local economies - it creates more jobs
Response	The Forest Service is moving away from the concept that the National Forests need to be managed based primarily on maximizing certain natural resource products This concept is being replaced with the realization that National Forest must be managed scientifically to best achieve the goals, objectives and future conditions desired by the American people The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past Not everyone agrees that the agency should provide for all of these needs and wants The amount of "development and wise use" of the renewable resources on the Forest must be balanced against the needs and values which are foregone with such development Alternative 12 provides a mixture of goods and services based on the traditional concept of multiple use management In particular, timber management, motorized recreation use and providing habitat for early successional wildlife species are emphasized more than in the Forest Service preferred alternative

In the record of decision for the FEIS, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and conditions in the alternative to serve as the Revised Plan

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Letters 4022, 4037

Alt. 12 would provide more opportunities for the communities and increase the benefits for all citizens.

I support Alternative #12 I feel curtailing the logging in the George Washington National Forest would only put our economy deeper into a recession

Response The timber supply on the George Washington National Forest is a small component of the total timber supply in northwestern Virginia and adjoining West Virginia. It is incorrect to assume that the reduction in allowable sale quantity in Alternative 8 from the current levels of offer would "...put our economy deeper into a recession "

Letter 181 We endorse Alternative 12 with the addition of the revised and proposed new standards above

Letters 374, 383, 768, 769, 847, 848, 849, 850, 851, 921, 922, 991, 992, 993, 1194, 1195, 1196, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1542, 1616, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1724, 2079, 2080, 2081, 2082, 2083, 2084, 2443, 3101, 3102, 3103, 3104, 3105, 3106, 3107, 3108, 3109, 3110, 3111, 3112, 3113, 3323, 3324, 3325, 4083, 4084, 4085, 4086, 4087, 4088, 4089, 4090, 4091

We have identified Alternative 12 as our preferred alternative

Letter 3743 In recreational activities, Alternative 12 meets demand, providing 163% of demand for Semi-Primitive Non-Motorized Recreation, 343% of demand for Semi-Primitive Motorized Recreation, and 2,514% of demand for Roaded Natural Recreation

Response *As displayed in Table 3-8 of the FEIS, it is apparent that most of the alternatives have a sufficient amount of lands* in the various recreation opportunity spectrum classes to meet the anticipated demand for the recreation opportunities afforded by this spectrum It is concluded, therefore, that the ability of various alternatives to respond to anticipated recreation demand, in terms of recreation opportunity spectrum classes, is not a useful decision criterion for selecting the alternative to serve as the Revised Plan

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Letter 3819 We approve of a forest use Plan between Alternative 13 and Alternative 8.

Response Alternatives 11 and 13 have been reformulated by the ID Team to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to respond to biological issues.

Letter 3812 Alt 9 is the best of the proposed draft plans. Due to competing interests, it may be unreasonable to expect implementation of this alt. without modification. However, any plan must provide large unfragmented highland forests which are not managed as timber stands

Response Alternative 9 is considered in detail in the FEIS It could be selected by the Regional Forester as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 74 I would like to see the Land Mgt Plan maintained at least at current levels.

Response The Forest Service is finding that people need and want a wider variety of uses, values, products and conditions from the Forest than in the past The 1986 Plan emphasized the traditional mixture of multiple uses. It was not sufficiently responsive to the changes in public needs and wants. It also is not in concert with emerging national policies that have led to the agency priority on ecosystem management.

Letter 145, 2878, 2914, 3612

The array of thirteen alternatives presented in the draft Revised Land and Resource Management Plan for the George Washington National Forest and its accompanying draft environmental impact statement (DEIS) is an effort to allocate limited resources among potential users whose desires may sometimes conflict The U S Forest Service preferred alternative is predicated on numerous assumptions regarding the degree to which

different uses conflict We share the Forest Service objective of "maximization of net public benefit" in selecting a management direction for the George Washington National Forest. However, looking at the same data, Westvaco arrives at slightly different conclusions, perhaps due to different assumptions about the degree to which different uses conflict With our shared objective in mind and based on experience and professional judgment, we support a final plan patterned after Alternative 12

Response

The identification of the alternative that maximizes net public benefits requires a careful balancing of the opportunities to provide different uses, products and conditions and public values in a manner that is sensitive to negative effects on the environment, to issues raised by the public, and to agency policies and priorities

Different individuals, organizations, corporations and agencies place different relative weights on the importance of providing different uses, values, products and conditions This fact results in major disagreements over which alternative should be selected as the Revised Plan

Alternative 12 places a greater emphasis on the production of goods, services and uses traditionally associated with multiple use management It is not particularly sensitive to other resource values for which the public has expressed a desire It is also not responsive to the emerging policies and priorities of the agency

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Letter 4031

"Managing" a considerable part of the George Washington by letting it alone would be the most conservative, prudent possible course

Response

The American public want and need a wide variety of uses, values, products and conditions from the Forest By not managing a considerable part of this Forest, the Forest Service would be denying the opportunity to provide other legitimate multiple uses

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Letter 145

It is important that our National Forests are managed in ways that are consistent with biological diversity and beneficial to wildlife, soil and streams, and recreation These all are elements of what we believe to be sound and progressive forest stewardship Environmental and natural resource management is a long-term investment, and Alternative 12 is the plan that we believe is most suitable to accomplish these goals

Letter 725

Alt 8 appeals more to special interest groups, individuals who may or may not visit the Forest On the other hand, Alt. 12 appeals to more individuals who take part in Forest activities

Letter 2886

Re-examine Alternative #8 This alternative does not meet the needs of most users of the forest, nor does it promote a healthy, biologically diverse forest for the future We ask that the final plan be more closely aligned with the management conception of Alternative #12

Letter 2891

I believe that the forest is capable of, and should be, providing a much greater quantity of wood products than Alternative 8 does I much prefer Alternative 12

Letter 2926

I am deeply disturbed to see the Forest Service gravitate towards preservation management. That is the role of our National Parks, conservation (wise use) is the central theme in management of our national forests. Alternative #12 provides a balanced full range of multiple uses of the Forest, and I therefore strongly urge you to reject alternative 8 and select alternative 12 as the management plan to guide the GWNF

Response

National and regional Forest Service policy during the 90's has evolved to include a greater sensitivity for environmental concerns and a willingness to adjust priorities to ensure that National Forests are managed to provide values beyond the traditional goods and services offered in the past

Alternative 8A has been formulated to provide the appropriate mixture of uses, values, products and conditions that will be provided for the next ten to fifteen years in light of the realization that people want and need a wider array of uses, values, products and conditions from the Forest than in the past

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Letter 1353

I agree with Alt 12 With proper cutting the gypmo is slowed

Response

The Forest is aware of no research which supports the contention that timber harvesting can serve as an effective control for gypsy moth

Letter 559 It is my opinion that Article 8 wouldn't benefit us as a whole as much as Article 12 would It seems to me that more land would be used more efficiently by all adjoining mills and people using it as a recreational area as well

Response The ID Team has been unable to determine the point of this comment besides favoring Alternative 12

Letter 964 Please support Alternative 3! I am deeply concerned about losing trees and jobs Alternative 3 prevents the loss of either!

Response The analysis performed by the ID Team does not support the contention that Alternative 3 would prevent the loss of jobs

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Letter 181 We endorse Alternative 12 with the addition of the revised and proposed new standards above

Letter 1410 I consider option #12, but the number of clearcuts should be less

Letter 1850 I support Alternative 12 with the following changes· 45 MMBF Board Foot ASQ, 2 MMBF Board Foot Salvage (Gypsy Moth); 3 MMBF Board Foot wildlife only, 50 MMBF Board Foot Total, a balance of cutting methods, an increase in acres where true multiple use is in effect, trails managed as sensitivity level three only, expanded highly developed camping areas

Letter 2348 I support Alt. 12 with some amendments

Letter 2659 The Council supports adoption of Alternative 12 with the following two amendments Reduce the number of acres available to all-terrain vehicles to 16,999 and reduce the number of forest acres on which clearcutting is permitted from 3,000 per year to 1,000 acres per year

Letter 2727 I like 12 with modification

Letter 2898 The lack of "Other even-aged methods" is the primary problem with the selection of Alternative #12 The use of shelterwood systems is all but non-existent in Alternative #12

Letter 2898 Adjusting Alternative #12 by shifting part of the acreage designated for "Clearcutting" into the "Other even-aged" method would balance the even-age and uneven-aged methods and would allow flexigbility for on-site application Alternative #14 does not quite achieve this balance, nor does it provide the economic strengths included in Alternative #12

Letter 3552 I support Alternative 12 I would, however, prefer modifying Alternative 12 by reducing or eliminating the number of acres available for ATV development ATVs should definitely be excluded from sensitive areas, such as remote highlands I also support the use of gypsy moth control measures on the entire GWNF to the extent necessary to minimize changes in the distribution of native species within the forest.

Letter 3639 I offer a modified Alternative 12 The use of clearcutting should be used in salvage sales and wildlife habitat projects only. Modified shelterwood should make up the bulk of all timber harvests Simply put, there should be no (zero) acres in Group Selection The use of ATV's should be limited until demand and impacts are *clarified No increase in ATV use should be allowed until it is clear that the use is not in any way being abused*

Response The public submitted a number of suggestions for modifying Alternative 12 Many of these suggestions were either contrary to the overall theme of Alternative 12 or were contradictory with one another Adjustments were *made in Alternative 12 where the suggestions seemed consistent with the overall theme of providing a full range* of goods and services including timber, recreation, minerals, wilderness, range, and wildlife habitat and where it allowed the Alternative to provide a more positive response to the issues

Lowering the allowable sale quantity for Alternative 12 to 450 MMBF (or an average annual offer of 45 MMBF) provided a substantially better response to the "Projected Net Revenue" displayed in Figure 2-4 of the DEIS Therefore, Alternative 12 was reformulated with an allowable sale quantity of 450 MMBF

No attempt was made to calculate the non-chargable timber volume for each alternative This information is germane to the timber sale schedule in the Revised Plan and is not a pertinent factor is selecting the alternative

No attempt was made to calculate the non-chargable timber volume for each alternative. This information is germane to the timber sale schedule in the Revised Plan and is not a pertinent factor is selecting the alternative to serve as the Revised Plan A non-chargable component of 5 million board feet per year, however, is not inconsistent with the management philosophy of Alternative 12

The mixture of timber harvest methods for Alternative 12 has been changed so that the estimated annual program of harvest would consist of the following mixture of timber harvest methods clearcut on 1,250 acres, modified shelterwood on 1,400 acres and two-staged shelterwood on 700 acres Alternative 12 does not employ uneven-aged timber harvest methods

The request for "an increase in acres where true multiple use in effect" correlated to lands suitable for timber production was assumed Alternative 12 now has 595,000 acres suitable for timber production This is 1/3 more acres suitable for timber production than in the DEIS This amount of acreage is needed to provide the ASQ using the mixture of timber harvest methods described in the previous paragraph and the standards applied to much of the suitable lands

The inventoried sensitivity level of any trail does not change However, this does not affect the adopted visual quality objective assigned to any management area prescription used in Alternative 12

Alternative 12 has been reformulated in the FEIS to include the same developed recreation program as the Forest Service preferred alternative

Despite comments to either increase or decrease ATV opportunities, the number of ATV routes remains nine. The mixture of motorized recreation in Alternative 12 is consistent with its overall theme

Alternative 12 does not recommend any roadless areas for wilderness study Recommending areas seems to be contrary to the overall direction of the alternative

Alternative 12 is considered in detail in the FEIS The Regional Forester will select it as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 289 — Alt 12 will also require $2,750,000 less in annual budget than Alt 8

Letter 2282 — I ask that you make yourselves more efficient by adopting Alternative 12

Letter 2731 — [Alternative 12] will cost less money to manage the forests

Letters 3423, 3424 — Alternative 12 budget is $2,750,000 less than Alternative 8 As a taxpayer I object to a plan that costs more and provides less

Letter 3743 — Alternative 12 will also provide a lesser burden to the taxpayers, costing only $16,149,000 to implement, which is approximately $2,750,000 less than the Draft Alternative

Letter 3904 — [We support Alternative 12 because it] recommends no new wilderness study areas and the cost to manage the forest would be a lot less

Letter 3939 — [Alternative 12] will cost the taxpayers over two million dollars less than alternative 8.

Response — The budget information in FEIS chapter 2 is intended to highlight the major cost differences between the alternatives In the DEIS, the Forest did recognize that the preferred alternative had one of the highest budgets In this FEIS, the budget has been updated to better reflect the money needed to implement each alternative

The final decision will consider the budget needed to implement the Plan In the record of decision, the Regional Forester will discuss the rationale for selecting the appropriate mixture of uses, values, products and services in the alternative to serve as the Revised Plan However, no single factor, such as the budget, will lead to this selection

The Forest will budget to implement the Revised Plan [1982 NFMA regulations at 36 CFR 219 10(e)]. Yearly, Forest budget proposals are aggregated nationwide by the Forest Service and submitted to the President. These proposals then become part of the President's budget request to Congress

The Forest's annual budget, as authorized by Congress, may vary from that which is indicated in Plan Appendix F The Implementation Monitoring Summary in the Plan's Chapter 4 provides for monitoring the budget. If annual budgets over time vary significantly from long-term direction, a Plan amendment may become necessary [36 CFR 219.10(e)]

Letter 3988

I recommend a new alternative built upon Alternatives 8 and 11 Alternative 11 has many good qualities except for its overemphasis on all-terrain vehicle use areas It has a good PNV and a slightly lower budget than Alternative 8. It appears to be more closely aligned with the future needs than Alternative 8

Response

Alternative 11 has been reformulated to respond to concerns from individuals and organizations that Alternative 8 needed adjustments to better respond to biological issues.

Letter 2300

Our industry needs 45 million feet per year and according to your figures I don't understand how you justify only cutting 59% of this demand Especially when you more than meet the needs of other users I think you should balance out all uses by choosing Alternative 12

Response

Alternative 8A is designed to provide for a wider array of uses, values, products and conditions than traditionally recognized as multiple uses. In deciding on the appropriate mixture of multiple uses, the ID Team considered values and environmental conditions which cannot be measured in terms of "demand" To conclude that portions of the Forest should not be allocated to Management Areas 4, 5, 6, 7, 8, 9 or 21 simply because they are not needed to meet the demand for "primitive non-motorized" recreation use ignores the fact that these areas are also providing biological values and conditions desired by the public and that development of these areas would require extensive roading that cannot be economically justified on a Forest with a below-cost timber program

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Letter 3882

I lean toward Alt. 3 But, realizing you have many values to satisfy, I ask you to remember the future by looking at the past. Try to hold onto what we have Alt. 8 is a start, but leaves out several areas that could be included in Wilderness Designation - if not, consider special mgmt.

Response

Alternatives 3, 6, 11, and 13 provide a more positive response to these concerns than Alternative 8 or Alternative 8A One of these alternatives will be selected by the Regional Forester to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letter 324, 950, 951, 953, 954, 958, 959, 960, 961, 962, 1100, 1101, 1102, 1103, 2158, 2159, 2361, 2377, 2383, 2463, 2467, 2468, 2585, 2673, 3539, 3674, 3777, 3778, 3817, 3859, 3869, 3900, 3905, 4174, 4175, 4176, 4177, 4178, 4179, 4238, 4244

I support Alternative 12, as modified by the Virginia Four Wheel Drive Association.

Letter 952

I and several of my friends support Alternative Twelve as modified by the Virginia Four Wheel Drive Association

Letter 989

The Virginia Four-Wheel Drive Association endorses Alternative Twelve only with the changes we suggest here and in the Final Draft of this position paper.

Letters 2210, 4256

We support Alternative Twelve as modified by the Virginia Four-Wheel Drive Association

Letter 2234

The Colorado Association of Four-Wheel Drive Clubs, Inc (CA4WDCI) supports Alternative 12 as modified by the Virginia Four-Wheel Drive Association.

