

United States
Department of
Agriculture

Forest
Service

Monongahela
National
Forest

Potomac Ranger District
HC 59, Box 240
Petersburg, WV 26847
VOICE and TTY 304-257-4488
FAX 304-257-2482

"CARING FOR THE LAND AND SERVING PEOPLE"

Reply to: 2320

Date: June 14, 1995

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

Dear Nancy:

This note will summarize some of the comments and editing changes that I have for your draft EA for the Dolly Sods Wilderness Ordnance Removal Project. I returned a copy of the document to you by Federal Express today. In it I highlighted many of my areas of concern and made several notations. If you have questions about what I did or what I meant, be sure to call me!

1 - I think the document proposes more protection and surveys for the archeological resources and for the biological resources than are reasonable and prudent.

More specifically:

a - I do not think we should be providing for transplanting rare and sensitive plant species, (this should only be a consideration for Threatened or Endangered ones, if they are found in an area involved in a detonation).

b - I do not think we should be doing a reconnaissance or search for Cheat Mountain Salamanders after the electromagnetic sweeps and prior to excavation - these should only be completed in areas to be involved in detonation. In those areas, the procedure that you describe for locating and capturing Cheat Mountain Salamanders is appropriate prior to the detonation.

c - The Forest Service will not be providing firefighting crews on standby when notified of detonation schedules. The UXO detonation crews will take initial attack measures for any fire that is caused by their operations and will notify us immediately of the existence of the fire. We will dispatch a back-up firefighting crew within 2 hours of notification. We still need the pre-disposal coordination.

2 - We will not provide mass mailings of information to the past users of the wilderness. We simply do not have adequate trailhead registration information or other resources to accomplish that. We will work with the COE and their contractors to provide news releases and trailhead signing.

200.1e

G03WV006504_08.01_0020



- 3 - Wayne Budress indicates that there is still a chance that this work will be initiated in the late summer/fall of 1995 - the document indicates that it is scheduled for 1996.
- 4 - We still seriously question the need to have a 4,000-foot radius closure in place around all detection and excavation sites throughout the project. We believe that a smaller closure is adequate, especially during the detection and excavation and possibly, also, during the detonation. The need for this size of a closure needs to be confirmed and justified.

The Forest Service has not agreed to provide the biologists, botanists, and archeologists for the levels of mitigation indicated in this document. Even if that level is reduced to the level recommended above, we need to work with the COE to determine how that need can be most effectively met. Our specialists are involved in many other projects throughout the forest and cannot be available on site with less than 2 days notification, in most cases, and sometimes longer. To meet their needs for quick responses, the COE should be responsible for obtaining such specialists. These may or may not be FS specialists: If they are FS specialists, then we need to work out an agreement to pay for their salaries/expenses on this project (an estimated \$200/day for most of our specialists).

- 6 - You need to change your specific references to straw mulch and straw bales for erosion control to more general references to mulch and to erosion control devices and practices as appropriate. We do not want to be locked into introducing straw when it may not be necessary or the most appropriate material.

Other, less substantive comments and clarification of some of my notes and markings include:

- 1 - Need to change "Dolly Sods Wilderness Area" to "Dolly Sods Wilderness" throughout the document.
- 2 - On Pg 1-1: What near misses???
- 3 - pg 1-3: "professional quality control monitor" - how about an official to monitor quality control and assure...?
- 4 - pg 1-4: the crater wasn't particularly difficult for Jill to find since she had previously located and had been to the site. However, it does blend in with the surroundings and would be difficult for the casual observer to find.
- 5 - pg 1-6: not sure the socioeconomic effect will be noticeable or large enough to measure.
- 6 - pg 2-1: this figure appears throughout the document, and I'm sure came from this office. I don't believe that it represents an accurate figure for the amount of use in the Wilderness...it appears to be an estimate of the number of people who use the Dolly Sods area for picnicking, hiking.

etc. (includes more than Wilderness, but doesn't include drive-through, motorized sightseeing-type use). We don't have accurate use figures, but believe that 20,000 - 25,000 visits is a more accurate estimate of Wilderness use in a given year.

7 - pg 2-7: use in the Wilderness has not been growing in recent years.

8 - pg 2-11: the Wilderness is not just allowed to be undeveloped; Congress has mandated that it be managed so as to remain in that state. Primary use of Wilderness is not recreation, but to preserve a part of our lands in a state where they are untrammelled by man, etc.

9 - pg 4-13/14: may need to work with the wording on this - while we may be forced to close the Wilderness, our preference is to continue as is or maybe to add other use restrictions, (such as a mandatory permit system).

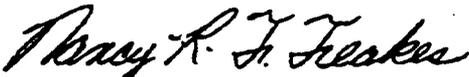
10 - pg 5-11: change "human interference" to prior to white settlement, or some similar phrase. Area rules are not accurate: the restriction on fires is within 300' of roads except within the campground. There is a mix of rules for the campground and the Wilderness, and no differentiation between the 2 areas.

11 - pg 5-13: air quality statement is confusing, and I don't believe it is entirely accurate. Contact Barry Edgerton at 304-636-1800 for more info.

12 - pg 6-1: drop "day-to-day" in reference to the professionals??

Many of these comments also need to be carried through to other parts of the document that include the same or similar words or ideas - I did not mark or comment on them in all places. As before, if you have further questions once you get the document, please give me a call.

Sincerely,



NANCY R.F. FEAKES
District Ranger

cc: SO

W.Budrus:COE, Huntington