



The Highlands Voice

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Ranger Cuts Enviros No Slack on East Gauley Timber Decision

Largest Timber Sale Ever in the Mon Forest Appealed
by Bill Ragette' et al

Cynthia Schiffer, US Forest Service Ranger for the Marlinton District of the Monongahela National Forest announced her decision to cut in over 4,000 acres of trees (16 million board feet) on the east flank of Gauley Mountain. The two Opportunity Areas included in this sale; (Props Run and Rocky Point) are drained by many small streams (Chimney Rock, Blackhole, Big , and Props Run, as well as Mill Creek, Crooked Fork) that flow into the upper reaches of the Elk River. This area encompasses 11,907 acres of publicly owned land.

Tea Creek and the roadless area of Leatherwood Creek lie adjacent to the west. From north to south Rocky Point (4,364),

Sharp Knob (4,532'), an unnamed knob (4,584') and Red Spruce Knob (4,703') form the western edge of the decision area and the backbone of Gauley Mountain.

Several WVHC Reviews have been held at the Elk River Touring Center located at the eastern edge of this project area, which extends 6 miles to the north and south of the Touring Center and is approximately two miles wide. Snowshoe and Silver Creek resorts are only a few miles away. Although Cynthia made some concessions (reduced time frames for helicopter logging) in her final decision, Gil Willis of the Touring Center feels this project will have a great negative impact on recreation in the area.

The Forest Service is also working on two other Assessments for this same area - one on recreation and the (see page 5)



OSM's Draft AMD Policy:

All Carrot - No Stick

by Cindy Rank

Mining Committee Chair

US Office of Surface Mining's draft policy on Acid Mine Drainage (AMD) soft-pedals any reference to enforcement or permit denial and appears to allow the creation of long term AMD.

BACKGROUND

In this age of conciliation and "partnerships" between industry and regulatory agencies, - when "self audits" are replacing

direct enforcement, and cleanup standards are being reduced to levels more palatable to industry through initiatives like "brown-fields", it isn't surprising that the U.S. Office of Surface Mining (OSM) has followed suit.

The agency has formed 'working groups' to revisit all the hot issues of the day -- blasting, remining, acid mine drainage, oversight review of primacy states, etc. The working group on acid mine drainage (AMD) has proposed and circulated a draft policy.

First let me say that there have been worse policies drafted in house (i.e. within OSM) on AMD. Nonetheless, this latest draft dated May 15th contains major deficiencies that must not be overlooked.

The major flaw in this policy is that it appears to allow the creation of long term AMD provided that long term treatment prevents the damage from going OFF-SITE.

Such a position is just not

acceptable under the law and has been the focus of numerous objections, complaints, appeals, suits, etc. by WVHC and others for nearly a decade.

Picture if you would, 10 five hundred acre permits side by side where AMD exists but is treated before flowing off site. The result is five thousand acres of reclaimed land where ground and surface water is degraded/destroyed, but discharges off-site are meeting effluent limits. Expand the scenario to visions of every major watershed in northern WV - or SWPA, etc. - at the mercy of a multitude of treatment facilities at every tributary where AMD exists but is treated before leaving the smaller watersheds. - What is wrong with this picture? Recent history has shown that no treatment systems are 100% reliable, nor are states and companies financially able to maintain treatment for as long as AMD persists. In brief, treatment is not the answer to AMD. One must assume that on-site

AMD will at some point cause off-site damage. One must also assume that the law does not intend to sacrifice on-site waters in perpetuity.

THE POLICY

Under the main heading of HYDROLOGIC BALANCE PROTECTION, this three page document is a description of the POLICY GOALS AND OBJECTIVES for CORRECTING, PREVENTING AND CONTROLLING ACID/TOXIC MINE DRAINAGE.

The introductory page describes the policy in general terms: "The program is based on designing mining operations to prevent AMD from occurring, monitoring operations during mining and reclamation to identify any corrective actions that may be needed to prevent or mitigate post-mining pollution discharges, and addressing liability for AMD in permit bonding determinations."

On its own the statement sounds relatively acceptable. But,

as is often the case, the devil is in the details.

Presumably the policy is meant as an attempt to present a somewhat balanced 'carrot and stick' approach to achieving the two main goals of Environmental Restoration and Environmental Protection. However, the goals and their expanding objectives and strategies offer all carrot and very little, if any, stick. The resulting ambiguities and unclear directives lend themselves to further disintegrating those parts of SMCRA that must be reinforced, not softened, to protect the waters of the nation from further abuse by the coal industry.

GOAL#1: ENVIRONMENTAL RESTORATION

The stated goal of restoration sounds good: "AMD discharges from pre-SMCRA operations sites (sites abandoned prior to the passage of the Federal Surface Mine Control and Reclamation Act of 1977) should be remediated to achieve water resource recovery." However, (see page 7)

In a Virgin Woods

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---from the heart of the plateau---

by John McFerrin

What Do You Think?

One of the things I try to do in the Conservancy is to make sure that everybody has a chance to have their say. We are a voluntary organization; nobody has to join. If we are to continue to have people send in their dues year after year they need to know that this is an organization where their views are listened to.

The only direct way I have of making sure that people have a chance to have their say is at the Board meetings. Anybody can add anything to the agenda. Anybody can say whatever he or she likes. It may make the meetings last longer but that is the price we pay for being an open organization.

But what about the rest of the organization? What of the people who are not on the Board, who don't come to the Board meetings? How do they get to have their say?

For those people, the Board meetings are always open for your attendance and your comments. The pages of the Voice are always open for your letters.

For anyone who is at a loss about what to have their say about, here is something to chew on: should we allow timbering in the National Forests?

The Conservancy has never taken a formal position on this issue. We may have opposed timbering in a particular location or in a particular way but we have never advocated a complete ban on timbering in the Forest.

Sincere, intelligent people make arguments both for and against timbering in the Forest. On the one hand, timber is a renewable resource. Carefully managed, the Forest could serve as a vast reservoir of valuable timber for the foreseeable future and beyond. In some counties money from timber sales helps fund schools. Congress did, after all, mandate that the Forest be managed for "multiple use" which can include timber sales.

On the other hand, however, people make equally sincere and intelligent arguments against timbering. They contend that the United States Forest Service pursues timber sales at the expense of other values. They contend that there is plenty of timber on private land that could meet all our needs for lumber. They contend that the National Forest could be a wild and untamed area, a type of area that does not exist on private lands, a type of area that could not exist if we routinely timber the National Forests.

Finally, they contend that timbering in the National Forests is a big corporate welfare program. Although companies who timber on National Forest land do pay for that privilege, the Forest Service must bear the costs of administering the sale and overseeing the timbering. When the sawdust settles the Forest Service may find itself with some logging roads of dubious value and less money than it would have had if there had been no timbering. If this is true then timbering on the National Forest is no more than a public subsidy for the lumber companies.