Letter 2362

I am in favor of Alternative 12, as amended [by] Capitol City Four Wheel Drive Club

Letter 2370

We support alternative 12 The amendment supported by VA4WD promotes public use of the lands and we support this

Letter 2382 — I support Alternative #12 as modified by the VA Four Wheel Drive Association Maintain continued access by four wheel drive vehicles to property supported by my tax dollars

Letter 2586 — The Midwest Four Wheel Drive Assn , and the Minnesota Four Wheel Drive Assn urge you to support Alternative 12 as modified by the Virginia Four Wheel Drive Assn

Letters 3982, 4035 — Alternatives 4 and 12 would best provide for recreation needs and multiple uses Sufficient safeguards exist within the standards and guidelines to assure that the resource is also protected

Letter 4013 — East Coast Four Wheel Drive Association supports Alternative Twelve as modified by the Virginia Four Wheel Drive Association.

Letter 4235 — I urge you to SUPPORT the views and opinions of OHV clubs, especially the Baltimore 4-Wheelers

Letter 4256 — We support Alternative Twelve as modified by the Virginia Four-Wheel Drive Association.

Response — The question of formulating a version of Alternative 12 that provides greater OHV opportunities was explored by the Forest The problem is that Alternative 12 contains a great deal of acreage allocated to Management Areas 4, 14 and 15 The biological species emphasized in these management areas require control, if not elimination, of motorized access It is inappropriate to modify these management areas to include a greater degree of motorized use

The only way to formulate an alternative with greater OHV opportunities is to increase the amount of lands allocated to Management Areas 11, 16 or 17 These options are explored in Alternatives 4, 5 and 7 There were no advantages in formulating alternatives that were mid-way between these alternatives and Alternative 12

Letter 3987 — Alternative 3 also provides the highest level of protection for air and water quality and soil retention and provides for the lowest fire danger of any of the alternatives It is also cheapest

Response — The philosophy of ecosystem management espoused by Alternative 3 is at odds with the national ecosystem management policy The Forest Service does not manage ecosystems just for intrinsic ecosystem values They are managed for specific purposes such as producing, restoring, or sustaining certain ecological conditions, desired resource uses and products, vital environmental services and aesthetic, cultural or spiritual values

Standards in the preferred alternative provide for maintenance or improvement of water quality for all beneficial uses, insure that long-term soil productivity is maintained, and require compliance with air quality regulations

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Letter 3643 — After careful review of the alternatives, the Department recommends a modified Alternative 10 as the Preferred Alternative In general, this approach would sustain significant acreage of neotropical migratory bird nesting habitat and roadless areas, maintain habitat to support game populations at a level comparable to Alternative 8, furnish high levels of recreational opportunity, and minimize the costs of road construction and below-cost timber sales Natural resource impacts and economic costs to the public would be minimized if this alternative is selected

Letter 3643 — Incorporate the Alternative 8 option that limits ATV/OHV use into the Alternative 10 forest plan

Letter 3643 — A modified Alternative 10 would provide the following benefits to wildlife species and the general public

Letter 3643 — Eliminate or substantially reduce the prescribed burning program for maintaining early successional vegetation However, maintain the burning program for the 100-300 acres per year that would be needed to preserve the Special Biological Areas in a natural state

Letter 3643 — Eliminate plans to create small openings for wild turkey, grey squirrel, and the pileated woodpecker Maintain unfragmented, roadless areas

Letter 3643 — Substitute the Alternative 13 roadless area plan for the alternative 10 plan

Response — Rather than modify Alternative 10, the ID Team reformulated Alternative 13 Alternative 13 provides a strong response to these concerns In particular, Alternative 13

1 maintains all roadless areas in an unroaded condition and recommends 22 of the 27 roadless areas for wilderness study,

2 eliminates ATV use and restricts OHV use to the open transportation system roads;

3 constructs no new system roads,

4 limits timber harvesting to within 1/2 mile of system roads and limits removal to the use of skid trails or temporary roads,

5 maintains migration corridors, and

6 restricts the use of non-timber management practices to promote habitat for game species to maintenance of existing openings in Management Areas 14, 15 and 16 and to prescribe burning 100 to 300 acres per year.

Letter 3643 *Substitute the Alternative 8 developed recreation program for the Alternative 10 program*

Response The developed recreation program in Alternative 8A has been added to Alternative 10

Letter 382 Alternative 8, only 24% of the GWNF is "suitable" for timber production, whereas 42% (still less than half) is "suitable" under Alternative 12 Timber management is essential for scientific forest/wildlife management

Letter 1878 I voice my opposition to Alt 12 I understand this would allow clearcutting??!! and the consequential environmental impact Also, why add to the taxpayer's burden of unprofitable lumber sales?

Letter 2031 I support Alt 12 as the most ecologically sound mgt system for the GWNF It is my belief that the more abundant undergrowth that will be provided by the cross cutting proposed in Alt 12 is vital to provide a hiding place in which the wildlife can escape from predators This cutting will provide a necessary barrier in controlling forest fires, and the undergrowth will provide soil nutrients needed for the long term enhancement of the forest

Letter 2680 Clearcut some timber Create habitat. Go with Alternative 12

Letter 3595 I like 12 because clearcut acres are increased to 2900 acres 60% of the Forest will be managed to emphasize wildlife species

Letter 2662 While only 42 per cent of the forest is suitable for timber production, under Alternative 12, the necessary vegetative manipulation tools are available

Response There is clear national policy that directs the Forests to reduce the amount of clearcutting, so an increase to 2900 acres is in direct conflict with national direction

Clearcutting is not the only way to manage wildlife The Revised Plan provides many methods, including timber management Wildlife management can occur on the vast majority of the Forest Using timber management to enhance wildlife habitat will be emphasized on almost half of the Forest.

The Forest Service preferred alternative has identified 1/3 of the forested acerage suitable for timber production A variety of management practices can occur on most of the remainder of the Forest. Even on most of the unsuitable timber lands, other management activities may take place The expanded wildlife management program provides habitat manipulation in areas where timber quality is poor, where there are weak markets for such products, and/or in remote areas where associated road construction costs are extremely high. These conditions exist in many portions of the Forest, and designating such areas as unsuitable for timber production helps avoid below cost timber sales Overall habitat management, as compared to Interim Management, increases, and estimates made for game species' populations do not show declines Estimates were made for deer, bear, and turkey for each alternative Alternative 8 produced more habitat for black bear and wild turkey, while Alternative 12 produced more habitat for white-tailed deer

Letter 552	Alternative 12 will provide more money for programs benefitting wildlife
Response	Alternative 12 spends more money on timber harvesting, much of which is designed to provide habitat for certain wildlife species Given that the Forest has a below-cost timber sale program, this does not appear to be an advantage.
Letter 1472	The State would be better off with money from hunting licenses [with Alternative 12]
Response	There is no way to substantiate the effects of different alternatives on the sale of hunting licenses All of the alternatives produce huntable populations of game species
Letter 2731	[Alternative 12] will provide wildlife viewing and nature studies, and provide protection for proposed threatened, endangered and sensitive species
Letter 3939	Alternative 12 would provide wildlife viewing, nature studies, and provide protection for proposed, threatened, endangered, and sensitive species It can place emphasis on biological values, provide habitat for area-sensitive species, and maintain biological diversity
Response	All of the alternatives offer wildlife viewing and nature study opportunities as well as protection for threatened, endangered and sensitive species to varying degrees Many of the other alternatives, including the Forest Service preferred, offer stronger responses to these concerns than Alternative 12 Biological diversity is a complex subject that cannot simply be equated with a well-balanced age-class distribution of timber stands. In particular, biological diversity cannot be equated with maximizing habitat for game species. Biological diversity includes the variety of all species in the Forest. Not all of these species benefit from timber or wildlife management practices. For instance, Alternative 12 does not provide habitat for forest interior nesting neo-tropical migratory birds that are sensitive to forest openings It does, however, provide habitat for black bear and turkey
Letter 1969	I ask that you choose Alt. 12 VA does not need any more wilderness With the average age of the US population increasing, fewer folks will be able to enjoy a 'wilderness experience.' Areas in wilderness mgt will become almost biological deserts as mast-producing trees give way to shade-tolerant species. These wilderness areas will cause the gypmo populations to explode, not only ruining the wilderness areas, but surrounding forest land as well.
Response	The Revised Plan recommends 12,000 acres for wilderness study. This acreage together with the 32,000 acres in existing wilderness represents 4 2% of the Forest, an area too small to make a difference in gypsy moth control. Wilderness as designated under the guidelines of the 1964 Wilderness Act is more than for the recreational enjoyment of a wilderness experience It is a benchmark by which to measure changes in the surrounding lands, a repository of ecological, geological, or other features of scientific, educational, scenic, or historic value Wilderness is a recognized part of multiple-use management
Letter 3544	Alternative 3 is the most economical of the alternatives
Response	The question of which alternative is the "most economical" depends on which index is used. Traditionally, the Forest Service uses present net value as the indication of economic efficiency Graph 2-46 in Chapter 2 displays the present net value for the fourteen alternatives Graph 2-47 displays the budget associated with each alternative Based on these indicators, Alternative 3 has the lowest budget but not the highest present net value.
Letter 1146	I feel that our national forest should be managed for multi-purpose but also feel strongly that as a renewable resource forest must be harvested when mature The GW can provide a diversity of plant life without locking large (areas) up in a single purpose use that removes the prospect of harvesting timber at some future time. Alternative 12 best reflects my view

Letter 1311	I support Alt. 12, which would provide a better habitat for wildlife as well as humans
Letter 1670	Even-aged management with periodic clearcuts is the best tool for producing grouse habitat
Letter 1670	Alternative 12 represents the largest emphasis on grouse habitat
Letter 1870	Trees should be used to produce livelihood for mankind not die and weather away For this reason I believe Alternative #12 is the best.
Letter 1972	I would very much like to see habitat for grouse continue to grow. Alt 12 would be best
Letter 2306	Timber harvesting will provide the stand diversity necessary for turkey, deer, grouse, etc. habitat.
Letter 2507	Alternative 12 will allow adequate protection for our environment as well as leaving us access to our natural resources.
Letter 2524	I think you should choose Alternative 12 instead. It manages for a variety of uses, while emphasizing wildlife
Letter 2525	Alternative 12 will go further to provide better quality habitat Please consider changing your preferred alternative.
Letter 2538	Alternative 12 would enhance wildlife management by insuring a continuing supply of hard mast producing trees and the isolation from disturbance for species such as the black bear, gray squirrel and pileated woodpecker.
Letter 2696	*There would also be a healthier forest to better serve the various wildlife species [with Alternative 14]. Timber* harvesting does not reduce the populations of bear and turkey unless clearcutting is the one and only method utilized.
Letter 2700	I ask that you choose Alternative 12 instead Alternative 12 supplies 17% more of the demand for deer than does Alternative 8.
Letter 3624	Change your preferred alternative to number 12 so many more acres of our National Forest will be dedicated to wildlife management, especially for wild turkeys
Letter 3668	I am in favor of Alternative 12. [It] being more beneficial to wildlife in the forest
Letter 3743	Alternative 12 has much increased flexibility regarding the effective management of wildlife species, allowing for 60% of the Forest to be managed for wildlife
Letter 3743	The habitat [in Alternative 12] is also well balanced with an approximately equal number of acres managed to "maintain or enhance habitat for wildlife species that prefer early successional habitats, including white-tailed deer and ruffled grouse " The acres earmarked for this habitat is nearly 5 times greater in Alternative 12 than Alternative 8.
Letter 3748	Alt 12 better emphasizes biology than does Alt. 8. Some sixty percent of the Forest is dedicated to wildlife (biology) mgmt. About 83% of the Forest is suitable for biological mgmt. of the gypmo. And equal treatment is *given to mgmt. (biology) of special areas and species Please consider my views supporting Alt. 12.*
Response	The Revised Plan actually more than triples the annual acreage of habitat management to be performed by the Forest Service. This habitat management will be done to benefit sensitive, threatened, endangered and sensitive species, non-game, and game species. The Revised Plan does not maximize the potential value for either early successional or late successional habitats. It recognizes the value of both, somewhat conflicting needs, within a large forested area and provides for both habitats To expand the timber program beyond the Revised Plan's limits is neither biologically necessary, nor economically efficient *Estimated white-tailed deer carrying capacity is not reduced Currently, in some areas of the Forest, deer are* inhibiting regeneration of preferred timber species. Other concerns include the development of a pronounced browse line which can be detrimental to many bird species that feed and nest in the understory, and that some

rare plant species are preferred as deer foods Forested areas that contain high deer populations, over time, may loose some of these rare species Hunting on this Forest (as determined by long term trends of National Forest hunting stamp sales) shows a very slow decline in the numbers of hunters Based on past sales declines, a slight annual decline is predicted throughout the next decade Increasing the deer herd, therefore, is not a long term goal of the Revised Plan.

Population estimates were not made for the ruffed grouse, another species that prefers young forest areas, but there is no question that the Revised Plan provides adequate habitat to maintain this species throughout the Forest Some alternatives probably do provide for a higher habitat carrying capacity for this species and thus a higher hunting success rate Grouse hunting accounts for approximately five percent of the hunting days on this Forest. In light of a below cost timber program, it is economically hard to justify an increased timber program to increase ruffed grouse hunting success rates

The amount of habitat for bear, pileated woodpecker, and gray squirrel are increased in relation to Alternative 12, and an estimate of carrying capacity for bear (and wild turkey) shows that these species' population levels are higher in Alternative 8A in comparison to Alternative 12

Early successional habitat in the Revised Plan is provided in adequate amounts and spatial arrangements so that those species which prefer this habitat will be found throughout the Forest.

Further explanation of how the Revised Plan provides for the wide variety of wildlife species inhabiting the forest is provided in Chapter 2, "ISSUE 1 BIODIVERSITY" and in "ISSUE 8 VEGETATION MANAGEMENT" (under the sub-heading of "Featured Species") Chapter 3 provides detailed descriptions of desired future conditions of the Forest as they pertain to wildlife

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Letter 2543

WVOHVA does support FLMP Alternative 12. Alternative 12 represents a much more balanced, multiple-use approach to managing the GWNF Alternative 12 provides for 200,000 acres that could permit OHV recreation That acreage is much more in-line with the demand for motorized recreation that could be served by the GWNF WVOHVA requests that all Management Areas 11 on the GWNF be of sufficient size to provide diverse, low-density, looping trails that afford a full spectrum of experiences to the users- 10 to 80+ mile rides WVOHVA requests that Management Area 11 designations be established in several areas of the GWNF to adequately serve local demand for the recreation and enhance the tourism potential of the GWNF to benefit the local economies Alternative 12 does reasonably address those needs Alternative 12 also provides more net benefits to the general public. It provides more than adequate areas of non-motorized recreation, wilderness, and wildlife management It provides more appropriate areas for timber management Alternative 12 provides for more jobs and economic development for the local communities served by the GWNF

Response

OHV's are restricted to trails specifically designated for their use and to open Forest roads. Unlicensed vehicles (primarily ATV's) and motorcycles may use trails in Management Area 11 that have been designated by Forest Supervisor's Order It is incorrect to assume that the entire acreage, whatever the amount, is available for use Cross country travel is prohibited Large licensed 4WD vehicles may travel on open public roads Certain of these have been identified as suitable for high clearance vehicles only and should offer a challenging and interesting ride. These roads are in Management Areas 7, 11, and 17 and are identified on a special features map. An acreage figure is not identified for these roads. It is understood that a system of loops providing various lengths is desirable The direct and indirect benefits to local economies resulting from OHV use is recognized They must be balanced with benefits for other resources, monetarily and otherwise The Regional Forester will select the alternative that maximizes net public benefits

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Letter 3544

Alternative 3 is the only one which views the forest from an ecological perspective.

