COOPERS ROCK STATE FOREST
BACKGROUND INFORMATION

The area for which this management plan is written is a State Forest, not a State Park. The major difference between a State Forest and a State Park is that State Forests are managed for multiple uses while State Parks are managed for recreation and historic preservation. By law (Chapter 19-1a-1) state forests are for demonstrating state-of-the-art forest management while providing developed and undeveloped outdoor recreation, propagation of forest trees, fish and wildlife, aesthetics, hunting and fishing, and timber production. Presently there are a little over 80,000 acres in State Parks and a little over 62,000 acres in State Forests with approximately 2,700 acres of state forests are managed as developed recreation areas.

The history of the area now contained within Coopers Rock State Forest has been one of exploitation. When the State purchased the property, no one else wanted it. Through proper forest management, the forest has regenerated itself and it is time again to conduct harvests to maintain forest health and vigor and improve wildlife habitat. Harvest recommendations are decided upon based on sound scientific silvicultural principles.

A forest is dynamic, it is not static, and it changes with or without human intervention. Coopers Rock State Forest is currently lacking in age and structure diversity. This characteristic limits the variety of wildlife that is able to thrive in this forest.

There is a requirement in our State Forest Management Guidelines for a public tour of an area following our inventory work and prescription formulation, prior to any implementation of the prescription. The Coopers Rock State Forest draft plan is not the final detailed work plan for each individual area, nor is it the last chance for the public to comment on practices to be implemented on the forest.

The Management Review Areas will be evaluated more closely to determine more exact needs. Since trees are the biggest component of a forested habitat, both in size and number, they determine many characteristics of the habitat. The condition of the trees and the species present are inventoried. Rare, threatened and endangered species have certain habitat requirements. The existence of these habitats is reviewed during intense inventory work. The presence and absence of water is recorded. Other special values such as scenic vistas, historical areas and unique wildlife habitats are identified and recorded. The cutting and/or removal of trees are the major forestry tool for managing forest resources and their many amenities. Planned cutting is done to enhance the habitats of trees, game and non-game wildlife, so as to maintain a diverse, healthy and productive condition. In a managed forest, a planned harvest that results in the sale of forest products provide income to create the potential for more recreational pursuits, sustain the aesthetic quality of the forest, protect, sustain and improve habitats for plants and animals including rare and endangered species while maintaining the high level of water quality that results there from. Other recreational pursuits are enhanced by establishing access to areas via forest management roads. The cutting of
trees helps to maintain a diverse forest ecosystem. It should be understood that as an area is harvested the forest continues to grow. The proposed harvests for the next ten years will not exceed the growth during that same time period. Growth is calculated on trees with 12” and up DBH. Through selective harvests, the trees that remain will be able to use the space more efficiently, produce more food for wildlife and allow for the layering of vegetation that contributes to the habitat requirements of many Neotropical song birds.

Twenty-five percent of the revenue generated from the sale of forest products now goes back into the future management and development of the forest resources including forest management, wildlife habitat development, recreational opportunities and the overall protection of the forest. The remaining 75% goes to the Division of Forestry to help fund the State's Forest Fire Protection Program unless a forest fire emergency dictates all revenue be used to offset that expense

ECONOMICS

The improved recreational area of the forest, operated by the Parks and Recreation Section of the Division of Natural Resources, operates at a loss, less than 50% self sufficient. Total revenue from, camp site rentals, firewood sales and picnic shelter fees in 2004 came to $130,648. The operating and personnel costs to operate this facility in 2004 came to $290,130 (an annual deficit).

Recent costs to inventory, prepare a prescription, conduct and supervise a timber sale have been approximately 1/5 of the generated revenue. This does not include the value in physical developments that are created on the forest as a result of a sale such as roads created, culverts and bridges, gravel, planting and seeding of wildlife areas and trails established. On Coopers Rock State Forest more than $64,000 in capital improvements has been created as a result of timber sales. In excess of $90,000 of forest products have been sold from Coopers Rock State Forest from 1978 to 1989. These forest products would be worth more than $300,000 in today’s markets. The costs of the capital improvements are paid by the timber buyer at the time of harvest.

RECREATION

The improved recreation area is managed by the DNR Parks & Recreation Section and is delineated on the map and the boundaries marked on the ground. There will be no Silvicultural practices performed by the Division of Forestry, on Coopers Rock State Forest, within the improved recreation areas, including the overlook and managed view shed, or Rock City.

A recreation plan is in the proposal stages for Coopers Rock State Forest. This plan will be based on current uses, determined needs and public input. This plan will be prepared by the Division of Forestry with input from recreation professionals and the DNR Parks & Recreation and Wildlife Resources Sections.
Each comment received during the comment period and the public meeting on the Draft Forest Resources Management Plan for Coopers Rock State Forest (CRSF) was reviewed to identify specific issues and concerns. This document is a summary of these comments as received. Comments are grouped by issue; following each comment is a response from the West Virginia Division of Forestry (DOF) or other experts on the particular subject.

ECONOMICS

“Climbers pump millions of dollars into the local economy surrounding CRSF. A misguided management plan that doesn’t consider recreational uses of the forest could put an end to Cooper’s Rock popularity and hurt the local economy.”

It is not disputed that climbers add money to the local economy, however determining the actual monetary impact can be difficult. The DOF is moving forward with developing a Recreation Plan for CRSF which hopefully will alleviate these concerns. No timber harvesting is planned around popular rock climbing areas outside of the Improved Recreation Areas (i.e. Roof Rocks). Within the Improved Recreation Areas (where most of the popular climbing areas are located), no timber harvesting prescriptions will be applied.

“As a trained urban/regional economist, I would be shocked if a full evaluation of Coopers Rock State Forest did not indicate that the best management plan would be to preserve [the] forest in close to its natural statement with some enhancements to promote a better outdoor recreational experience. West Virginia has plenty of harvestable forest land, but does not have anything to match Coopers Rock State Forest. From an economic standpoint, I believe that its preservation would be beneficial for local [sic] the local area as well as for the State of West Virginia.”

Currently the DOF is managing CRSF under a multiple use plan. Multiple use means that more than one forest use may occur on the same area at the same time. These uses are approached in such a way that compatibility is maintained. Timber harvests that occur on State Forests are prescribed to meet multiple objectives. The intent is for them to first be economically viable, and then to achieve the goals identified in the prescription. Some of the objectives of timber management are to enhance wildlife habitat, improve the health and vigor of the forest, increase stand diversity, provide a model of good forest management to private landowners, and create opportunities for outdoor recreation. Many of the most popular climbing areas on CRSF are already within the Department of Natural Resources (DNR) improved recreation areas and are off limits to timber harvesting. A recreation plan, based on current uses and determined needs will be developed by the DOF in cooperation with recreation professionals and made an addendum to this plan.
“Take no action under the current draft plan (especially, no road-building or timber sales) until data have been gathered on recreational use and economic impacts, and the plan substantially modified by an agency with competence in this area (DOF has basically acknowledged that they do not have the competence to undertake this).”

The DOF is contracting with recreation professionals to develop a Recreation Plan for CRSF which will be an addendum to the Forest Resources Management Plan. This Recreation Plan addendum will be consulted when developing specific forest management prescriptions.

“Pending proper data and a substantially modified plan, DOF and DNR should proceed with management under the working hypothesis that recreation is the most valuable of the multiple uses of the Forest – which I am confident that a proper analysis would confirm.”

The figures below were provided by the WV DNR Parks & Recreation Section.

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<thead>
<tr>
<th>Year</th>
<th>Operating Revenue</th>
<th>Operating Expenses</th>
<th>Net Operating Loss</th>
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<td>$294,342</td>
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</table>

Timber Sale Values

| Total volume sold from CRSF | 2,187,620 board feet |
| Value at time of sale (last sale 1989) | $91,722.49 |
| Value of same volume of timber in today’s dollars | $328,141.75* |

*(this represents conservative figures in a market with oak prices lower than normal)
ENDANGERED SPECIES

“I strongly support the work that is being done to research and protect the endangered and threatened species on the forest and surrounding lands.”

Thank you.

“At your public meeting, you mentioned that your agency is working with the US Fish & Wildlife Service on a Safe Harbor Agreement (SHA) for the threatened Cheat 3-Tooth Snail. This important fact was not mentioned in your Draft Plan. A full disclosure of this process, including why the DOF is pursuing a SHA rather than a Habitat Conservation Plan, what this Agreement will mean for people who recreate on or around the rocks, and an expected time line, should be included in your Final Plan.”

“The DOF mentioned they were working on a SHA with the US Fish & Wildlife Service with regard to the threatened snail at Coopers Rock during their public meeting, yet made no mention of this in the Draft Plan. Full disclosure of their plans on this must be included in the Final Plan.”

The SHA will be addressed in the final plan. All known specifics will be disclosed.

“A SHA under the Endangered Species Act was mentioned at your public hearing; however, there was no mention of this in your Draft Plan. Are you seeking such an agreement with the US Fish & Wildlife Service for the Cheat 3-Tooth Land Snail [sic] at Coopers Rock? If so, the public, the owners of this land, deserve a full and thorough disclosure about this in your Final Plan, and what it may mean for recreation in rocky areas throughout the Forest as well as the pathways and associated views experience when traveling to such areas.”

“While the draft management plan provides a discussion of these species, there is no plan of action laid out to provide protection for each species. The presence of the threatened flat-spired three-toothed land snail on CRSF is noted in the draft management plan. Other than past actions, no specific actions are discussed in the plan that would provide protection for this species. In the written plan, there are no discussions of habitat buffer zones, habitat conservation plans, or SHAs. It was not until the September 13th public hearing that the public is informed the WV DOF is engaged in discussions with the U.S. Fish and Wildlife Service about a SHA for the snail, the WV DOF is working with other agencies to protect the snail, and that the special value areas map refers to forested areas set aside for snail habitat. All these actions and considerations to protect the flat-spired three-toothed land snail should be fully described in the draft plan.”

“The plan must be more specific as to how the aesthetic and, especially, the ecological values (including threatened and endangered species) will be preserved.”
The SHA project was entered into, with the DNR Wildlife Resources Section and the US Fish & Wildlife Service in the summer of 2001. When the grant was received for this work, a news release announcing this project was published in the Charleston Gazette (9/29/01), and the Charleston Daily Mail (9/29/01). This SHA is still in development and all conservation measures will be fully addressed in the agreement. This document will be an addendum to the Forest Resources Management Plan for CRSF. A public meeting and comment period will also be held as part of the SHA process.

“...what size buffer zones will you place around snail habitat, and around potential or likely snail habitat?”

Currently, the planned buffer areas are to be 300 feet around known snail habitat. As the SHA with the US Fish & Wildlife Service is developed, we will know more about providing adequate buffers for potential snail habitat.

“What buffer zone size will DOF place around known snail habitat (Cheat 3-tooth) and around likely, potential snail habitat?”

Not enough is currently known about snail travel patterns to accurately address potential habitat issues. As more is learned through studies and research on the snail, along with any guidelines contained in the SHA, new information will be added to the plan addendum.

“What is the buffer width given snail habitat and why?”

300 feet. This meets the needs of certain salamanders (more studies have been done on salamanders) that have the same habitat requirements of these snails.