Our Public Lands Committee has pondered these questions along with other land management issues. There have been discussions of related issues in the Voice. But what do our other members think? If you have thoughts on this question now would be an excellent time to have your say.

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Help Stop The Stripmining Of Public Lands



The Office of Surface Mining is about to make a decision that will potentially affect 40 million acres of public lands, especially in the Eastern United States. The Buckeye Forest Council is seeking organizations to endorse [join] our campaign to end strip-mining on public lands. The Buckeye Forest Council is Ohio's Heartwood affiliate and has focused on strip-mining issues for the last three years. We hope this will be the final push to end strip-mining on public lands. Campaign endorsements and questions should be directed to: buckeye@envirolink.org or Buckeye Forest Council; PO Box 99; Athens, OH 45701; (614) 594-6400.

BACKGROUND

The history of coal mining in the United States has been one of tragedy to the land and to the people. It has left behind a

legacy of impoverished communities and devastated land incapable of forest regrowth. By the 1970's, there was enormous public outcry for the government to tame the coal industry. In 1977, that action came in the form of the Surface Mining Control and Reclamation Act (SMCRA). Among other provisions, it put an end to new coal strip-mine operations on public lands. But like many great laws, there was a loophole: Valid Existing Rights.

The unfortunate truth is that no one knows what Valid Existing Rights (VER) are, because Congress did not define the term. They left that task up to the Office of Surface Mining (OSM), a government agency within the Department of Interior. Nineteen years later, the Office of Surface Mining has failed to come up with an answer for what Valid Existing Rights are. In the mean

time, the loophole has allowed companies to mine public land.

Finally, and after much public pressure, the OSM has initiated a rule-making process to come up with a definition. Four alternatives have been developed: One which would maintain the present state of ambiguity, two that would allow mining on public land, and one that would virtually end strip-mining on public lands in the Eastern US. The alternative that would stop the mining is Alternative 2. It is called the "Good Faith All Permits" standard.

In late July, the Office of Surface Mining will be moving forward with this rule-making process during which the opportunity to close the loophole that allows stripmining to persist will arise.

According to Stephanie Hanna, spokeswoman for the Department of Interior, the new def-

inition could affect an estimated 40 million acres of national forests, parks, preserves, and other protected lands. This will have an enormous impact on lands like the Allegheny, Monongahela, and Wayne National Forests. For example, 95% of the Allegheny National Forest in Pennsylvania, has mineral rights in private hands, thus the land could be mined if there is an unfavorable definition.

PLEASE SIGN ON

We need to speak in a strong voice and call for an end to an ecological disaster that Congress meant to reign in almost twenty years ago. Please sign on by contacting the Buckeye Forest Council, preferably by E-mail (see above). As the rule-making proceeds, we will be utilizing your endorsement in letters, and possibly meetings, to demonstrate

the extent to which the environmental community is unified against strip-mining of our public lands. As events are yet unfolding, we must be fluid in our actions. Yet we want to make sure that you are supportive of our efforts BEFORE it is time to act. For that reason, we cannot ask you to sign a particular statement or letter at this time. However, we have the following goals from which the use of endorsements will not deviate:

CAMPAIGN GOALS

- 1) To halt strip-mining on public lands.
- 2) To get a favorable definition of Valid Existing Rights (VER).
- 3) To stop industry's efforts to establish a takings' standard for determining mineral rights.
- 4) To ensure the implementation of the Surface Mining Control and Reclamation Act (SMCRA).



All Fly Away

by Linda Smith

Neotropical migratory birds, those that breed in North America and migrate to Central and South America or the Caribbean for the winter, are declining. Data from breeding bird surveys in the eastern U.S. suggest that 75% of North American forest-dwelling bird species declined from 1978 to 1987. The forests of West Virginia have a significant portion of breeding populations of several of these bird species that are considered in trouble elsewhere in the eastern U.S., species like the cerulean warbler, scarlet tanager, Louisiana waterthrush, and wood thrush.

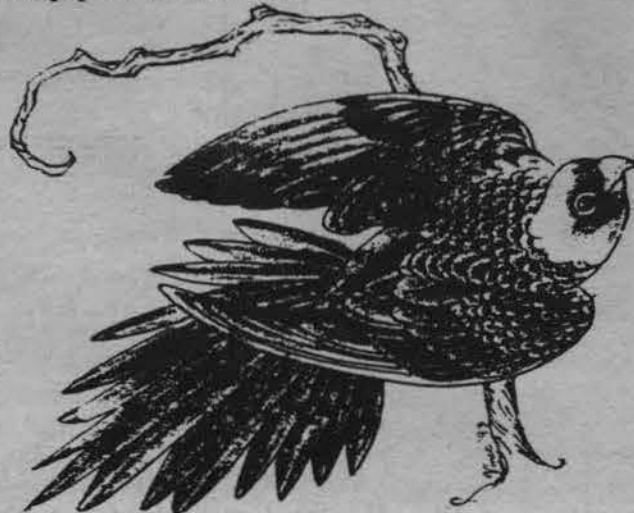
Neotropical bird population declines are believed to be primarily due to habitat loss - on their wintering grounds (with rainforest destruction) and in North America. For the eastern U.S., fragmenting of forest into smaller and smaller blocks has contributed to the decline of forest-dwelling birds. An estimated 40% of today's eastern forests area contained in fragmented suburban and rural woodlots. Why does WV have high concentrations of some of these declining birds? This is uncertain. It may be assumed, until determined otherwise, that it's because WV has a large portion of forested land - 78% of WV is forested - with less fragmentation than other eastern states. Also, WV has a very rich and diverse forest.

As land management strategies are planned, providing natural habitat for declining North American bird species is an important consideration. This includes preserving, as much as possible, large blocks of contiguous forest for forest-interior bird species. In looking at the eastern deciduous forest ecosystem, West Virginia is considered critical since its' relatively high concentrations of certain highly ranked and significantly declining bird species may provide core populations for expansion where they are uncommon.

It should be noted that even though WV is important for supporting the highest proportion of several bird species of concern in the Northeast, some of these species' populations in WV show declining trends. If we work now to develop proactive conserva-

tion plans which consider what is happening to these species throughout the entire ecosystem, not just in our state. Then we may help prevent neotropical migratory birds from ever becoming listed as endangered species. West Virginia agencies, organizations, and industry have recently joined an International cooperative effort called Partners in Flight. The goal of PIF is to improve our knowledge of neotropical migrants, identify species at risk, and develop and carry out cooperative plans to protect their habitat.

As the expanding human population reduces natural habitat throughout much of the eastern U.S., we can see more than ever that WV provides important ecological diversity for this region.



