Friends of the Cheat

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1343 North Preston Highway | Kingwood, WV 26537 | www.cheat.org

July 29th, 2021

Dear Mr. Morgan,

Thank you for providing the opportunity to review and comment on the proposed USFS Upper Cheat River Project, and for hosting a pre-scoping presentation and discussion prior to this scoping period to gather input from the public, stakeholders, and partners.

Friends of the Cheat (FOC) is a non-profit watershed organization that has worked for over 26 years to restore, preserve, and promote the outstanding natural qualities of the Cheat River watershed. Since our organization's inception we have worked alongside state, federal, and private partners to restore water quality of the Cheat River, and have documented success: the Cheat River in its entirety is no longer listed as impaired for acidity, and pollution sensitive fish and other aquatic organisms are again inhabiting all sections of the river. A large portion of the Cheat River's success story is grounded in the protection of the Cheat's headwaters through the establishment of the Monongahela National Forest, which allows for water quality improvements to be achieved downstream. Additionally, some of our current restoration projects (riparian reforestation efforts on private lands in the Upper Cheat watershed and the removal of the Albright Power Dam in the Lower Cheat watershed) will have tangible positive impacts for watershed health both on and off the Monongahela National Forest. Thus, our organization has a vested interest in the activities proposed under the Upper Cheat River Project.

First, FOC is immensely supportive of the watershed and fisheries restoration activities proposed under this project, namely the Large Woody Material Additions, Aquatic Organism Passage Restoration, and the Riparian Buffer Improvements, which will compound with our efforts to restore riparian buffers on adjacent private lands. Additionally, our organization is looking to forge new partnerships with USFS and the WVDOH to improve Aquatic Organism Passage within the project area, both on public and private road systems.

As an organization that is working to reduce sedimentation and erosion within the Cheat and its tributaries, FOC also commends the proposed soil restoration activities on existing haul roads and skid trails, or existing linear features. However, in an effort to reduce future degradation of soil health and water quality as well as minimize restoration needs in the future, FOC advocates that any road or skid trail development related to timber harvest that does not have an additional management purpose under this proposal should be restored to its former topography after the harvest activities take place.

FOC believes the largest risk to increased stream temperatures in relation to the proposed actions under the Upper Cheat River Project is the interception of ground water through road and skid trail development, which can warm the water and pick up sediment before reaching the stream. As noted in the Pre-Scoping presentation, many of the high quality brook trout streams within

the project boundary are already thermally stressed, with marginal or sub-optimal stream temperatures, and none are considered optimal. Additionally, brook trout and Regional Forester Sensitive Species such as Eastern hellbender (both having documented occurrences within the project boundary) are sensitive to sedimentation. FOC is actively working to address both of these issues on private lands through establishing riparian buffers along streams within the project boundary and advocates for limiting any additional risk of groundwater interception or increased sedimentation. Recontouring roads and restoring hillslope hydrology as soon as possible after harvest would mitigate this risk to brook trout and Eastern hellbender in these high quality streams.

Further, Forest Plan Guideline SW15 states that "Topsoil should be retained to improve the soil medium for plant growth on areas to be disturbed by construction. Topsoil should be salvaged from an area during construction and stockpiled for use during subsequent reclamation, or obtained from an alternate site." With this Guideline in mind, topsoil generated from clearing or creating skid trails and other roads associated with timber harvest can be used to recontour the slope and restore soil health and natural hydrology after the harvest takes place, implementing a proactive rather than reactive approach to soil and water conservation.

Additionally, other USFS Timber Management projects have taken place within the Upper Cheat Project Boundary within the last two decades, specifically the Hogback Project and Lower Clover Project. Have the skid trails and roads (existing linear features) associated with timber harvest in these former project areas been evaluated for potential soil restoration activities or road decommissioning under this new project? FOC would support additional soil restoration activities in these former project areas as well.

FOC is encouraged that a large proportion of the timber units proposed will utilize helicopter logging or cable yarding practices, particularly in units with steep slopes. FOC is interested in learning more on how the USFS determines which units will utilize helicopter logging versus those that utilize cable yarding in relation to percent slope. In the event the USFS can not procure a contract to harvest via helicopter or cable yarding it is critical to FOC that these units be dropped and cannot be considered for conventional ground-based harvest due to their steep topography and the potential for impacts to soil and water quality. Additionally, some helicopter units are proposed to receive herbicide treatment. FOC is interested in learning more about this process, especially in regards to timing of herbicide treatment in relation to the harvest, how the herbicide will be applied, and if any roads are needed to apply the herbicide in helicopter units.