Letter 3850

No wildlife management - let nature take its course

Letter 3933

Biological realities but forth in the Alt #3 are ignored in "the Plan"

Letter 3987

Alternative 3 provides the highest protection of biodiversity

Letter 4061

Alternative #3 is the most economically viable and environmentally protecting plan Alternative #3 is the only plan that will completely and totally protect the forest and its inhabitants

Response

Providing for biodiversity and large tracts of unfragmented, old growth habitat with an ecological perspective towards management are some of the values that members of the public desire on the Forest Alternative 3 was developed to explore the capability of the Forest to provide this value without providing for other uses such as timber, developed recreation, or wildlife habitat improvements

Alternative 3 precludes opportunities to provide other values, goods, services and uses desired by the public There is, therefore,"a trade-off in terms of other multiple uses

In the record of decision for the FEIS, the Regional Forester will identify the alternative that provides the mixture of values, products, uses and conditions that maximize net public benefits

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Letter 2046

I'm tired of knowing that our trees are being cut down which is taking away habitat for the wildlife

Response

The Revised Plan provides adequate habitats for both game and non-game species Populations of game species remain high, great care is given to the management of sensitive, threatened and endangered species, and non-game species are provided for The Plan provides for a wide range of habitats from early successional to old growth, in amounts that adequately provide for all wildlife species inhabiting the Forest

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Letter 2241

More dollars should be generated by the wise use of the renewable raw material as the original concept of the national forests intended

Letter 3823

[We urge the adoption of Alternative 12 because it] is more consistent with the original purpose of establishing National Forests

Response

Although the authority to cut timber (the Organic Act of 1897) was in place when the Forest was chartered (1918), timber was not a driving force behind the creation of the Forest From "The Lands Nobody Wanted" by Shands and Healy "Land for these forests, which would later be combined to form the George Washington National Forest, was acquired by the authority of the Weeks Act In order to be considered, the land had to have a direct impact on a watershed." And, paraphrased from "Impacts of National Forests on the Forest Resources of the South" by Young and Mustian This damage to the watersheds led to the creation of the Act of March 1, 1911 -- most commonly known as the Weeks Act This act helped solve two problems. it allowed land which was under private ownership to be purchased by the government, it also gave the government the authority to *acquire land specifically for the purpose of watershed protection Paraphrased from page 30, "Origins of the* National Forests" edited by Steen· The first Weeks Law forest was established in 1916 Through 1923, ten more forests were established all justified on their value as protectors of water flows. In 1924, the Clarke McNary Act added "the production of timber" as a purpose for forest acquisition, thus permitting the purchase of land beyond the headwaters of navigable streams

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Letter 145

This total of 6,263 treated is less than that proposed in Alternative 8 (8,550) but is concentrated in more efficient cutting systems. Therefore, more volume, and subsequently more revenue, is generated from fewer acres

Letters 2640, 2641

You need to manage the forest like Alternative 12 Its increased harvest level would better manage this overmature tract. Trees need to be thinned and harvested to keep stands healthy Jobs are created to complete these tasks

Letter 3743

Alternative 12 provides for 42% (still less than half) of the Forest (447,133 acres) to be suitable for timber management, although only 117,561 acres (11 percent) is actually dedicated to timber production This alternative is one of the few that achieves parity with anticipated demand for timber products

Letter 3743

[Alternative 12] provides an annual harvest of 50 MMBF, yet harvesting on 2,287 acres less per year due to utilizing sound silvicultural practices

Letter 4030

Alternative 8 allows only 27 million bf to be cut which leaves about 88% of the annual growth going into *inventory of eventual decay Alternative 12 allows 50 million bf*

Response — Alternative 12 was considered in detail in the FEIS It provides for a high level of timber product output. Alternative 12 could be selected to serve as the Revised Plan if it is identified as the alternative that maximizes net public benefits

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Letters 2, 14, 18, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 41, 42, 43, 44, 47, 1572, 1576, 1581
I support Alternative Four

Letter 1583 — I support option 4 because it was the wildlife's land before it was owned by anybody So why would you want to burn or cut down their homes

Response — In the record of decision for the Final Environmental Impact Statement, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits

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Letter 4 — Perhaps the finest long-term planning was submitted for the George Washington National Forest as "Alternative 3" in the planning papers

Letter 5 — We support the Wilderness Corridor System alternative management plan

Letter 49 — My wife and I resolutely insist that Alternative 3 be implemented

Letter 137 — Choose Alternative 3

Letter 140, 143, 173, 178, 180, 871, 892, 1085, 1105, 1259, 1288, 1585, 1680, 1971, 2046, 2049, 2056, 2360, 2572, 2685, 3438, 3439, 3440, 3518, 3600, 3654, 3666, 3715, 3739, 3922, 4058, 4196, 4197, 4212, 4214, 4248, 4254, 4311
I support implementation of Alternative 3

Letter 171 — There are only three Alternatives that warrant consideration for the revised Forest Plan. #3 is the only alternative that offers hope for bio-cracy in the Central Appalachian Bioregion

Letter 938 — Of all the plans put forth, Alt 3 conserves and protects our GWNF best

Letter 944 — As a general comment, I would like to urge the Service to adopt the approach in Alternative 3

Letter 965 — I do not know your politics on the issue and realize that the measures of "Alt 3" are probably too far-reaching for some, but I think the measures that it calls for are necessary.

Letter 1075 — I consider Alternative 3 far and away the best plan

Letter 1153 — I strongly urge you to implement Alt 3. Wilderness is the only blueprint we have for healthy ecosystems

Letter 1262 — Rethink your priorities and give serious consideration to Alt 3

Letter 3749 — I support plan #3 It is the least destructive and best over the long run

Letter 3933 — I oppose every plan except Alternative #3 for the GWNF.

Letter 3963 — Daily News-Record (Harrisonburg), 23 Jan 1992, pg 6 Alternative No 3

Letter 3568, 4026, 4031
Adopt Alternative 3 as the best course for the George Washington National Forest

Letter 4034 — The alternative that is clearly and without question the only morally and ethically correct choice is Alternative 3, the Wilderness/Corridor alternative, proposed by Virginians for Wilderness

Letter 4188 — I am asking you to consider/implement the proposal known as "Alternative 3 " It's the only plan for this state as well as the planet

Letter 4190	I am in favor of Alternative 3 Save our trees
Letter 4191, 4201	Please consider "Alternative 3" as a plan to save the George Washington National Forest.
Letter 4192	I support Alternative 3 which is a start
Letter 4193	Seriously take into consideration "Alternative 3 " It is the best thing for our future and our children as well
Letter 4194	Please choose Alternative 3 for the children So they know what wilderness is
Letter 4195	*I strongly favor Alternative #3 and I hope that you will too, so that VA's such as I can enjoy the beauty of our* parks for many years to come!
Letter 4199	I favor the proposal introduced by Virginians for Wilderness (Alt. 3) in preventing an overt desecration of the GWNF
Letter 4202	Alt 3 will be a more farsighted plan for our forests.
Letter 4203	For the sake of breathing comfortably in the century to come, please consider this alt 3
Letter 4204	I feel the Alt. 3 plan is a smarter idea.
Letter 4205	Alt 3 proposed by Virginians for Wilderness, is the only plan that will protect the health of the forest.
Letter 4206	I am for Alt 3 proposed by Virginians for Wilderness It is the only plan that will protect the whole of our forests
Letter 4207	I am in support of Alt 3, in the interest of protecting a crucial and much-endangered natural resource - the few areas of unexploited forest left - for our enjoyment.
Letter 4209	Please consider the Alt 3 proposal There are enough environmental concerns - let's not let GWNF be another.
Letter 4210	Please support Alternative 3! This is important for all of us.
Response	In the record of decision for the FEIS, the Regional Forester will select the alternative to serve as the Revised Plan for the next ten to fifteen years Although public comments are considered in reaching this decision, it is not based on a voting process but rather the identified ability of the selected alternative to maximize net public benefits.

OTHER COMMENTS: Comments beyond the Capability of the Forest Supervisor or the Authority of the Regional Forester

Letter 1372	I would like to see the hunting season come in Statewide everywhere, when one goes out all go out. All of the hunters pile up in one place
Response	The setting of hunting seasons is a responsibility of the Commonwealth of Virginia and the State of West Virginia. As such, it is outside the scope of the revision of the Forest Plan
Letter 89	The Forest Service should spend more time in the field, managing the National Forest resources and enforcing the laws and regulations Less time and effort should be spent in providing detail plans in attempts to please the public.
Response	While there is unquestionably a need to spend more time managing the Forest, land and resource management planning is mandated by the National Forest Management Act (NFMA)

Letter 3538 I don't think anyone with a monetary gain should have any say in how the forest should be managed

Response This suggestion is clearly a violation of the public participation requirements of NEPA and NFMA

Letters 134, 185, 4001, 4034

On p B-12 of the DEIS we read that the minimum age at which timber can be cut "is determined by calculating the age at which the stand achieved 95 percent of culmination of mean annual increment of timber volume growth," or CMAI-in-cubic-feet Unfortunately for taxpayers and the ecosystem CMAI-in-cubic-feet usually occurs when trees are little more than large saplings In some cases, as for Ponderosa Pine, it may occur more than 80 years earlier than the culmination of growth in board feet This is the case because volume growth in cubic feet is a measure of all usable wood and includes very small logs usable only for pulpwood On the other hand, the board foot measure is applicable to lumber which can be produced only from trees of greater size and value In the case of the Chestnut Oak, a common GWNF tree for example, board foot culmination occurs at an age of about 100 years (Agricultural Handbook No 271, USDA Forest Service, 1965) From this it's easy to see the taxpayer fraud in the common practice in timber sale environmental assessments on the GW In these they usually call 80-90 year old trees "overmature" They prefer to call saplings at CMAI-in-cubic-feet "mature" as an excuse for clearcutting, in the process defrauding the taxpayer by not allowing trees to reach board foot culmination or older at which times more valuable wood is produced The volume CMAI rule is applied in national forests generally and it's a subject they don't explain anywhere

Letter 185 In eastern forests the Culmination of Mean Annual Increment (CMAI) volume rule is invoked to justify cutting young growing stock on high site index sites

Letter 185 The result of cutting these many small trees is not only economic loss but for many reasons devastation of the forest ecosystem Beyond the inevitable habitat fragmentation and negative edge effects of clearcuts and the associated roads are the destructive effects of the many heavy machines on the forest floor

Letter 185 I hereby request that in the Revised Forest Plan you explain in detail how the CMAI volume rule results in the cutting of many trees before they have reached more profitable BF culmination at least

Letter 185 Virginians for Wilderness ask for the abolition of the CMAI volume rule in National Forest management everywhere

Letter 185 The volume and board foot culmination will generally be followed in time by other culminations of forest values and benefits For example, very large forest trees capable of producing lumber will in all probability also yield in plywood, veneer, and even more valuable products, since logs from such trees contain fewer knots than those from smaller trees Finally there is the ultimate ecological culmination of greatest and most lasting benefit, old growth forest, as part of a naturally balanced ecosystem

Letter 4001 One of the reasons there is so much pulpwood harvested on the GWNF now is the totally unrealistic definition used for maturity of a stand of trees "Culmination of mean annual increment of volume growth" occurs long before any reasonable measure of maturity and results in the premature harvesting of stands of virtual saplings Maturity should be defined in terms of culmination of growth in board feet, and trees should generally be allowed to stand still longer to achieve even more valuable timber Much private land is managed for quick profit The USFS should manage its lands for what is best over the VERY LONG haul

Response The National Forest Management Act requires that " the Secretary shall establish standards to ensure that, prior to harvest, stands of trees throughout the National Forest System shall generally have reached the culmination of mean annual increment of growth (calculated on the basis of cubic measurement or other methods of calculation at the discretion of the Secretary) " Since this is part of federal law, the agency does not have the discretion to remove it

The discussion of "Rotations at CMAI (36 CFR 219 26)" was added to Appendix B to demonstrate that the FORPLAN model was constrained so as to NOT harvest before the culmination of mean annual increment This requirement does not mean that any stand must or even should be harvested at culmination of mean annual increment This constraint merely sets the *minimum* rotation age that any stand can be harvested

Letter 935 It is the opinion of the Rockingham County Board of Supervisors that, at this time, designation of national forest land within Rockingham County as wilderness by the United States Congress would not increase protection of the forest resource and would severely limit public input into future management of such areas designated as wilderness, Now, therefore, be it resolved that the Rockingham County Board of Supervisors hereby urges that the US Congress not designate any National Forest lands within Rockingham County as wilderness areas

Response *Since this comment deals with concerns about Congressional action, it is beyond the scope of the revision of* the Forest Plan

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Letter 3537 Preventative measures such as licensed permits to use OHV/ORVs on the forest should be considered

Letter 3840 Should ATV trail systems somehow find their way into the Forest Plan· Permits should be required Permit fees pay for enforcement only Repair of damages falls on user groups not the general public Some means of identifying user and or vehicles needs to be instituted for control and reporting abuses

Response The Forest Service has no legal authority to require permits for the use of motorized or non-motorized trails Also, the agency has no authority to charge a fee to use a motorized or non-motorized trail

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Letter 4001 *If a Govt subsidy of the lumber industry is necessary, direct dollar payments for trees not cut would be no more* expensive and would have a salutary effect on our planet's ecology

Response Government subsidies to the timber industry are beyond the scope of the revision of the Forest Plan

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Letter 1334 You should consider charging everyone $3, like the hunter has to pay

Letter 1639 I propose that anyone who uses the NF lands for any reasons, hiking, camping, sightseeing, along with hunting and fishing, OBTAIN A NF STAMP I don't believe that it is fair to place this on just hunters and fishermen

Letter 2575 *I also think that everyone who uses the forest should have to buy a NF stamp (hikers, campers, etc.), not just* hunter and fishermen They are as likely to litter or start a forest fire as the fishermen and hunters.

Letter 3726 We would like to see a fee system put into place for recreational use of the Forest The potential revenue could be directed toward maintaining trails and campsites and part-time WEEKEND rangers

Letter 3927 I feel that every one who uses the forests for any type of recreation should have to pay the same as the sportsmen who buy a National Forest Stamp in order to hunt and fish

Response The Forest Service has no legal authority to charge such a fee The hunting and fishing stamps are required by state regulation

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Letter 89 Fishing and camping should not be permitted on National Forest land just across a stream that borders private land, especially if the private landowners object Much of my land on Piney River is across the river from the National Forest

Letter 1071 There is no need for hunting animals in the name of "game mgmt " The hunter kills the strong, healthy animal while natural predators kill the animals that should be "managed" - the ill and the weak.