PIF comes 100 years too late for the Carolina Parakeet

Write A Letter To Expand Wilderness

The National Park Service is preparing a draft environmental assessment for the Parsons Branch Road, a flash flood-damaged road through a remote section of Great Smoky Mountains National Park. Parsons Branch Road ought to be converted to a trail because (1.) the road is an infrequently used one-way road, (2.) closing the road would combine two roadless areas, one of which is the largest unroaded area in the southern Appalachians, (3) very high levels of air pollution and visitor use in the park make it necessary to encourage non-motorized recreation and discourage automobile use where possible and (4.) the inadequate 1982 General management Plan for the park allows the closure of only one open road in the entire park: Parsons Branch Road. A 30 day comment period for the Draft EA should begin July 1, 1996. Write or call Karen Wade, Park Superintendent, GSMNP, 107 Park Headquarters Rd., Gatlinburg, TN 37738, (423) 436-1201. Let your voice be heard.

One Four Lane Dead, how many to go?

Virginia Dept. of Transportation has backed off plans to build a 4 lane highway through Mount Rogers National Recreation Area. VDOT stated that after they selected Alternative 2A, "we began to receive notices of organized and widespread opposition to the decision." Now VDOT plans to "convene a group of county officials within the study area and other interested stakeholders ... to discuss opportunities for improving Routes 58 and 16 along the existing roadways." Now if only WVDOT would understand that same lesson for Corridor H.

An Unworkable Covenant

Studies of the statistical correlation between logging and employment in forest products industries "have routinely concluded that there is little or no relationship between sustained or increased harvests and employment," says a paper released last week by The Wilderness Society. The report says employment in wood products and paper has declined 4% since 1950, while the amount of timber cut has increased 64%. "Any expectation that employment is determined by National Forest timber harvests is analogous to expecting that automobile employment is driven by iron ore mined from public lands," TWS says. "Meanwhile, taxpayers are subsidizing National Forest timber harvesting to the tune of about \$300 million a year."



The Headwaters High Route

Two Weeks around the Cheat, Greenbrier, and Potomac Watersheds

by Greg Good

I have had a vision for the last quarter century: to hike long, connected loops, linking expansive areas of eastern woodland. I was never much attracted to long linear hikes, like the Appalachian Trail. A personal quirk: I like circles and their sense of completion. The vision was realized once, in the 1970s, when I discovered the Susquehannock Trail in north central Pennsylvania. And again, when I combined parts of that trail with the Black Forest Trail.

It struck me as odd, when I moved to West Virginia in the early 80s, that there were no loop hikes here. Loops are not all that visionary, are they? After all, it was a chamber of commerce in Pennsylvania that printed up the guide to the Susquehannock Trail. Here the mountains were much bigger. Here was the Mon National Forest. Here there were many more short trails. Why were there no big circle hikes?

Not one to sit around pondering such a useless question, I got on with life and hiking. I set out with the goal of exploring the possibilities of big loops in the Mon. I gave myself plenty of time. The Mon is a big place, nearly a million acres.

I had time. Over more than ten years I explored nooks and crannies from Canaan in the north to Lake Sherwood in the south. The only way to do this was on the ground. I needed to hike individual Wilderness areas. Then I got to know the Forest Plan, the document that was hammered out in the mid 80s for the management of the National Forest. Thanks to the hard work of forest activists, a new category of lands just short of Wilderness was created. To bureaucratic poets these were known as Management Prescription 6.2s. To lovers of words and forests they became variously Backcountries or Wildlands.

Designating these areas and making them real to people are two very different things. How many can say where Laurel Fork Backcountry or Flatrock/Roaring Plains Backcountry is? And depending on how one counts, there are between 15 and 20 Backcountries.

My vision of a great circle hike in the Mon developed with

two main ideas. First, it should stitch together as many Wilderness and Backcountries as possible: a string of West Virginian pearls. Second, it should come down from the mountain tops often enough to touch the towns, both for the mundane purpose of re supplying and more importantly to link hikers and townspeople. Call it sustainable development.

Then came reality. I'm married with young kids, so I can't afford to escape to the mountains for long periods. I could squeeze out two weeks without endangering domestic tranquillity. This time limit, though, pointed out another advantage of such an adventure close to home: no time lost in airplane travel to distant places. All through the winter of 1994-95 I poured over topo sheets and guidebooks, scoping out alternative routes. I decided that the best place for the hike was in the northern half of the Mon. For one thing, I live in Morgantown. A good starting point, Davis, was

only 60 miles from home, only an hour away. The challenge lay in planning a route that connected the Wilderness and Backcountries with, at best, only road crossings, not road walks, and a minimum of them.

I knew I was ready for the hike when, one insomniac spring night, I lay in bed and walked through the entire hike in my head: hill after hollow, camp sites placed, stream crossings imagined. A few weeks later came reality.

Bruce Summers and I parked my old Sube in Davis, donned our backpacks, and headed down the main street. Passing a road crew, we made our way across route 32, down the Blackwater River, and toward the state park. Out the length of Canaan Mountain we hiked. The next day we entered Otter Creek Wilderness and camped on Shavers Mountain. The next we left the Wilderness and sauntered upstream along the Glady Fork, on the Allegheny Trail. The fourth, we ventured

further up the Glady and crossed over Middle Mountain into Laurel Fork Wilderness. The fifth day was to see us on Hinkle Run, and the sixth through to Island Campground, beside East Fork of the Greenbrier Backcountry.

Now halfway through the loop, we turned and headed back north: up the East Fork, over the mountain eastward and down into Big Run of the Potomac, up into Seneca Creek Backcountry, over the top of Spruce Mountain and down into Brushy Run, through Onego, up onto Flatrock/Roaring Plains Backcountry, north through Dolly Sods Wilderness and Dolly Sods North, across future parts of Canaan Valley Wildlife Refuge, and back to Davis.

That's the loop at lightning pace. The joy in the walking, though, was that it unfolded slowly. Each bend in the trail brought new sights, new release. It took me less than a day to put my work and worries behind. I was in the woods. The swim in Otter Creek washed me clean, the trudge up

Green Mountain Trail in the rain consumed me. The bear and the flying squirrel and the spruce on Shavers Mountain left no room for thoughts of town. Ahead lay two glorious weeks of the trail, my friend, and me. That's heaven.