“Are there maps of where the endangered species are on the forests? Do you have prohibition of road building in the areas where the snails are?”

Yes, there are maps of where the threatened species, the flat-spired, three-toothed land snail, is known to exist on the Forest. There are no known endangered species present on the Forest. Roads will not be built where snails are known to exist. The SHA, when completed, should more fully address road building in snail habitat.

“People visit CRSF, impacting the region economically in a very puritive (??) way and with large magnitude of effect, for the diversity of wildlife, why not specify buffer zones for endangered and threatened species habitats, both know habitats and viable habitats.”

There are no known endangered species present on CRSF. Buffer zones have been specified for the known threatened species on the Forest, and should be addressed for potential habitat in the SHA. As more knowledge is gained about the snail, future specifications will be implemented.
“Why doesn’t the written plan even mention the special value areas map in reference to set aside areas for the flat-spired three-toothed land snail?”

The Special Value Areas map doesn’t contain direct references to the snail because it was deemed undesirable by the DNR wildlife biologists for the public to know exactly where the snail is located to prevent people from disturbing it and its habitat.

RECREATION PLAN

“I think it is obvious that a recreation management plan is necessary and you should transmit this request to DNR Parks and Recreation. I would suggest that they consider a recreation user-fee to pay for the plan. If there are 250,000 visitors/year and each paid $1 to use the forest, you could fund the plan and many improvements to the recreational areas.”

There would have to be additional infrastructure put in place to collect these fees which would take up much of the money collected, if the fees were nominal. Fees could also potentially reduce visitors of poorer socioeconomic classes. It would also take an act of the State Legislature to charge fees for usage on State Forests. The DOF is currently working toward contracting with recreational professionals to collect data and provide recreational recommendations.

“One request as a climber is that timber not be cut within 300 feet of rocky areas.”

The majority of heavily used rock climbing areas on CRSF is contained in the Improved Recreation Areas or the Managed View shed, neither of which is prescribed for timber management activities. Other areas used for rock climbing are generally inaccessible or otherwise not conducive for timber harvests. Rocky areas which are known snail habitat will also be given a buffer.

“The number of people who use Coopers Rock for recreation is quite large. Because of this the forest is more like a State Park than other State Forests. Recreation planning needs to be equal in the planning process. As the current draft plan includes forest practices that will impact recreation, this plan should be delayed until it includes a proper recreation component.

The current draft plan will not negatively impact recreation on the Forest. The DOF is moving forward with the development of a Recreation Plan for CRSF.

“Given that Coopers Rock State Forest is as much a park as a forest, it is imperative that a plan be developed for the management of the recreational resource, one of the most valuable resources the park has to offer.”

CRSF is a State Forest and according to State Code, must be managed for multiple uses. As an example, many hunters are able to use CRSF because hunting is allowed in State Forests, but not in State Parks.
“I request that the draft forest plan remain unapproved until a recreational plan is developed and integrated into the whole forest plan. It is clear that many members of the public recognize the importance of recreation at CRSF.”

“CRSF is one of the most heavily utilized state forests for recreation in West Virginia. As such, it provides an important quality of life and tourist attraction for the local economies of north central West Virginia. Despite being arguably the dominant use of CRSF, recreation is currently allocated less than one page of the draft management plan. As is stated in this plan, it would be beneficial if there was a recreation plan on CRSF. Recreational planning, however, can not be conducted in isolation of a forest resources plan. Nor can a forest resources plan be presented and put forth without a recreation plan and can not serve as a blueprint for future management of CRSF without fully incorporating recreational uses of the forest into forest management.”

“The WV DOF should work with the DNR Parks and Recreation Section to jointly put together a recreation plan....Such a plan should consider both current and potential future recreational uses of CRSF in the management of forest resources on CRSF.”

“The CRSF Forest Resources Management Plan needs to explicitly take into consideration the potential impacts from timbering harvesting on recreational use of CRSF within the commercial forested area of CRSF.”

“...the WV DOF should devote adequate planning resources to all uses of state forests in order to comply with its multiple-use mandate. Clearly, the draft management plan for CRSF, the 1st or 2nd most visited state forest for recreation, represents an inadequate amount of planning for recreation on CRSF and should be substantially revised before being implemented. Revisions of the draft management plan that include planning for recreation and for rare plus threatened species should take priority over the 120 day implementation limit as described in the Guidelines for Managing West Virginia’s Nine State Forests.”

“As a recreational user of Cooper’s Rock, I am concerned about the lack of consideration given to recreational use by the West Virginia Division of Forestry in the plan.”

“I am troubled by the Coopers Rock State Forest Resources Plan, as it seems to neglect the recreational use of the park.”

“Please commission a thorough scientific study of the recreational uses of Coopers Rock State Forest before the Resources Plan is finalized. Among other things, the study should determine the views of hikers, skiers, mountain bikers and other park users regarding the desirability of roads and logging within the forest.”

“I believe it is extremely important to include recreation to a greater degree in the Forest Plan than in the current draft plan.”
The DOF is moving forward with the development of the Recreation Plan for CRSF which will address these issues.

“Given recent history at Cooper’s Rock, including strong opposition to development that would detract from the outdoor experience, heavy and growing use of the forest for recreational use, enough interest to form and sustain interest in the Coopers Rock Foundation – an organization devoted to protection of the forest and enhancement for outdoor recreational experience, a state-assisted purchase of more land near the overlook, how could the agency in charge of the forest dismiss recreational use in its draft management plan. How can they make a management plan for the forest while ignoring what has clearly been its most important and valued use?”

The plan that was developed is a forest resources management plan that addresses the improvement of the forest resources for multiple benefits. A healthy forest will create recreational opportunities, as well as a wide a variety for other uses of the forest. As specific management prescriptions are developed, recreational and all other impacts will be considered. The land purchased by the State is across the Cheat River from the overlook and is contained in the Snake Hill Wildlife Management Area.

“I have learned that the Division of Forestry is currently preparing a new 10-year plan and I have been advised, although have not actually seen the plan, that the document does not address in any significant way the recreational value of the state forest. I urge the Division of Forestry to remedy this situation and consider the forest as a recreational resource, as well as a timber resource.”

Public input and review is very important when developing long range plans for public owned resources. But it is the public’s responsibility to be fully informed when asking questions or providing input. Based on the comments that we have received, the DOF is in the process of contracting with recreational resource professionals to develop a recreation plan addendum for CRSF.

“...and don’t take action on the Forest Plan until studies are completed on the impact of foresting [sic] plans on recreation. Recreation needs to be a pivotal consideration in the plan.”

Part of the proposed Recreation Plan will be conducting studies/surveys on Forest user activities and location of activities to reduce conflicts with forest management activities occurring on the Forest.

“It is exceedingly distressing that you have not bothered to take into account the views of the thousands of people like me who use the park before completing your forest management plan. You are mandated to create a plan for multiple use, including recreational use. CRSF is as much about people as it is about trees.”
The plan presented is a draft that can be revised based upon public comments received during the comment period. Recreational considerations are included in this plan. Current recreational uses have not been limited by this plan. Forest aesthetics is one of the primary reasons people visit CRSF. The practice of multiple-use planning is finding a way for trees and people to co-exist in an amiable manner.

“The dominate use of the forest is currently recreational. The most pressing need is to accommodate this dominant use.”

Given that timber harvesting only occurs at prescribed intervals and not on a continual basis, it may be hard to conceive any dominant use of CRSF other than recreational. However, that doesn’t mean that one use should supersede all the others. Multiple use management is finding a balance between the many uses of the forest.

“I believe the plan neglects the recreational aspects and the economic impact of recreational activity, focusing almost exclusively on forest products.”

The plan presented was a Draft Forest Resources Management Plan. A public meeting was held to solicit comments from the public, and due to overwhelming responses, the DOF is currently moving forward on the development of a Recreation Plan for the Forest.

“According to the plan, the timber value since 1978 has been under $100,000. Yet I understand that there are something like 250,000 visitors each year to the park. Calculating the estimated value of recreation at just $5 per visit (the value derived by recreational users, not actual dollars spent in the park - since I don’t have such figures), that would mean $1.25 million in value. So, maybe this $1.25 million is value only to the visitor, but remember that these visitors stay in hotels and camp grounds, buy clothes and souvenirs and eat at restaurants. That would be lot’s more than $5 per person.”

“I am advised that over a quarter of a million people visit CRSF per year. If we assume that the value of a visit per person is worth only a dollar, we have an annual recreational value of a quarter of a million dollars. I am advised that the total value of all the timber sales at Coopers Rock since 1978 has only been $90,528. This disparity demonstrates the significant recreational value of the forest as compared to its value as a timber resource. While I am not suggesting that Coopers Rock be managed as a State Park, it is essential that we look at the forest as a recreational resource.”

This proves that multiple use management does work. These timber sales returned $90,000 (not in today’s dollars, see page 3) to tax payers and provided recreation at the same time. Areas such as Scott’s Run Timber Harvest Area were harvested and the road system developed during this sale is now used
regularly for biking and hiking. This road system is an example of a capital improvement, from a timber sale, which recreationalists use on a regular basis. Areas of the forest that have received Silvicultural prescriptions are in better condition, more productive and provide numerous benefits to wildlife.

“The Plan appears to be very vague on how the WVDOF would accommodate the many people of this area who enjoy using Coopers Rock for their recreational activities.”

“Since Monongalia County does not have a state Park, our people consider Coopers Rock to be our “Park” and we appreciate its presence here. This is why it is so important that provisions for the extensive recreational use of Coopers Rock be an important part of your Master Plan.”

Please remember, Coopers Rock is a State Forest. Forest management activities will not necessarily inhibit recreational opportunities on the Forest. The DOF is currently moving forward on developing a CRSF Recreation Plan.

“By now you have heard plenty about your 53-page Draft Plan containing only one page on recreation. The DOF may not be able or suited to doing this kind of planning, but, using the Mononghela National Forest planning system as a model, your plans need to be integrated into a larger plan which takes recreation into account as a primary factor, not just a side light.”

The DOF does not manage State property the same way the United States Forest Service (USFS) manages Federal property, nor do we have the same staffing or funding levels. Therefore, we must work with the State’s resources to develop the best plan to address the multiple uses of the Forest. When completed, the CRSF Recreation Plan will be an addendum to the CRSF Forest Resources Management Plan.

“There are many uses of Coopers Rock, but it is apparent to even the casual observer that the most important use is recreational.”

CRSF is as valuable for forestry as it is for recreation. Because CRSF is near a high population center and is easily accessible, it provides opportunities for forestry demonstration to non-industrial private forestland (NIPF) owners who live in the State as well as educational opportunities for school children. With additional Silvicultural practices and expanded educational interpretation, even more residents can benefit from the increased research and varied demonstration areas which can be showcased on this State Forest.

“Recreation provides wider economic benefit to the region, besides its direct value to the users of the Forest. Out of state visitors to Coopers Rock eat in local restaurants, shop in local stores, stay in local hotels. Many professionals in Morgantown (myself included) settled here in part because of the recreational amenities at Coopers Rock State Forest. It is widely acknowledged in the economic development literature that high-tech, information based, high-wage industry located where it can attract an
educated workforce, and that educated workers locate where they can find amenities. My department uses Coopers Rock as a recruiting tool to help attract quality people to Morgantown.”

