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September 2, 2021

Cynthia Sandeno, District Ranger
Monongahela National Forest
1627 Cemetery Road
Marlinton, WV 24954

Re: Comments – Upper Elk Ecological Restoration Project- Preliminary EA

Mrs. Sandeno,

Thank you for preparing a detailed Preliminary Environmental Assessment for the Upper Elk Ecological Restoration Project and the opportunity to provide comment. As stated on page 1 of the document, the majority of the project area falls within an area described by our Resilient Land Mapping Tool as a climate flow zone with confirmed diversity, which connects the project area with other significant resilient landscapes. The Nature Conservancy appreciates your use of this information and we share your interest in restoring landscape resilience and connectivity so that the area's rich biodiversity can shift across the landscape in response to climate change. In particular, we support the proposed commercial and non-commercial spruce restoration, and commend the Forest Service for including those activities in appropriate sites across the project area and in each of the Management Prescriptions. We also strongly support the proposed watershed and aquatic habitat improvements, including road decommissioning and obliteration, restoration of legacy features, riparian planting, aquatic organism passage and in-stream habitat improvements, along with only minimal new road construction. These activities have the potential not only to restore habitats for many species of concern, but also to restore ecological processes, resilience and connectivity across the landscape.

TNC also supports managing for the full range of age classes within a forested landscape, achieving the desired natural range of variation from early to late successional forests across dynamic forest blocks that support a range of wildlife species. This can also include the proposed use of small wildlife openings and carefully managed rangelands in appropriate locations. Managing for early successional habitat in appropriate conditions is also an important component of forest climate adaptation as well as providing wildlife habitat and achieving the natural range of variation in the landscape.

We appreciate the recognition of the importance of managing forest stands for carbon mitigation and resilience to climate stressors by improving current stand health in the Climate Change and Carbon Storage section. In designing treatments for improved forest health we encourage the Forest to create opportunities to drive more of the landscape towards late successional characteristics (i.e., snags and coarse woody debris) with non-commercial methods, not solely relying on commercial thinning, particularly in areas not prone to wildfire. Late successional forests provide opportunity for carbon mitigation, bolster resilience to climate change, and provide critical wildlife habitat. We also encourage the Forest to consider species composition and encourage shifts toward species predicted to be adapted to future climates when designing TSI and planting. TNC will continue to pursue funding for active management that advances landscape scale age class diversity, including both early and late successional forests, with outcomes for people and nature.

TNC would like to make the following specific suggestions regarding the proposed red spruce restoration treatments described in the document, based on our direct experience with this work. We support the avoidance of high-suitability WVNFS habitat in selecting treatment areas, and we agree that the proposed, targeted herbicide treatments are unlikely to have long term effects. However, there is some inconsistency in language that we recommend be clarified.

- The design criteria described on p. 12 as retaining hardwoods greater than 6 inches dbh with a visible cavity would seem like a reasonable way to avoid impacts on WVNFS in suitable habitat, while also achieving mid-story red spruce release.
- Limiting non-commercial spruce release treatments to trees less than 6 inches dbh in MP 3.0 within suitable WVNFS habitat, as described on p.56, is not consistent with the previously listed design standard and would not achieve the release of larger midstory red spruce trees into the canopy.
- For consistency, we also suggest clarifying or amending the description of red spruce restoration beginning on p. 87 as releasing smaller “seedling, sapling, and pole-sized red spruce” to include release of larger subcanopy or “midstory” red spruce, as indicated on p. 54.
- It may also be worth clarifying in the treatment description on p. 87 that to effectively release red spruce, commercial thinning needs to emphasize the removal of trees near, or overtopping, suppressed red spruce, through the creation of small canopy gaps, as indicated in the language on pp. 12 and 54.
- We suggest amending the description of native planting activities on p.94 to also include under planting with red spruce in appropriate areas to connect existing stands of red spruce trees on the landscape.
- We would like to fully understand the layout of the proposed red spruce and aquatic restoration activities along with remaining roads and the sequencing of road decommissioning, obliteration and soil restoration treatments in those areas. Each of

those activities provides important restoration benefits, and yet road access to restoration sites is also critical. While it appears that some road access will remain in most restoration areas, it is not 100% clear from the maps provided.

We look forward to discussing these points further and would welcome the opportunity to assist in implementing this important work.

Lastly, in order to understand the connectivity of habitats and activities across the project area, it would be helpful to see information regarding stream habitats, forest types and age classes on National Forest lands as well as the private lands running through the center of southern half of the project area in particular. Information about lands and waters outside but immediately adjacent to the project area would also be helpful.

The Nature Conservancy recognizes that in addition to proposing a significant set of activities to restore ecological functions and habitat, climate resilience and connectivity, the Monongahela National Forest area plays a large role in supporting local people and community economies by providing opportunities for timber production, restoration jobs and outdoor recreation. The activities proposed in this Preliminary EA would provide many of those same benefits.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Miller", with a long horizontal flourish extending to the right.

Todd Miller

Director of Conservation