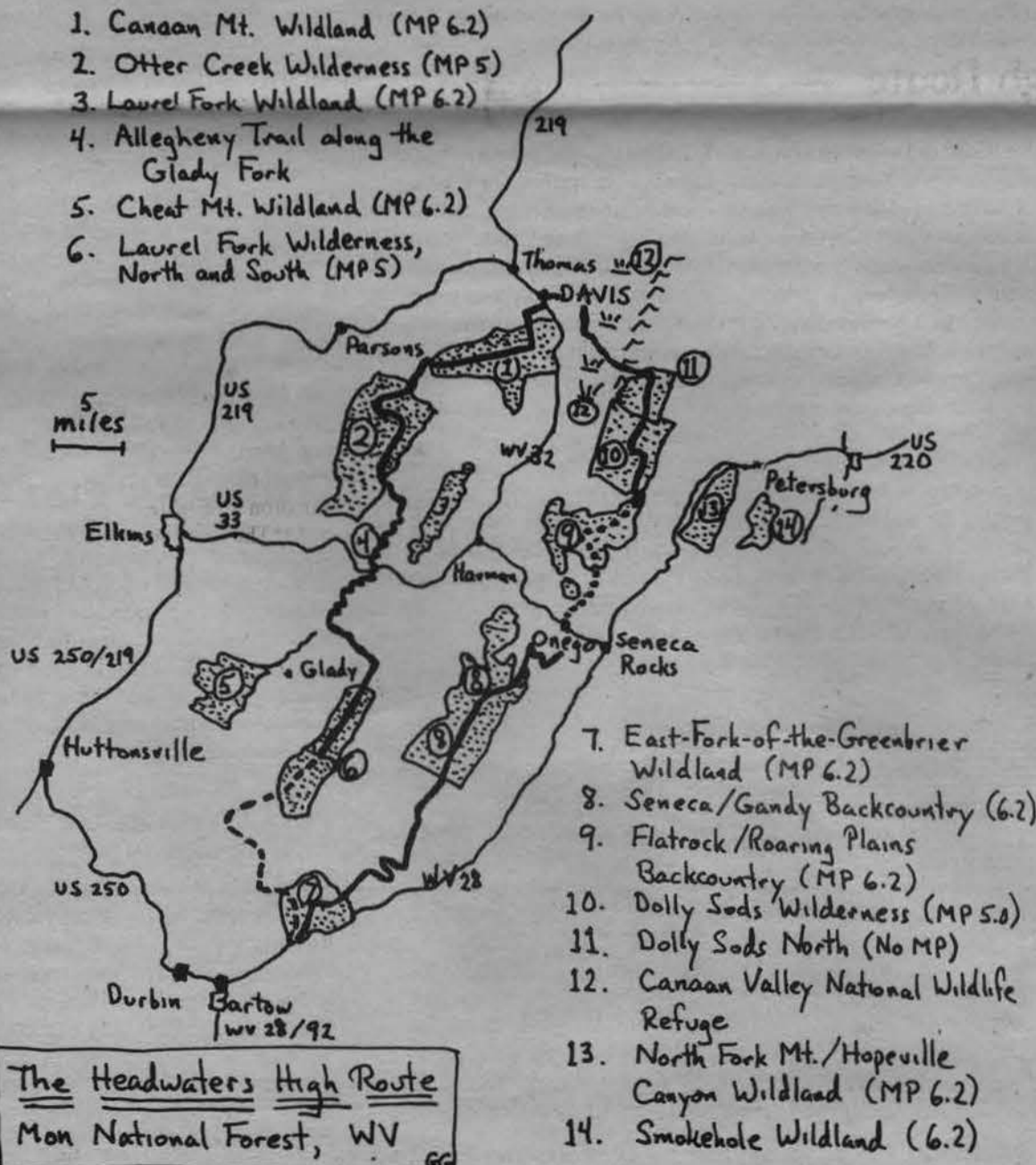
Our days were long. We began daily between 8 and 9 am, and didn't stop until early evening, always trying for a minimum of 12 miles. This became grueling after a few days, especially with packs full enough for a week. Nevertheless, I was struck by how easily the little bits of the hike strung themselves together. We never hiked very much along a road. We crossed pavement three times, and dirt a few more. Generally, the trails matched up even when one would never guess this from the guidebooks. Several times this was because we took old roads that didn't appear in the guides, or because we struck out cross-country with map and compass.

The lesson is simple. Loop hikes work in the Mon. Dozens of them could be made in the National Forest without making any new trails. All it would take is new blazes, a few maps especially drawn up. All it would take is some vision. Why not link the Backcountries to Davis and Durbin? Why not make Onego a center for the most impressive day hikes south of New Hampshire? Why not indeed?

Tales were once told in the Shtetls of Ukraine about how the devil tempted peasants with free land. The peasant could have for his own all the land he could plow around before the sun set. There was one catch: the devil got the peasant's soul if the circle was not closed by sundown. The devil collected many peasants' souls and never gave away a farm.

I am but another poor peasant. While Bruce and I hiked around 150 miles and visited every Wilderness and Backcountry that we had intended, we left two gaps in our circle. To keep promises and schedules (two things a real romantic would have left behind), we twice hitched rides. We missed a section of trail from Laurel Fork Wilderness over Lynn Knob, up Hinkle Run, and down to Camp Pocahontas. We had simply underestimated the mileage in the first half of the hike and we had to get to our food drop.

Our second gap came around



Ranger Cuts Enviros No Slack



(from page 1) other a watershed analysis. Of course the timber assessment is finished and ready to roll, while the other assessments have not proceeded very far. How can anyone call this multiple use, when its obvious that timber comes before all else?

To accomplish her nefarious schemes Cynthia also plans to build 13.4 miles of road, spray herbicide, buy right of ways across private land, and then plant some seedlings wrapped in plastic tubes. Since so much of the land is extremely steep terrain, she is recommending that most of the logs be hauled out by helicopter.

Local landowners and several conservation groups were very upset by the scale of the project, the FS's disregard for recreation, fisheries, and biodiversity that they have appealed the decision. Two separate appeals were submitted; one filed by WV Trout Unlimited and the other by Heartwood (yours truly as contact), WV Sierra Club and several local landowners.

Of course when you appeal

a Forest Service decision you are appealing it to the Forest Service. After the FS denied the excellent 66 page appeal of the Thornwood Gas Pipeline by the Southern Environmental Law Center, citizens don't have much hope that the Forest Service will see the light on this Timber Cut. Don Garvin, author of the appeal for Trout Unlimited, said "This is one decision we must follow through on all the way". As contact for the Heartwood appeal I'm already looking for a knowledgeable, dedicated (affordable) lawyer to help out on this case.

Here are some highlights from the appeals-

FISH and SEDIMENTATION- from the Trout Unlimited appeal

***The Elk River, in its many segments, is in fact unique as a trout fishery in this area, due in no small part to major initiatives by the West Virginia Division of Natural Resources and thousands of hours of volunteer work by Trout Unlimited members from across the state. That it

is a trout fishery of such high quality is somewhat of a miracle itself and can only be attributed to mother nature and the constant vigilance of those who care about the stream -- because someone is always wanting to put mud in this stream. This time it is the Forest Service.

