

# **APPENDIX A**

## **Response to Comments on Proposed Action**

Responses to the proposed action public comment letter were received from:

- Don Gasper, February 3, 2001
- Thomas Ward, February 13, 2001
- Larry Orr, President, Kanawha Valley Chapter of Trout Unlimited, February 19, 2001
- K.J. Dodd, February 6, 2001
- Mr. Francis D. Slider, Forest Committee Chair, WV Council of Trout Unlimited, February 21, 2001 and February 24, 2001
- Larry G. Williams, Sr., January 17, February 6, and February 7, 2001
- Pete Isner, February 7, 2001, phone call to Linda Tracy, MNF
- Charles Piercy, March 13, 2001, phone call to Linda Tracy, MNF
- Allan C. Glasscock, Wildlife Biologist/National Forest Coordinator WV Dept. of Natural Resources, March 9, 2001

Most comments are paraphrased. Copies of the actual letters are included in the analysis record of this EA. General comments in favor of the project are not listed here.

ISSUE or CONCERN	COMMENT	RESPONSE
Roads	If there is a chance the mines may be reopened in area or if timber might be cut, keep the roads in place.	Most of these roads have not been maintained, leading to the current sediment problem. Because of the terrain and the location of these roads (close to the river, low on the slope), roads for future timber harvests will most likely be constructed off the ridgeline, or timber will be removed by helicopter.
	Road repair should be cheaper than road obliteration.	Since the roads are not needed for long-term access, the obliteration actions described will be cheaper in the end by reducing miles of road to maintain across the forest. Roads are not being truly obliterated, that is returned to original contour.
	Sediment from roads is a primary threat to native and wild trout fisheries.	This issue is one of the driving issues in the need for this project. The project is designed to reduce sediment movement from old roads and trails no longer needed in the transportation system.
	All abandoned and derelict roads should be inventoried for obliteration when funding becomes available.	As the Forest continues to conduct watershed assessments, more abandoned roads will be identified for obliteration.
	Existing roads should be gated but not obliterated—for safety purposes/emergency access.	As described in responses above, roads will not be returned to contour.
	Keep access for long-term monitoring of site pH and treatment of any acid impacted	Since the mines are not discharging acid drainage now and have no history of acidic drainage, long term monitoring is

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	waters.	not needed.
	Would proposed obliterated roads make good trail to connect with Cranberry Wilderness Area trail?	The roads generally run parallel to Little Fork Trail, trail 271, and 206. Since roads are not being returned to contour, they could be considered for trails after this project.
	Maintain administrative access to any development (including wildlife habitat) within project area.	The gates placed on mine entrances will need maintenance. Mines will still be accessible by Forest service employees by ATV.
	Constructing water bars following road obliteration is tricky.	The waterbars will be constructed as a part of road obliteration. These roads will appear more like trails after rehabilitation work and will not be returned entirely to original contour.
Sediment Ponds	Would like existing sediment pond saved—summer habitat for stocked trout.	Two sediment ponds will be retained at mines WV-0967 north and south. One pond will be removed at mine MF-1039, the other retained, but not maintained.
	Drainage ponds should be repaired or replaced and stocked w/bluegill and bass as pH permits.	See response above.
	Request establishment of small wetlands at outflow of sediment ponds to reduce metals.	Metals were not found at problem levels in these mine drainages. However, where favorable conditions exist for wetlands on the mine benches, they will be enhance.
River/Stream Water Quality (pH)	White Oak Run (White Oak Fork West) is a superb trout stream and needs enrichment/neutralization	Not within the scope of this project. The Forest is working with the WVDNR to prioritize streams for addition of limestone fines.
	While mine discharge and acid rain still continue, interim fix of limestone fine additions is better than no action at all.	See response above.
	The lower Williams River watershed is too valuable a resource to neglect treating with limestone fines.	See response above.
	Corrections need to be made to bring water quality to level that will support brook trout and addition of limestone fines to selected areas while personnel and equipment are executing this project seems to be a golden	See response above.