Letter 1687 I would also like to see hunting stopped in the GWNF, especially when it is classified as wildlife mgt

Letter 3981 *Close hunting season on bears and prohibit firearms in large core areas of the Forest*

Response The laws establishing the national forests left the regulation of fishing, hunting and firearms in the hands of the states The Forest Service has no control over where and when fishing and hunting may occur

Letter 6	Perhaps a permit fee charged to us four wheelers with the money going into road maintenance and construction as well as law enforcement would enable you to keep the roads open and perhaps re-open those recently closed like Black's Gum and Chestnut Ridge
Letter 2345	Set up a permit system for ATVs on the national forest This would involve payment of a fee and display a permit on the ATV ATVs could be identified for enforcement purposes Make the permit contingent on the user signing an agreement to follow regulations, stay on trails, and avoid riding through streams and wildlife ponds
Letter 2921	[If] off-highway vehicle users damage becomes significant, we hope that some way may be found so that the vehicle users can compensate the Forest for such damage.
Response	The Forest Service has no legal authority to require financial renumeration from OHV users The Forest does not designate an OHV route for unlicensed vehicles unless there is an OHV organization that is willing to sponsor the trail, including the construction and maintenance Licensed vehicles are limited to system roads open to public use. The agency must assume the cost of maintaining these roads.
Letter 171	The Blue Ridge Parkway, as nice as it is, is a problem, it encourages the spread of gypsy moths through the very heart of the Pedlar The Parkway grants access to otherwise 'rather inaccessible' forest-interiors and the species dependent upon such "isolation from (human?) disturbance "
Response	The Blue Ridge Parkway is administered by the Department of the Interior As such, any concerns about its presence or management are beyond the scope of the revision of the Forest Plan
Letter 171	Give the James River Face Wilderness some help, 501 is impact
Letter 171	Major access along 501, 60, 56, 608, 603, 634/735 and 664 all pose major threats to the Pedlar
Response	These roads are not under Forest Service jurisdiction As such, any concerns about their presence is beyond the scope of the revision of the Forest Plan
Letter 1313	Allowing logging in a National Park is bad These parks were intended to belong to the American people, not businessmen
Response	The Revised Plan will serve the George Washington National Forest A national forest is not a national park They operate under different legal mandates
Letter 738	Do what you can to reduce the external pollution which is damaging our forests
Response	The reduction of "external pollution" is beyond the scope of the Revision of the Forest Plan
Letter 966	Among the alternatives offered for the George Washington National Forest the most important decision should be to have a group of non-affiliated, dedicated foresters research past practices, the results of those practices, and to arrive at a decision that will maintain and improve the forest for all interested parties These objectives would encourage the adoption of Alternative 12 I believe
Response	Both the National Forest Management Act (NFMA) and the National Environmental Policy Act (NEPA) require that the Revised Forest Plan be prepared by an interdisciplinary team NFMA requires that the Revised Forest Plan be an integrated resource management plan that considers a number of resources and values
Letter 3566	Keep more areas as wild-life preserves, safe from guns for man and beast Also, free from dogs
Response	The Forest Service has no legal authority to create "wildlife preserves" Thus, this suggestion is beyond the scope of the revision of the Forest Plan

Letter 3933	Military overflights were not addressed
Response	The military is advised of wilderness areas and training flight routes are routed to avoid infringement. No other controls are possible in airspace above the Forest

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Letter 979	Banish all boom boxes.
Response	*The Forest Service has no legal authority to ban boom boxes.*

Letter 1850	Many persons are under the assumption that (unsuitable lands) means that this land is permanently unsuitable for timber production This is false Your team has placed this land in defacto wilderness. Conditions change in a dynamic society and forest. You need to come up with an alternative term for the land I suggest Multiple Use Reserve Land.
Response	One of the questions being explored in the updating of the NFMA Regulations is the methodology for suitability analysis. Any change in terminology from "suitable for timber production" or "unsuitable for timber production" is beyond the authority of the Regional Forester

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Letter 2884	Owners of the off-road/all-terrain vehicles should park them permanently
Response	The Forest Service has no legal authority over the actions of OHV users off National Forest lands In light of this, this comment is beyond the scope of the revision

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Letter 3981	Discard the Draft LRMP for the GWNF and the FORPLAN model for forest planning Prepare a new EIS based on ecology and a biocentric land ethic, rather than economics and a multiple-use concept geared toward the convenience and consumptive patterns of a single species (Homo sapiens).
Response	*The DEIS and Draft Revised Plan were prepared under the legal requirements of the National Forest Management Act* The Forest must comply with applicable laws and regulations in the revision of the 1986 Plan

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Letter 3981	EIS· 3-90 - Table 3-20 - Have the "anticipated demand" increased for motorized recreation factored in the rising ecological, economic, and social costs of oil dependency? If not, say so or revise the table
Response	*The question of motorized recreation and oil dependency is beyond the scope of the revision. The FEIS deals* with affects on the George Washington National Forest not with the social and economic issue of oil dependency

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Letter 3984	The Federal government should be leading the way in helping to create a market for recycled paper, and an indirect subsidy to Westvaco does not do that
Response	Government action to create markets for recycled paper is beyond the scope of the revision

OTHER COMMENTS: Resolution of comment is beyond the scope of the Revised Plan

Letter 501	As for even suggesting that timber companies can clear up to a million board feet from one area of land without public knowledge or environmental restrictions, this is criminal You would be giving the logging industry yet another license to destroy the environment
Letter 869	I am also against allowing projects yielding less than a million board feet of timber or less than 1000 acres be carried on without public knowledge or environmental restrictions The public has the right to comment on all such projects and environmental restrictions should be enforced no matter what the size of the project
Letter 1153	By listing virtually all activities as "categorical exclusions" from environmental review, citizens will be unable to force the Forest Service to comply with the National Environmental Policy Act Through judicious use of a similar "loophole" clearcutting is virtually always found to be the "optimum" silvicultural tool implemented by the Forest Service It is also the most environmentally degrading
Letter 1153	The revised plan would permit projects yielding less than a million board feet of timber or encompassing less than a thousand acres in scope to go unchallenged The FS would like nothing better than to carry out its destruction without citizen input or opposition
Letter 2045	The proposed plan allows for public knowledge, environmental restriction & documentation only on timber sales over one million board feet and/or over 1,000 acres in scope I think that this is outrageous!
Letter 2215	The preferred alternative would not allow citizen input or review of timber sales less than 1000 acres or a million board feet under proposed regs This is a violation of our rights to review what goes on in our forests
Letter 2691	Public involvement in the forest's decisions is crucial The forest's are owned by the nation's people, not the interests of Westvaco. Efforts to limit involvement on area's less than a thousand acres are a step in the wrong direction As are efforts to dilute the appeal process
Letter 2757	The present draft would deprive citizens of their right to participate in forest management decision making
Response	This comment appears to apply to the Forest Service NEPA requirements relating to project-level decisions As such, it is outside the scope of the revision of the Forest Plan
Letter 3933	Nothing that prevents or addresses the current situation surrounding the Reddish Knob - hanggliders 85/85B roading in "the Plan".
Letter 4001	Plans for the "improvement" of routes 85 and 85B to Reddish Knob should be abandoned These roads should be regraded to single-land gravel roads with turnouts and posted with signs warning of these conditions, similar to the signs on route 61 along the west flank of Shenandoah Mountain
Response	Any decision on the reconstruction or management of Routes 85 and 85B require site-specific analysis and disclosure Since the Revised Forest Plan establishes broad program policy rather than making site-specific decisions, site-specific decisions on which roads should be reconstructed are beyond its scope
Letter 2366	I understand there is some effort afoot to change CFR 217 9, the Administrative Appeal procedures We need to retain this mechanism Via the appeals process, many legal errors in mgmt policy have been rectified Let's keep an accessible appeal procedure, including EA by EA appeal rights Let's keep the Forest Democratic!
Letter 2693	Dropping the appeals process will really take the public out of the picture in regards to input on our forest mgmt
Letter 3625	The Forest Plan to eliminate public right of appeal is appalling, in fact, anyone in the forest service promoting this idea should be removed from decision making positions in the Forest Service Not many citizens have the time or money to take their concern to court It may cost the F S (U S tax payer) in time and dollars but it is essential that the citizens of U S have the right to tell the Forest Service what they want, not the Forest Service telling the citizens what they are going to get

Letter 3689 Having attended preservationist "pow-wows" I am aware of how [the] appeals process is being used to muck up the works and turn the Forest into Park I cast a vote to end or modify the appeals process

Letter 4048 I am supportive of timber harvest in conjunction with the publics continued input, through advertised hearings *and opportunities to respond and object*

Response Any changes in the appeal regulations are outside the scope of the revision of the Forest Plan The appeal regulations are promulgated by the Secretary of Agriculture Any modifications must be made by the Secretary and published in the Federal Register

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Letter 89 Open and maintain the road up Shoe Creek to the top of Big DePriest Mt for use by trucks and four-wheel drive vehicles This road has existed for many years, certainly long enough to legally establish it as a public road

Letter 94 Stone Camp Road area is unique, not abused, and should remain open to the 4-wheel drive recreationist whom frequent it

Letter 171 "The District Rangers' Alternative", is also disturbing The "protection" afforded Big Levels – does it close FDR 162 to "motorized" wreck-reation

Letters 3016, 3017, 3018, 3019, 3020, 3021, 3022, 3023, 3024, 3025, 3026, 3027, 3028, 3029, 3030, 3031, 3032, 3033, 3034, 3035, 3036, 3037, 3038, 3039, 3040, 3041, 3042, 3043, 3044, 3045, 3046, 3047, 3048, 3049, 3050, 3051, 3052, 3053, 3054, 3055, 3056, 3057, 3803 I request that the Forest Service leave the gates open until the end of the hunting season on the Forest land, south of Robinson Gap in Amherst County, to Rt 130 in Amherst, and all land east and west of the Blue Ridge Parkway. This includes the roads leading from "Slate Quarry Hollow"

Letter 3840 Southern Massanutten - MA #9 Close Cub Run Road at Runkles Gap and Catherine Furnace. Close road to tower – this one administrative use only Game commission can continue to manage some fields and projects but Cub Run Road needs to be lowered in its visual impact and intrusive nature The current use and abuse of the road significantly adversely impacts the entire Southern Massanuttens due to the linear configuration of the mountains and roads

Letter 3962 On the Lee RD, Tenth Legion quad, it is recommended that Pitt Spring Road and Cub Run Road be closed (Administrative Use Only) at Catherine Furnace.

Letter 3962 On the Lee RD, Rileyville quad, it is recommended that the Powell Mt Road be closed

Letter 3962 On the Lee RD, Elkton West quad, it is recommended that Cub Run Road #65 be closed at Runkles Gap

Letter 4251 Seriously consider closing the U S Forest Service road FDR #51 in the Mount Pleasant area and incorporating it as part of the present trail system

Response The decision to open or close any particular road requires site-specific analysis and disclosure Since the Revised Forest Plan establishes broad program policy rather than making site-specific decisions, decisions such as which roads should be open or closed are beyond its scope

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Letter 3528 Take a long walk through the forest before making your decision on April 17th

Response NO RESPONSE REQUIRED

Letter 2039 Encourage paper recycling

Letter 3933 Using both sides of paper in 'public correspondence' not addressed (economics)

Response The Forest acknowledges that there appears to be good merit to this suggestion. Administrative procedures, however, are outside the scope of the revision of the Forest Plan This suggestion has been forwarded to the Forest Supervisor for his consideration

Letter 283	NO to Tread Lightly, sponsored by the U S Forest Service and the BLM
Letter 3594	Develop timber harvesting equipment and methods that do not require roads or clearcutting
Response	Such an action is beyond the scope of the revision of the Forest Plan

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Letter 1990	We urge the Forest Service to eliminate its costly and disruptive appeals process as soon as possible
Letter 2610	I want to express my appreciation to you for your support and approval of the United States Forest Service's administrative appeals initiative. It is our hope that you do all you can to see that this vital proposal is implemented as soon as possible.
Letter 3551	I support the Forest Service's proposed Appeal Rule Revisions (36 CFR Part 217).
Response	The appeal regulations are promulgated by the Secretary of Agriculture As such, they are outside the scope of the revision of the Forest Plan

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Letter 3883	Various forms of recreation are available elsewhere and therefore do not meet the test of a major national objective, but they can be offered on a low-cost or break-even budget, recovering Federal expenses incurred from fees and prices charged by users
Response	Congressional legislation would be required for the Forest to expand its fee collection program. The Forest Service does not have the authority to charge a fee for dispersed recreation opportunities on the GWNF. Therefore, they are managed as a public service with allocated revenues

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Letter 3998	We would like to propose a relocation of the Massanutten Mountain West trail by Peters Mill Run However, we cannot support this knowing that a foot trail through an ecologically sensitive area would lend itself to use and abuse by motorized vehicles.
Response	Any decision on the relocation of the Massanutten West trail requires site-specific analysis and disclosure Since the Revised Forest Plan establishes broad program policy rather than making site-specific decisions, decisions such as the relocation of the Massanutten Mountain West Trail are beyond its scope.

Letter 2380	[We are in favor of] segments of all 11 rivers for recreation or scenic-river designation
Response	The recommendation for recreational or scenic river designation for any of the rivers qualifying for wild and scenic river designation must be based on suitability studies As discussed in Chapter 2 of the FEIS, these studies will be conducted after the Forest Plan has been revised

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Letter 1292	We call for genuine change. We call for truth Openness Citizen participation Failing this, we call for the dismantlement of the Forest Service
Response	The Forest has diligently attempted to develop the Revised Plan in the spirit of truth and openness with full citizen participation We believe that the Revised Plan represents a significant change from the 1986 Plan

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Letter 1066	In the area of Forest Road 92, any attempt to halt or discourage improvements (patching holes, road widening, new trails, etc.) would not be the best use of the area There is already heavy use by fisherman, hunters, horse people, bikes, etc in this area and it could and should be improved to facilitate better continued use
Response	Any decision on the reconstruction or maintenance of Forest Road 92 requires site-specific analysis and disclosure Since the Revised Forest Plan establishes broad program policy rather than making site-specific decisions, any decisions such as the reconstruction or maintenance of roads are beyond its scope.

Letter 981 — The Plan should correct a serious problem in the Mt. Pleasant area· an old road that remains open, listed as FDR #51, is badly damaged and causing heavy siltation in a native brook habitat, the North Fork of the Buffalo River The Plan should specify permanent closure of this road to reclaim it and add it to the Mt Pleasant-Mt Pompey trail system

Letter 2929 — FDR #51 is badly damaged and washed out in several places from the November 1985 flood Since then it has caused periodic, heavy siltation in one of the Pedlar District's finest native trout streams, the North Fork of Buffalo River. The lower portion of the river has two fords (above an existing Forest Service gate) which permit vehicle crossings during the crucial brook trout spawning and incubation periods The entire road runs in close proximity or its tributaries which receive all of its run-off

Letter 2929 — The Forest Plan should specify the permanent closure of this road The road bed should be water-barred, seeded, blazed and used as an addition to the Mt. Pleasant-Mt Pompey trail system. The Draft EIS for the Revised Land and Resource Management incorrectly states (Appendix C, C-102) that FDR #51 could be obliterated and revegetated at great cost. Cessation of vehicle traffic and the simple measures listed above will provide immediate improvement to the brook trout habitat.

Letter 2929 — The Draft EIS states that the closure of FDR #51 would be highly controversial. It neglects to record that permitting vehicle use of this badly damaged roadbed has been highly controversial since 1985

Response — The removal of FDR 51 from the Forest Transportation System is consistent with the intent of the management of Mount Pleasant under Management Area 21. Any decisions to remove system roads from the Forest Transportation System, however, requires site-specific analysis and disclosure This analysis must be performed during implementation of the Revised Plan

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Letter 3665 — [We recommend] increased emphasis on Air Quality as it has direct effect on native plants Acid rain from co-generation plants should be minimized. Join other agencies' efforts This also is necessary for best water quality.

Response — Forest standards specify that regulations related to air quality are complied with on the Forest, that resources that can be affected by air pollution are surveyed and monitored, and that concerns resulting from surveys and monitoring are expressed to air regulatory agencies.

Letter 3848 — One of the largest environmental and aesthetic problems on the forest, yet also one of the least discussed, is the prevalence of all manner of trash and refuse in the GWNF. We suggest in the final document. (1) research to identify the extent of the problem, impacts on biota, water quality and legitimate human use and approaches to reduce the problem, (2) a forest clean up plan and (3) plan for educating the public.

Response — Although the Forest Service is concerned about the amount of littering on the Forest, research on the subject of why people litter and how to stop it is beyond the scope of the revision. The Forest Service does have an anti-litter campaign in Woodsy Owl. Any clean-up plan is a specific program usually centered around volunteers since the agency is traditionally underfunded to accomplish these tasks.

Letter 3933 — Effects of Westvaco not addressed.

Response — The operations of Westvaco are outside the scope of the revision since they are a private company.