It is our opinion that the Forest Service has failed to give both adequate consideration and adequate protection to the Elk River trout fishery in preparation of the East Gauley timber project and its Environmental Assessment.

**To its credit, the Environmental Assessment does document that the trout fisheries in the Rocky Point and Props Run Opportunity Areas are already seriously impacted by human disturbance. Siltation is at or near threshold limits on Slaty Fork, the main Elk, and every tributary in the watershed... The EA confirms that these sediment levels are adversely affecting wild trout populations. The tributary most affected by sedimentation, Rose

Run, has been visually identified as having siltation percentages as high as 50%, and it no longer supports a viable trout population.

We do not argue that the larger waters, Slaty Fork and the upper Elk River below Elk Springs, have been and continue to be impacted from activities primarily on non-Forest land. It is certainly true that developments at Snowshoe Resort, as well as state roads and highways, and private logging operations and mining activities on the area's private lands have contributed most of the sedimentation to the larger waters. It is for that reason that the numerous nursery tributaries, which are located almost exclusively on National Forest lands, are so critically important to the health and survival of the entire Elk River trout fishery.

The National Forest lands in question here hold the key to the survival of the wild and native trout fishery in the upper Elk River watershed.

***We remain highly uncomfortable with the amount of hard data available in the Environmental Assessment on sedimentation levels and sources in the project area. We are uncomfortable both with the quality and the quantity of this information...

In addition, stream surveys of trout populations in the affected waters also seem to us to be sketchy, or minimal at best. We are never comfortable with deciding conservation matters on the basis of degrading down to a certain level, and we are much less so when there is inadequate information available.

***The Environmental Assessment, while admitting that the trout fisheries in the project area are already in a stressed condition, does not contain a thorough analysis of all the elements that cumulatively impact those fisheries. For example, the EA notes that for most of the streams in the project area already have fine sediment levels well above the threshold level of 20% where trout start experiencing impairment. The EA also notes that the wild and native trout populations in the tributary or nursery streams are very likely being adversely affected by acid deposition. In addition, the EA correctly points out the major contribution of siltation in the larger waters from the private lands in and surrounding this watershed. (But we would strongly disagree with the Forest

Service conclusion that this will improve in the future as a result of the State of West Virginia's adoption of voluntary BMP's for the private logging industry. So far there is no evidence that would support that conclusion).

***While we would agree with the statement on Page 70 of the EA (discussing the Environmental Effects of implementing Alternative B) that even with mitigation some sediment is unavoidable, we would strongly disagree with the statement that proceeds it: namely, that increases in sediment delivery to streams over background erosion rates will be short-term and minimal.

LIMITED ALTERNATIVES:

***The East Gauley Timber Analysis seems to us deficient in another major regard. We do not see how anyone can argue that a true full range of alternatives for this project area were considered, even under the somewhat confining strictures of the 6.1 management designation. The range offered here includes a no-action alternative and three harvest alternatives -- from 15.5 million board feet to 18 million board feet. This hardly seems to us like a credible attempt to consider a range of viable options that might both protect the fishery while continuing to allow for the harvest of timber at some reduced level which could still meet the demands of the 6.1 management prescription.

LIMITED ECONOMIC ANALYSIS:

***Recent National Forest Service reports contained the following information:

In fiscal year 1994 the Forest Service hosted over 835 million visits on National Forests, compared to 300 million by the National Park Service and 40 million by Disney parks. Recreational use of the forests is at an all time high, and RPA projections indicate that use will increase more than 50 percent by 2040. More than two-and-a-half million jobs are associated with the economic activity generated by recreation which is estimated at almost \$100 billion annually. Recreation fees to the Treasury were \$46 million last year and in order to meet increasing demand the agency plans to increase the use of fees in the future. In 1995, National Forests provided 16.1 million activity days of hunting, at an estimated value (see page 8)

The Headwaters High Route



Onego, where Seneca Creek slashes through the Allegheny Front, creating the most alpine of mountain reliefs in West Virginia. Here we faced the headwall of Roaring Run, uncertain private ownership, no trail, and whipped bodies. We opted for a rest day (our only one), and got a ride

with a friend to Dolly Sods Picnic Area.

I aim to go back and finish these two gaps. Like I said at the start, I like the sense of completion in a circle. This is not, however, merely metaphysical preference. The practicality of coming out of the woods after a

few days or a few weeks and finding your car waiting for you is to be highly recommended. So when we emerged from Canaan Valley, into Davis, rounded the corner, and saw that my car was gone.... But that's another story. The devil (or sheriff), I suppose, had claimed his due. ♦



Bruce Summers and Greg Good above Red Creek in Dolly Sods Wilderness

federal affairs

Nine votes in the House by Bill Ragette' and the League of Conservation Voters

On Wednesday June 19, the US House of Representatives considered the 1997 Department of Interior Appropriations bill. The Senate will be working on their version this week.

For your edification I am printing the voting record of our Representatives for the nine amendments considered that the League of Conservation voters reported on.

Mollohan shows himself as a true Republican and bedfellow of the nature haters dominating congress at the present time. If either he or Wise had voted with the Democrats on the repeal of the Salvage Logging Rider or on reducing funding for Forest Service timber road construction, it would have changed the results. Did you contact your Representative?

Hurrah for Nick Joe Rahall (that's my Representative!)

Votes 1 and 2)

Representatives Kennedy *et al* offered an amendment to reduce wasteful funding for logging road construction in the National Forest System by eliminating funding for NEW Forest Service logging roads in Fiscal Year 1997. This amendment would save \$48 million by elim-

inating funding for 550 miles of new timber roads. After the amendment was approved 211-210, a parliamentary procedure was used to force a re-vote on the same amendment. On June 20, the amendment was defeated 211-211, failing to receive a majority of the votes cast. YES is the pro-environment vote. on both votes - Alan Mollohan- NO

Robert Wise- NO
Nick Rahall- YES

Vote 3)

Representatives Porter (R-IL) and Furse (D-OR) offered an amendment to repeal Section 2001 of Public Law 104-19. This amendment repeals the so-called salvage logging rider included in the 1995 Rescissions bill which suspended all federal environmental and natural resource law for old growth timber sales in Washington, Oregon, and Northern California and salvage logging being conducted on Forest Service and BLM lands nationwide. The Furse amendment was defeated 209-211.

Alan Mollohan- NO
Robert Wise- NO
Nick Rahall- YES

Vote 4)

Rep. Farr (D-CA) offered an amendment to increase the FY 1997 Land and Water Conservation fund by \$135 million. The amendment, which would be off-

set by an equivalent cut to the Department of Energy's Fossil Energy Research and Development program, would restore LWCF funding to its FY 1995 level. The Farr amendment was defeated 183-235. YES is the pro-environment vote.

