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Organization: West Virginia Highlands Conservancy
Title: President
Comments: July 30, 2021

Mr. Jon Morgan, District Ranger

Monongahela National Forest, Cheat-Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

Re: Scoping comments of the West Virginia Highlands Conservancy on the proposed Upper Cheat River Project

Dear Mr. Morgan:

With this letter, the West Virginia Highlands Conservancy (WVHC) provides scoping comments on the Forest Service's proposed Upper Cheat River project.

WVHC promotes, encourages and works for the conservation [ndash] including both preservation and wise management [ndash] and appreciation of the natural resources of West Virginia and the Nation. We focus primarily on the Highlands Region of West Virginia, but our work is for the cultural, social, educational, physical health, spiritual and economic benefit of present and future generations of residents and visitors alike.

Thank you for the opportunity to participate in the scoping of this project. We especially appreciated the virtual scoping meeting and follow-up contacts of interested parties in December, 2020. WVHC believes that early, frequent, and thorough public involvement is the key to designing a project that can achieve a consensus of support among the agency and the full spectrum of stakeholders. In that spirit, we have reviewed the scoping materials, and we have the following specific comments and suggestions to offer.

Thoroughness of the Scoping Package

The scoping package appears to be very complete and thorough. The detailed descriptions of project area conditions and proposed activities facilitated a clear review of the proposal. We especially appreciate the maps

and GIS layers. The scoping package for the Upper Cheat River Project sets an excellent example for future projects to follow.

Timber Harvest, Early Successional Habitat, and Old Growth

The proposed project includes an extensive amount of regeneration harvesting spread across a large project area. All of the proposed harvest is in Management Prescription 3.0 areas, which are designated by the Forest Plan for intensive timber management. Also, land ownership is fragmented, backcountry management potential is low, and the project area has fewer sensitive habitats than many other areas of the Monongahela National Forest. Therefore, the project area appears to be an appropriate place for the proposed timber harvesting. Of course, sensitive habitats and resources do exist, and we expect that the Forest Service will avoid impacts as much as possible, and fully analyze and disclose any impacts that may occur.

Due to the large amount of intensively managed private land in the area, we think the Forest Service should consider the extent to which early successional forests and herbaceous openings already exist within the watershed when planning for these habitat components on National Forest. National Forest management should not cause over-representation of young forests and openings within the overall watershed.

Old forests (>120 years) are currently near desired levels on National Forest land. Presumably, old forests are less common on more intensively managed private lands within the project area. Also, old forests constitute important reservoirs of stored carbon that are critical on a nation-wide and global basis for mitigating the ongoing acceleration of climate change, and old forests provide habitat and species diversity within the otherwise intensively managed watershed. For these reasons, timber harvests should avoid old stands, and should instead be concentrated in mid-late successional stands.

Watershed and Soil Issues

We favor all of the proposed watershed and soil restoration activities. The proposed activities would help improve aquatic habitat, reduce sedimentation, and stabilize stream flows. Such improvements are critically important for building resilience to the ongoing and increasing impacts of climate change, such as rising water temperatures, increasing storm flows, and seasonal droughts.

We commend the Forest Service for developing a landscape-scale timber project without proposing any new construction of system roads. The proposed road decommissioning should actually result in a slight decrease in overall mileage of system roads in the project area, which would help limit the project's impacts on watershed.

Of course, many miles of temporary log skidder roads would be created by the project, which presents the potential for widespread sedimentation and disruption of watershed hydrology. Effective decommissioning of

these roads after use would mitigate the long-term impacts, and it appears that the Forest Service has proposed a workable and flexible strategy for effective decommissioning. We are pleased by the proposal to decommission 47 miles of existing skid roads, in addition to decommissioning the 49 miles of new skid roads. However, follow through during project implementation will be the key to success of this strategy. We urge the Forest Service to commit to adequate funding and staffing for a team of watershed specialists to carry out this strategy, and to include transparent stakeholder involvement in this process.

