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Jon Morgan
District Ranger, Monongahela National Forest
Cheat-Potomac Ranger District
2499 North Fork Highway
Petersburg, WV 26847

Re: Comments – Environmental Assessment for Upper Cheat River Project

Mr. Morgan,

The Nature Conservancy in West Virginia (TNC) seeks to work collaboratively with the Monongahela National Forest (MNF) and other conservation partners at the landscape scale to protect and restore the ecological integrity of critical forests of the Resilient and Connected Network (RCN) in West Virginia, and across the Central Appalachian Mountains. Thank you for the opportunity to review and comment on the Environmental Assessment for the Upper Cheat River project, an area important to climate flow for species migrations within the RCN.

Active timber management for age-class diversity in MP 3.0, which makes up the vast majority of this project area, is clearly a defined outcome in the forest plan, and TNC recognizes the role of timber management for both ecological outcomes and contribution to local and state economies. However, we believe that management decisions on the Forest at this scale should reflect the conservation needs, when appropriate, of the entire watershed and landscape, and not just the desired conditions within the Forest ownership or Management Prescription. And we urge MNF to place more emphasis on protecting rare forest types, ecosystems, communities and other unique features within project areas from forest fragmentation and other impacts of timber management.

Our comments on the scoping document highlighted the Upper Cheat watershed as a core climate flow zone within the Central Apps RCN, and a regionally significant high-quality watershed with a rare concentration of exceptionally biodiverse cove and Mesophytic forest types in late successional age classes where detrimental activities should be avoided. Our main comments were founded on our “hotspot” analysis of late successional forested areas completed at the scale of the Upper Cheat watershed which encompassed both private and public lands. This analysis identified three conservation “hotspots” in the Upper Cheat project area within MP 3.0 which had a high degree of climate connectivity, tier 3 stream associations, and a high percentage of mixed Mesophytic cove and northern hardwood forest types in late

successional stands. To protect these regionally underrepresented late successional stands of mixed Mesophytic cove and northern hardwood from harvesting and additional fragmentation we recommended reducing the acreage of timber harvest units within these hotspots, particularly in the Horseshoe Run and Hile Run watersheds.

While the EA acknowledges the importance of late successional, mixed Mesophytic cove and northern hardwood forests, it does not reduce the number of timber units in the conservation hotspots or quantify the impacts in those locations. The EA states that of the 8,278 acres that would not be managed for commercial timber production, 1,641 acres would remain in late successional stands and 3,575 acres are mixed Mesophytic forests. Additionally, the EA states that within the Horseshoe and Hile Run watersheds, 29% of NFS land is not available for commercial timber production, which includes 271 acres of mixed Mesophytic forest and 45 acres of late successional stands. The EA states that these areas would contribute to the overall goal of late successional stands on the Forest. However, the location and spatial distribution of protected or managed late successional stands matter. The proposed actions in the Upper Cheat would fragment cores of underrepresented mixed Mesophytic cove and northern hardwood late successional forests.

The Forest Plan establishes a management direction with desired conditions of age-class diversity in MP 3.0, and that is driving forest management planning for this project. But forest management activities should also consider the need for ecological and watershed integrity, rare plant communities, patterns and processes and other Forest Integrated Desired Conditions described in the Plan. Where there are regionally important mixed Mesophytic and cove forests in late successional stands, rare high-quality watershed and streams, management actions should be planned so as to maintain those features as well as the patterns and the processes that support them. Actions to regenerate early successional stands should occur outside of these hotspots, and in other locations in the Forest. We agree, as written in the EA, that managing forests for age-class diversity will help provide habitat for numerous species that depend on them, but place matters and the EA should include an assessment of timber harvesting impacts on these habitats.

We recommend that the Forest eliminate or reduce the number of timber harvest units that overlap mixed Mesophytic and cove forests in late successional stands within the conservation hotspots, such as the following:

unit	R20	R22	R23	R24	R25	R26	R27	R33	R46	R47	R48	R49	R51	R67	R68	R69	total
acres	40	29	15	34	31	21	28	19	29	40	38	27	38	28	40	39	496

Please provide information about the forest type and age-class to be impacted by these proposed timber harvest units in the conservation hotspots. And while we understand the need to control grape vines, non-native invasive species, beech brush and other undesirable vegetation from timber stands, we recommend limiting TSI treatments in the conservation hotspots to avoid additional impact of heavy machinery that could lead to erosion, soil compaction and sedimentation, invasive plant spread, and further core forest fragmentation.

Furthermore, while early successional habitat is an important component of managing dynamic forest blocks for age class diversity, wildlife habitat and climate adaptation, we recommended considering the entire watershed as the ecologically relevant scope to drive appropriate management. Forest Plan Guideline VE05 also suggests 5th-7th order watersheds as the appropriate unit of analysis. However, the EA only describes impacts within FS lands in the project area and does not address the cumulative impact of activities on private lands within the watershed, even in the project area. Given the large extent of timber harvesting on nearby private lands, this would be an ecologically appropriate context for consideration of age-class categories and other management needs. Due to the risks of introduction of invasive species and sedimentation in a regionally rare high-quality watershed we recommended reconsidering the extent and placement of even-aged regeneration cuts that have been proposed. Please provide additional information about the cumulative impact of timber harvesting activities on private lands within the project area and reconsider the extent and placement of even-aged regeneration cuts accordingly.

Our scoping comments also encouraged staff to set aside some of these areas for structural complexity enhancements that would accelerate late successional forest traits in stands that have the greatest potential to store carbon and mitigate climate change. TNC plans to advance a network of demonstration sites for accelerating late successional forests in the Central Appalachians and would include the Upper Cheat in project proposals should there be NEPA-approved opportunities. The EA does not consider these recommendations.

We continue to support the watershed and fisheries restoration actions proposed through this project, such as Large Woody Material Additions, Aquatic Organism Passage Restoration, Riparian Buffer Improvements, Road Closure and Soil Restoration. The prescribed burning activities would also be beneficial to habitat improvement and forest structural diversity.

We look forward to further collaboration with MNF to plan and implement this project.

Sincerely,

Todd Miller
Director of Conservation Programs