CRSF will continue to provide these amenities to visitors and residents of West Virginia. The current 10-year forest resources management plan provides a base to strike a balance between all of the forest resource benefits.

“Within the current Plan, in several places you state that any management prescriptions will be managed with “sensitivity” to recreational needs. (For examples, see pages 5 and 22 of the Plan). This is not especially reassuring, since you have not gathered any information about recreational needs or wants, you cite no data or methodology to determining the impacts of prescriptions on recreational users, and you have no professional expertise in the area of recreation. You need to back up these assurances with more specifics as to buffer area widths, specific practices you will use, and commitments to aggressively solicit input from recreational users and experts prior to making management prescriptions. My skepticism of your sensitivity to the needs of recreation increases when I read your blanket statements in this regard, such as on page 22:

...Sometimes the roads built to service management activities can enhance recreational use; sometimes they are detrimental. My point is that, since recreation is the primary and most valuable use of the forest, its needs should also be considered early on and specifically whenever you are contemplating a management prescription. You simply can not assume that whatever you do will enhance recreation. It may, and it may not. You have not set forth methods or criteria to judge.”

Recreational use will be an important consideration in managing the Forest, but it cannot be the only consideration. Recreational uses can vary greatly from hiking and biking to bird watching and hunting. Each of these activities may require different forest attributes. What one person may see as detrimental to recreation, another may see as an improvement. Additional early-successional habitat could be seen as an improvement by grouse hunters, for example. Buffers to trails and other areas used for recreation are listed in the “Guidelines for Managing West Virginia’s Nine State Forests”. As each prescription is developed, a public tour, followed by a public comment period will occur. More details regarding specific actions to reduce negative impacts to recreation will be addressed at that time. This will also be the time for the public to provide input regarding issues they feel were not adequately addressed. A recreation plan will be prepared as an addendum to this plan, which will be based on current uses, determined needs and public input.

“As to vision, I looked in vain for a clear statement of your objectives in managing the forest. You taught me yourself that management techniques depend on whether the objective is aesthetics, maximizing the value of wood products, wildlife, recreation, or something else. What are you trying to maximize? My opinion is that aesthetics should be the first concern, as that is the prime consideration for recreational users. But you never state
a vision of what you are trying to do with the forest, other than some vague statements about forest vigor and health and multiple use. I believe that, at a minimum, the Plan needs to have a clear statement of management objectives that will have sharp consequences. Only then can the public give you useful comments and criticisms.”

State Forest Management objectives for all State Forests are identified in the State Forest Guidelines. See the “Guidelines for Managing West Virginia’s Nine State Forests”; section IV, Desired Future Conditions, starting on page 5, section VI Prescriptions, starting on page 8 and section III Policy, part B, Public Input on State Forest Management Prescriptions. The guidelines are available on the DOF website at www.wvforestry.com, and are in the Appendix of the CRSF draft plan and will be included in the final plan. mailto:apdick@mail.wvnet.edu.

“As you know, recreation is the number one use of Coopers Rock State Forest, with recreation of all types occurring forest-wide throughout all four seasons. We are surprised that your Draft Plan included but one page addressing recreation. Though we recognize that a recreation plan is beyond the scope of your responsibilities as an agency, we feel that the impacts of forest treatments on recreation is definitely within your purview. Recreation at CRSF is not limited to the developed recreation areas such as the Overlook and picnic areas, nor is it constrained to just the trails. It occurs forest-wide, and comprehensive planning should give significantly more consideration to the spectrum of recreational practices at Coopers Rock than just 1 page. We believe that your planning process should halt, and that no final decisions be made on your proposed Draft Plan, until recreation is thoroughly integrated into the planning process as a full partner, not just a plate dressing. It, and the public it serves, deserves equal time.”

The DOF is currently moving forward on developing a CRSF Recreation Plan.

“...I support expanding the recreational opportunities at Coopers Rock State Forest, expanding and protecting wildlife habitat, and integrating hiking and biking trails from Morgantown to lake-side parks and Coopers Rock State Park [sic].”

“Considering that timber is hardly a scarce resource in our state, but public lands occupy only a small fraction of our land base, public outdoor recreation clearly should have taken precedence over timber harvesting in this management plan. Not only did recreation not take precedence, the Draft Plan for CRSF actually omits an outdoor recreation plan.”

Timber is not scarce, but areas that demonstrate good forest management are. Private land owners control approximately 10 million acres of forest land in WV, a huge resource, but we have only about 70,000 acres of State Forest land in which to provide a model of good forest resource management for those landowners.
“Two large public surveys have been done for CRSF, the first with the involvement of all managing agencies. Neither were mentioned in the background for this plan, and they should be. Nearly 700 responses were received in 1989 and over 800 in 2000 showing an overwhelming public interest in outdoor recreation at CRSF, not timber production! In fact, the vast [sic] majority of respondents wanted the naturalness and quiet at CRSF protected, and opposed commercial development there. They also wanted attention paid to outdoor recreation on the forest, such as expansion of trails. That the DOF would come to Morgantown with only a Draft timber plan for CRSF (and a wildlife section promoting timbering) was extremely disappointing. This lack of attention to, and respect of, the long-standing and well-documented public interest for this public-owned land demonstrates to me a serious problem in CRSF management. It calls into question whether DOF is the most appropriate agency to manage this Forest.”

The survey conducted in 1989 and published in 1992, was developed with State agency input, but this data is dated. The survey conducted in 2000, however, was prepared and distributed without time for proper input from State agencies. There is also a question whether these surveys were statistically sound since they were not randomly conducted. Therefore, the results were not included in the report. However, the proposed recreation plan will include data from a survey that will be based on current uses, determined needs and public input, determined by unbiased scientifically based procedures.

“My primary comment is that this draft plan for CRSF be shelved until a recreation plan can be developed and integrated into the timber and wildlife plans. Furthermore, the language in this plan should give much more emphasis to joint management of this forest with the WV DNR Parks and Recreation Section who, in view of the public’s interests in this state forest, should have at least as much influence over management activities at CRSF as the DOF. They certainly should have partial management authority for the entire CRSF land base, not just the few hundred acres around the overlook.”

The management of WV State Forests is mandated by statute to the DOF. Management input is continually sought from the other agencies, both DNR Wildlife Resources, and Parks & Recreation Sections. Any change in management responsibility would have to be approved by the State Legislature.

“It is obvious that you and your planners have gone the proverbial extra mile to try to include all parties in the planning process for the Coopers Rock State Forest Plan. There are those that seem to think that Coopers Rock should be managed as a park and not as a multiple use forest as mandated by statute. I definitely support the plan as presented. It is important that the state forests are managed scientifically and ecologically for all users and should be used as a model for multiple use management for private landowners.”
“The West Virginia Legislature established the state forests in West Virginia to demonstrate good forest management to the public. West Virginia state forests only represent a tiny percentage of the total 12 million acres of forested lands throughout West Virginia and should be continued to be managed as multiple-use forests to insure the health and vitality of this renewable resource. Proper forest management with a good harvesting program minimizes the potential for forest fires and also creates a cash stream to provide funds to create recreational opportunities, wildlife habitat, improved water quality and fight forest fires.”

“You correctly recognize the importance of recreational use of the forest. Were it not for that reality, we submit that the forest could support significantly higher production of commodity forest products. While we might prefer to see more focus on demonstration of the forest’s ability to yield higher volumes of valuable products we concede that the plan legitimately contemplates a balance with non-consumptive uses.”

“There is much public land exclusively or predominantly dedicated to recreational use. We therefore caution that although every parcel of public land will attract a constituency that advocates for its particular interests, the mere emergence of vocal advocates should not be allowed to subvert the responsibility of government to ensure that the broadest possible array of benefits accrues to the larger society; not merely those who are vocal in their demands.”

*Thank you, the above comments will be taken into consideration.*

“Are there plans to expand Recreational Areas – with this being #1 or 2 forest visited there is a huge need to expand these areas.”

*The improved recreation area of the forest is managed by the DNR, Parks & Recreation Section. This draft plan is for Forest Resources Management. Specific plans for the recreation area will need to be addressed by the WV DNR; however we hope to collect data on the improved recreation area needs during the preparation of the recreation plan.*

“If there is overuse in certain areas, why not include a plan for amplifying recreational use in undeveloped areas, especially since this is part of the mission contained in the code 19-1A-1.”

*Some people want areas left “wild” while others want recreational access to certain areas. A comprehensive forest management plan will ensure continued and new access to areas which will expand the recreational land base for the common forest user. While preparing the recreation plan, data will be collected and public input sought, to help better determine the uses and needs for CRSF.*

“Who is going to talk to us in depth about recreation use and planning, history and future at Coopers Rock?”
“The principles and statutory requirement for Multiple Use management allow flexibility for you to set objectives flexibly, based upon the preferences of the users and owners of the Forest. Obviously, it is appropriate to consider all management objectives, but the weights attributed to them should reflect their relative value to users. Any Plan for the south side of Coopers Rock should begin with, and center around, an inventory of recreational use and needs and a vision of the future of the recreational resource.”

“Why is there not a comprehensive recreation plan included with the logging and wildlife plans? (Pg. 5) What would it take to obtain such a document – how can citizens advocate for inclusion of a recreation plan (i.e. who can we contact to urge creation of this). Why does the plan not address in more detail resolution of potential or real conflicts between logging & recreational uses of the forest?”

“Outdoor Recreation is specifically mandated in state code but is given only 1/53 pages is dedicated to recreation. It’s clear that recreation is not being addressed in this 10 year plan – Don’t you think this should be addressed.”

“How can you submit a draft management plan for Coopers Rock without a comprehensive recreation plan integrated with logging and wildlife plans? Who in WV State government is qualified to do a recreation plan, since DOF is not?”

“CRSF has great value in outdoor recreation, yet no provision is made for a recreational plan. A recreational plan must go hand in glove with a forestry plan. Please extend the public comment period and delay the implementation of the forestry plan until the “whole picture” is drawn.”

“In what manner do you propose to include information about the recreational use in the forest? Why have you not included the wishes of the 250,000 people who use the park each year?”

“Why isn’t a recreational use plan being drafted in conjunction with the forest resources mgt. plan? Why isn’t the WV DOF working in conjunction with the WV DNR to draft a recreation plan?”

The DOF is currently moving forward to develop a CRSF Recreation Plan, with help from recreation professionals. It will include input from DNR Parks & Recreation Section and the public. This plan will include an inventory of recreational activities on the Forest and determine additional needs.

“The draft plan, while comprehensive, includes far too little on recreation + the impact of timbering on recreation in the forest.”

The public’s view of different forest management practices varies greatly and therefore is difficult to quantify. Timber harvesting can promote increased recreational use by creating new access corridors for the average user and improve wildlife habitat and species populations for the many hunters and bird watchers who use the Forest.
“The DNR Parks + Recreation needs to be included in planning for the forest. It seems as if these two entities should communicate about this very important issue.”

DNR Parks and Recreation has provided input on this plan and will continue to do so. As prescriptions are developed for specific areas both DNR Wildlife Resources and Parks & Recreation Sections provide input to the prescription. Their suggestions are incorporated prior to the public tour and comment period.