Alan Mollohan- NO
Robert Wise- NO
Nick Rahall- NO

Vote 5)

Rep. Robert Walker (R-PA) offered an amendment to provide an additional \$62 million to the National Park Service operating budget and an additional \$55 million for Bureau of Indian Affairs operating budget. These increases would be offset by cutting \$137 million from the Department of Energy's Fossil Research and Development program. The Walker amendment was defeated 196-224. YES is the pro-environment vote.

Alan Mollohan- NO
Robert Wise- NO
Nick Rahall- NO

Vote 6)

Representative Dicks (D-WA) offered an amendment to strike the provision prohibiting the implementation of critical habitat designation under the federal ESA for the endangered marbled murrelet on private lands in the northern coastal area of California. If critical habitat in

this California area does not continue to be designated, there is a strong likelihood of marbled murrelet extinction in northern California. Critical habitat designation on private land does NOT stop all activities, as such designation only impacts federal, not private, actions. The Dicks amendment passed 257-164. YES is the pro-environment vote.

Alan Mollohan- YES
Robert Wise- YES
Nick Rahall - YES

Vote 7)

Representative Richardson (D-NM) offered an amendment to increase funding for the operations and maintenance of the National Wildlife Refuge System by \$5 million, to be offset by a decrease of \$5 million in the Advanced Pulverized Coal-fired Power Plant. The Richardson amendment was defeated 200-220. YES is the pro-environment vote.

Alan Mollohan- NO
Robert Wise- NO
Nick Rahall- YES

Vote 8)

Rep Bruce Vento (D-MN) of-

fered an amendment to increase funding for the National Park Service by \$23.5 million, to be offset by a decrease of \$23.5 million in Forest Service reconstruction and construction. The Vento amendment was defeated 178-242. YES is the pro-environment vote.

Alan Mollohan- NO
Robert Wise- YES
Nick Rahall- YES

Vote 9)

Representative Miller (D-CA) offered an amendment to provide \$10 million to restore the Park Service's Urban Parks and Recreation Program which was zeroed out in the Interior Bill. The Miller amendment was defeated 199-223. YES is the pro-environment vote.

Alan Mollohan- NO
Robert Wise- NO
Nick Rahall- NO

Environmental Correctness Score -
Nick Joe - 67%
Robert Wise - 33%
Alan Mollohan - 11%

More on the Kennedy Amendment

Road building in the national forests is one of the most environmentally destructive and fiscally irresponsible components of the U.S. Forest Service's timber sale program. Most of the proposed new roads would be built to assist timber companies harvesting trees.

The amendment would have saved taxpayers a total of \$48.5 million. \$42 million in direct costs and an additional \$7.3 million in avoided payments to counties. Problem: Construction of new roads in the forest causes irreparable damage and costs a tremendous amount of money. Most of the road building budget is a subsidy to timber companies to help them harvest trees.

Here are some of the many reasons why construction of new roads in our national forests should be stopped.

* There are already 379,000

miles of road in the National Forest System --a road network more than 8 times the U.S. interstate highway system. In recent years, an average of ninety-five percent of the roads built in national forests were logging roads--only five percent were for recreation or general purpose. The Forest Service continues to defend a timber road building program that is inefficient, costly to operate, and subsidizes industry.

* Scientists believe roads are a major cause of the decline of old-growth forests, grizzly bear habitat, and even cause problems for more common wildlife such as elk. Roads fragment habitat, disrupt wildlife-migration routes, and destroy scenic beauty. Forest roads also cause soil erosion and stream sedimentation which ruins water quality and fish habitat.

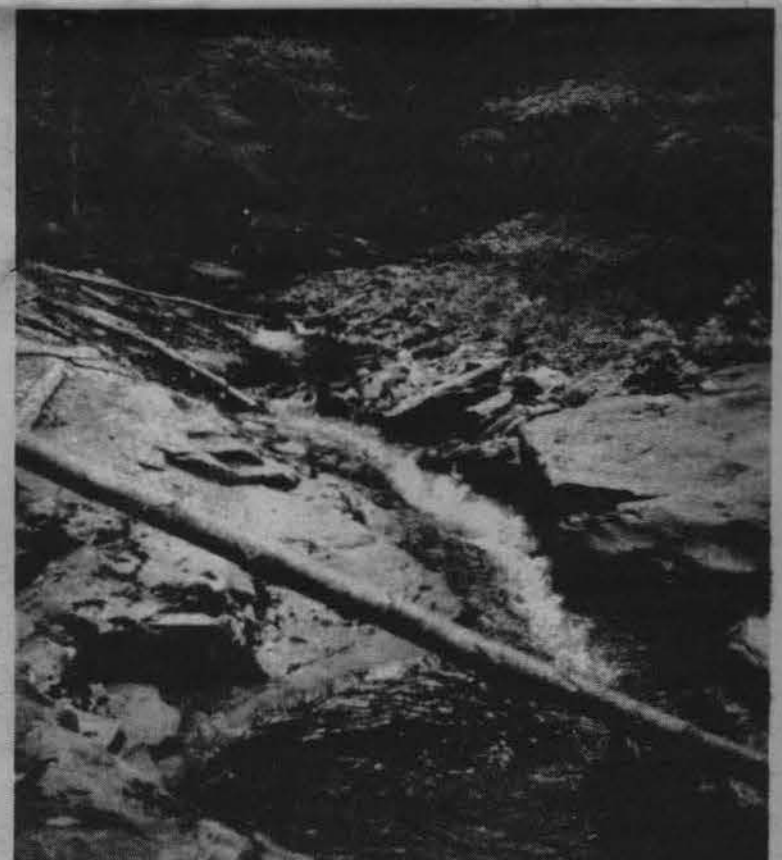
* Timber sales lose hundreds of millions of taxpayer dol-

lars every year. According to the U.S. General Accounting Office (GAO), Forest Service timber sales cost more than they bring in to the U.S. Treasury. The Wilderness Society's analysis of the fiscal year 1994 sales show that 109 of 121 national forests lost money.

In FY92, timber sales lost \$339 million. In FY93, timber sales lost \$377 million. In FY94, timber sales lost \$279 million. Total 3-year loss: \$995 million

* Road-building is a major factor in below-cost timber sales. From 1992-94, GAO found road construction costs nearly \$245 million. The Forest Service should operate more like a business rather than losing money through a road construction subsidy.

* Timber companies make bids on trees in national forests,



Headwaters High Trail - Big Run of the Potomac

but taxpayers pay for the cost of building the roads necessary to log them. The Kennedy amendment does not prohibit them from building the roads at their own expense.