During review of the project shapefiles, FOC noticed that a portion of the conventional timber harvest units proposed still cover some areas with steep slopes (>40% - >60%). As required under Forest Plan Standard SW07, what interdisciplinary methods and recommendations will be implemented to maintain soil stability and productivity in these areas? Altering the boundary of the conventional harvest units to exclude areas where slope is 40% or greater and especially where slopes are 50% or greater, could mitigate risk to soil health and stability. Another consideration may be to change the harvest method to "Helicopter'" or "Cable."

Further, our organization recently partnered with the NASA DEVELOP program to complete an intensive study of climate and flood vulnerability on the Cheat River, specifically Tucker and Preston County, in spring of 2021. The results from the study show that temperature has increased by about 1.5°C and precipitation has increased by 4.2 inches between 1970 and 2020, while monthly river discharge has become more variable (Figures 1 - 3). We have included the Technical Report as an attachment for your review and reference.

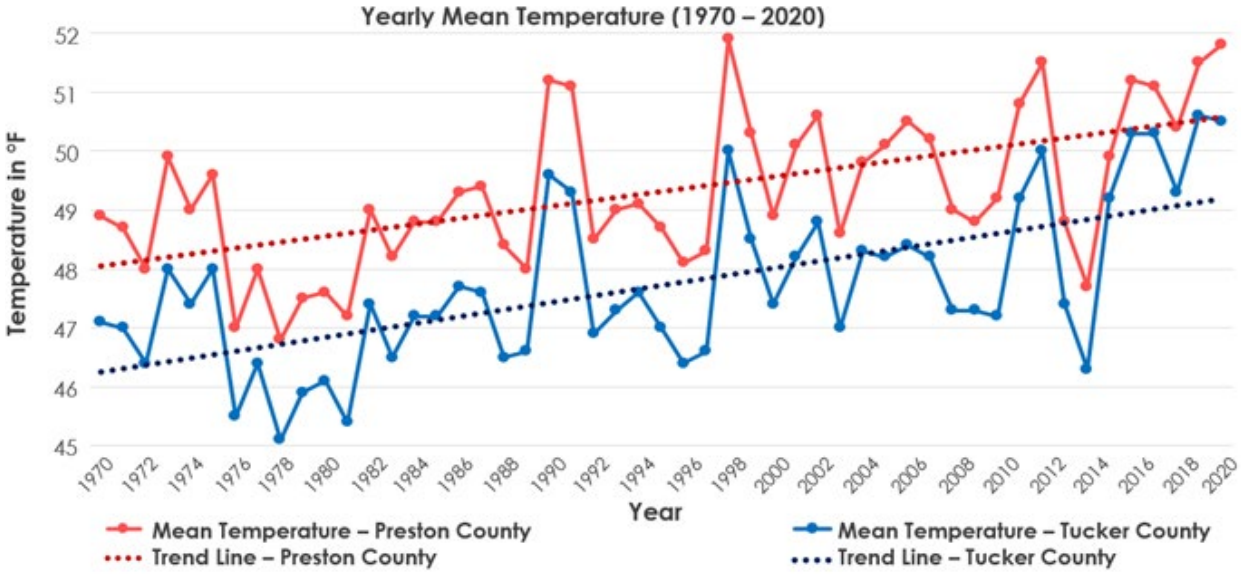

Figure 1. This graph depicts the yearly average temperature time series, including a trend line to show change in climatic trends between 1970 and 2020 in Preston County and Tucker County, WV.