“What do you say to those of us who were left out of this plan, i.e. hikers, bikers, picnickers, climbers, and other outdoor recreationists?”

As presented, the current draft plan does nothing to limit any current uses on CRSF. A recreation plan is in the proposal stage and may provide the considerations you are requesting. The Guidelines for Managing West Virginia’s Nine State Forests provide for buffers and no harvest areas in the most heavily used recreation areas.

“I realize that DOF does not have the Recreation expertise to do a Rec. Plan but why would they not have commissioned one to be included since so many people use the forest for rec.”

Due to public concerns, funding will be designated and a recreation plan is in the proposal stage to be made an addendum to this plan, it will be based on current uses, determined needs and public input.

“What specific actions have you taken to determine the recreational needs and desires of the users of CRSF?”

A recreation plan is in the proposal stage to be made an addendum to this plan; it will be based on current uses, determined needs and public input.

“Recreation is specified in WV Div. Of Forestry mandate of management scope. Why not address how recreational use would require consideration in any logging campaign or contract?”

These issues will be considered when a specific prescription is developed, which would include a public tour and comment period.

“What is your vision of recreational resources and opportunities at CRSF?”

The following excerpts from the Guidelines state the vision for all state forests.

“The mission of the W.Va. Division of Forestry is to protect and manage all West Virginia forest land resources through partnerships emphasizing a stewardship ethic. Forests provide a multitude of benefits and are a source of emotional, spiritual, and financial well-being for the population in general. These benefits have tangible and intangible values. It has been said that the quality of life for modern man is in direct proportion to the health, quality and abundance of the forest resource.”
The Division's goal is to meet the needs of the present without compromising the future. It is through public involvement, interagency cooperation, the practice of Silvicultural, and the implementation of a natural resources stewardship ethic that the Division of Forestry satisfies its legislative mandate (see page 15 of these Guidelines) to serve the many needs of various user interests.

II. GOALS
Based on the aforementioned mission, the following are the goals for State Forest resource management:

1. Manage the forest ecosystem and its resources such as clean water, aesthetics, wildlife, soils, and recreation through a planning system which involves interagency cooperation and public involvement.

2. Provide abundant and diverse wildlife habitat.

3. Provide intensive and extensive recreational opportunities commensurate with the resource base.

4. Provide multiple forest resource products.

5. Demonstrate sound forest resource management practices so as to sustain and improve the overall health, productivity, and quality of the forest resources.

6. Protect, maintain, and actively manage environments for rare, threatened, and endangered species of flora and fauna.

7. Provide areas for research for the management of forest-based resources. (The most intensive forest research is conducted on the 7,500 acre University Forest, the northern portion of CRSF).

8. Protect the forest resource from fire, insects and disease, and other destructive influences so as to maintain the overall health of the forest.

9. Demonstrate sound forestry concepts through public education.

FOREST ECOLOGY

“I hope this letter and others like it are seen as what the public feels the future of Coopers Rock State Forest should be like and that is to keep it [sic] as close to the current state of the forest as possible, or even let the area mature into an older type of forest with a developed understory which would attract more people for ecological purposes. It truly is a great place for local and visiting people to experience the Wild & Wonderful in West Virginia.”
Under current Forest conditions, an underscore will most likely never develop due to lack of sunlight reaching the forest floor and interference from competing vegetation. Forest management practices are needed to maintain a healthy, vigorous, and diverse forest. Certain wildlife species benefit from a mature forest environment, but most species need a range of forest environments, from early successional to mature, to thrive.

“The next step in rocky habitat restoration, in my opinion, is to transplant oak seedlings and saplings from unmanaged sections of the Forest, such as along power line borders and close to I-68, into these areas to actively regenerate the forest among the rocks.”

If natural regeneration isn’t working in these areas, planting trees probably won’t work. Transplanting trees is a tough proposition. First, most if not all, of the root system must remain intact. A sapling sized oak may have a root system that is as large as the above ground tree. A hole big enough for the root system must be dug which may necessitate the use of mechanical equipment. Soils in these rocky areas are usually thin, hence why the natural trees are susceptible to damage from over-use. Also the transplanted trees need sunlight to survive, which, if provided, could have potential negative impact on snail habitat. The most practical way to re-vegetate rocky areas is to restrict human use and allow natural regeneration to take place. Once damage is done in any fragile habitat, it is not an easy or short-term proposition to restore it under any circumstances.

“What is the DOF’s definition of forest health?”

The DOF’s definition of forest health can be found in the “Guidelines for Managing WV’s State Forests” in the glossary on page 29. Our definition is as follows. “Forest can be considered healthy when there is a balance between growth and mortality and the forest has the resiliency to react and overcome various forest impacts. Potential forest stressors include, insects, pathogens, weather, climate, pollution and others.”

“Do you distinguish between healthy trees and a healthy forest?”

Yes, see previous response.

“What do residual trees show about fire history at CRSF?”

Since most of the trees currently present in the forest setting at CRSF grew up following the periods of high fire occurrence, little knowledge can be gained by examining them because fire has essentially been eliminated from the Forest for the last 70 years. A few isolated, larger trees do show signs of fire damage, as do old tree remnants, such as chestnut and oak stumps. More is known about the fire history on CRSF from historical accounts than from examining the trees currently present. The species of trees currently on CRSF indicate that the dry slopes and ridges burned frequently enough to allow oak species to become established. The thinner bark species were primarily in the moist areas that would not burn as hot or as readily. Some sites are occupied by pioneer species, such as a nearly pure stand of sassafras, which indicate a hot fire that would have killed the trees previously occupying that site.
“Will you use prescribed burns to improve advance regeneration of oaks?”

The DOF has no current plans for prescribed burns for oak regeneration on CRSF.

“Is protection from fire still a sound management practice? Has fire been a part of the ecology of this forest?”

Fire has helped to shape the present forest. Historical references to human-caused fires exist, especially during the early part of the last century. Today, researchers have developed other methods to mimic the effects of fire on forest ecology and these would create less of a safety and health impact to the surrounding communities. One of the effects that fire had on CRSF is the high composition of oak species currently present on the Forest.

“I’m a frequent hiker at CRSF, and am concerned that CRSF has extremely valuable wild areas which need to be considered off limits for logging. Nature has a natural succession and ways of adapting and finding a balance without our intervention. We don’t need more roads to access the eastern part of the forest for logging. WV needs a new class of wild area like PA has in its State Forests.”

Pennsylvania has over 2.1 million acres of State Forest, representing 12% of the forested area in the State. With that many acres of forest, PA is in the unique position of being able to set aside areas for these special uses. WV has only approximately 70,000 acres in our State Forest System. WV State Forests were developed primarily to demonstrate sound forest management for private landowners. Special value areas are currently the mechanism used to set aside unique areas on our State Forests. The WV State Park system contains approximately 80,000 acres where commercial timber harvests are not allowed. Portions of these areas could be regarded as wilderness, with the potential to provide an experience similar to “Wild” areas in PA.

INVASIVE PLANT SPECIES

“All non-native invasive species within any wildlife opening in which management has been proposed should be completely removed, especially Autumn Olive.”

“...Autumn Olive and other non-native invasive species should be removed from Wildlife Openings #’s 5, 6, 20 and 21, as these are close to rocky habitat, and that is valuable habitat that should stay as intact as possible without any non-natives infringing on the plant/animal community among the rocks.”
The autumn olive planted in the wildlife openings is an invasive species, but due to the closed canopy of the forest surrounding these areas, this plant is not invading the forest at this time. The cover and food that is provided to wildlife by these shrubs is currently more of a benefit than a detriment. We will continue to monitor the surrounding areas and watch for the establishment of autumn olive beyond the wildlife openings. Native shrubs will be considered for any new planting for this type of habitat enhancement in the future.

“Why are the invasive olives in the wildlife openings not mentioned as non-native invasive?”

The autumn olive on the forest is non-native, but is currently not invasive on the forest. If we were in an agricultural setting, with more open ground (not under a forest canopy), then it would be considered an invasive.

**BUFFER ZONES**

“All rocky areas, snail habitat or not, should have large buffer zones around them, as the rocks of Coopers Rock provide habitat, aesthetics, and recreation – multiple layers of values – and should be treated as such.”

“All rocky areas at Coopers Rock need permanent big buffer zones, larger than the 100' allotted to official trails and perennial streams. Rocky areas are layered with multiple values, from aesthetics to recreation to, of course, habitat. We don’t have this type of rocky terrain within a forest on public land everywhere – it should be protected from resource extraction, renewable or not, anywhere on CRSF lands. Whether rocky areas have snails or not, they need big buffer zones.”

“Because they are integral to the aura of Coopers Rock for so many reasons, we believe there should be large buffer zones around all rocky areas, forest wide. We know the US Fish & Wildlife Service will be recommending no-cut buffer zone sizes for known habitat. We also believe these buffer zones should be followed for likely, potential snail habitat as well. Rocky areas, even those without this threatened snail, should have buffers, due to the other habitat, aesthetic, and recreational values the rocky areas of Coopers Rock uniquely provide. This type of combined habitat/scenery/recreation area does not occur all across the landscape – it is a rare and valuable thing and should be treated as such. We realize that there will be 100' buffers around perennial streams and official trails – buffer zones around rocky areas should be considerable larger.”

The majority of the popular rock climbing areas known to the DOF are contained within the managed view shed area or the overlook improved recreation area, where we have no plans of conducting forest management activities. The other known rock climbing area outside of the managed view shed, Roof Rocks, is not in an area under consideration for forest management activities under the current 10-year plan. Other climbing areas outside of the no management areas will be addressed during the development of future prescriptions that may occur in these areas. Many of the rocky areas contained within CRSF are poor growing sites.
and better left alone. Roads are difficult and expensive to build in rocky areas, further limiting potential forest management activities.

“In your presentation, you mentioned climber impact to rocky areas while displaying an image of some boulderers. Perhaps you are unaware of the organized efforts climbers have made in recent years to mitigate human impact in rocky areas – even those more impacted by non-climbers.”

We are aware of the work some climbers have done to lessen their impact on rocky areas, but they still have an impact on the areas they use. There is continual impact to areas that are being heavily used.

“What determines whether a stream gets the 100 ft. buffer? Do ephemeral streams/tribs count as streams?”

All perennial and intermittent streams will receive the 100 ft. riparian butter zone. Ephemeral streams will receive a 25 foot buffer as prescribed in the publication “Best Management Practices for Controlling Soil Erosion and Sedimentation from Logging Operations in West Virginia”. In addition, all wetlands and other riparian areas within harvesting areas will be protected from soil erosion and sedimentation by use of BMPs or buffer zones.

“What determines whether a road gets the 50 ft. buffer? Just paved roads?”

“Hazardous trees will be cut for a distance of 50 feet on either side of a designated hiking trail or public road and a light selection cutting for the next 100 feet. However, roads and trails created by planned timber harvesting in the working forest are not subject to the establishment of buffer zones during subsequent harvest, as are designated hiking trails established and maintained for recreational purposes alone and specified in the management plans for individual forests. The selection of hazardous trees along trails or other recreational areas will only be at the specific recommendation of the Forest Superintendent.” This is from Chapter 5, section 2a of the “Guidelines for Managing West Virginia’s State Forests”. On CRSF, all of the public roads open to vehicular traffic happen to be paved roads. Official, blazed trails are also subject to the buffer zones.

