



WEST VIRGINIA RIVERS

November 24, 2020

Monongahela National Forest
Marlinton-White Sulphur Ranger District
1627 Cemetery Road
Marlinton, WV 24954

Attn: Cynthia Sandeno, District Ranger

Re: Upper Elk Ecological Restoration Project

Dear Ranger Sandeno:

Thank you again for your efforts to collaborate with stakeholders on the proposed Upper Elk Ecological Restoration project. We would appreciate a virtual meeting to discuss this project collectively. And thank you for the opportunity to comment on this new scoping document.

On March 20, 2020, West Virginia Rivers Coalition submitted scoping comments on the proposed Upper Elk Ecological Restoration Project. Although the scope of the project has changed, our original comments are still relevant. The proposed project is generally consistent with the management prescriptions for the various units. We support the new comments submitted by West Virginia Highlands Conservancy and offer the following remarks.

Drinking Water Protection Areas

This project area intersects with West Virginia American Water's Webster Springs zone of peripheral concern along Rose Run, Big Run, Bergoo Creek, Leatherwood Creek and Right Fork of Leatherwood Creek. In the environmental assessment for the Upper Elk Ecological Restoration project, please outline the protective measures that will be in place to prevent any impacts to source water. We urge the Forest Service to consider reducing herbicide use in source water protection areas and follow Guideline SW27 in the Forest Plan to coordinate with the water utility for activities that have the potential to affect the municipal water supply.

Tier 3 Trout Streams

The project area includes several Tier 3, high quality trout streams including Bergoo Creek, Leatherwood Creek, Right Fork Leatherwood Creek, Big Run Props Run, Laurel

Run, Old Field Fork, Slatyfork, Crooked Fork. We encourage the Forest Service to follow all Standards and Guidelines in the Forest Plan for the Management Direction of Soil and Water to protect cold water fisheries and aquatic resources.

Range Allotment Improvements

Several wetlands are present in the range allotments; two in the Gay Sharp unit and one in the Hoover unit. Please identify in the Environmental Assessment (EA) how these wetlands will be protected in the range allotment improvements.

Commercial Timber Management – Regeneration and Thinning

In areas proposed for commercial timber management, we recommend following Standard VE013 and Guideline VE014 which specifies to identify, avoid and minimize impacts to rare plant species. We encourage the Forest Service to ensure that the Objective WF10 is not jeopardized by timbering activities and ensure that it is working towards or meeting the objective to have 150,000 acres of 50-150 old oak and oak-pine forests.

Road Work Related to Timber Harvests

In the new scoping document, we noticed the inclusion of proposed road reconstruction, as well as new permanent roads and new temporary roads. We encourage the Forest Service to conduct a site suitability analysis in the EA for any new road construction and minimize road crossings over rivers and streams, avoid highly erodible soils, minimize view-shed impacts, and avoid sensitive, threatened and endangered species habitat.

Improved Maps in Environmental Assessment

We request that the Forest Service include more detailed maps in the EA. On the maps, please include proposed roads, contour lines, natural features, trailheads, recreational assets, streams (including Tier 3 trout streams), and other details that would provide the public a better idea of the extent of the proposed project.

Watershed Improvement

We support the Forest Service's efforts to improve watershed health by increased road maintenance, decommissioning roads, restoring aquatic organism passage, and enhancing stream and riparian habitat.

We appreciate your dedication to serve as stewards of our public lands. Thank you for the opportunity to comment.

Sincerely,

Angie Rosser, Executive Director
West Virginia Rivers Coalition