[](https://wvhighlands.org/)

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March 31, 2022

Mr. Jon Morgan, District Ranger

Monongahela National Forest, Cheat-Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

Re: Comments of the West Virginia Highlands Conservancy on the Draft Environmental Assessment for the proposed Upper Cheat River Project

Dear Mr. Morgan:

With this letter, the West Virginia Highlands Conservancy (WVHC) provides its comments on the Draft Environmental Assessment (EA) for the Forest Service’s proposed Upper Cheat River project.

WVHC promotes, encourages and works for the conservation – including both preservation and wise management – 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.

As we noted in our previous comments during the scoping period, WVHC recognizes that the project area largely falls within Management Prescription 3.0, which places an emphasis on intensive commercial timber harvests and high levels of early successional habitat. We understand that the Forest Service is required to pursue the goals and objectives of the Forest Plan. However, in our review of the Draft EA, we have identified several areas of concern that we would like to see rectified. These concerns largely mirror the concerns that we raised in our scoping comments.

**Timber Harvest, Early Successional Habitat, and Old Growth**

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. The analysis of tree age classes in the Draft EA makes no mention of openings and recent timber harvests on private land. A cursory examination of aerial imagery shows an abundance of such disturbed habitats, especially maintained openings, in the project area. We strongly urge the Forest Service to go back and analyze age class diversity and maintained openings on a project-wide basis, and to re-design the project if the analysis indicates an overabundance of openings or young stands.

We also again urge the Forest Service to reconsider proposed harvests in existing stands that are over 120 years old. 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. Old forests are currently near desired levels on National Forest land, and likely are less common on more intensively managed private lands within the project area. We consider it likely that old forests are currently under-represented on a watershed-wide basis. The analysis in the Draft EA notes that continued aging of current mid-late successional stands (80-120 years old) will produce an abundance of >120 year old stands a decade from now, in spite of planned harvests. While this statement may be true, it ignores the fact that current stands that are over 120 years old, if not harvested, will continue to age and approach true old growth conditions, which makes them more valuable than “new” old stands. In other words, aging of younger stands is not a like-kind replacement for existing older stands. Given the current overabundance of mid-late successional stands that could be used to meet harvest objectives, we see no reason why the Forest Service has to harvest in existing old stands.

**Carbon Analysis**

We applaud the Forest Service for addressing carbon sequestration in the Draft EA, which is a big improvement from the complete omission of the issue in other recent Forest Service EAs. The Forest-wide modeling of carbon that formed the basis of the Draft EA’s carbon section is a good baseline resource for facilitating such analyses.

However, the analysis of carbon in the Draft EA misses the most important points: (1) how much would the proposed project change carbon sequestration in the project area, and (2) what measures could be used to sequester more carbon? No attempt has been made to estimate how much carbon would be lost, how much would be sequestered in wood products (and for how long), how quickly and completely lost carbon would be replaced by the growth of regenerated trees, or how the project could be modified to ensure maximum sequestration of carbon. The analysis glosses over all of these points by essentially taking a “drop in the bucket” approach – i.e., the project’s effects would be so small that they are meaningless in the overall global picture of greenhouse gases and climate change. The problem with this approach is that any greenhouse gas-emitting action by any entity could be viewed the same way. Individually, no action has any meaningful effect on the total amount of greenhouse gases in the atmosphere. But collectively, all of those gas-emitting actions are responsible for the climate mess in which humanity currently finds itself.

Therefore, we urge the Forest Service to go back and 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. Based on this analysis, measures should be developed to enable the project to be as close to carbon neutral (or carbon negative) as possible.

**Watershed Hydrology**

We strongly favor all of the proposed soil and watershed restoration activities, and we commend the Forest Service for developing a large timber project that does not involve any construction of new system roads. We also are cautiously optimistic that the approach to decommissioning all new and re-used skid roads would be adequate for restoring watershed hydrology in the harvest units. Unlike other recent projects that rely on an arbitrary slope cut-off for determining which techniques to apply, the Upper Cheat project proposes to assess all skid roads at close-out and apply enhanced decommissioning techniques (such as decompaction and recontouring) wherever they are needed to remedy hydrologic impacts. 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.

We do think the Forest Service is missing a very large opportunity to correct watershed problems that were created by other recent timber harvests in the project area. The Lower Clover and Hogback 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 understand that the Forest Service has proposed decommissioning 50 miles of legacy skid roads, plus an unspecified mileage of additional existing skid roads that would be re-used and then decommissioned. But comparing the amount of decommissioning shown on the project maps with the extensive networks of existing skid roads that are apparent on aerial imagery of the project area, it would appear that the Forest Service has not systematically assessed and identified all of the legacy features that need to be decommissioned to restore watershed hydrology.

**Steep Slopes and Soil Issues**

The soils analysis and the watershed analysis state that small areas of slopes >40% are included in some conventional harvest units, but that skidding would either be avoided in these small areas, or would occur on existing stable skid roads. In our scoping comments, we identified at least 10 conventional units that appeared to contain large areas with slopes over 40% (by overlaying the project’s timber unit shape file on a slope raster file of the project area). Based on the current project shape files and the unit tables in the Draft EA, it would appear that most or all of those units are still included as conventional harvest units. It is beyond our capability to assess whether the steep areas truly do constitute small inclusions or are adequately served by existing stable skid systems. We ask that the Forest Service provide the data gathered from its field reconnaissance and any other analyses of steep slope areas to demonstrate the feasibility of its approach for ensuring that these areas are not destabilized. As it currently stands, the soils analysis is not adequate for demonstrating compliance with Forest Plan standard SW07, because it provides no evidence or rationale to document the feasibility of avoiding steep areas within units or maintaining stability during the re-use of existing skid roads on steep slopes.

We also are concerned that nutrient depletion and acid deposition issues have not been analyzed adequately. The soils analysis states that 3,651 acres of timber harvest may cause altered nutrient cycling and decreased soil productivity. The analysis says nothing about the significance of this effect or any measures to mitigate it. The context and intensity of this effect needs to be thoroughly examined to determine whether the effect is significant and would require mitigation measures.

**Conclusion**

We appreciate the opportunity to provide comments on the proposed Upper Cheat River project. Should you have questions or additional information to share, please feel free to contact me.

Sincerely,

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