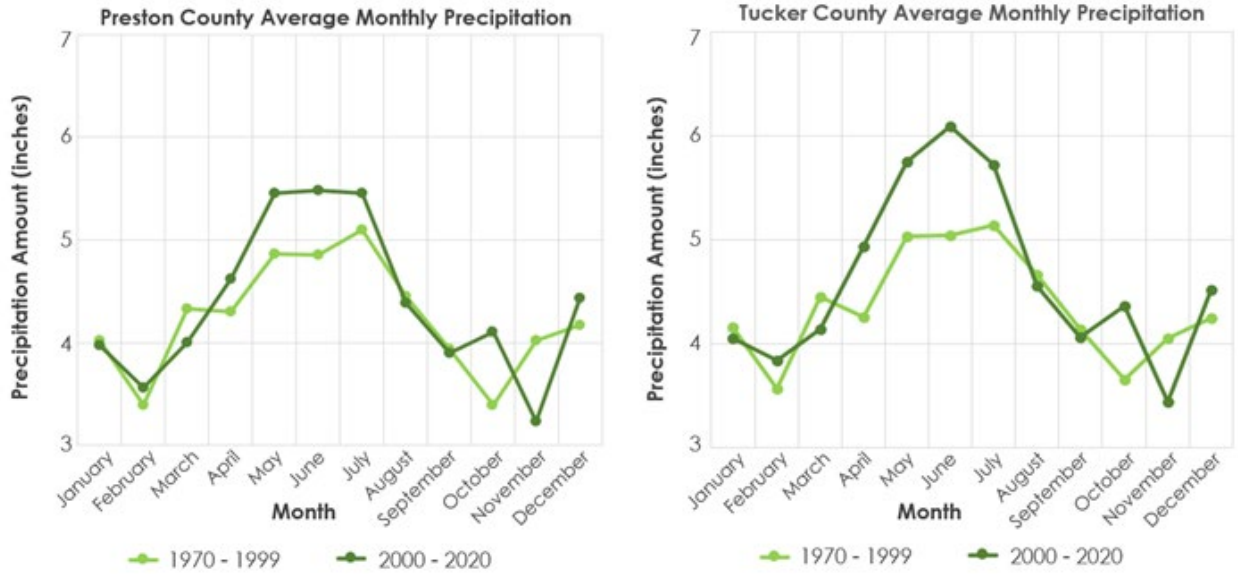

Figure 2. These graphs depict the monthly average amount of precipitation time series, using two different means (1970-1999 and 2000-2020) to show change in climatic trends between 1970 and 2020 in Preston County and Tucker County.

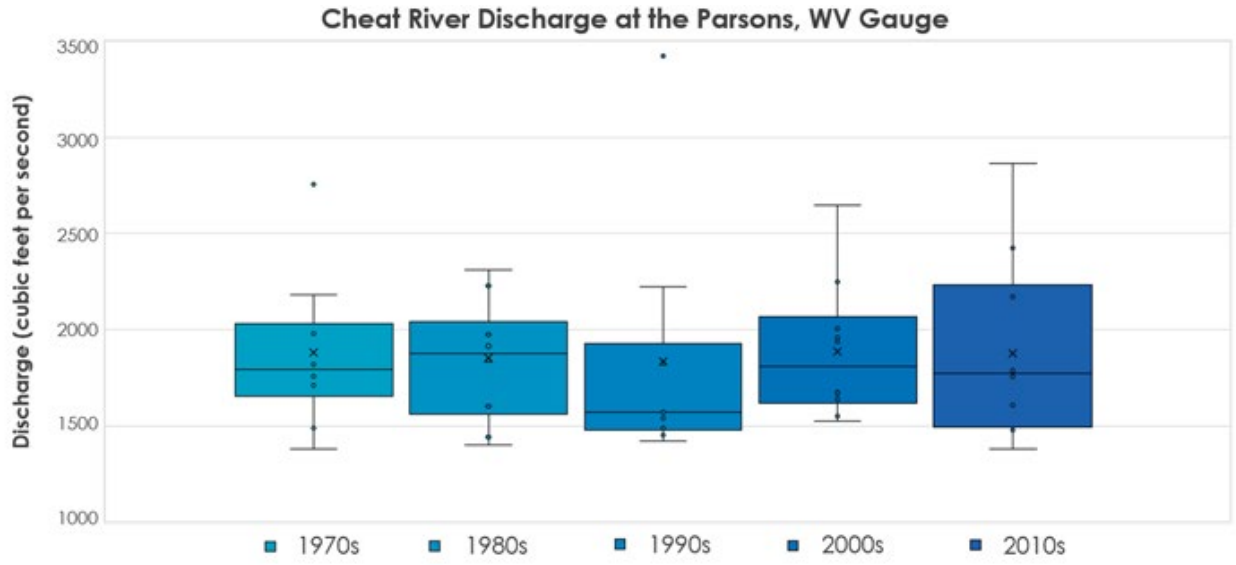

Figure 3. This graph utilizes box and whisker plots to show river discharge of the Cheat River at the Parsons, WV gauge, in decadal increments.

With these tangible and local observations in mind, FOC is committed to promoting activities both on private and public lands that are rooted in the most current climate science to improve climate resiliency in the Cheat River watershed. Additionally, as project partners we support the comments provided by The Nature Conservancy (TNC), and would also like to learn more about how the USFS is integrating climate adaptation practices in timber unit selection and vegetation management. As part of our mission to preserve the outstanding natural qualities of the Cheat River watershed, we echo TNC's request to reduce the number of conventional and cable units in the Horseshoe Run and Hile Run watersheds that correspond with their identified Hot Spots for high quality streams, high biodiversity, and climate resilience. Also in the Hile Run watershed, unit R45 (while a helicopter unit), is proposed near or adjacent to where landowners collect drinking water via cisterns-- we ask this unit be reevaluated in regards to impacts to drinking water supply.

FOC understands that under the Multiple-Use Sustained-Yield Act, timber management is a pillar of USFS program goals and activities. FOC believes we can work together to improve climate resiliency, restore water quality, and avoid impacts to unique, biodiverse areas while allowing for sustainable harvest in low impact areas.

We look forward to working with you on the USFS Upper Cheat River Project,

Amanda Pitzer
Executive Director
Friends of the Cheat