

Data Submitted (UTC 11): 3/31/2022 4:41:38 PM

First name: Randy

Last name: Kesling

Organization: TU

Title: WV Council TU, Conservation Committee Chair

Comments:

Thank you for the opportunity to comment on the draft environmental assessment of the proposed Upper Cheat Project. As members of Trout Unlimited whose mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon, we are concerned with the impact that this project may have on the several trout streams that flow within the project boundaries.

We do appreciate the Forest Service's attention and acknowledgement of the need to protect the trout streams in the project area, and the steps it plans to take towards that end. We do, however, want to emphasize the importance of protecting and improving our coldwater fisheries and the aquatic habitats essential to them. The need for further emphasis becomes apparent when we see the declining numbers of brook trout within the project watershed evidenced in Table 30 of the EA draft. Since brook trout are a Forest Management Indicator Species for stream health, such population declines should be setting off alarms that something needs to be done to increase resilience and mitigate potential loss of this resource.

Trout Unlimited urges the Forest Service to take every effort to counter the negative effects of the proposed actions on the coldwater resources and to implement all actions that increase resilience to climate change which may continue to increase stress on coldwater aquatic communities and potentially lead to the extirpation of brook trout in the project area as indicated in the Environmental Assessment. Our major concerns and recommendations can be summarized as follows:

- *protecting streams from temperature increases which can affect brook trout populations
- *protecting streams from sedimentation which can smother brook trout spawning beds and diminish available food sources for the fish
- *protecting streams from run-off from herbicides applied as part of the proposed project activities
- *ensuring that calculation of any timber harvest for the proposed project takes into account the age class distributions within the entire Upper Cheat watershed as a whole which includes class distributions on both public and private lands, and not just those in the proposed project area
- *improving aquatic habitat by implementing large woody material additions, riparian buffer improvements, and aquatic organism passage restoration
- *continuing to assess and monitor the brook trout populations and coldwater resources on the Forest.

In general, we believe that the future of forest management as it relates to our coldwater fisheries will require a greater emphasis on the protection and remediation of increasingly imperiled habitats and their associated species. Certainly, stopping the accelerating loss of suitable water quality (including water temperatures) and the decline of species diversity in our streams is a top priority for us. We rely on the Forest Service as a crucial player in efforts to preserve and protect our coldwater fisheries, and we look forward to working together with the Forest Service to meet the challenges ahead.

Thank you again for providing us the opportunity to voice our concerns and to comment on this proposed project.