Letter 3933 — Directives of "New Perspectives" not addressed

Letter 3933 — Effectiveness of "New Perspectives" not addressed

Response — "New perspectives" is a management philosophy not any specific management practices As such, it is inappropriate to address it in the revision

OTHER COMMENTS: Comments directed at Forest Service Employees

Letter 134	It is difficult to believe that the rangers who promote these machines (ORVs) are true forest rangers in any sense of the word Clearly they are not worthy of the name.
Letter 171	The Alternative #14 map sheds light on the intent of the Pedlar District Ranger I would like to feel better about this situation Don't be THEIR whippin' boy, support within the Agency is growing, swelling the mass of discontent, and encouraging the vociferous amongst us Dylan said, "Please get out of the way if you can't lend a hand "
Letter 295	Rangers are being dishonest about the 27 million BF to be harvested under Alternative 8.
Letter 501	Of course being Forest Supervisor you should be aware of this, but you obviously do not care.
Response	It is inappropriate to address personal remarks at Forest officials or to condemn these officials for acting in their official capacity
Letter 3665	The material prepared for the review of the Draft was educational, easy to use and your staff is commended for its preparation Bob Glasgow, John Coleman and Steve Croy have been extremely helpful They have afforded the Virginia Native Plant Society opportunities to share special biological areas and have exhibited a keep appreciation for native plants, their needs and preservation
Letter 3681	The public will never be satisfied with all of the decisions concerning the management of our forest treasures Quit worrying about it and do the right thing
Response	NO RESPONSE REQUIRED.
Letter 857	If we are not going to manage the forest, are we going to reduce Federal employees, too?
Response	While providing different responses, the number of personnel on the Forest is intended to remain constant with each alternative Depending on the mix of values, uses, products, or services selected to serve as the Revised Forest Plan, job responsibilities may shift Overall, though, the number of employees is expected to remain the same as currently exists

OTHER COMMENTS· Comments not based on revision effort

Letter 40	The Forest Service has a long way to go to get our confidence
Letter 45	[THIS LETTER DEALS WITH CONCERNS ABOUT AN ARTICLE ENTITLED "WILDERNESS SOUTH OF THE BELTWAY" IN THE WINTER 1991 EDITION OF WILDERNESS MAGAZINE
Letter 54	[THIS LETTER CONSISTS OF A COPY OF A LETTER TO "FORMER SUBSCRIBER TO PUBLIC LAND NEWS" PROVIDING A COMPLIMENTARY COPY
Letter 65	[THIS LETTER SIMPLY THANKS THE FOREST SUPERVISOR FOR INFO ON PARK SERVICE LABOR STATISTICS AND THE CONTINUED USE OF FLYING SITES]
Letter 731	[THIS LETTER WAS A REQUEST FOR INFORMATION ABOUT OFF-HIGHWAY VEHICLE TRAVEL ON THE GEORGE WASHINGTON NATIONAL FOREST]
Letter 2501	I am forwarding a copy of this letter both to my congressman and to my senators in the hope that they too will get the message that there will be no more give-aways in government any more

Letter 3663	Surely, we can increase our efforts in recycling what we have, therefore, creating new industry and jobs
Letters 3802, 3852	Comments not based on revision effort
Letter 3961	Concerning the desire of individuals to obtain authorization to guide anglers, since the granting of authorization to the individual concerned will not involve improvements of any kind, and the applicant has 35 years experience permission should be granted
Letter 3965	It is estimated that $9 billion dollars will be needed from the United States to implement a global population stabilization effort by the year 2000 There are currently several international development organizations focusing their resources on the adult education component of self-help
Letter 3965	I suggest that Congress seriously consider utilizing this type of existing infrastructure in any implementation scheme Any proposal to allocate funds to population stabilization efforts should consider the cost savings of providing these resources to proven, organized channels
Letter 3987	I recommend the emerging technology of virtual reality Increase [your] involvement in promoting forest product recycling and increased utilization efficiency
Letter 4208	I or my children should not have to live in a concrete jungle Please save our forests
Response	THESE COMMENTS DO NOT RELATE TO THE REVISION OF THE FOREST PLAN.

PETITIONS

Letter 3455 We support the Sierra Club stand.

Letters 3453 and 3454

We, the citizens of the Commonwealth of Virginia, demand that the National Forest management plan provide strong protection for the George Washington National Forest. Specifically, we want the revised plan to include the following provisions:

1) Designation of additional land as protected wilderness areas. Areas proposed include: Little River Area; Ramseys Draft Addition; Mt Pleasant Area; Skidmore Fork and the Laurel Fork areas; Big Schloss and Kelley Mtn.

2) We demand that all other roadless areas remain roadless and be managed to protect biological and recreational values. No new roads should be built in the Forest.

3) ATV use in the GWNF is inappropriate and should be eliminated.

4) Streams must be protected (on each side) with a minimum 100 foot wide buffers in which no timber cutting is allowed.

5) All timber cutting should be limited to within one half mile from an existing road. Timber management should stress large hardwood and softwood sawtimber over smaller low quality pulpwood.

6) The plan must emphasize providing unfragmented habitat for non-game wildlife. Acreage must be provided to protect wildlife migration corridors.

Letters 2384 and 3450

We applaud the balanced approach to forest management being developed by the George Washington National Forest and recognize the necessity for multiple usages according to the interests of timbering, hunting/fishing, hiking, horseback riding, protecting biological assets and wilderness areas, etc. However, we are also in agreement for three additional strategies to further emphasize horse trails in the final plan as described by Alternative 8.

(1) The production of more horse trails, especially loop trails that can be ridden in one afternoon or one day, in the George Washington National Forest. Such trails have the two-fold purpose of being able to be used by hikers as well as horse riders.

(2) Although horse camps are planned for construction in the Deerfield, Dry River, Lee, and Warm Springs District in Alternative 8; it would be desirable to have such camps constructed as well in the James River and Pedlar Districts.

(3) The 65 mile Roanoke/Botetourt/Rockbridge County Horse Trail through the Glenwood District of the Jefferson National Forest is nearly completed and is scheduled to be opened this summer. This trail should be extended over the James River, through the Pedlar District, and onto the Sherando Lake area. A similar trail on the western slopes of the Shenandoah Valley in the George Washington National Forest from the Clifton Forge area to the Woodstock area should also be developed.

We encourage the George Washington National Forest to take the opportunity to become a national model for the development of a horseback riding trail system that can be used not only for this activity but for hiking.

Letter 3451 We hold that the draft "10-Year Land and Resource Management Plan for the George Washington National Forest" should be modified to make the preservation of biological diversity the primary consideration by including the following specific management directives: a) designation of all 26 roadless areas as wilderness study areas; b) elimination of all logging on the GW; c) elimination of wildlife management for all featured species; d) elimination of all new roadbuilding and reconstruction and the closure of all non-critical roads; e) elimination of all use of herbicides, pesticides, and defoliants; f) provision for the restoration of human damaged ecosystems, including a campaign to remove exotics; g) elimination of all ORV/ATV and unlicensed vehicle use.

Letter 144 We request 1) that you institute ecological management and 2) that your adopt the Wilderness/Corridor Alternative (#3) as your Management Plan.

Letters 2064 and 3452

With regard to the vanishing natural world (only 3% of the George Washington and 8% of the Monongahela have been set aside as wilderness), we the undersigned petition you to adopt Alternative 3 which we feel best serves the long term interests of all living things on this planet.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Affairs
Custom House, Room 217
200 Chestnut Street
Philadelphia Pennsylvania 19106-2904

TAKE PRIDE IN AMERICA

April 14, 1992

ER-92/33

George W Kelley, Forest Supervisor
George Washington National Forest
Harrison Plaza
P O Box 233
Harrisonburg, Virginia 22801

Dear Mr Kelley

This is the Department of the Interior s (Department) response to the request for comments on the Draft Environmental Impact Statement (DEIS) for the Revised Land and Resource Management Plan for the George Washington National Forest (GWNF) The GWNF extends along 140 miles of the Appalachian Mountains of northwestern Virginia and eastern West Virginia The DEIS discusses 13 multiple use alternatives for managing this 1,061,080-acre forest

General Comments

The Forest Service has selected Alternative 8 as the preferred alternative in the DEIS and developed a separate document entitled, "Revised Land and Resource Management Plan" to support their decision. We believe the early identification and documentation justifying a specific alternative, before receiving formal input to the DEIS, strongly biases the decision in favor of this alternative.

The DEIS states that "The preferred alternative is defined as being the one that maximizes net public benefits and best accomplishes the mission of the Forest Service in managing the Forest." After careful review of the *alternatives, the Department recommends a modified Alternative 10 as the* preferred alternative In general, this approach would sustain significant acreage of neotropical migratory bird nesting habitat and roadless areas, maintain habitat to support game populations at a level comparable to Alternative 8, furnish high levels of recreational opportunity, and minimize the costs of road construction and below-cost timber sales Natural resource impacts and economic costs to the public would be minimized if this alternative is selected

Specific Comments

Fish and Wildlife Resources

A modified Alternative 10 would provide the following benefits to wildlife species and the general public:

1 Alternative 10 limits forest fragmentation to 11 percent *(120,308 acres) of the forest Much of the remaining 89* percent (944,361 acres) of the forest could be left in an unfragmented condition for neotropical migratory bird nesting habitat and endangered, threatened, and sensitive species This area would also be valuable for recreation.

2 The carrying capacities of the forest habitats for black bear (Ursus sp), white-tailed deer (Odocoileus virginianus), and wild turkey (Meleagris gallopavo) under Alternative 10 are comparable to Alternative 8 (Forest Service preferred alternative)

3 Soil erosion would be reduced by 48 percent with Alternative 10 as compared to Alternative 8

4 Alternative 10 allows clearcutting as a harvest method. This logging method is the most cost effective and provides the best conditions for the natural regeneration of hardwoods It also provides early successional forest habitat for white-tailed deer, wild turkey, common flicker (Colaptes auratus), and ruffed grouse (Bonasa umbellus)

5 Alternative 10 has the most cost-effective timber sale program alternative Since its timber sale program is only 26 percent as costly as the Alternative 8 timber sale program, the Forest Service would realize savings of $781,000 each year in timber sale administrative and operating costs. Further, Alternative 10 requires the fewest miles (two) of yearly road construction of any of the timber harvesting alternatives This would represent an annual cost savings that is unspecified within the document We recommend that the annual road construction costs for each alternative be listed in the Final Environmental Impact Statement. Road maintenance costs would also be reduced *because fewer miles of roads would be constructed.*

One of the major concerns is the retention of large areas of unfragmented forests to provide nesting habitat for neotropical migratory birds. Rapid urbanization throughout the Atlantic coastal states has made this habitat type rare The future only promises further fragmentation of the remaining forested habitats on private lands Management of public lands should consider the status and future of this natural resource Of the eleven timber harvesting options, Alternative 10 provides the second highest potential for providing unfragmented forest habitat However, this potential would only be achieved if this alternative is modified to provide

for the preservation of the 251,978 acres of roadless areas within the GWNF. Preservation of these roadless areas offers the most cost-effective solution for retaining unfragmented forest habitat. Most of the roadless areas in the GWNF are steep and unproductive (shallow, droughty soils) for timber management Due to the steep terrain, roads would be costly to build and prone to slumping It is recommended that these areas be maintained in a roadless condition in perpetuity.

The Department recommends that the Alternative 13 roadless area plan be incorporated within the Alternative 10 forest plan. The Alternative 13 roadless area option recommends 77 percent of the roadless areas for wilderness study areas and designates 21 percent of the roadless areas as unavailable for development. If this roadless area option can work under the Alternative 13 forest plan, it can certainly be incorporated within the Alternative 10 plan without modification to the timber harvest or road construction programs This is especially apparent when one considers a 47 percent larger annual harvest and 550 percent larger road building program under the Alternative 13 plan, as compared to the Alternative 10 harvesting and road building programs.

We also recommend the elimination of plans to create small openings for wild turkey, grey squirrel (Sciurus carolinensis), and the pileated woodpecker (Dryocopus pileatus). We agree that small openings are beneficial to turkey poults, but we are not aware of references in the scientific literature that document the benefits of small openings to grey squirrel and pileated woodpecker populations. Again, emphasis should be placed on maintaining unfragmented, roadless areas since these habitats are becoming scarce on an ecosystem basis

To effectively manage for turkey populations, the Forest Service could maximize the dispersal of their clearcutting operations over the total 120,308 acres of suitable timber lands. Dispersal of clearcuts, in combination with logging operations on adjacent private and State fish and wildlife lands, would provide numerous openings for turkey poults.

The dispersal of clearcuts over the suitable timber land would provide a habitat management program for white-tailed deer and ruffed grouse To optimize the habitat for ruffed grouse, the timber land base should be divided into forest management blocks of 80 to 120 acres Each block would be subdivided into four harvest units. One harvest unit should be clearcut every 25 years Once the four timber stands have been logged, the rotation would begin again with harvest unit number one. This management strategy would provide a continuous rotation of early- and mid-successional forest habitats, while supplying a continuous supply of wood products. Further, it would also benefit white-tailed deer populations.

The Department commends the Forest Service for their foresight in establishing the 48 Special Biological Areas to protect State- and Federally-listed endangered, threatened, and sensitive plant and animal species We believe the preservation of these unique habitat areas is an effective method for maintaining biodiversity within the GWNF. It is recommended that these Special Biological Areas be bordered with 200-foot

wide buffer zones that would be protected from logging operations and road building Buffer zones, which are especially important for protecting riparian and wetland areas, would also be essential for maintaining water quality in these aquatic habitats

We agree with the Forest Service's decision to prohibit logging within the Alternative 10 riparian zones of trout streams. This would minimize the potential for sediment to enter trout streams from logging roads or skid trails. It will also preserve the forest canopy This forest canopy is essential for water course shading to maintain low stream temperatures, fostering food chain support (leaves and terrestrial insects), and supplying fallen trees to create pool habitat and trout escape cover.

The Department is also concerned about development of all-terrain vehicle/off-highway vehicle (ATV/OHV) and developed recreation plans for Alternative 10 These categories of activities directly affect fish and wildlife habitat as well as the public's perception of the forest environment

The DEIS lists 127,141 acres of terrain as potentially available for ATV/OHV use under the Alternative 10 plan. If this plan is fully implemented, there is a high probability of water quality impacts to streams and rivers as a result of vehicle trail erosion. This plan would also create excessive noise levels throughout the forest and disrupt other user groups. We recommend that the Alternative 8 option, which limits ATV/OHV use to 16,999 acres of forest, be incorporated into the Alternative 10 forest plan.

The Department also recommends that the Alternative 8 developed recreation program be substituted for the Alternative 10 program We believe the Alternative 8 developed recreational program balances public use with habitat protection

By adopting the expansion of developed recreational sites for Alternative 10, the Forest Service costs would be increased However, the Forest Service can minimize the additional cost of developing, maintaining, and administering these camping facilities by reducing costs in other program areas. This would be partially accomplished by eliminating or substantially reducing the prescribed burning program for maintaining early successional vegetation We do recommend that this program be maintained for the 100-300 acres per year that may need to be burned to preserve the Special Biological Areas in a natural state However, the more common species inhabiting early successional forest would benefit as much from the Alternative 10 clearcutting as from a prescribed burning program.

