

SUBJ: DOLLY SODS NORTH

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To: Nancyvyas@aol.com

Here are my comments. I write them while camped along the left fork with a group of students. My reaction are based on 12 years of taking groups to this area, and the travel patterns I have seen develop over the past few years with the opening of the area. We are spending much of our time studying how people move through the area, where they concentrate, and how they will likely respond to the proposed action.

Page 1-2. I assume the Blackbird Knob location was chosen because it was a logical target. But later on you mention many other target areas. Why were the following areas not included?

- The peaks joined to the north of Blackbird Knob, the North end of Breathed Mountain, Cabin Mountain, and the Bear Rocks high area?

- The area just north of the Red Creek Campground and the Red Creek trail (areas that absorb a good bit of use from wandering automobile campers).

- A buffer zone along both sides of the major forks of Red Creek (Left fork, Right Fork, Alder Run). In the absence of a trail system, the banks of these creeks have become primary travel routes, and are the places where the greatest concentration of visitors can be found camping.

Page 1-4. Since a management perscription has not been developed for the area, I can't see how use of motorized vehicles is legal. In addition, this system of roads that are referred to are usually no more than eroded impact areas, often through wetlands or on steep slopes ("road" implies improvement - gravel, ballast, etc.). Many of these corridors are currently impassable without brush and tree cutting or creation of bypasses. Use of these areas will cause significant damage to the already fragile soils and plant communities. Also, since the area is already much more accessible because of the road to the east and the Timberline access to the west over cabin mountain, the need for motorized equipment is actually less than in the Wilderness Area, where steep climbs with heavy equipment was required. There is no location in the Dolly Sods North that is more than 2.5 miles from road access of equal or higher elevation.

I therefore think the same "minimum tool" techniques used in the Wilderness area should be employed here in this alternative. If I think so, I'm sure the environmental community will come up with the same conclusion and challenge the Forest Service.

The adverse impacts are not exactly the same as for the Wilderness Area. There is much more wetland here (much more than indicated by the enclosed map) and the use of motorized vehicles through these areas in no way compares to the searches done by foot crews.

Page 1-6. The effect of the motorized vehicles on the fragile slopes and wetlands is not mentioned here. Also not mentioned is the affect of

motorized users on backcountry visitors, which is profoundly negative).

Page 2-3. Again, if Cabin Mountain and Breathed Mountain (the parts north of the Wilderness) were targets, why aren't they being swept?

2-7. The first paragraph understates the extent of wetlands in the area. With the exception of ridge tops, wetland communities can be found throughout the area, even on the saddles between the Blackbird Knob Peaks!) Additional areas have been created by beavers, even on forested hillsides.

2-9. Somewhere in this section, reference should be made to the current management philosophy/direction being used in the Dolly Sods North. Is it being managed as 6.2? 6.1? Wilderness? or something else?

3-3. I believe that the mitigation plan for the Issue of concern number 3, damage to trails, is totally inadequate. Sitting here looking at these saturated soils, I can't imagine how motorized equipment is going to get in here without creating massive damage.

5-15. Associate, not Assistant Professor.

5-16. I wouldn't go so far as to say that the Bear Rocks area is the least-used entry point. A visit during Blueberry season will confirm the fact that hundreds, if not thousands of day use visitors wander into the area from the road to pick berries. In addition, more and more backpacking trips are starting in this area in order to complete a north to south trip through the Dolly Sods North and Wilderness Area. Also, it should probably be mentioned that a growing number of mountain bikers are frequenting the area, usually from Canaan valley across to the Scenic Area and back.

5-17. The information from our study will probably be okay, with an intro statement saying "With the exception of the Day use visitors entering from Bear rocks and the Red Creek Campground, visitors to Dolly Sods North are probably quite similar to Dolly Sods Wilderness.

5-29. While I probably agree with the estimate that there are approximately 5,000-7,000 annual visitation to the area, it should be stated that this is a complete guess by the Forest Service and is based on no objective, reliable data (try to say that tactfully!). Also, it's not clear if this is number of visits, number of visitor days (a visitor day is 12 hours) or something else. Asking this question will make them squirm since you are asking for a very specific variable descriptor to attach to a very, very fuzzy number.

6-5. (last paragraph) Again, since motorized vehicles will be used on fragile, eroded corridors, I don't think you can conclude that the impacts will be similar.

6-7. (6.2.1.1.) Again, because of the condition of these old roads and railroad beds, significant cutting of vegetation will be necessary.

6-7 to 6-10. This discussion would be much informed if the motorized vehicles were included in the botanical impacts. Frankly, I am much more

concerned with this traffic than with the relatively small number of noises dug and areas detonated.

6.22. Again, same comment for this table.

6-26 (6.3.1.3). I could agree with this statement if it weren't for the motorzied equipment issues. What routes are they going to use to get in to Blackbird Knob? The Blackbird Knob Trail? A jeep track off Cabin Mountain and a crossing of the wet bottoms? I just can't see it.

6-33 (6.4.1.3). This statement is not logical. There is no budget for trail maintenance as it is. To say there costs will double is therefore inconsequential. Also, the location of the old jeep trails and railroad grades aren't necessarily the best places to put future trails. Usually they sort of fade out, don't really go anywhere, and are poorly designed for wilderness trail standards. The areas where future trails would likely go will therefore have to be swept anyway. Also, why would signs be needed under this alternative but not others. I imagine that under any alternative, if an ordinance is found, the area will bel closed until the orinance is detonated or removed.

6-34. Hmmm. Is this alternative (closing of the area) really a realistic outcome of this alternative. I think a much more likely scenario is that more information/interpretation of the dangers will occur. I know of none of the 2,000 plus federal protected areas where such an extreme scenario has unfolded.

6-35. (Nancy, between you and me, I think this "insidious risk" will be virtually just as high after the action as before.)
s)

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