**PLAN CONTENT**

“... the Plan as currently written is woefully inadequate. It does not set forth a clear and appropriate vision of the future of the Forest, does not state clear management objectives, nor does it present a balance application of the principles of Multiple Use to the realities of Coopers Rock State Forest. It is particularly deficient in four interrelated areas: 1) Consideration of recreation, 2) Vision and objectives, 3) Specificity of plans, and 4) Public input. It believe that the Plan should be withdrawn until it can be incorporated into a more comprehensive plan that considers owners of Coopers Rock: West Virginians, and particularly the residents of North Central West Virginia.”
1) Increased consideration of recreation will be addressed within the recreation plan addendum.  2) The desired future condition of any state forest is listed on page 5 of “Guidelines”  3) Plan specificity will be covered in individual prescriptions for areas as listed in the Management Review Areas section of the plan.  4) The Public will have an opportunity prior to any practice implementation to tour the area, ask questions, and comment on individual prescriptions when they are developed.

“A second major comment involves the presence of massive historical info in the plan, but a total lack of detail on proposed timber management activities, what this plan is supposed to be about. This effectively prohibits the public from commenting on these activities. No information is given on where timbering is to occur, by what methods, what size, how often, and importantly, what roads will be built of what type to take the timber out. Only with this detail included can the public be informed as to just how much commercial development is being planned, and have input into that, which could potentially change the plan. For example, I oppose any further roading or logging in the Scott’s [sic] Run wild area. At the public meeting, we were told that all of these decisions were going to be “shared” with the public when the timber operations had already been planned. The public needs to have input into whether or not timbering should occur in certain places in the first place, not after the trees are marked and roads designed.”

The public will have an opportunity to tour and comment on prescription areas before any trees are marked or roads designed. The prescription is not final until we have public input. Beyond this, the prescription is not implemented until we have the Governor’s permission.

“We have reviewed the Draft Forest Resources Management Plan for Coopers Rock State Forest and agree broadly with its conclusions and approach. We recognize that a number of interest groups focused primarily on recreational use of the area have raised opposition to the plan. However, it is our view that the Division of Forestry has taken an entirely rational and balanced approach to maintaining the forest ecosystem represented by Coopers Rock in a condition that will sustainably support the important public benefits for which it was created.”

Thank you.

TRAILS

“Some appreciation should be expressed to Cooper’s Rock Foundation (CRF) and all of the volunteers that have worked with them for their work on water and erosion control on the trails and the work by the rock-climbing areas to lessen the damage done by overuse. Although the guidelines for state forests state that “construction and maintenance of roads and trails shall be in keeping with stringent BMP’s”, the only trail maintenance it have ever seen has been done by CRF and volunteers.”
The trails referred to in the BMPs are those used for skidding timber products, skid trails. Many of the hiking trails on the forest were old roads existing prior to State ownership, not designed with BMPs in mind. Maintenance of trails on the forest is an issue. There are many more users than volunteers. The employees of CRSF have spent many hours performing trail maintenance. The most obvious recent work has been the replacement of bridges washed out by flooding several years ago. They have also cleared fallen trees and brush from the trails. Any of the chainsaw work seen alongside the trails was performed by CRSF employees.

“Any new trails should be designed by trail-users for trail-users, and not by products of timbering. There are plenty of trails at Coopers Rock that used to be roads – any new trails should be designed as trails from the beginning.”

Current trails are difficult to maintain now due to their original designs and limited Parks & Recreation staff, therefore, DNR is not requesting any additional trails. Any new trails desired by trail-users will need to be coordinated with the managing agencies.

“...the section on Grade in the Pedestrian classification excludes a whole category of trails that is almost completely lacking at Coopers Rock, the challenging footpath.”

This type of trail will be looked at in the pending CRSF Recreation Plan since few steep trails exist on CRSF. Through the recreation planning process, we will gauge public interest and explore potential development of a “challenging footpath”.

“Your Pedestrian Trail Grade standard does exclude a type of trail lacking at Coopers Rock, though – challenging, steep foot travel trails – and that end of the trail difficulty spectrum should not be ignored.”

Please refer to previous response.

“If you look at trails from the perspective of difficulty (admittedly just one way of many to look at a trail), the Forest has easy, medium, and hard mountain bike trails and covers more or less the same spectrum from a cross-country skiing perspective, especially when Roadside Trail is completed. But from a foot travel perspective, it is sorely lacking on the upper end of the difficulty spectrum – there are virtually no “hard” trails for hikers.”

This type of trail will be looked at in the pending CRSF Recreation Plan.

“Coopers Rock has plenty of trails that were “developed from old roads, tramways, access roads and casual use” as you say, although not all of the current trails meet this description, and too high a percentage of the trail system falls into this category already. What is scarce, almost completely lacking, are challenging, steep trails for hikers. The trail from Pavilion #1 down to Haystack Rock is a small example of this type of trail. Such trails have to be designed to be trails from the start... One place a foot trail
steeper and more challenging than the Coopers Rock norm could be constructed at Coopers Rock would be a trail roughly parallel (maybe a few hundred yards apart) to the main “trail” down to the Henry Clay Iron Furnace from it’s trail head, on the upstream, east side. This would also create a loop and give hikers two choices between the trail head and a main point of interest.”

Any new trails to be developed at CRSF would be addressed in the pending recreation plan.

“A significant permanent trail was left out of your Physical Features Map and Road & Trail Map. To the northwest of the reservoir, there are two trails that make a loop there, not just the single trail which you included. The one you left out is not one of these late 90's, mountain-bike-created social trails such as that which parallels the entrance road into McCollum Campground on the right side. Rather, it is decades old, and is marked by the signage system that has been in place at Coopers Rock from at least the 70's, which were installed by the Youth Conservation Corps, It believe. Along the road below the dam (which used to be a trail until the Clay Run Timber Harvest which concluded in 1991) are two easily seen signs on the left side of the road – the reservoir dam is within sight when you are standing by these two signs. Across the road on the right, the trail cuts up through the greenbrier into the forest, and approximately 400 yards later it reaches its apex and turns right – this corner is marked by another decades-old sign. It descends eastward 200 yards down to a 3-way intersection, and then one can turn sharply right and follow the trail that you did include on your maps down to the reservoir dam. This trail – the trail leading from the road below the dam up and around to the trail you did include – has been in use for decades, has appeared on state maps and in guidebooks, is signed and blazed using signage common for decades throughout the trail system, and is a trail where the Coopers Rock Foundation has performed maintenance several times over the years. ...needs an official name as well”

Once this trail is mapped using a Global Positioning System (GPS) unit, consideration will be given to adding it to the official trail inventory.

“Your Road & Trail Map shows two trails with the name Advanced Ski Trail. The trail that connects the Intermediate Loop with the reservoir should have a different name.”

This suggestion will be considered.

“Another comment involves the fact that roads are not trails, and should not be portrayed as such. They can be used for hiking and biking access, but they have a much greater impact on the area’s naturalness that a bona fide hiking or biking trail designed for such. Our recreational trail system should not depend on timber haul roads for its expansion! The CRSF trail system does not need expanding...but through purposeful trail design. It do not favor the widening of timber access roads as proposed in the draft plan to simply keep them “dry.” There is a negative aesthetic effect from
unnecessary widening, the iron furnace road being another prime example, making a much greater negative impact on the area’s naturalness.”

The Roadside Trail (under construction) is a trail being developed that is not using existing roads. Delighting a road does not involve widening the running surface. It consists of cutting trees that shade the road to facilitate drying, allowing the road to be used in inclement weather conditions without needlessly damaging the road surface, thus reducing maintenance costs. This is an established practice on forest roads in general.

“On p. 11 is a paragraph on overuse from “too many visitors.” ...The DOF proposes to limit, control, and restrict use, demonstrating again that this agency is out of touch with public interests. In fact, overuse is a symptom of the lack of attention, including funding, that the outdoor recreation activity at CRSF has received. Another symptom is the erosive damage to what had been narrow, non-muddy hiking trails due to mountain biking, as well as the conflict among trail users... When biking arrived on the forest, there was no plan to deal with it, resulting in a lack of new trails specifically designed for mountain biking which would have avoided conflicts with traditional users. This points again to the need for a professionally constructed recreation plan with public input for this forest, along with sections dealing with historic use in this regard in the CRSF plan.”

The statement regarding overuse is merely a factual statement, not the DOF’s intent to limit, control, or restrict such uses. Mountain biking and their impact on trails is an issue we hope to address with a recreation plan based on current uses, public input, determined needs and input from recreation professionals.

“How much of an increase in forest/trail use do you anticipate?”

The DOF is not in a position to address this at this time. Perhaps the surveys to be conducted during the preparation of the recreation plan will give more insight into this issue. We hope to address most of these issues in the pending CRSF Recreation Plan.

“Attention needs to be paid to protection of the popular Virgin Hemlock Forest area and its trails and bridges, hardly mentioned in the plan, and something the WVU DOF appears disinterested in.”

The Virgin Hemlock area is contained within the West Virginia University (WVU) Research Forest section of CRSF and is therefore not addressed in this plan.

“It’s unclear to me as to what the impact will be on use of the existing trails. Will trail use be restricted? Will logging be obtrusive to those using the trails?”

Under the current 10-year plan, the only official road/trail that runs through a management review area is a section of the Raven Rock Road/trail. A wider buffer will be considered as the prescription is developed. Trail use could be restricted during active harvesting operations as a safety precaution.
WILDLIFE

“My patience for silvicultural practices that include timber companies runs out when you get to areas which are not excessively trafficked by humans, like Scott’s [sic] Run, which most proponents of the park [sic], including myself, feel should be managed like a wildlife area.”

In order for an area to be beneficial to a variety of wildlife or specific wildlife species, management practices are often applied. By being able to sell timber products at the same time, those practices beneficial to wildlife can be accomplished in an economical manner.

“There should be a list of the multitude of species of flora and fauna presently known to exist in this forest; the draft plan only specifically lists birds and trees-for-timber-management. In terms of wildlife, I am strongly in favor of activities that would expand as well as protect the habitat for the threatened and endangered and rare species of CRSF. Also, in terms of control tactics, considering the number of people frequenting this forest and playing in its waters and dirt, I urge the DOF and DNR to develop guidelines to limit the use of pesticides only as a last resort, with public input into such decisions.”

A list of known animal species present on the forest was developed but inadvertently left out of the draft plan appendix. This list will be included in the final version of the plan. A list of all plant species present on the forest does not exist. In regards to pesticide use, it will be very limited and only used in specific situations where other options do not exist. As with all prescriptions for silvicultural practices, a public tour and comment period will be part of the process.

“What management are you proposing to reduce deer numbers?”

The DOF is not in a position to do anything to reduce deer numbers. We can only apply practices that reduce deer impact on the forest.

“Trout unlimited wants to know what will be done to protect Laural Run & Tribs fisheries. There are native brook trout in Tribs, and we have stocked brown trout fingerlings in Laural for many years. Any slit [sic] will kill off these populations of trout.”