Prescribed burning does not provide substantially different habitats than clearcutting We believe that the prescribed burning funds would be better spent on the development and administration of camping facilities as planned under Alternative 8 Wildlife can also use the early successional habitats which are common along the GWNF boundaries

Endangered Species

The Endangered Species staff of the Annapolis and West Virginia Field Offices of the Fish and Wildlife Service have reviewed the endangered species lists in the DEIS The listings are complete. The DEIS and Resource Management Plan provide a good general discussion of endangered species resources. We understand that a more detailed Biological Assessment dealing specifically with endangered species issues is currently being prepared by the GWNF. A thorough review of effects on endangered species and compliance with Section 7 of the Endangered Species Act will be provided following receipt of that document

Mineral Resources

The DEIS summary of affected mineral resources (pp. 3-53 through 3-65), mineral laws/policies, and exploration methods (Appendix E) is excellent and gives the reader an accurate mental picture of the realities of mineral resource exploration and development The impact analysis, however, focuses primarily on oil and natural gas. It is not clear whether any of the alternative plans would affect future development of the small kaolin deposit (mentioned on p 3-57) or development of saleable mineral deposits We suggest a few remarks be added to future documents regarding impacts to the kaolin occurrence If saleable-minerals mines exist or permits have been historically concentrated in certain areas, the Affected Environment section should summarize impacts of the alternative plans to permit renewal. If none of the alternative plans would create adverse impacts to the kaolin deposit or to saleable minerals, the document should so state

Summary

The Department of the Interior recommends that a modified Alternative 10 be selected to provide increased conservation of fish and wildlife resources as well as substantial, multiple use of the GWNF. Therefore, we recommend that Alternative 10 be designated as the preferred alternative, provided that the following modifications are incorporated into the plan:

- Substitute the Alternative 13 roadless area plan for the Alternative 10 plan.
- Eliminate plans to create small openings for wild turkey, grey squirrel, and the pileated woodpecker. Maintain unfragmented, roadless areas
- Place 200-foot wide buffer zones, that are protected from logging operations and road building, around areas designated as Special Biological Areas.
- Incorporate the Alternative 8 option that limits ATV/OHV use into the Alternative 10 forest plan.
- Substitute the Alternative 8 developed recreation program for the Alternative 10 program

- Eliminate or substantially reduce the prescribed burning program for maintaining early successional vegetation However, maintain the burning program for the 100-300 acres per year that would be needed to preserve the Special Biological Areas in a natural state

Thank you for the opportunity to comment on this proposal. Should you have any questions regarding Endangered Species, please contact John P. Wolflin of the U S Fish and Wildlife Service, Annapolis, Maryland at (410) 269-5448.

Sincerely,

Don Henne

Don Henne
Regional Environmental Officer

United States Department of the Interior

NATIONAL PARK SERVICE
Blue Ridge Parkway
200 BB&T Building
One Pack Square
Asheville North Carolina 28801

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:
D18

February 7, 1992

Mr George W Kelley
Forest Supervisor
George Washington National Forest
Harrison Plaza
Post Office Box 233
Harrisonburg, Virginia 22801

Dear Wayne

Thank you for sending us the draft Land and Resource Management Plan and associated documents We congratulate you on a very thorough and thoughtful planning effort

We would like to offer a few comments for your consideration based on our staff review of your draft

We strongly support your plans to protect critical resources and to expand recreational opportunities We share with you management responsibilities for the Appalachian National Scenic Trail, and hope to continue to work cooperatively to provide for the ever-expanding need for public recreation in the region

We are gratified to learn of your very ambitious plan for an expanded interpretive program Our staff Interpretive Specialist is reviewing this portion of your draft in greater detail We hope that our programs will be mutually supportive and complementary Please feel free to call on us if we can provide information or resources as you implement this plan

The Blue Ridge Parkway threads its way through approximately 65 miles of the George Washington National Forest Since our right-of-way corridor is very narrow, we depend almost totally upon the Forest Service to protect our views in this area Your proposed wilderness study areas and planned management to enhance scenic and natural values adjacent to portions of the Parkway lend strong support to the realization of our management objectives Further, it appears that areas to be managed for timber production would have minimal or no impact upon Parkway views

NATIONAL PARK SERVICE 75 1916 - 1991

We would appreciate a statement of commitment in the Land and Resource Management Plan to work cooperatively to minimize degradation of Parkway views and other resources, much as we stated in our joint Letter of Agreement of November 9, 1988 We appreciate your cooperation and support in this area in the past, but since management plans often are in effect for many years, we feel that such a statement with specific reference to the Parkway would provide a positive basis on which to continue this vital cooperation into the future

Thank you for considering our comments Please call or write if you would like to discuss these or other matters further

Sincerely,

Gary Everhardt

Gary Everhardt
Superintendent

United States Department of the Interior

BUREAU OF MINES
INTERMOUNTAIN FIELD OPERATIONS CENTER
P O. BOX 25086
BUILDING 20 DENVER FEDERAL CENTER
DENVER COLORADO 80225

TAKE PRIDE IN AMERICA

January 24, 1992

George W Kelley, Forest Supervisor
George Washington National Forest
United States Department of Agriculture
Harrison Plaza
P O. Box 233
Harrisonburg, VA 22801

Dear Mr Kelley:

Subject Land and Resource Management Plan for the George Washington National Forest, Reply to 1920

We received a copy of the subject plan and appreciate your interest in our comments We are, however, electing not to respond at this time. Rather, our remarks will be included with those you will receive at a later date from the Department of the Interior.

Sincerely,

Richard Grabowski, Acting Chief
Intermountain Field Operations Center

jad/rr

United States Senate

WASHINGTON D.C. 20510

April 7, 1992

George Washington National Forest
101 N Main Street
Harrisonburg, Virginia 22801

Dear Friends.

Thank you for sending me a copy of your letter to the U S. Forest Service regarding the draft land management for the George Washington National Forest

Every time I have the opportunity to hear the interest and concerns of fellow Virginians, I feel more able to fully represent Virginia in the U S Senate. It is important for me to know how the people of Virginia feel about the problems facing our Nation today.

The opinions I receive provide me with great insight and assist me in my efforts to find solutions to pressing national problems. Thus, I am appreciative when citizens, such as yourself, take the time to share their views with me.

In my efforts to help find solutions to pressing national problems, it is important to maintain an awareness of the interests and concerns of the people I have had the honor to represent during the past thirteen years I value the thoughts you have shared with me, and will keep them in mind as Congress considers legislation to improve government and our quality of life

Please be assured that I will continue to do all I can to solve the problems that face our Nation today and to address concerns that may well affect us in the future.

Again, thank you for taking the time to share your views with me.

With best wishes,

Sincerely,

John W. Warner

JWW/mjb

CONSTANCE A. MORELLA
6TH DISTRICT, MARYLAND
COMMITTEE
POST OFFICE AND CIVIL SERVICE
SCIENCE, SPACE, AND TECHNOLOGY
SELECT COMMITTEE ON AGING

Congress of the United States
House of Representatives

April 3, 1992

The Honorable Edward R. Madigan
Secretary
U S. Department of Agriculture
14th Street & Independence Ave
Washington, D C. 20250

Dear Mr. Secretary:

I want to express my interest in the land and resources plan that the Forest Service is creating for the George Washington National Forest.

As a constituent, James Clarke, has stated in the enclosed letter, I, too, believe that the results of such a plan will have an impact on the Chesapeake Bay. I agree with his analysis of the need for more forest land and preservation of biodiversity in this area. In Congress, I have cosponsored legislation to preserve ancient forests and to prohibit clearcutting on federal lands. Since my days in the Maryland General Assembly, I also have supported measures that will restore and assist the Bay and the Bay region. As you know, the Bay's watershed encompasses six states, including Virginia. The ecosystems surrounding the Bay are fragile and need nurturing. I hope that as you consider plans for the George Washington National Forest, you will keep in mind the vital role that the Chesapeake Bay plays in the health and vitality of the entire region.

Thank you in advance for your attention to this matter.

With best wishes, I am

Sincerely,

Constance A. Morella
Member of Congress

CAM:hm/rb

THIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

JAMES W CLARKE
1916 DUNDEE ROAD
ROCKVILLE, MARYLAND 20850-3135

March 26, 1992

The Honorable Constance A. Morella
1024 Longworth House Office Building
Washington, DC 20515

Dear Congresswoman Morella,

The Forest Service is doing a land and resources plan for the George Washington National Forest. How the Forest Service manages the George Washington National Forest will have a major impact on the Chesapeake Bay.

I have long felt that the eastern national forests should be managed for two purposes, to maintain and preserve biological diversity and as places for low density recreation. The Forest Service's proposed Alternative 8 is a small step in that direction but still puts to much emphasis on timber cutting, game management, road building and ATV use. I feel there is no need to cut any timber in the GW National Forest or to build any more roads, indeed they should close some of the existing roads. We have enough deer in the East, more emphasis needs to be placed on nongame management. ATVs should not be allowed on national forest land. They are totally incompatible with what a national forest should be.

We need more wilderness in the East. As a minimum all eight wilderness proposals in Alternative 8 should be wilderness, the best way to manage national forest land and preserve biological diversity.

Attached are my comments on the Forest Services plan for the GW National Forest for your information.

Sincerely,

James W. Clarke

6TH DISTRICT VIRGINIA

WASHINGTON OFFICE
410 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-4606
(202) 225-6431

COMMITTEES
AGRICULTURE
SMALL BUSINESS

Congress of the United States
House of Representatives
Washington, DC 20515-4606

APR 6 1992

DISTRICT OFFICES
08 FIRST STREET ROOM 1
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525 MAIN STREET 2D FL.
LYNCHBURG VA 24504
(804) 845-8548

13 W BEVERLEY STREET 2D
STAUNTON VA 24401
(703) 885-8178

SUITE 604
NATIONSBANK BLDG
COURT SQUARE
HARRISONBURG VA 22801
(703) 433-8433

March 31, 1992

Mr. George W. Kelly
Supervisor
George Washington National Forest
P O. Box 233
Harrisonburg, Virginia 22801

Dear Wayne:

I would like to make the following comments and recommendations regarding the Draft Land and Resource Management Plan for the George Washington National Forest.

1. I believe Alternative 8 should be modified in various aspects to improve the balance between various multiple use activities. I would not recommend moving to another alternative (such as Alternative 12).

2. I would like to see you add a category of management to be called "Special Management Areas " This would be similar to the provision in the current management plan. Each of these areas would have a defined boundary and you would describe the management practices to be used within each Special Management Area. The purpose of doing this is to preserve the unique natural features of certain forest areas and provide for the use of the areas by a wide variety of citizen users. These areas would be less restrictive than wilderness areas. The activities within the Special Management Areas would be more flexible but, at the same time, the natural features of the areas would be relatively well protected so that for decades these areas could bring pleasure to many visitors.

I would propose the following areas to have the Special Management Area designation:

Name	Approximate Acreage
Little River	28,000
Laurel Fork	10,000
Big Schloss	25,000
Mt. Pleasant	8,900

You may want to include other areas. I would caution against having too many such areas because I contemplate that these areas would involve reasonable management expenses for construction and maintenance of special roads or facilities and proper supervision.

HIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

3. I believe the annual timber Allowable Sale Quantity (ASQ) should be raised to 40 million board feet or more. This should be brought about by making the acreage suitable for timbering larger, possibly up to 450,000 acres. You should consider how much land has high quality trees that could be harvested at break even or better.

As you know, the Chief of the Forest Service has committed to implementing a policy on below cost timber sales; there is also legislation pending in Congress which is designed to eliminate below cost timber sales. Either way, there is likely to be a change in the Forest Service policy regarding below cost timber sales. As you know, I am opposed to below cost timber sales for the commercial portion of the timber program. You should structure the various activities related to commercial timber sales to achieve at least break even on the average each year and be consistent with adequate regeneration to be sustainable over the life cycle of the trees. You can do this by eliminating unnecessary overhead and by improving timber stand selection so that high value timber is harvested.

It would also be advisable to increase the area suitable to clear cuts to 2,500 acres per year or more. This is the best harvest method for high growth portions of the forest. It costs less and regenerates faster when clear cuts are used in the right places

Some of the other benefits of this revision would be·

*increased jobs for those in the timber industry
*increased payments to the counties from the higher timber sales.

4. Areas suitable for ATV trails should be designated by number and length of trails rather than overall acreage. It should be clear that trails will be permitted only if there is success in achieving responsible management by the user groups. This project will continue to be on trial. I believe the whole treatment of ATV areas in the draft plan does not have the right tone to it.

5 Adequate flexibility to deal with the gypsy moth should be in the plan. In this respect, Alternative 12 permits greater acreage to be treated. I suggest you look at this element Certainly the gypsy moths are going to be going through the whole forest over the next 10 to 15 years. They will be a major factor in recreation and timbering. They will probably alter the nature of many areas of the forest. There should be adequate provision in the plan to adapt to the changes this will involve.

6. I have been told that the provision for riparian areas is not adequate in Alternative 8. This should be corrected. I believe streams should be protected in all areas.

Conclusion

I hope you are able to accept the above recommendations.

As you can see, I believe there is room in the GW to continue a reasonable timber program (harvesting about 1/2 of one percent each year) as well as increasing recreational opportunities. All of this need not interfere with long standing use for hunting, fishing, camping, hiking, etc.

It is not intended that national forests be totally protected from the normal wear and tear of regular use. It is intended that there be reasonable harvesting of timber so long as provision is made for regeneration so that the general nature of the forest as a whole can be maintained. It is not intended that every acre of the forest be pleasant to look at all of the time, but it is intended that the forest as a whole will be beautiful and be a permanent area of growth and life that is pleasant and an asset to our environment.

As you prepare and finalize your plan, I hope you will communicate and defend those principles and others that you have learned are important. Follow the law, use good judgement and give us a plan that will stand the test of time.

My best wishes to you and your staff. It is always a pleasure to work with you and your organization.

Sincerely,

Jim Olin
Member of Congress

COMMONWEALTH of VIRGINIA

Elizabeth H. Haskell
Secretary of Natural Resources

Office of the Governor
Richmond 23219

(804) 786-0044
TDD (804) 786-7765

April 16,1992

Mr. George W. Kelly
Forest Supervisor
George Washington National Forest
P. O. Box 233
Harrisonburg, VA 22801

Dear Mr. Kelly,

I have followed with interest the development of the revised Land and Resource Management Plan for the George Washington National Forest. You are to be commended for the extent to which you involved the public in identifying the issues and concerns you dealt with in developing the range of alternatives set forth in the Environmental Impact Statement.

Virginia's resource management agencies have worked closely together and with input from the public and your staff to develop the enclosed comments These comments reflect the plans, priorities and the management philosophies of the state resource management agencies. They also reflect the intent of the Code of Virginia as it relates to natural resource management.

State agency staff that have worked with you in the development of the draft will continue to assist you in developing the final Plan. We look forward to continuing the close working relationship and many years of cooperative effort we've shared in the past as we begin implementation of the new Plan.

It is a pleasure to know that the Forest Service is as committed to the conservation of Virginia's resources as we are I hope you will contact me if there is anything I can do to assist you with this effort.

Sincerely yours,

Elizabeth H. Haskell

Elizabeth H. Haskell

Attachment

SENATE OF VIRGINIA

MALFOURD W. TRUMBO
32ND SENATORIAL DISTRICT
BOTETOURT, ALLEGHANY, BATH, CRAIG, GILES,
AND NORTHERN PART ROANOKE COUNTY, WESTERN PART
CLIFTON FORGE, COVINGTON, BUCHANAN, SALEM
P.O. BOX 44
PINCASTLE, VIRGINIA 24090

COMMITTEE ASSIGNMENTS
COURTS OF JUSTICE
REHABILITATION AND SOC
TRANSPORTATION

April 17, 1992

Mr G. Wayne Kelly, Supervisor
George Washington National Forest
Harrison Plaza
P. O. Box 233
Harrisonburg, VA 22801

Dear Mr. Kelly:

I represent the counties of Alleghany, Botetourt and Bath, and the cities of Covington and Clifton Forge, among others, in the Virginia Senate. I have been contacted and provided information by numerous constituents, both individuals and groups, with regard to the proposed management plans for the George Washington National Forest. Inasmuch as I do not purport to be an expert in forest management, I relate to you my concerns with regard to any plan that you may adopt.

The Highlands is currently suffering from the national and state economic downturn without much relief in sight. Even though there have been efforts, and will continue to be efforts, to turn the local economy around, these attempts have been able to at least stabilize a worsening situation. From a pure economic standpoint, it appears that Alternative 12 would continue to provide at least stability. When compared to Alternative 8, Alternative 12 would provide 23 million more board feet in average annual timber sales, 188,000 more acres suitable for timber production, $72,000.00, less in negative projected net revenues, 215 additional direct jobs, 145 additional direct timber industry jobs, $4 billion increase in total area income and $139,000.00 additional gains in distribution of revenues to counties.

With regard to other aspects, my information denotes a 41% increase of the forest wildlife management emphasis when Alternative 12 is compared to Alternative 8. Furthermore, Alternative 12 would provide an average of 80.33% of demand with regard to big game hunting compared to 81% with Alternative 8. Gypsy moth treatment would increase by 348,454 acres under 12, with $12,000.00 more wildlife benefits from timber sales, and no difference in recreation visitor days.

