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Department of
Agriculture

Forest
Service

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Forest

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File Code: 2320

Date: June 07, 1995

Nancy Vyas, Environmental Engineer
New-Bold Enterprises
1489 Locust Avenue, Suite X
Fairmont, WV 26554

Dear Nancy:

I am writing in response to the questions you asked about the Dolly Sods Wilderness Ordnance Removal Project in your June 1 letter.

We did not conduct a formal analysis of the impacts from the work performed in the 1991 Feasibility Study. There were minor impacts and disturbances to the vegetation and soils observed in 1991, and we are in the process of photographing some of those disturbance areas this week. Monica Gallion and Jill Showmaker, two of our forestry technicians who have worked in the Dolly Sods area, observed several mortars being exploded in the 1991 study and since. They reported that, for the most part, the ordnance was moved to rocky areas with little vegetation before it was exploded and that the environmental damage occurring was "negligible" - in some cases hardly noticeable. In at least one instance when the partially exposed ordnance was detonated in place, (with explosives and cover being placed on top of it), the resulting 1 - 1 1/2 foot-deep hole was filled with rocks and soil, and plant litter was placed on top of it so that it was less noticeable.

In many of the areas where the digging of metal will take place, the soil profile was disturbed and/or overturned by explosions of ordnance during the training exercises fifty years ago. Additional disturbance by digging to identify and recover the metal objects located during this operation will not be significant, if steps are taken to prevent erosion and protect aesthetic values. This project will disturb well under 1 percent of the acreage in the Wilderness.

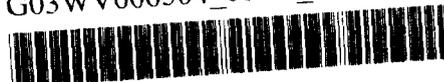
We did not observe or hear any reports of changes in water quality as a result of the 1991 study, and our monitoring did not show a change in air quality. No fires occurred as a result of that work. Wetlands were not included in the 1991 study.



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Nancy Vyas
June 7, 1995

One known historic archaeological site was impacted by the digging in the 1991 feasibility study. Treatment of the artifacts found in this process did not provide the level of protection that we would like to see in this upcoming phase of remediation. To assure better protection, we suggest the following steps be taken:

1. The Forest Service will perform or oversee a visual survey of the impact area to locate sites, do an initial assessment, map locations, and write a report with recommendations. (This will not likely include prehistoric sites.)
2. When the ordnance removal work begins, if a recommendation cannot be followed, COE or their contractors will notify the FS archaeologist to work out a compromise. This may involve her or another archeologist being present for digging and to record information.
3. If prehistoric artifacts are found by the ordnance removal workers, they will immediately notify the FS archaeologist and provide for an archeologist to assess the site.

Noise was an impact to some Wilderness users during the 1991 feasibility study, but it was not something that disturbed people to the point that they complained about it. The disturbances were brief, limited to air horn blasts and the sounds of the detonations themselves. These occurred mid-week and only on a few days. Adequate notices were posted so that most visitors knew that they may be occurring and understood why. Most of the individuals we talked to said that they believed that the extra safety resulting from having the bombs exploded was worth the noise.

Prior to the 1991 study, we did not realize the extent of the disturbance that would occur due to digging, and did not require a survey for Cheat Mountain Salamander. Though small areas of their habitat were disturbed during the digging operations, there were no large or continuous areas of disturbance that would significantly restrict the salamander movements. Because most of the ordnance was moved to the dry, rocky sites before being exploded, few of the explosions would have impacted the salamanders.

During the proposed ordnance removal project, the Forest Service intends to have an employee available on-the-ground to serve as a liaison and to provide assistance to the contractors in assuring protection of the resources. This person will not be able to be with all the workers at all times, but will be able to coordinate with all of the work groups on a regular basis, (probably daily). This person will not be an expert in all the various resource fields, but will probably be either a forestry technician or a forester with background in land management including Wilderness management.

We do not anticipate requiring additional specialists (archeologists, biologists, etc.) to be present in the field throughout the project, unless

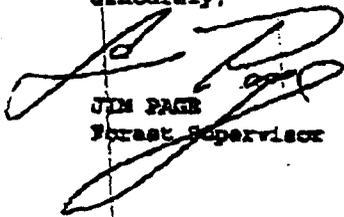
Nancy Vyas
June 7, 1995

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there is a need for them indicated by the EA. There may be a need for them to be present at various times based upon the resources that are discovered. Since our specialists will be engaged in other work and not available to respond immediately when needed, we have recommended that the COE obtain the services of other archeologists and biologists to be on call for their team.

If you have any further questions, please contact District Ranger Nancy Peakes.

Sincerely,



JIM PAGE
Forest Supervisor

On June 7, 1995 I hiked along the Red Creek corridor in an attempt to observe the natural revegetation of sites where UXO has been found and dug out of the ground in the 1991 feasibility study conducted by a contractor for the US Army Corp of Engineers. I was also looking for sites where one or more of the ordnance had been detonated. I did a visual survey of the area identified as "area 7" in the Feasibility study report prepared by Metcalf & Eddy, Inc. in 1992. The report stated that UXO was found in this area which is the floodplain of Red Creek bordered on both sides by steep slopes. I saw no obvious signs of UXO removal from the ground or detonation of UXO. The undergrowth is grass and rhubarb and the ground is somewhat rocky. The forest is rather open in this area. Portions of a turn of the century railroad grade are visible where flood waters have not destroyed it.

I located a site along the Red Creek corridor where one mortar round was located by visitors in August, 1994 and then detonated by US Army personnel in September, 1994. I was present at the detonation. The ordnance was partially buried therefore the Army personnel decided not to move it to another location to detonate and also decided to blow it into the ground rather than upward. This area was located in the floodplain where only very high water channels dissect the plain. The ground was covered with a thin layer of soil with rocks protruding throughout. The ordnance was buried in rock and soil.

After the explosion a sulphur scented smoke hung in the air for several minutes. The loud sound of the explosion only lasted a second or two. I did not observe any impact to the water quality of Red Creek which was approximately 100 feet away. My only observation of wildlife at the time was a pause in the bird songs which resumed several minutes after the detonation. A hole approximately 18" deep by 5ft long by 4ft wide was left by the detonation. We filled this with the rock fragments (approx the size of two softballs) that had been broken by the explosion. Some tree roots (approx 1" in diameter) were exposed and they extended out over the crater.

I observed this same site on June 7, 1995 and found the hole to be filled with leaf litter so that the depth was no greater than one foot at any point. The crater was still 5ft long by 4ft wide. The exposed roots were no longer functional but the two birch trees (approx. 4" in diameter) had green leaves and appeared to be healthy. I saw no signs of erosion immediately surrounding the crater. Because of the rocky and uneven ground in this area the hole left by the detonation that occurred nine months ago is relatively unnoticeable by the average visitor. The turn-of-the-century logging and frequent flooding of Red Creek have left depressions and gullies throughout the Red Creek corridor. I am defining the Red Creek corridor as the land that lays between the steep-sided walls of the mountains on both sides of the creek.

I have also observed ordnance detonation on the grassy plains of the Dolly Sods Scenic Area located north and east of the Dolly Sods Wilderness. The holes left by these explosions were not as deep or long as the one previously discussed. The ordnance was placed on rocks which were fragmented by the explosion. I do not feel that the UXO detonations I have witnessed have had significant impacts on the resources of the Wilderness or Scenic Area.

Jill Shoemaker
Forestry Technician
6/7/95