Both of these streams are on the north side of CRSF, currently leased to the WVU as a Research Forest.

POLICY

“...I was extremely disappointed with the amount of notice given for your public meeting. I received the press release a mere 6 days before the meeting.”
The draft plan was posted on the DOF web site (www.wvforestry.org) August 1, 2005 along with the meeting date, time and place, 42 days before the meeting.

Legal advertisements listing the availability of the draft plan and particulars regarding the public meeting were published in the Morgantown Dominion Post and the Charleston Daily Mail on August 5th and 12th, 2005, 38 & 31 days, respectively, before the meeting.

The news release regarding the public meeting and draft plan availability was sent out September 7th, 2005.

“I am also concerned that the draft management plan was created without formal input from important entities such as the West Virginia University, the Cooper’s Rock Foundation and the Cooper’s Rock Regional Climbers’ Coalition.”

The other managing agencies (DNR Parks & Recreation and Wildlife Resources Sections) were the only groups to provide input into the plan prior to it being put out for public review and comment. The public comment period was the time for formal input from other groups and the general public.

“Why does the DOF always quote State Code 19-1A-1 + 19-1A-3, but never 19-1A-2?”

The reference to State Forests under 19-1A-2 specifies issues about which the DOF will provide advice to the Governor and Legislature. 19-1A-1 and 19-1A-3 contain direct references to how State Forests will be managed.

“Given the complex array of constituencies who utilize Coopers Rock State Forest, the draft forest management plan must be revised to take the multiple uses of the forest into consideration.”

Multiple use was the intent of the draft plan. More specifics regarding various uses and goals will be addressed when prescriptions are developed. The prescription process includes a public tour and comment period. Recreation will be addressed further with a specific plan for this use. A SHA is being developed to address the threatened snail on CRSF. Both of these documents will be addendums to this plan.

“We cannot have a plan that will change the face of Coopers Rock without a comprehensive plan that includes input from multiple agencies and the interested public.”

This plan will not change the face of CRSF. Other managing agencies provided input to the draft plan. This document is part of the public input process.
“The “public comment” session on 9/13 was a grave disappointment. It seems that you did not want to hear any comments. I had to leave at 7:40...Maybe you allowed comments near the end??”

The public meeting was intended to present the plan and provide some time to answer questions from the public. Written comments were accepted until 5pm on 9/27/05.

“I believe your agency needs to restructure their public meetings to create a much more interactive format. I have been to public hearings held by the US Forest Service, the WV Division of Highways, the WV Public Service Commission, the WV DNR, and Wal-Mart, and across the board they provided more opportunities for the public to speak than did the public meeting held by your agency. To have the meeting limited to two hours at the onset, to have one of those two hours taken up with a presentation (although informative, the public perceived that their already limited time was being taken away), to have an unexplained 10 minute break, then to not be able to verbally ask questions in the ensuing format is just not conducive to genuine give-and-take conversation and communication. “

“I believe the DOF should make no final decisions on any of the proposals in this Draft Plan until comprehensive planning occurs in which wildlife (not just game species) and recreation concerns are given the same weight as silvicultural concerns. Then, a Second Draft of the Draft Plan should be issued to the public – so that they can participate in and comment on a comprehensive draft plan. Further, there should be a 90-day public comment period on this...”

“By rigidly setting the time limits of the hearing and then using the first hour to primarily discuss the history of CRSF, there was a feeling of disenfranchisement of the public that had come to comment.”

“... the public meeting on September 13 was scheduled in an inconvenient location, at 6:00 PM on a Tuesday when the legislature was in session, and tightly controlled in a way that minimized public input and prevented discussion recreation [sic] issues. Furthermore, the comment period allowed on the plan was very short (about 60 days, or 14 after the Public Meeting), and precluded email submissions for no obvious reasons (and many people had trouble with the cranky fax machine at DOF).”

“At your public hearing of September 13th, we were dismayed at the format which allowed for virtually no group conversation. Public hearings should allow the public – a large and varied group – to freely question and comment about agency proposals and procedures – something it did not. As owners of this public land, we deserve a better, and more interactive, format.”

“Why constrain public awareness and opportunity to comment to the minimum required when doing so much more would be in the public interest?”
“As a matter of process, why don’t we have at least a 90 day comment period? It’s that way for the Mon. National Forest Plan why not CRSF?”

This format for public meetings follows what was determined by the Governor’s Advisory Committee and the Forest Management Review Commission as spelled out in the “Guidelines for Managing West Virginia’s Nine State Forests”. This same process was followed for five other state forests, without public complaints regarding the format, process or time allowed for comments. The guidelines are posted on the DOF web site (www.wvforestry.org).

“There is a rumor that no substantial changes will be made by WV Div. of Forestry to this document even though the document is referred to as a draft. Please paint a scenario whereby a substantial change could be realistically incorporated before the draft becomes final.”

The request for the recreation plan will be a major/substantial addition to this plan and made an addendum to the final plan. Care was taken when developing this plan to avoid the need for major changes and it was purposely made very general. Specific actions will be described in prescriptions that will then be presented to the public via a tour, followed by a public comment period, as called for in the Guidelines. The Management Review Areas are not set in stone, to allow for the flexibility to address other issues as they arise, such as insect and disease infestations or storm damage.

“How high a priority is forest expansion through acquisition?”

There is presently no formal long range plan to expand CRSF. Any acquisition would need to consider maintenance, access and law enforcement issues. It is the State’s desire that any new property acquisitions be contiguous to existing State property.

**TIMBER MANAGEMENT**

“These logging sites are in and around the main recreation areas. I oppose any and all logging in these areas.”

No Management Review Areas are in and around the main recreation areas. The 211 acre overlook/concession/picnic area is contained within the Improved Recreation Area managed by the WV DNR, Parks & Recreation Section, and everything from the overlook is included in a 773 acre Managed View shed Area which is not scheduled for forest management activities.

“I approve of the forestry management plan and the objectives of the plan.”

“Whereas I understand and to some degree support silvicultural management in Coopers Rock State Forest, there are some aspects of this in the present plan that are cause for great concern. Certainly, I, and many others, can see the benefits of promoting diversity in a same-age forest,
particularly in areas where that diversity is hampered by large amounts of human traffic, however I think planning has to take this recreational value into account when making these plans, and no part of the public wants this turning into carte-blanche for timber companies to raise valuable hardwoods for their own use.”

DOF State Lands Management Foresters develop all aspects of forest management activities on State Forests. The only involvement timber companies have in State Forest timber harvests is with the actual removal of the timber. Timber is sold using a competitive, sealed bid process with a strict contract and required performance bond. Prior to marking the timber for harvesting, the public will have an opportunity to comment on the prescription and tour the area. Timber harvesting is done to provide multiple benefits.

“Old growth should be encouraged within any silvicultural plan, if not for the animal habitats provided, then for the aesthetic value of such growth.”

A limited number of wildlife species may benefit from old growth, but most species need a mix of forest ages and size classes to thrive. We realize the aesthetic benefits of forests with old growth characteristics and have provided for this type of habitat in rocky and riparian buffer areas along with other places designated as Special Value Areas. When areas with unique characteristics, such as large trees or historic significance are identified, care is taken to protect these areas.

“Over-mature,” to me, sounds like timber company language, designed to make it easier for them to justify cutting old growth for it’s lucrative returns. This language should be completely eliminated from this plan as it gives the impression that the Division of Forestry is fostering timber company goals, namely to cut the biggest, most valuable trees possible.”

Often the biggest trees are not the most valuable trees. Trees that are extremely large are frequently rotten or otherwise unsuitable for timber production, but they are valuable to the forest, providing mast production, depending on species, and cavities for wildlife. Trees such as this are rarely removed during State Forest timber harvests. The DOF considers the term “over-mature” in terms of a biological, not economic basis. Certain tree species generally live longer than others. White oak can remain viable for several hundred years, while other species, such as black cherry, may reach biological maturity at 80-100 years. Because of this, different Silvicultural methods are needed to manage different species.

“There are parts of this 10- year Cooper’s Rock plan that I find perfectly acceptable, and I want Cooper’s Rock to be a healthy and diverse forest. The night of the public meeting, my impression was that the staff at Cooper’s Rock truly shares this dream. It have seen nothing, though, from the WV Division of Forestry that alleviated my suspicions that this plan will be abused, if not here, then somewhere else.”

The draft plan presented applies only to CRSF. The DOF will continue to follow the “Guidelines” that ensure public input in the management process.
“It has been brought to my attention that 78.25% of the south side of Coopers Rock State Forest, as well as other areas, are under consideration for commercial timbering in years to come.”

Using the numbers listed on page 28 of the CRSF Draft Forest Resources Plan, only 70.5% of the total area of CRSF (not leased to WVU) would be available for potential prescribed forest management activities. Under the current draft 10-year plan, approximately 492 acres are under consideration for timber management activities. This relates to only about 9% of the total area of CRSF (not leased to WVU). Any timber harvesting prescribed would be based on Silvicultural practices designed to provide multiple benefits. Any prescription prepared for the Forest will be presented to the public by way of a tour, followed by a public comment period, before any prescribed harvesting would take place.

“Considering the amount of timbering and managing for timbering on the north side of Coopers Rock, and the amount of timbering occurring outside and around its boundaries, including in the Cheat Canyon, the Draft Plan’s classification of over 3/4 of the south side’s acreage as “commercial” forest is out of line. This figure should be reduced significantly – below 50% for starters.”

As stated before, less than 3/4 (70.5%) of the south side of CRSF is available for potential prescribed forest management activities with only about 9% of the Forest considered for forest management activities under the current 10-year draft plan. As situations change and continue to develop, additional areas may be deemed unsuitable for forest management activities and added to the already 29.5% of the area prescribed for no forest management activities. A high percentage of users only visit this area that is prescribed for no forest management.

“The western section of Management Compartment 4 should be permanently closed to timbering, as the only ways into the area would be too disruptive (one is across Rhododendron Trail, across the permitted but unbuilt Foot-Travel-Only Trail, across a fork of Clay Run, and through some cliffs, all upon steep terrain; and the other would be to use Rock City Trail, in front of Pavilion #3 as a haul road; all other ways in are far too steep and these ways are unreasonable and disruptive).”

There are numerous alternatives to access the western section of Management Compartment 4 if so desired. The DOF is unaware of any “permitted” but undeveloped Foot-Travel-Only Trail on DOF managed areas. The western section of Compartment 4 is not listed as a Management Review Area; therefore, it will not be considered for forest management activities under the current 10-year draft plan.

“The Forestry Demonstration Area proposed to be between I-68 and Route 73, near the truck brake check station, is a good choice of location for a demonstration forestry area.”
“Managing a forest by timber harvesting has positive impacts on many uses of the forest. Without controlled burning, timber harvesting is obviously one method that allows the Division of Forestry to create a healthier forest on CRSF in terms of species diversity and promoting habitat for certain wildlife species. The actions discussed under the Management Review Areas on pages 52 and 53 present a reasonable vision of how CRSF can be improved. The draft management plan, however, does not provide much information about the quantity of timber harvesting (acres or volume) envisioned within these Management Review Areas.”