I realize the great importance that differing groups place upon your decision. Each has its own concerns and agendas. The National Forest staff has no envious task ahead. However, in an effort to analyze the needs and desires of my constituents, I feel that to jeopardize further the economic well-being of the area without a demonstration of irreparable harm to our environment would cause further instability. I support your efforts and trust that you will take all these matters into consideration.

With best personal wishes, I am

Sincerely,

Malfourd W. Trumbo

MWT/m
M3/1-2

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

R. CREIGH DEEDS
P.O. BOX 182
WARM SPRINGS, VIRGINIA 24484
EIGHTEENTH DISTRICT

COMMITTEE ASSIGNMENTS
CORPORATIONS, INSURANCE AND BANKING
LABOR AND COMMERCE
AGRICULTURE

March 23, 1992

Mr. John E Alcock
Regional Forester, USDA
1720 Peachtree Road, N.W
Atlanta, Georgia 30367-9102

Dear Mr. Alcock.

I represent all or parts of the counties of Alleghany, Augusta, Bath, Botetourt, Highland, and Rockbridge, and the cities of Covington, Clifton Forge, and Lexington, in the Virginia House of Delegates. I write with regard to the proposed management plan for the George Washington National Forest. I am particularly interested in maintaining a policy of allowing multiple uses of our forest land and I am concerned with the limitations of suggested Alternative 8 of the plan.

The area that I represent is currently in the throes of the recession. Our largest growth industry is the timber business Therefore the ability of our citizens to harvest and market timber must not be unreasonably impaired

As you know, the majority of land in Alleghany and Bath counties is made up of the George Washington National Forest That, of course, is land which is not included on our tax rolls We all enjoy the National Forest. We enjoy its recreational uses and we enjoy the tourism dollars that those recreational uses produce However, the most tangible way that the communities I serve benefit from the National Forest is through the harvesting of timber. Alternative 8 reduces the number of acres available for timber production from the 640,000 acres available in 1986, to 259,000 acres Of that, only 60,131 acres or 5.6% of the national forest would be dedicated to timber production. Since the national forest constitutes the majority of timber land in this area, the reduction in acreage would necessarily remove from the marketplace some of the best timber land. In my view, that reduction in available acreage amounts to an unreasonable restriction on use of the National Forest.

In addition, I am concerned that Alternative 8 fails to take into account the encroaching menace of the gypsy moth The moth is a fact of life which we are going to have to deal with in the immediate future. In some cases, the only way to effectively deal with the moth, I feel, will be to cut large amounts of timber in its path, and allow regeneration of hardwoods. Alternative 8 would effectively prevent the necessary cuts.

As much as anyone else, I am concerned about finding the right method of treatment for the gypsy moth. If left untreated, the gypsy moth will destroy thousands of acres of hardwood forests. Millions of dollars worth of timber will be lost. Alternative 8 unreasonably restricts potential treatment of the moth and therefore threatens further erosion of our economy.

On the other hand, Alternative 12 basically amounts to "business as usual". I am not convinced that we need to reduce the amount of land available for timbering and therefore that we need to adopt a course more restrictive than Alternative 12. As I understand it, Alternative 12 would effectively increase the number of timber related jobs in my area, would pay more money to localities than Alternative 8 and would meet the market demand for timber products. I encourage you to give serious consideration to this alternative.

The district that I serve is facing widespread unemployment and population loss. From an economic standpoint, the timber industry is one of the few bright spots on our horizon. We are fortunate to live in a beautiful part of the world. I understand that your mission is to come up with a plan which properly balances preservation of our natural resources with the needs of our citizens. I support your efforts and trust that you will take the economic welfare of my region into account in determining which of the suggested alternatives to adopt as the resource management plan for the George Washington National Forest

Thank you for your attention.

Sincerely,

R. Creigh Deeds

RCD/rpm

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

WATKINS M ABBITT JR
P O BOX 681
FROM O RG N A 24522
F F N NTH DISTRICT

COMMITTEE ASSIGNMENTS
RO DS AND INTERN L NAVIGATION
CONSERVATION AND NATURAL RESOURCES
L BOR AND COMMERCE
M N NG AND M NERAL RESOURCES

March 26, 1992

Mr G W Kelley
P O Box 233
Harrisonburg, Virginia 22801

Dear Mr Kelley

I have looked over your proposed Alternative 8 and find it to be a very good plan I do not believe that we need any ATV recreation in our National Forest, and I wonder how it would conflict with the requirements of Virginia Law stating that anyone operating an ATV not on their own property obtain written permission. I do not believe that we need any new roads in the forest, but should one have to be built, I would think we should have a public comment period before such proposals could be carried out

I think that we need to add to the wilderness study area the eight areas which are recommended by the Virginia Wilderness Committee Also there should be no logging within three hundred feet on either side of any stream

I believe Alternative 8 is a very workable plan, and I commend you for your hard work

With kindest regards, I am

Sincerely yours,

Watkins

Watkins M Abbitt, Jr

WMAjr/td

SENATE OF VIRGINIA

ELLIOT S SCHEWEL
33RD DISTRICT
CITIES OF LYNCHBURG BEDFORD
COUNTIES OF AMHERST BEDFORD
CAMPBELL PART OF NORTHWESTERN
P O BOX 900
LYNCHBURG VA 24505
OFFICE 804 528 5000

COMMITTEE ASSIGNMENTS
EDUCATION AND HEALTH
COMMERCE AND LABOR
FINANCE
GENERAL LAWS
RULES

April 17, 1992

Mr. George W Kelley
Forest Supervisor
George Washington National Forest
P O. Box 233
Harrisonburg, VA 22801

Dear Mr. Kelley·

I am writing concerning the new Management Plan for the George Washington National Forest I represent the citizens of Amherst County and the City of Lynchburg which are served by the Buffalo and Pedlar Watersheds Whatever plan that you select will have a direct impact on the water supply of both of these entities. This represents a total of over 105,000 water customers.

Whichever alternative is selected it is imperative that water quality in these watersheds be protected. Specifically, the need to establish broader protection zones around all tributaries of the Buffalo and Pedlar Rivers. Any timer harvesting in these critical watersheds must be closely monitored and should only be permitted on small tracts of land, so that the impact on the surrounding waters will be limited.

Thank you for your consideration of this matter

Sincerely,

Elliot Schewel

ESS/ck

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

S VANCE WILKINS, JR
P O BOX 488
AMHERST VIRGINIA 24521
MINORITY FLOOR LEADER
TWENTY FOURTH DISTRICT

COMMITTEE ASSIGNMENTS
PRIVILEGES AND ELECTIONS
GENERAL LAWS
RULES

April 5, 1992

Mr G Wayne Kelley
Forest Supervisor
George Washington National Forest
P O Box 233
Harrisonburg, Virginia 22801

Dear Mr Kelley

I have received a great deal of constituent concern over the various proposals for a new management plan for the George Washington National Forest, a large portion of which is in my legislative district.

The Forest is a considerable asset to our area of the Commonwealth. It is a source not only of great recreation but a provider of many jobs.

It is for these reasons that I have been reviewing carefully the new management plans and would like to make the following suggestions

Alternative 8, which allows 27 million board feet to be cut each year, appears to be low Alternative 12 allows 50 million board feet to be cut, and that appears to be more than the present demand. Therefore, a figure of 40 million board feet seems to be a reasonable and acceptable compromise that will have little impact on the Forest's recreational, economic, and employment contributions and will meet the present demand for timber in the area.

It also appears that Alternative 12 allows more clear cutting than is necessary to harvest an appropriate amount of timber This could be cut to approximately 1,000 acres per year, which would make timber cutting more economical and also provide more habitat for game and allow more use of the forest for hunting.

Many adjoining landowners have also expressed concern about uncontrolled gypsy moth infestations in forest areas where no roads or control measures are allowed. These people in the main oppose wilderness designation.

Many people have expressed extreme concern that the development of roadless areas will dampen hunting and other recreational activities. Alternative 12 is much more suitable than Alternate 8 in meeting their concerns

There are a few people who would like to close the Forest down to everything except wilderness areas. The vast majority of my constituents, however, would prefer that the Forest be managed as it is at the present with as little change from current practices as possible.

In particular, the majority of my constituents do not want new wilderness designations in Amherst, Nelson, or Augusta counties.

I would appreciate your consideration of these views in reaching a conclusion on how the manage the Forest.

Yours truly,

S Vance Wilkins, Jr

JAMES W GARNER
State Forester

COMMONWEALTH of VIRGINIA
DEPARTMENT OF FORESTRY

Alderman & McCormick Roads
Box 3758, Charlottesville Virginia 22903
(804) 977 6555

April 9, 1992

Mr G Wayne Kelly
Supervisor
George Washington National Forest
P O Box 233
Harrisonburg, Virginia 22801

Dear Wayne

Until now I have remained silent on the George Washington Forest Plan, but the acceptance of Alternative 8 would, I think, abrogate responsible stewardship of public resources Clearly, this alternative would put the staff of the George Washington National Forest in nothing more than a custodial position, and that would be a disservice to future generations

I will not go through the "facts and figures" of comparing one alternative to another, you have a good supply of these comparisons My concern is more philosophical I look at the history of this forest, the professionals (past and present) who have nurtured it, the conservation ethic that made it what it is today and the potential that future generations will inherit through our decisions.

The forests of the George Washington National Forest are not virgin, or in my view, even old growth They are, at least, the second or third forests to occupy the land since Jamestown was settled If small, isolated pockets of old growth remain it's because foresters recognized their uniqueness and protected them This forest is not the result of nature left alone, but of thoughtful stewardship Public enchantment with the GWNF affirms the wisdom of past management

I also worry about the principle of resource conservation Since well managed forests are renewable, it is irresponsible not to use this advantage to reduce the exploitation of non-renewable alternatives Management of the GWNF has not been destructive to plants, animals, or human well-being It has not changed the face of the planet or threatened our existence I believe the very biodiversity we enjoy today is a result of one hundred years of careful nurture

I try to understand those who are wanting to preserve nature as they see it today I believe there is a fear that our world is declining around us because it lacks care and protection Public, and increasingly private, forestland seems to be the focus of this fear Perhaps, because our activities are so visible and public lands have no owner or private property rights My guess is that public forestland preservation is a symptom of these fears and frustrations How does one individual prevent urban sprawl from consuming vast acreages of farms and forest? How does one person keep raw sewerage from our waterways or stop interstate highways from consuming our landscape? Or how do we house the homeless or escape from the drug scene? To me, these issues overwhelm concerned individuals so they spend their weekends trying to save the forest. With the acceptance of Alternative 8 their well meaning but misinformed crusade will be rewarded

Somewhere, somehow, we must take a stand It is time our experience and our record of forest stewardship be defended forcefully I wonder if the George Washington National Forest might not be the place It is the closest to Washington, D C and much of the country's population It should be a model of providing the most for the most people Alternative 8 will not provide that model It promotes waste This alternative will change a productive, working forest into a park for the privileged few who have time and money to watch it grow old It will gradually become more uniform, less productive and of interest to fewer people

I have reviewed the comparison of Alternative Outputs and Management Area Acres Considering a holistic, multiple benefit and diversity enhancement combined with the basic biology of plants and animals, it seems that at least three other alternatives (5, 12, and 14) would serve the public and the resource far better than Alternative 8

Mr G Wayne Kelly
Page 3
April 9, 1992

Which brings me to the future generations We know the GWNF will not be preserved in its present condition, nature will not allow it Currently it offers a good balance of resource diversity, clean water, scenic beauty, and economic stability One way to eliminate this diversity is to stop everything I prefer to continue to manage this treasure in the public trust so those who follow will have what they need As professional foresters, we owe them that much

Sincerely,

James W Garner
State Forester

COMMONWEALTH of VIRGINIA

Department of Historic Resources
221 Governor Street
Richmond, Virginia 23219

Dr C Ritter Director

GWNF
APR 6 19
JPVR
Secty
DEPUTY
CORE TEAM
ADM OFR
Admin Ck
B&F
Prop
ENGR
LND/FR/MIN
PAO
PLN/INF MGT
REC
TIMBER
W/L-RS/W
FILE

April 2, 1992

Mr. George W Kelley, Forest Supervisor
George Washington National Forest
Forest Plan Revision Team
P.O Box 233
Harrisonburg, VA 22801

Re Revised Land and Resource Management Plan, George Washington National Forest, VDHR File 92-0145-F

Dear Mr. Kelly.

We thank you for providing our agency with the opportunity to comment on the Revised Land and Resource Management Plan (LRMP) for the George Washington National Forest We received our review copy of the plan on February 4, 1992 Our comments on the plan, both general and specific, are provided below.

General Comments

We support your agency's selection of Alternative 8 as the preferred management plan

Preferred Management Alternative

Page 2-3 For the discussion of cultural resources, the reference to E.O. 11593 *should be changed to Section 110 (a)(2) of the* National Historic Preservation Act of 1966, as amended (1980) Specifically, we recommend that the text read "the cultural resources inventory is completed as required by the National Historic Preservation Act of 1966, as amended, Section 110 (a)(2) "

Page 2-25: We appreciate that cultural resources are included as a specific category under Management Area 4

Page 2-30. The inclusion of Camp Roosevelt and Elizabeth Furnace in Management Area 12 is not objectionable, however, use of those *resources should be in a manner consistent with the practices* outlined in Management Area 4. Please note that the reference to Appendix E (minerals) is not accurate for the cultural resources noted in the text The appropriate appendix appears to have been

omitted. We suggest the final document include an appendix describing the known significant historic properties

Page 2-30. For Standard No. 36, the reference to MOMM should be deleted and replaced with the Advisory Council's "Preparing Agreement Documents" (September 1989).

Page 2-31 Excavation of archaeological resources by GWNF staff and/or avocational groups (Standard 37) should be undertaken only through the Section 106 consultation process. This comment is specifically restricted to voluntary archaeological excavation projects and does not include efforts necessary for mandated resource identification and evaluation

Page 2-56: For Standard 226, please revise the statement to include qualified professional architectural historians and historians for the "inventory of cultural and historic resources."

Page 2-62: Please include Standards 220-226 as applicable standards for Management Area 9.

Page 2-85: For Management Area 12, any development of an historic property as a recreation area must include protection of the resource. The development must be consistent with The Secretary of Interior's Standards for Archeology and Historic Preservation (48 FR 44716 - 44742).

Page 2-149. Please note that for Standard 811, permits are now issued under the Archaeological Resources Protection Act (ARPA) rather than the Antiquities Act of 1906

Specific Projects (Appendix C)

Our comments on certain identified projects are provided below Please recognize, however, that these comments do not constitute formal consultation with regard to the Section 106 process As a general comment, we recommend that under the sub-theme "Man's Influence on the Land," consideration be given to early historic settlement in the highlands of western Virginia This specifically refers to those inhabitants of the mountains prior to the development of the iron and forest-products industries

Warwick Mansion

We recognize that the activities pertaining to the objectives for Warwick Mansion have advanced due to filming of "Sommersby." Our agency has worked with the GWNF on that undertaking and has no objection to the plans as proposed However, we wish to restate our position concerning archaeological investigations at that historic property. In our letter of February 17, 1992, we requested that archaeological investigation be "temporarily

terminated" following completion of project-specific work We feel that sufficient archaeological information has been obtained to allow your interpretive plans to proceed without further excavation. A complete analysis of data gathered to date should provide the framework for interpretation and possible future archaeological efforts

Highlands Scenic Tour

While we do not object to the concept being proposed, use of an area where "there are countless historical remnants" and "many mines and furnaces" needs to be designed in a sensitive manner that ensures protection of the cultural resources. A controlled use of the tract is preferable over unrestricted "partying, camping, and dumping." Given the fact that archaeological survey work is now being conducted by Washington and Lee University, we request that the GWNF initiate consultation on this undertaking through the Section 106 process.