* Roadless areas are gener-

ally in the most remote and mountainous terrain in the country, characterized by steep slopes and rough land. Building new roads in these areas is extremely expensive. Timber road construction is the single most costly factor in below-cost timber sales. ♦

All Carrot - No Stick



(from page 1) the objectives to 'remove regulatory barriers,' 'advance remediation technology through partnerships' and 'promote use of the latest technological advances' in real world application often translate into actions that relieve companies from ongoing liabilities, or, through a watershed approach to cleanup, that blur the lines between pre-SMCRA AML sites and those sites regulated and forfeited under SMCRA.

GOAL #2: ENVIRONMENTAL PROTECTION

The stated goal of protection falls short of the full intent of SMCRA: "AMD from sites permitted under SMCRA should be avoided so off-site material damage to the hydrologic balance will be prevented." That statement may be true as far as it goes, but SMCRA never intended to allow on-site damage to continue to exist once reclamation was completed. Full reclamation under the law leaves a site in a condition as good or better than it was before mining. This Draft AMD policy seems to accept water treatment as an approvable post mining land use.

Objective 1 admits that permits shall only be approved where OFF-SITE damage will be prevented. However, no mention is made of preventing ON-SITE damages after reclamation has been completed, i.e. no mention is made of denying permits where long term on-site AMD will exist. (Hence the image suggested earlier of 5,000 acres of reclaimed land where both ground and surface water has been destroyed.)

The strategies listed to implement Objective 1 speak of identifying risks of AMD; employing measures to control and manage the risk; establishing criteria to measure and assess material damage, and evaluating the implementation and effectiveness of the reclamation plans, but doesn't mention anything about denying permits where there is a risk of long term AMD, or revoking permits where unanticipated AMD proves to be too great to control.

Objective 2 admits the financial responsibility associated with AMD should be fully addressed. The strategies talk of adequate financial assurance to ensure the completion of the hydrologic reclamation plan; adjustments to the financial assurance if conditions worsen at the site, and bond release only if adequate financial assurances are left in place to cover continued treatment. But nowhere is it indicated that there may be some sites where any amount of financial assurance would not be adequate and denial is required, or that permits might be revoked at sites where unanticipated AMD cannot be controlled or prevented, or that releasing bonds where AMD is an ongoing treatment need cannot relieve the operator from his responsibility, or when/if permit blocks would apply, (i.e. what happens when money runs out at one site and the operator has gone on to mine an addition 8 permits that produce AMD and require treatment).

Nor does the policy define how long long-term treatment is or how to determine financial assurances "adequate" for that unknown period of time. Nor does the policy address the financial assurances needed to reclaim the backlog of post-SMCRA sites forfeited since 1977 where AMD exists.

Objectives 3 and 4 describe that monitoring and inspections must evaluate the implementation and effectiveness of the reclamation plan, but offer no guidance RE: agency action if those plans are deficient, failing or if AMD damage will continue to exist after mining and land reclamation has been completed.

CONCLUSION

WVHC and other environmental and citizen groups have long supported the following assertions of SMCRA:

- No permits should be issued where there is a risk of long term AMD.

- At permits where UNANTICIPATED AMD occurs, reclamation plans must be altered to prevent further production of AMD, (or revoked if they can't) and bonds must be adjusted to cover the full extent of water treatment as long as the AMD exists....100, 200, years, etc.

- Bonding (and the Special Reclamation Fund/Bond Pool in WV) must be adjusted so that the state can fulfill the hydrologic reclamation plans at all sites forfeited since SMCRA.

Unfortunately, although OSM's May 15th AMD Policy may be better than those that industry proposes or supports, it is, nonetheless far from what is required by law or by the future needs of citizens and water resources in the coalfield regions.

POSTSCRIPT

A cover letter from OSM Director Bob Uram accompanies the May 15th draft policy. The letter states that "OSM, the coal States, the National Mine[d] Land Reclamation Center, and industry are sponsoring an Acid Drainage Technology Initiative partnership that is bringing together industry, government, and academic experts to explore and develop science-based approaches that will advance mutual environmental protection goals."

For those familiar with West Virginia's recent history this statement may bring on waves of recognition and distress.

- The DLM fiasco on the Buckhannon River was coming to a head in the late '70's and AMD was becoming a major issue in the coalfield area of north central WV. In 1978 David Callaghan, then Director of the WV regulatory agency, appointed a 'Surface Mine Drainage Task Force' to define the AMD problem in that area and to outline procedures for controlling AMD. The Task Force consisted of agency, industry and academic experts and developed a publication in 1979 suggesting guidelines for mining operations in potentially acid producing areas.

- In 1981, as the Holly Grove Coal permit for the Little Kanawha River headwaters was being scrutinized in heated

public meetings and in the first ever EPA EIS study for coal mining East of the Mississippi River, and a coalition of citizen groups was petitioning the state of WV to declare as 'Unsuitable for Mining' the acid producing portions of the neighboring Buckhannon and Middle Fork Rivers, Director Callaghan appointed yet another committee: the AMD Technical Advisory Committee which consisted of representatives from the agency, industry and the academic community who were "the most competent experts in the field of AMD control." The committee was to assist the earlier Task Force to resolve complicated technical questions.

- Anyone who remembers those earlier efforts (which are ongoing in an expanded form today more than a decade later) will also remember the legacy that has followed: i.e. the 'Colombo Amendment' and the many acid producing sites

(eg. Kittle Flats on the Middle Fork River) that were permitted using that provision of state law, the expansion at the Island Creek/Enoxy/(now Anker) Tenmile complex on the Buckhannon River, the F&M site, the Omega deep mine, etc.,etc. The list is long; it's legacy lethal.

The similarities between Director Uram's language and effort of 1996 are strikingly similar to Director Callaghan's language and efforts of the late '70's and early '80's. OSM's May 15th Draft Policy on AMD gives little assurance that the legacy of OSM's initiative will be any more positive than WV's initiative during the '80's. In fact, the loopholes and ambiguities in OSM's May 15th AMD policy may well allow further expansion of the string of trials, experimentation, mistakes, failures and treatment nightmares that now plague north central WV. ♦

Monongahela National Forest Hiking Guide

The Monongahela National Forest Hiking Guide, 6th edition, is bigger and better than ever, with 368 pages, 96 pages of maps, 49 photographs, 177 trails totalling 812 miles, and a full color cover. West Virginia Highlands Conservancy is the publisher. Authors are Allen de Hart and Bruce Sundquist (same as edition 5). Allen has hiked all the trails of the Monongahela N.F. over the past few years. Bruce was the editor for the first four editions. The hiking community and the U.S. Forest Service provided trail reports and photographs. The Guide also provides information for ski-touring and backpacking.

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Thornwood Pipeline Appeals Denied



The "Appeals Deciding Officer" (ADO) at Forest Service regional headquarters in Milwaukee, in lengthy reviews denied both appeals filed on the Thornwood Gas pipeline project. Construction may start as early as July 15. Both of the appellants - Southern Environmental Law Center (SELC) et al and Bill Ragette' - are considering legal action.

