WEST VIRGINIA RIVERS

September 7, 2021

Marlinton-White Sulphur Ranger District
1627 Cemetery Rd.
Marlinton, WV 24954

Attn: Cynthia Sandeno, District Ranger

Re: Upper Elk Project

Dear Ranger Sandeno,

West Virginia Rivers Coalition, on behalf of our members, respectfully submit the following comments on the preliminary environmental assessment for the Upper Elk Project.

Soils

The soils analysis contains no literature citations, references to data, or other rationale to back up conclusions that adverse effects would be minimized. Simply stating that the project will use best management practices (BMPs) does not guarantee that no erosion or sedimentation will occur. This project is proposing 5 miles of new road construction on Mauch Chunk geology with highly erodible soils and a high risk of landslides.

The soils analysis only considers the impacts from disturbed soils. It does not consider the cumulative impacts of acid deposition and the secondary impacts of nutrient depletion. Forest soils, in general, and the Pottsville geologic substrates, specifically, are highly susceptible to nutrient depletion.

Brook Trout

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. The aquatics analysis says the project may cause "slightly less desirable conditions" for brook trout in "most cases," and acknowledges the possibility of suitable habitat being reduced in "extreme instances". The analysis does not tell us (1) where the impacts are likely to occur and how much habitat would be affected, (2) the intensity of the impacts, (3) whether brook trout or other species are likely to be extirpated anywhere, (4) the extent to which habitats are

likely to recover and the timing of such recovery, and (5) the effectiveness of BMPs and mitigations in lessening impacts and facilitating recovery.

No data, literature citations, or other rationale are presented to back up the conclusions that impacts would be slight, temporary, and would be mitigated by BMPs. Brook trout are highly sensitive to sedimentation impacts; however, the analysis of sediment transport is very general and doesn't specify about the amount and intensity of expected impacts, nor does it provide any rationale for the conclusions.

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. The protective measures outlined in the EA include riparian buffers and BMPs to prevent impacts to source water; however, the analysis presents no rationale or documentation to support that conclusion.

Climate Change

The forested mountains of Monongahela National Forest help increase climate change resiliency in the Appalachian Region. The EA contains no analysis of the increase or reduction of carbon storage as a result of this project. This information is needed to determine whether the project is a help or a hindrance to carbon sequestration.

Roadless Area

While WV Rivers supports the activities proposed in the Gauley Mountain Roadless Area such as watershed restoration, red spruce restoration, and enhanced habitat for threatened and endangered species, we question whether the Forest Service is doing these activities while in compliance with the Roadless Rule. are compliant with the roadless rules. Activities such as timber harvesting, wildlife openings, and cutback borders under the guise of enhanced habitat for the West Northern Flying Squirrel does not appear to meet the requirements of the roadless rule.

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.

Signed,

Angie Rosser
West Virginia Rivers Coalition

Linda Frame
West Virginia Environmental Council

Allen Johnson
Christians for the Mountains

Beth Little
Eight Rivers Council