Augusta Springs Environmental Education Center

Detailed information concerning this undertaking should be submitted for review through the Section 106 process as soon as possible. It is likely that identification surveys and cultural resource evaluation will be necessary so that the effect of your proposal on the historic resort complex can be determined

Charcoal Iron Furnace

We are interested in receiving specific information regarding this project once the subject furnace sites have been selected Stabilization of the ruinous structures, controlled use, and interpretation are preferable to unrestricted access and continued deterioration

In summary, we feel that the revised LRMP constitutes a well-reasoned approach to the stewardship of historic properties by the GWNF. If you have any questions concerning our comments, please contact Antony Opperman or Elizabeth Hoge of our staff We appreciate your cooperation

Sincerely,

H. Bryan Mitchell
Deputy State Historic Preservation Officer

cc: Charles H Ellis, III, Virginia Council on the Environment

STATE OF WEST VIRGINIA
DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES
DIVISION OF NATURAL RESOURCES
Capitol Complex Building 3
1900 Kanawha Boulevard East
Charleston West Virginia 25305
Telephone (304)348-2754
Fax No. (304)348-2768

GASTON CAPERTON
Governor

J. EDWARD HAMRIC
Director

ANN A. SPANER
Deputy Director

April 10, 1992

Mr. George W. Kelley
Forest Supervisor
George Washington National Forest
101 North Main Street
P.O. Box 233
Harrisonburg, Virginia 22801

Dear Mr. Kelley-

Please find attached the comments of the West Virginia Division of Natural Resources (WVDNR) on the Draft Revised Forest Plan for the George Washington National Forest (GWNF). I would like to briefly summarize those comments and place them into a broader perspective

In general, the WVDNR finds that wildlife, wildlife management, and wildlife associated recreation have been inadequately considered in the development of the Forest Plan Revision. As you are aware, the State of West Virginia is an appellant of the current Forest Plan as regards its treatment of these issues. From a wildlife management perspective, we find the draft revision to be far less acceptable than the current plan

Not only was wildlife not one of the 13 major issues guiding the development of the plan revision, the piecemeal treatment of wildlife as part of the other issues is not based upon proven management principles. Traditional wildlife management programs have been de-emphasized in what seems to be a headlong rush toward someone's concept of "unfragmented forest" and "biodiversity." While WVDNR has a long history of supporting remote wildlife habitat and long rotation timber management, we have always advocated a balance between early and late successional habitats. Such a balance promotes a much greater degree of biological diversity than is the case with a preponderance of unmanaged, mature forest

Recognizing the traditional linkage between wildlife management and forest management on the National Forests, it is equally distressing to note that the plan revision has apparently preselected cutting methods and silvicultural systems. These decisions should be made only as a result of site-specific silvicultural prescriptions and designated forest and wildlife management objectives. To do otherwise is to have, as they say, "the tail wagging the dog" and is wholly inappropriate in a Forest Plan. Since wildlife was not one of the major issues guiding the plan revision, it is not surprising that the preselected cutting methods and silvicultural systems are among those that are of least benefit to wildlife. The WVDNR believes that these decisions were made with more emphasis on the visibility and perceived public acceptability of the proposed cuts than on soundly derived wildlife and forest management objectives. If the revised plan is implemented as presented, I believe the public will be dismayed by the realities of increased road construction, stream sedimentation, and type conversion that will result from uneven-age forest management on the GWNF.

In summary, it is apparent that the revised plan for the Forest is beyond the mainstream of public opinion and perverts the National Forest Planning process to produce a revised plan that is anti-management. I do not believe that the majority of the public supporting balanced, multiple-use management of our National Forest will accept this purely preservationist vision. As an agency devoted to the conservation and wise management of our natural resources, I assure you that the WVDNR does not accept that vision and offers the attached technical comments in that vein.

As always, I and my staff are available to assist you in any way that we can. Please do not hesitate to contact me if you have questions or comments on the attached materials.

Sincerely,

J. Edward Hamrick III
Director

Attachments

cc: Congressional Delegation

WEST VIRGINIA LEGISLATURE
Joint Committee on Government and Finance

CARL M. VICKERS, DIRECTOR
LEGISLATIVE SERVICES
[redacted]
Building 1, Room E132
1900 Kanawha Blvd., E.
Charleston, WV 25305-0610

CHARLESTON, WEST VIRGINIA

558
PHONE NUMBER
AREA CODE :

April 15, 1992

Mr. George W. Kelley
Forest Supervisor
Forest Plan Revision Team
George Washington National Forest
P. O. Box 233
Harrisonburg, VA 22801

Dear Mr. Kelley:

The West Virginia Forest Management Review Commission at its April 13, 1992, meeting reviewed proposed alternatives for responding to gypsy moth infestation in the George Washington National Forest. The Commission voted unanimously at that meeting to express strong disapproval of the proposed Alternative #8, consisting in large measure of letting nature take its course, and endorsing the more reasonable Alternative #12.

The West Virginia Forest Management Review Commission has been instrumental in encouraging and developing a management plan within the state to control the encroachment of the gypsy moth on forest areas. In the opinion of the members of the Commission, gypsy moth must be planned for, managed and met with adequate resources with respect to both commercial timberland and public lands including parks and forests. Failing to act in advance of the progress of the moth and then attempting to salvage what is lost after the trees as killed would be a tragedy For this reason, the State of West Virginia, through its Legislature, has made a policy decision to consider gypsy moth management a priority and to make the necessary sacrifices to allocate a portion of scarce state revenues for a gypsy moth spray program.

On a tour of infested areas in the Eastern Panhandle of our state last June, members of the Forest Management Review Commission saw entire mountain panoramas containing not a single living oak. Oak is the foundation of the timber industry in West Virginia. One of the more striking instances of devastation was a view of a portion of the George Washington National Forest lying in Virginia. Many small loggers and sawmill owners rely on timber from the National Forest. Protecting our hardwood resources and the public perception of those resources is vital to the economic survival of our state.

Alternative #8 is an abdication of the responsibility of the federal government to protect the timber resources, the natural beauty and the people of our state in managing the portion of the National Forest which lies in West Virginia. The Commission is deeply concerned that the United States Forest Service would consider the sacrifice of West Virginia's hardwood forests and high-quality oak acceptable.

Very truly yours,

J. D. Brackenrich
State Senate

Joe Martin
House of Delegates

Cochairmen, Forest Management
Review Commission

cc: S. Dale Robertson, Chief
U. S. Forest Service

John Alcock, Regional Forester
U. S. Forest Service

DIVISION OF FORESTRY
DEPARTMENT OF COMMERCE LABOR AND ENVIRONMENTAL RESOURCES
State Capitol
Charleston, West Virginia 25305

Gaston Caperton
Governor

John M Ranson
Secretary

William H Gillespie
Administrative Forester

March 11, 1992

Mr G Wayne Kelly, Supervisor
George Washington National Forest
Harrison Plaza
Post Office Box 233
Harrisonburg, VA 22801

Dear Wayne

I have perused, over the period of a month, the various alternatives you and your staff have presented in the "draft" for the revised management plan for the George Washington National Forest

It may seem strange to you that I would write since most of the 1 1 million acres are not in our State, but the more than 125,000 or so acres we do have are very important to us and it's very important that we respond

Wayne, in all sincerity, I believe alternative eight, your staff's preference, to be the least desirable for the people and for the science and art of forestry

Actually it's hard for me to rationalize your decision when you so eloquently state that alternative 12 "provides a full range of goods and services, including timber, recreation, minerals, wilderness, range and wildlife habitat " Such is, by nearly any definition, wise use, multiple use, scientific forest management, etc It shows consideration for the people by providing employment, and it shows consideration for the future by establishing perpetual production

I can't be as enthusiastic about any of the other 12 alternatives, and neither can I rank number eight as a second choice In my opinion, it's just not so worthy.

The Gypsy Moth is just one determinant I used in making my choice, but it is a vital one Your wish to allow Gypsy Moth free rein and consequently to drop oak and much wildlife in favor of other tree species, most probably pine and maple, is disheartening Surely any economic consideration would blunt this, whether it be a study for 10 or for 100 years I realize your staff used "use conflict" as a determining factor, but in this instance the facts are open to other interpretations

I also believe that the newly proposed Integrated Pest Management (IPC) facility will ultimately result in a breakthrough for controlling this pest Until then, alternative 12 will allow other controls In West Virginia, the cost-benefit ratio of protecting with Dimilin, for example, is about 40 1

As to timber production, it seems to me that professional forestry has shown time and time again that only by harvesting can we preserve biological diversity, maintain a variety of wildlife habitats and keep a maximum number of our fellow citizens working

Yes, these views are somewhat generic, but they are based on a rather thorough analysis

For example, from the standpoint of economics, alternative 12 has 38% more money for the counties than does alternative eight Twelve also increases total jobs over eight by 215, and the timber industry alone by 145 The total budget under twelve is nearly 15% less, a significant $2,750,000 And, annual road construction is 25% less and, allowable sale is up under 12 Yet, there is nothing under 12 that will detract from the maintenance of soils, water, recreation, aesthetics and wildlife. The mileage of scenic rivers actually increases under alternative 12.

Wayne, I believe the preceding comparisons show that your goal of maximizing net public benefit is met extremely well by alternative 12 The people and the forest are served well Under alternative eight, however, the citizens suffer As just one example, millions of dollars of timber will be lost to Gypsy Moth, biological diversity will be sacrificed, just as surely as if it were a tropical forest burn, and people will be sacrificed, i e , reduction-in-force, for a visionary future that flies in the face of the Forest Service's own analysis of trends to 2034 or so

I vote for alternative 12 and will suggest to anyone that should ask that they do likewise

Sorry to be so long Incidentally, I appreciated your visit to our State's Forest Management Review Commission last fall Thanks

Sincerely,

William H Gillespie
Administrative Forester

WHG/tss

cc. The Honorable Robert C Byrd
The Honorable John D Rockefeller IV
The Honorable Bob Wise
The Honorable Nick J Rahall, Jr
The Honorable Alan B. Mollohan

HOUSE OF DELEGATES
WEST VIRGINIA LEGISLATURE
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CHARLESTON 25305

JOE MARTIN Chair
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Committees:
Home Rules

April 9, 1992

Mr. George W. Kelley
Supervisor
George Washington National Forest
P. O. Box 233
Harrisonburg, VA 22801

Attention Mr Ron Lindenbloom

Dear Supervisor Kelley.

The eventual impacts of decisions being made regarding the future management of the George Washington National Forest on the State of West Virginia will be extremely significant. As a Legislator, a longtime advocate of sensible development of wood based industry and as cochair of the West Virginia Forest Review Commission, my interest in and knowledge of forest management lead me to express deep concern about the management direction proposed in your preferred alternative (alternative 8)

Although there are many aspects of alternative 8 that concern me, none are of greater significance than its decreasing recognition of the forest's responsibility to market timber; its reluctance to deal effectively with gypsy moth; and its "hands off" approach to much of the forest that will result in loss of much of its biological diversity

By apparently giving in to the popular perception that varied uses must be exclusive, the Forest Service abdicates a professional responsibility to plan for the integration of uses to the greatest extent possible to provide maximum net benefit to the public at large In choosing to dedicate a small portion of the forest to timber harvesting, rather than to plan for integration of harvesting with other uses, a tacit decision is made to deprive a region dominated by federal ownership of badly needed jobs and economic development opportunity.

The linkage between timber production acreage and gypsy moth treatment assures only minimal moth suppression on the forest Reliance on silvicultural treatments at this late date is no more than a cruel joke. This devastating insect has already consumed significant state and federal resources in an effort to minimize

environmental and economic losses. Alternative 8 is unacceptably weak in dealing with moth depredation and constitutes a tacit decision to sacrifice much of today's mature forest, looking instead to what will surely be a much different forest forty to fifty years from now. For the sake of the forest itself as well as for adjoining landowners the George Washington should be planning to aggressively combat the spread of gypsy moth.

Maintaining a broad diversity of plant and animal species across the forest is an objective shared by all but the most radical preservationists. To maintain the full spectrum of diversity, from early successional to climax species, significant and regular manipulation of the vegetative complex is necessary Commercial timber production, guided by the overall objectives of management, is the common sense approach to that manipulation and it has spin-off economic benefits. The other key to managing for diversity is to protect the forest from the catastrophic effects of fire, gypsy moth and the like. Thus, I urge you to consider the broader, long term effects of these aspects of the plan.

I join many of my constituents in proposing that your planning team reconsider its preferred alternative. Alternative 12, while certainly not a perfect choice, provides a reasonable basis for developing the plan which will establish the direction for the George Washington It has broad support among numerous interests who are willing to work together for a healthy and productive forest that will meet the needs and desires of generations of Americans - present and future.

Very truly yours,

Joe Martin

Joe Martin

cc Hon. Robert C. Byrd
Hon. Robert E Wise, Jr.

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

LACEY E PUTNEY
P O BOX 127
BEDFORD VIRGINIA 24523
NINETEENTH DISTRICT

COMMITTEE ASSIGNMENTS
PRIVILEGES AND ELECTIONS
APPROPRIATIONS
AGRICULTURE

April 9, 1992

Mr. G. Wayne Kelley
Forest Supervisor
George Washington National Forest
P O. Box 233
Harrisonburg, Virginia 22801

Dear Mr. Kelley

This letter is in reference to the George Washington National Forest Draft Environmental Impact Statement and specifically in opposition to Alternative 8, which has been proposed as the preferred alternative plan for the George Washington National Forest.

Based on information communicated to me by the wood products industry and by pulpwood and timber cutters and haulers in and around my legislative district, it would appear that Alternative 12 will provide better support and protection for the multiple-use concept of the forest by providing much needed economic support for industry and small business operators as well as providing a better habitat to support wildlife in the area.

Since Alternative 12 appears to more closely parallel what I believe to be the Congressional intention under the Multiple-Use Sustained-Yield Act, as a taxpayer and as an elected member of the Virginia General Assembly, I strongly support Alternative 12.

I am keenly aware of the benefit which would be derived by the Georgia-Pacific paper mill at Big Island as well as the pulpwood and timber cutters and haulers who depend on this mill for their livelihood.

I might add that I have received calls and letters from a number of my constituents - all of whom strongly support Alternative 12 as the management plan for the George Washington National Forest.

Thanking you, I am

Yours very truly,

LACEY E. PUTNEY

LEP bll

CC The Honorable Lewis F Payne
The Honorable James R Olin
The Honorable Elliot S Schewel
The Honorable John W Warner
The Honorable Charles S Robb
Mr. James Hileman
Mr R H Beauchamp

CARL E. GAINER, COMMISSIONER
DEPARTMENT OF NATURAL RESOURCES
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March 24, 1992

Mr George W Kelley, Supervisor
George Washington National Forest
U.S.D.A.-Forest Service
Harrison Plaza, P O.Box 233
Harrisonburg, VA 22801

Dear Supervisor Kelley

I have read your proposed 10 year management plan on the George Washington National Forest

It seems to me you are changing plans so often that the general public or industry has no way of knowing what's coming next.

What has happened to the sustained yield-multiple use plan for the forest? That was a good plan for everyone

We fought the battle of clear-cutting in the 60's in the W VA Legislature, finally taking it to Congress where it was settled I thought very well

I realize there are times caused by disease, storms etc., some timber must be cut but not a wholesale change of policy such as this

Timber harvest is our best hope in West Virginia for future economic development and I know rates high in Virginia.

I hope your draft of this proposed plan will be reconsidered

Very truly yours,

Carl E Gainer
(Chairman Senate Natural Resources Comm.1962-1980)
(Chairman Forest Management Review Board 1964-1976)

CEG.sbc

cc. Senator Robert C. Byrd
Senator John D. Rockefeller IV
Congressman Bob Wise
Governor Gaston Caperton
Ernest Lake, Georgia Pacific Corp.
Bill Gillespie, WV Forestry Div
Dennis Austin District Timber Manager, BV
Roy Zangari Plant Manager, BV
Anthony P. Mollish, Mgr. Appalachian Woodlands