Although we are encouraged by the road and skid road decommissioning proposals, aerial imagery of the project area shows many more miles of existing old skid roads that are not included. While the current proposal should help prevent further degradation of the watershed, an opportunity exists to make a substantial improvement by conducting soil and hydrology restoration on a larger proportion of the existing legacy features. Of particular importance is decommissioning the skid roads that were constructed by the recent Lower Clover and Hogback projects. These projects resulted in a large increase of skid road mileage in the watershed, and the skid roads were not effectively decommissioned upon completion of those projects. We strongly encourage the Forest Service to develop an alternative that focuses on watershed restoration, to include extensive decommissioning and restoration of legacy skid roads.

We are pleased that the Forest Service is attempting to maintain the integrity of steep slopes by including many harvest units that would be yarded by helicopter and cable systems. However, it appears that the Forest Service is also proposing to use log skidders on many areas with slopes over 40 percent. Although the Forest Plan does not completely prohibit skidders on such slopes, it strongly discourages them. We believe that the best way to ensure stability of steep slopes is to avoid ground-based skidding on slopes over 40 percent, and we encourage the Forest Service to commit to such avoidance. The following proposed conventional units appear to contain large areas of slopes over 40 percent. As our review was cursory, others may exist. We encourage avoidance of ground-based skidding in all such areas.

R35

R65

R85

R121

R127

R128

T82

T134

T141

Many small streams in the project area support populations of native brook trout. These populations exist at relatively low elevations, and would appear to be vulnerable to high water temperatures caused by climate change and land management impacts. The Forest Service should evaluate the potential for the proposed project to contribute to increasing stream temperatures, and should include measures to avoid such impacts.

Surveys for Threatened, Endangered, and Sensitive Plants

We are confused about the proposed timing of surveys for threatened, endangered, and sensitive (TES) plants. Design feature Botany-1 seems to suggest that surveys would occur after the project NEPA decision, and that mitigation measures would be developed at that time. Such timing would be a major flaw because the EA could not disclose the actual impacts to TES plants. We strongly urge the Forest Service to conduct the surveys prior to writing the draft EA so that impacts can be disclosed and so that stakeholders can have input on protection measures.

Climate Change

The need to reduce greenhouse gas emissions and adapt to climate changes that are already occurring grows more urgent with each passing day. Although forest management is not the largest player in global efforts to reduce overall greenhouse gas levels in the atmosphere, it is still an important part of the picture, and the incremental impacts of each project cannot be ignored.

We applaud the Forest Service for using the NIACS Adaptation Workbook to develop strategies for making the project area more resilient to the impacts of climate change. However, the Forest Service must conduct a more thorough assessment of the project's contribution to climate change, as well as the extent to which project activities affect the resilience of important resources. Therefore, we urge the Forest Service to analyze the project's potential for emission and sequestration of carbon. The analysis should address direct emissions from equipment, loss of carbon in waste material (tops, stumps, roots, non-merchantable stems, etc.), loss of carbon due to soil disturbance and vegetation changes, the status of stored carbon throughout the lifecycle of wood products, the ability of mature forests to store and continue sequestering carbon, sequestration of carbon in new growth, and long-term changes in carbon sequestration due to management-induced changes in the state of the ecosystem, including the soil. The cumulative effects of this project together with other ongoing and foreseeable projects should also be assessed. The analysis should also include an assessment of the effects of the proposed project on the resiliency and adaptability of project area resources as they continue to be affected by the changing climate.

In a recent executive order, the President established a goal of conserving 30 percent of US lands and waters by 2030. This goal is often referred to by the shorthand term "30 X 30." The proposed project should be evaluated to determine the extent to which it would contribute to, or detract from, this goal. Measures should be included to ensure that the project makes a positive contribution to 30 X 30.

Conclusion

We appreciate the opportunity to provide scoping comments on the proposed Upper Cheat River project. Overall, we think the Forest Service has made a diligent effort to design a project that meets the management emphasis for the area, includes protections for sensitive resources, and responds to stakeholder concerns. As noted above, some areas of concern need further attention. We look forward to working with you to help develop the project in a way that provides the projected benefits while also protecting sensitive and important environmental resources.

Should you have questions or additional information to share, please feel free to contact me. You may also contact the Chairperson of our Public Lands Committee, Kent Karriker.

Sincerely,

Larry V. Thomas, President