Since the acreage of the Management Review Areas (MRA) is listed under other sections of the plan, it was not deemed necessary to list them again. FYI: MRA1 - 48.2 acres, MRA2 - 260 acres, MRA3 - 135.41 acres, MRA4 - 47.97 acres. These areas will be re-inventoried prior to prescriptions being developed and at that time more accurate volumes and acreage figures will become available. These acreage figures can be included in the final plan.

“...discussed under the Management Review Areas on pages 52 and 53 do not seem to be consistent with the text of the draft management plan. The text includes discussions of increased harvest rate to maintain the health and vigor of the forest (p. 24) and calculations of the estimated permissible cut (p. 31). These discussions are not incorporated into the actions described on pages 52 and 53. Why compute permissible cut and then not utilize this information in how forest resources will be managed?”

Permissible cut calculations as presented in the draft plan were included to provide the public with specific information as to forest growth versus harvest potential. Permissible cut is again calculated when developing prescriptions as a guide for areas receiving an improvement cut or for areas being managed using a selection type system (un-even aged management). (See previous response)

“Vagueness of timber harvesting details in this draft management plan only serves to raise unnecessary suspicious among the general public about what and how much timber harvesting will occur on CRSF. This draft management plan needs to present estimated ranges of how much and where timber harvesting will occur over the next ten years. If clarity in timber harvesting can not be provided by the WV DOF, then the draft management plan should at least describe how any forest management prescriptions will conform to public input guidelines as described in the Guidelines for Managing West Virginia’s Nine State Forests.”

As a prescription is developed, more detailed information will be gathered and presented to the public for their input. This will occur for all prescriptions as presented in the “Guidelines”.

“Considering the amount of timbering in and around the forest the planned amount should be decreased for the sake of keeping the forest intact. Timber practices would disrupt multiple trails and affect wildlife habitat which are both unique to the region.”
Timber harvesting will, most likely, improve wildlife habitat. Currently, most of the south side of CRSF is an even-aged forest with a closed canopy, poor conditions for many forest wildlife species.

“Although we do not oppose timbering and haulage roads, the various uses of Coopers Rock must work in harmony. Only then can we say that the public interest is being served.”

“The diminished value of the forest cut by timber roads + timbered would be far greater than any profit from timber sales.”

Determining the true value of the forest is difficult to determine, since all West Virginia residents collectively own the forest. These collective owners hold the DOF responsible for properly managing State Forests to the benefit all WV residents. It is the Division’s position that multiple use management, correctly implemented, is the best way to provide benefits to all WV residents both near and far from a particular state forest. Timber management prescriptions are developed to enhance the value of the overall forest while minimizing the impact to any one specific forest use.

“The Department [sic] of Forestry should take no action on this plan, no timber sales or new road building, until a complete forest plan has been prepared. A complete forest plan would include:

1. A scientific Recreational Opportunity analysis
2. An economic analysis to assign relative priority to timber production versus recreation.
3. Information on the impact of logging and roads on current recreational usage.
4. A specific prescription for preserving aesthetic and ecological values.

Unfortunately, the current plan proposed a higher rate of timber harvest with the accompanying timber haul roads. This plan would negatively effect the best use of this particular forest which is recreational.”

“All around the South Side of CRSF, including the Research Forest on the North Side, around the borders of CRSF, and in the Cheat Canyon upstream of CRSF, timbering is, has recently, or will soon be occurring. Our regional societal needs for wood and paper products and the employment created producing them are being adequately met. Plenty of our landscape is under management for the needs of the timber industry. Lands being used primarily to produce timber are not in scarce supply in the Coopers Rock region, but lands supplying the other things that State Forests are to supply to the people according to State Code are scarce. All the things that State Code allows for on State Forests, I think, should continue to occur on Coopers Rock land, but the percentage allotted to each must be altered from that in your Draft Plan, significantly and permanently.”
Recreation and timber management activities can co-exist. Many of the trails currently used for hiking, biking and skiing were part of previous forest management activities. Recreational users such as hunters and those who wish to view wildlife depend on forest management activities to maintain varied wildlife habitat.

“One place to start would be to re-designate a significant part of Management Compartment IV to a non-commercial, no-cut zone.”

Under the current 10-year draft plan, only 6.2 acres (surrounding Wildlife Opening #6) are under Management Review. The other 948 acres are not scheduled for forest management activities.

“Another area which needs to be re-designated as non-commercial and no-cut is the rest of the Scott’s [sic] Run Watershed other than the area inside the loop road behind the woodshed. Other than this one area, which is already encircled by a road, the rest of the area should be managed as a Wild Area. New roads into this area, as mentioned on page 23, should be permanently discarded from all future plans, as they will fragment this last primarily roadless area on the South Side other than the very steep Cheat Canyon Gorge, provide migration corridors into the interior of Scott’s [sic] Run for non-native invasive species, and leave the area a sitting duck for illegal AT use from the Pisgah region, and illegal AT use is already running rampant in sections of the University Forest just across the Interstate. Roads are not needed for safety purposes – state and national forests do not need to be dumbed down to such a degree that there is a road every so many yards in a rough grid in case someone gets lost. Further, to build roads but then to leave their future maintenance uncertain due to no guaranteed funds or to not having equipment is irresponsible. Any roads the agency would like to build should have maintenance and equipment issues for the future already answered before construction commences, if indeed there are to be any new roads at all.”

Forest roads by themselves do not cause forest fragmentation. There are no plans to build any additional roads other than what would be needed to accomplish the activities outlined in the Management Review Areas section of the draft plan.

“If borders of #s 5 and 6 are going to be expanded to ease the abrupt transition from field into forest, then “proclamation boundaries” of sorts containing 2 or 3 acres should be permanently designated around these openings, so that expansion does not continue every 5-15 years farther and farther into the surrounding forest, without limits. Specifically, Opening #5 should permanently not expand any farther than 100’ to the north or to the east, and Opening #6 should not expand at all in the south or west directions.”

Once established, border cut areas surrounding wildlife openings normally do not expand. The same area would be cut every 10 - 20 years to maintain early successional (brushy) habitat.
“An un-managed forest can provide many benefits not realized in a managed forest.”

An un-managed forest has no trails, no roads, and no access of any kind; therefore it has no protection from fire and/or insect/disease outbreaks. It is the Division’s responsibility to insure that all state forests are managed to improve public benefit, therefore any public land that is un-managed in WV would be a loss to tax payers.

“Regarding your proposal to conduct a harvest in the isolated tracts east of the main body of the Forest, I think surrounding landowner concerns should be respected. At the intersection of the lower end of Goodspeed Highway, on the north side, and another road that contours north along the ridge side, a clearcut occurred a year or to [sic] ago. The cutting went right to the absolute border of Coopers Rock State Forest, and did not leave a considerate buffer of any size at all for the private landowner neighbors. A buffer of 10' would have been nice. In the case of these two tracts, whatever type of cutting is to occur – most likely not clearcutting, I imagine – It request that you leave some consideration buffer alongside the borders with the private landowners there.”

The aforementioned situation at Goodspeed Highway is on the part of the forest managed by WVU under different guidelines. The public will have an opportunity to comment on buffers during prescription development.

“Regarding your proposal to silviculturally treat the area within the loop road behind the woodshed, I believe this timbering should be limited to within that loop, and not outside of it. It would like to... discuss what will be done silviculturally to provide a more complex structure to that tract of forest as the thinning of red maple and other selective cutting occurs.”

As the prescription for this management area is developed, a public tour and comment period will be part of the process. At that time, all interested parties have another opportunity to provide their input and comments.

“It think your choice of location for a demonstration forestry plot between It-68 and Route 73 is a good one. This shows a successful attempt at locating such an area away from places with other activities and values, as well as locating it in a place very convenient to the public.”

“The WV Division of Forestry’s 10 year plan for Coopers Rock seems to focus on timbering the trees. It am concerned on the impact of timbering on Cheat Lake. Many organizations have worked very hard to clean up the polluted water that enters the lake and have succeeded in making the waters clean enough to support a dynamic fishery and multiple recreational uses... The lake however still has problems due to sediments and suspended matter, dissolved metal ions including mercury, and nutrients as sources of phosphorus and nitrogen and sporadic organic species.
Increased road building, logging, and other activities within the forests of the watershed may compound these problems. Logging generated sediments and fill the lake. Compounds such as heavy metals including mercury and other power plant pollutants, fecal coliforms from animal wastes, acidic compounds resulting from the sulfur oxides, from acid rain, that accumulate in the soils can be released from the disturbances of logging activities resulting in the contamination of Cheat Lake and its tributaries. ...It would also support no new road building at Coopers Rock State Forest, preserving large areas of trees that will never be timbered, an [sic] limiting timbering to areas that are flat, remote and not likely to contribute to water pollution at Cheat Lake and its tributaries.”

The areas under consideration for timber management activities during this 10-year plan are in flat and remote areas. The use of Best Management Practices along with the associated filter strips will prevent any such soil contaminants from reaching the water ways on the forest, thus preventing further contamination of Cheat Lake.

“...with respect to aesthetics, a number of comments in the draft plan and at the public meeting dealt with the presence of red maple in CRSF. The DOF and DNR wildlife personnel took the stance that this is essentially a nuisance tree and should be removed (I do not support herbicide use for this purpose) However, the DOF is also charged with management of aesthetic qualities on the forest. Autumn brings to Coopers Rock the most visitors of any other time of year, and why? Because they are coming to view the color of WV’s spectacular hardwood forests, particularly the brilliant reds and oranges of the red maples. Therefore, the aesthetic value of these trees should be emphasized in the plan. Again, DNR Parks and Recreation should exert more protective influence in this regard, as well.”

We have no plans to eliminate red maple from the forest. We want to maintain the current species composition of red maple, and not have it approaching 50%, which is likely to happen if nothing is done. A forest with a high percentage of red maple is not good for wildlife and insect and disease problems that could affect red maple would have a greater impact. Also keep in mind that studies have found that the herbicides that would be used for Silvicultural purposes on CRSF are less toxic than caffeine or aspirin. These chemicals with such low toxicity are so effective at killing plants because herbicides work on biochemical pathways that are specific to plants. Not only are Silvicultural herbicides non-toxic to wildlife, they also do not bioaccumulate (accumulate in the food chain).

“I support the Plan as presented by the WV Division of Forestry which prescribes multiple-use management for Coopers Rock State Forest. Our state forests need to be managed in a responsible manner which promotes conservation ethics and demonstrates good forest management to the general public and the forest resource management plan should be implemented on schedule.”

Thank you. The DOF received 12 additional comments of essentially the same content.
“What data were used to estimate annual timber production and are these data available to the public for review?”

The data used in the plan was from the 1999-2000 inventory. This data is available for public review by appointment. Interested parties make contact Andrew Dick at 304-293-2941, ext. 2425 to make an appointment.

“It seems as though wildlife habitat, forest health & forest diversity issues are some concerns regarding multiple use management. What is the approx. distribution of acres by stand age and what are the plans to alleviate this imbalance?”