Ragette's appeal focused on the patch of old growth located in the right of way of the pipeline, the failure of the Forest Service to document its existence in the

Environmental Assessment (EA), and the significant loss of resources that would result from clearing this patch. The ADO felt that the FS clearly showed that this 'patch' was not old growth, was not a 'stand' and that there was plenty more of those - whatever they are - all over the forest.

SELC's appeal was more focused on the procedural flaws of the EA, the need for an EIS, the implied expansion of gas well drilling the pipeline would permit (demand financially), and the lack of analysis of cumulative

impacts. The ADO felt that there were no procedural flaws, that the pipeline did not demand more drilling, and there was no need for a cumulative impact analysis for wells that may or may not be drilled in the future.

The longest part of the decision record was a copy of a court decision entitled Mahler vs. the US Forest Service et al. You know Andy Mahler himself, Mr. Heartwood. Andy tried to stop a timber sale in the Hoosier National Forest by using the Migratory Bird Treaty Act that states no one shall harm, take, kill, hunt,

trap, etc. migratory birds, whether the harm is intentional or not. Recent court cases have begun to interpret the law more liberally. (In Sierra vs. Martin, the judge issued a preliminary injunction against logging until the nesting season was finished.) But the Judge in the Mahler case felt that even though the FS was taking migratory birds by allowing cutting during nesting seasons, common sense would suggest that we couldn't arrest everyone who cut down a tree with a migratory bird nest in it. His interpretation was that Congress only intended to

prohibit those whose intention was harming, taking of migratory birds. The ADO agreed with him and against the SELC.

Rumors are circulating that SELC and Thornwood are trying to reach an agreement before the case goes to court. Thornwood claims to be willing to 'extinguish' some of its leases, especially in Laurel Fork, Virginia, and perhaps some in WV if a court case can be avoided. Bill is still looking for a lawyer.

Ranger Cuts Enviros No Slack

(from page 5) of \$574 million, supporting 18,900 local jobs and generated \$22.6 million in local taxes. An estimated 37 million days of recreational fishing produced an estimated \$1.6 billion in economic value.

The economic analysis section of this Environmental Assessment considers only the direct costs and benefits of the timber operations, based on the premise that other information was too difficult to compile. We do not believe this is an adequate response to the NEPA process.

IN SUMMATION

***MCTU believes the following: the upper Elk River watershed is a significant and unique trout fishery which is threatened by the adoption of Alternative B, including the proposed mitigation measures; the data on stream siltation presented in the EA is incomplete and inadequate; cumulative impacts to the trout fisheries were not considered; a full watershed anal-

ysis is not provided; the economic analysis is incomplete; a range of diverse alternatives was not presented; real protection of riparian zones is not offered; and, therefore, the EA and projects proposed do not adequately provide for the protection of coldwater streams suitable for trout.

FROM THE HEARTWOOD et al APPEAL-

***The Biological Evaluation, however, does not contain a cumulative effects analysis for either the Endangered Indiana bat or the Endangered Virginia Big-eared bat.

***This sale will violate the Migratory Bird Treaty Act because the sale allows logging during the nesting season... The Forest Service should also bear in mind that both the District Ranger and the Regional Forester could face criminal charges if they allow the sale to go forward. The MBTA is a criminal law.

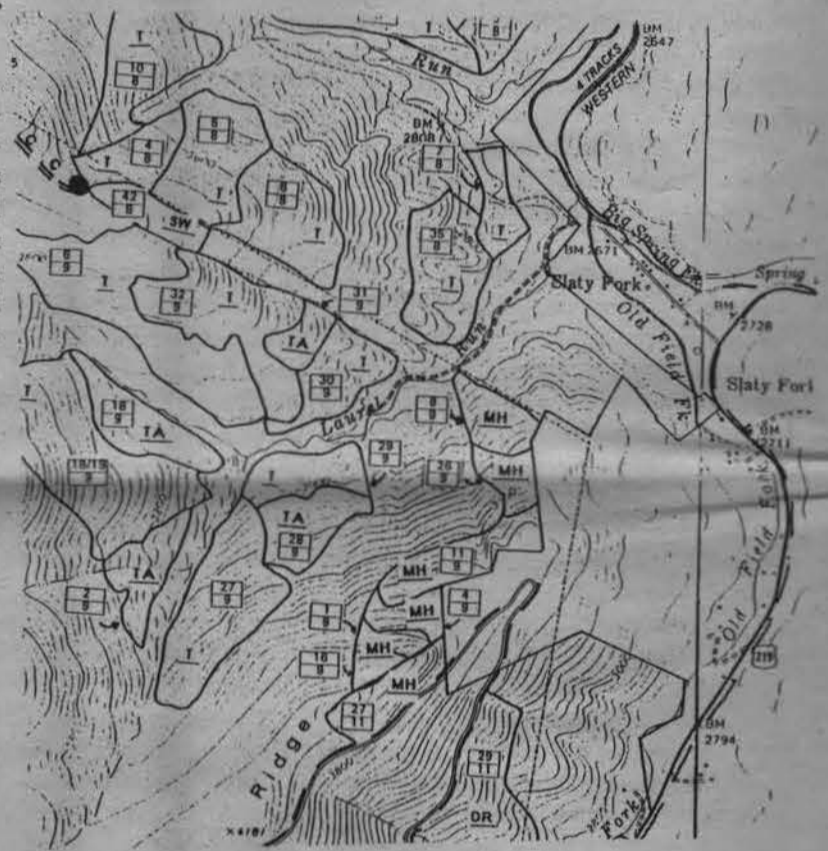
***The EA did not consider an alternative with an interme-

diated or low volume of timber. All of the action alternatives consider a very high volume of timber. There were no alternatives considered that only cut a small amount of trees. This is not an adequate range of alternatives. In California v. Block, the Court held that the Forest Service must consider these types of alternatives.

***The EA and DN make countless claims that they are conducting the project to benefit these species [bear and turkey - editor]. The Ranger, however, fails to explain how disturbances of massive logging and road building will benefit species that cannot tolerate these disturbances. In National Audubon Society v. Hoffman, Civil No. 1:94CV160 (Vermont Dist. December 13, 1995), the court found that logging in black bear habitat would have significant negative impacts on black bears.

***Forest Service figures show that recreation created over 33 times as many jobs as Forest Service logging did in 1994. The

figures also shows that recreation contributed 38 times more to



A section of the project map for East Gauley

the economy than logging did. (National Summary Timber Sale Program Annual Report Fiscal Year 1994 and Explanatory Notes for the 1997 Forest Service Budget.) The project area is a heavily used recreation area. The eco-

economic analysis in the EA, however, neither addresses the economic value of the recreation of the project area nor discloses what the economic impact of the logging will be on recreation. ♦

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