ISSUE or CONCERN	COMMENT	RESPONSE
	opportunity.	
	Tributaries of lower Williams River have very low overall pH levels and will not support trout year round.	Not within the scope of this project.
	Monitor pH of mine discharge and treat outfall if pH decreases to assure its alkalinity.	Since the mines are not discharging acid drainage now and have no history of acidic drainage, long term monitoring is not needed.
	If any acid impacted waters are found on these sites, means should be taken to neutralize them.	See response above.
River/Stream Water Quality (pH) (cont.)	Noticed orange water discharging along Cranberry River downstream of Cranberry Campground.	Not within the scope of this project. Forest Geologist knows of this concern.
Wildlife Mitigation/ T&E Species	Install bat gates at all portals.	One portal was deemed to far collapsed to allow for bat gate construction (MF-1031). In the proposed action, all other known portals are planned for closure by bat gates.
	Design/build bat gates according to American Cave Conservation Association guidelines.	Designs for bat gates have been completed following ACCA guidelines.
	Autumn olive is benefiting wildlife. Replace by planting other wildlife trees/shrubs (i.e. hawthorn and crabapple).	Wildlife trees/shrubs will be incorporated into plantings as funding permits. The highest priority for revegetation is to quickly establish cover to protect soil from erosion.
	Recommend wildlife and erosion control seed mixture for revegetation.	The seed mixture to be used includes 15 pounds per acre of annual ryegrass to quickly establish cover on the sites. A mix of native grasses and forbs consisting of: 30% switchgrass, 25% Indian grass, 25% big bluestem, 6% partridge pea, 3% coneflower, 3% oxeye sunflower, 3% blackeyed susan, and 1% bundleflower will also be used for long term cover at a rate of 12 pounds per acre.
	2 rare species occur in project area—one, beaked dodder, occurs in a trail that may be a woods road planned for obliteration.	Beaked dodder is not on our Regional Forester's sensitive species list.
	Eastern small-footed bat was	This was considered in project design

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	found at portal just east of WV-0967-north.	and analysis, page 25 of EA.
	Have bats been documented in areas to be gated?	Yes, mist netting has determined the presence of the eastern small-footed bat, and bat guano was noted at several portals.
	Do not feel endangered species listed are indeed threatened or endangered.	Not within the scope of this project, species status already determined.
Revegetation	Revegetation to control erosion needs a lot of seed. Plant trees.	Grass and legume seed is easier and cheaper to plant and controls soil erosion quicker than planting tree seedlings. Native species will be used, which are generally not as aggressive as non-native species. Trees will encroach on the road surface over time.
	Recommend wildlife and erosion control seed mixture for revegetation.	The seed mixture to be used includes 15 pounds per acre of annual ryegrass to quickly establish cover on the sites. A mix of native grasses and forbs consisting of: 30% switchgrass, 25% Indian grass, 25% big bluestem, 6% partridge pea, 3% coneflower, 3% oxeye sunflower, 3% blackeyed susan, and 1% bundleflower will also be used for long term cover at a rate of 12 pounds per acre.
	Use native species for revegetation.	See response above.
	No wild fruit trees grow on Forest.	Not within the scope of this project.
Heritage Sites	Leaving old mining structures in place is very strange—should not leave.	The Forest has a legal obligation to protect historic buildings on National forest lands. Pages 26-28 of the EA discuss the heritage resources of the area. A minimum amount of modification will be made to the structures to make the area safer to Forest visitors.
	Designing to minimize disturbance of historical feature is inappropriate for Forest, as plenty exist off Forest.	See response above. The historic features are not considered eligible for the National Historic Register and can be removed, but a limited amount of removal will occur through this project.
	Be careful not to obliterate historic sites.	See response above.
Cleanup Costs/Responsibility	Coal companies should have to pay for trash cleanup.	At the time of mining, the sites were rehabilitated to the existing

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		requirements.
	Why is public picking up the tab for this cleanup?	See response above.
Implementation Methods	Mines should be collapsed and continually monitored for seepage.	Bats, possibly including a sensitive species, are using the mines for shelter. Since the mines are providing quality habitat for bats, gates will be installed. Please see pages 23, 24, and 25 of the EA.
	Restrict major earth disturbances when rain events are occurring or are likely to occur.	Mitigation of effects to soil and water resources is given in the EA, pages 12, 13, and 20.
	Actual work should be accomplished with Best Management Practices in mind.	See response above.
	Limiting possibility of increased sedimentation to watershed from proposed activities is a major concern.	See response above.
General	Who owns mineral rights at present?	A private company holds the mineral rights in the project area.
	The proposed activities do not meet the purpose of/need for action.	The purpose of the project is to make the area safer for Forest visitors and improve water quality and watershed conditions. The project includes blocking access to mines and reducing sediment movement from old, unneeded roads.
	The agency policy does not reflect what is actually done on the ground.	It is the policy of the Forest Service to restore and protect water quality, which is a large part of this proposed project.
	Need to put untreated fertilizer back into the ground (human waste).	Not within the scope of this project.