Currently the majority of the forest is of the same age, size and structure. Due to various issues, correcting this imbalance will be a long process. What we would like to achieve during this 10-year period, is providing the conditions to regenerate oak on an area that received an improvement cut approximately 20 years ago. Getting enough light to the forest floor, and having an abundant enough acorn crop will need to coincide to start this process. Once oak seedlings are large enough to be considered competitive, then more of the overstory trees can be removed. We are then on our way to changing age and structure in one small part of this forest. Another project listed for our Management Review Areas is to create early successional habitat surrounding several current wildlife openings, these will also be a small percentage of the forest being converted to a younger age class. Though small, these projects are a start towards achieving a more balanced mix of age, size and structure on this forest.

“Nothing was said of the forest conditions from 1979-91 when harvesting was done.”

The prescribed harvests that took place during this period of time were under the 1970 Management plan. At that time the forest had reached a condition where the canopy was closed, the trees were over crowded and improvement harvests could take place to improve the condition and productivity of the forest. See section IV Past Management Recommendations, pages 45 - 51 for more details of the conditions in the specific harvest areas.

“Since the timbering of CRSF has only accounted for $90,000 since 1978, my question is what’s the point. Isn’t there a way to make it a park and not a forest?”

If the money derived from these sales was adjusted to take inflation into account, the figures would be much higher (see page 2 of this document). Additionally, timber prices have risen significantly in the last 10 years, along with the quality of timber on CRSF, making future sales highly economical. This proves that multiple use management (unique to State Forests) does work. These areas were harvested returning $90,000 to taxpayers and providing recreation at the same time.

“”Allowable cut”? What exactly does this mean?”
As it is used in this draft plan, allowable cut refers to the volume of timber that could be removed from the forest that represents the amount of growth for a year. The forest would remain fully stocked, which means an acre has a given quantity of space occupied with trees that have room to take full advantage of the growing site, and any extra wood taking up growing space can be removed. Think of it as planting carrots in a garden and then thinning out the seedlings, so the ones you leave can get large enough to eat, but there is no wasted, or extra space around each carrot, only enough to provide for what each remaining carrot needs to reach its full potential.

“Exactly how much timber will be removed for each project both per year and total?”

Prior to preparing a prescription, for which the public will have a tour and comment period, an inventory of the area under consideration is conducted. This will give the DOF a good idea of what should remain in the stand and what could be removed. The exact figures of removal are determined when the trees to be removed are actually painted, measured and tallied. Therefore, we will not have this information until preparations are made for harvest. The timber is then put out for competitive bid based on the estimated volume.

“The draft plan does not include specific acreage logging plans or placement of new roads.”

Management Review Areas 1, 2 & 3 would not necessitate much, if any, additional road building, since road systems were installed during the previous harvests. Depending on what is prescribed for Management Resource Area 4, some additional roads would have to be built. These issues would all be spelled out specifically during the prescription development process, which includes a public tour and comment period.

“What kind of logging methods would you use to ensure minimal “collateral damage”?”

We are not sure what you mean by “collateral damage”. Trees that are conspicuously home to wildlife are not removed during harvesting. Trees that are damaged but not marked for removal are added on and the timber company additionally charged for that tree. Sensitive wildlife habitat, streams and roads will be given buffer zones.

“How might red maple regrowth be prevented?”

By providing enough light to species less tolerant to shade so they can compete with the red maple. The reduction of red maple trees and the stump sprouting that would occur if these trees are cut could be accomplished though prudent use of herbicides.

“Who will do the actual timbering – harvesting of the trees?”

Normally, the highest bidder (above a minimum appraised value) would designate a licensed logging company or contractor to conduct the timber harvest. All loggers in WV are required to have a timbering license which
includes having completed training in the use of BMPs, tree felling safety, and first aid. A strict contract, an example of which is in the appendix of the draft plan, is used along with close supervision to be sure the prescription is followed.

“How will the cut trees be removed from the forest to paved roads?”

Normally, trees are cut down and skidded to a log landing. Then the logs are loaded onto a truck which would utilize a haul road to access a paved or main road.

“Regarding roads/trails created for timber harvesting – what restoration will be made to those trails to prevent erosion and sedimentation?”

All timber operations on State Forests stringently adhere to the guidelines contained in the publication “Best Management Practices for Controlling Soil Erosion and Sedimentation from Logging Operations in West Virginia”. Additionally, State Forest Harvests are subject to the stricter guidelines contained in the “State Forest Road Standards” (found in the appendix of the draft plan) such as seeding all skid roads, regardless of slope.

“How specifically, what are your plans for timbering, roads in area between I-68 and the lake? Scott Run Trail Area, compartment 8?”

All plans for timber harvest and Silvicultural activities are contained in the Management Review Section of the plan. Details will be presented during the prescription development process, which includes a public tour and comment period.

ROADS

“New roads will encourage more destruction of habitat by careless AT riders, which are already a problem. It will also provide easy avenues of encroachment by non-native, invasive plant life. This does not promote diversity, nor does it help the health of the forest. No new roads should be included in this plan.”

No new roads are directly called for in this 10-year plan.

“Scott’s Run is the last primarily roadless area in Coopers Rock’s south side, between I-68 and the Cheat River. No new roads should be built in Scott’s Run, and it should be managed as a wild area. The argument that roads must be built for safety reasons is not true.”

The State of West Virginia does not have a “wild area” management prescription. The WV State Park system contains approximately 80,000 acres where commercial timber harvests are not allowed. Portions of these areas could be regarded as wilderness, with the potential to provide an experience similar to “Wild” areas in PA.
“Page 1 contains a brief description of why roads are beneficial to non-timber uses of the forest. These statements are not documented and no information relevant to CRSF is presented in the plan about why more roads would be beneficial to CRSF. In addition, the term “road” is not defined in the draft management plan and what constitutes a “road” is not distinguished from what constitutes a ‘trail’

For a description of the roads that are built on state forests, see the State Forest Road Standards in the appendix (section E). The appendix also contains Trail Design Criteria (section G)

“There are distinct disadvantages to more roads on CRSF. Roads require maintenance. In the draft management plan, the WV DOF notes its lack of ability to maintain roads on CRSF (p. 23). Roads also have been observed by CRF board members to attract illegal AT use on the forest. Finally, many CRSF recreational users prefer fewer roads.”

Under the proposed 10-year draft plan, very few if any, new roads will be built. The Management Review Areas listed already have roads, except for the area between I-68 and Route 73.

“From the CRF conducted survey during 2000 over 800 respondents, only one third (31%) believe that timber harvesting that requires creating new roads should be allowed. 59% oppose creating new logging roads for the purpose of timber harvest. Also, a majority (68%) want to leave some remote, road less areas on CRSF without trails. One-fifth (21%) disagree with this statement.”

New scientific surveys will be conducted in conjunction with the development of a CRSF Recreation Plan.

“Without coordinated plans for recreational uses as well as fire suppression and prevention, the issue of whether more roads are truly beneficial on CRSF can not be answered within this draft management plan. More roads represent a situation where conflict arises within the multiple use approach. This conflict requires a means of setting priorities among uses. No such means is presented in this draft management plan for deciding priorities on CRSF.”

A fire management plan is currently being drafted and will be included with the final plan.

“Please insure that the Department [sic] of Forestry does not build any new roads, or take any action, until the study has been completed and a plan has been developed which will retain the long term value of Coopers Rock.”

“The process of building roads will create “islands” within the forest and change the environment around the road edges, such that the diversity and integrity of the forest will be compromised.”
The type of roads the DOF would build are not wide enough, or create enough of a canopy gap, to create edge effects or “islands” that would cause fragmentation effects to the forest. A majority of this forest is of the same age, size and structure, not conditions that provide for diversity.

“Thus, plans for more forest roads may not be the best thing in terms of recreation. I believe some well planned timbering could be possible, but I don’t think the plan takes into account the impact it might have on recreational activities and wildlife.”

The wildlife on CRSF would benefit immensely from timber harvesting. Currently, the lack of age and structure diversity is adversely impacting wildlife populations. More early-successional habitat is needed on CRSF.

“One thing that I found particularly frustrating about the Plan is its lack of specificity. A case in point from page 23:

“Access needs to be improved into the eastern sections of the Forest, either through upgrade of an existing road, or construction of a new road. Any of this work would most likely be done in conjunction with management prescriptions.”

But, the “Management Review Areas” don’t mention any specific road plans. So, will there be more roads, or not? The same passage continues,

“This approach relieves the State of appropriating funds for road construction, and roads would be built by logging contractors to State Forest standards as part of other management activities. Maintenance is dependant on funds also. This work is primarily custodial and is performed by Division of Forestry personnel as time allows. Efforts are hampered, however, due to the lack of any mechanized equipment available to assist with performing needed maintenance. As funds become available, some of this work can be contracted out as needed.”

Is it a good thing to build roads if you don’t have the capacity to maintain them? Un-maintained roads are ugly, muddy, and rough, and are especially unsuitable for recreation. And a wide haul road is less desirable in most cases for recreation than a narrow foot trail, so even a reasonably well-designed and maintained road (such as the one built from the reservoir to near the Iron Furnace) may have a negative impact on recreation. But, because there is no specific information about the layout of possible roads, it is difficult to provide useful comments on them. The same is true for the unspecified buffer widths and aesthetic improvements mentioned around management activities. The same is also true for management prescriptions such as spraying herbicide on red maples. The desirability of suppressing red maples depends on their location relative to tourists and other people who come to see brilliant fall foliage, but we don’t get sufficient information to make useful comments.”

The mention of access needs and maintenance in the plan is for informational purposes. When any work is prescribed, including road construction and red maple control, the details will be presented to the public during a tour as described in the Guidelines. A public comment period will follow the tour and before any work on the ground begins.
“To what extent does your plan include building of roads, and how do you plan to minimize impact on wildlife?”

*Roads will actually benefit wildlife when re-seeded with appropriate seed mixtures recommended by wildlife biologists.*

“Where will logging roads be located for each project and will there be safety precautions taken to protect recreationalists?”

*It is impossible to know exactly where roads will be located for a given project prior to its prescription being developed. We do know that the Management Review Areas listed in the draft plan would need very little, if any, new road construction. Safety precautions will be taken during harvesting operations to ensure public safety. Signs will be posted and areas may be closed to protect the public during active harvesting operations.*

“Will there be a need for new roads? And if so, can it be used after the logging for recreation by hikers, climbers, hunters, etc. Could new hiking trails come to exist from these new logging roads? Please only build these roads if necessary, and if it is necessary, please build with a purpose for after the logging.”

*Under the proposed current 10 year plan, few if any, new roads would be built. Access to Management Review Areas would use existing roads. If new roads were to be built, non-motorized public access would be available after harvesting is completed.*

“What specific data do you have to support the assertion on p. 25 that roads provide “outstanding... hiking and ski trails”? The recreational value of roads depends on context + needs.”

*People continually use them for hiking, skiing and biking. The DOF has not received any complaints about using roads for hiking or skiing. In fact, we have had people compliment us on the roads and the access and recreational opportunities they provide. Data regarding uses of roads on CRSF should be gathered and used in the development of the CRSF Recreation Plan, which the DOF is currently moving forward on.*

“What data or information does the WV DOF have that additional roads on CRSF constructed for timber harvesting would be beneficial for recreational use?”

*The Division bases these assumptions on the numerous people that currently use old haul and skid roads for various recreational pursuits. As the CRSF Recreation Plan is developed, this sort of data will hopefully become available through scientific surveys.*