Friends of the Cheat

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1343 North Preston Highway | Kingwood, WV 26537 | www.cheat.org

March 31st, 2022

Mr. Jon Morgan, District Ranger – Cheat-Potomac Ranger District
Monongahela National Forest, WV

Dear Mr. Morgan,

First, we want to thank you for hosting a pre-scoping presentation and discussion for this project, for coordinating a virtual meeting with us after the submission of our scoping comments, and for providing the opportunity to review and comment on the proposed USFS Upper Cheat River Project - Draft Environmental Assessment. This letter serves as Friends of the Cheat's submission of formal comments on the Draft Environmental Assessment (EA) for the USFS Upper Cheat River Project.

Friends of the Cheat (FOC) is a non-profit watershed organization that has worked for over 27 years to restore, preserve, and promote the outstanding natural qualities of the Cheat River watershed. Since our organization's inception we have worked alongside state, federal, and private partners to restore water quality of the Cheat River. A large portion of the Cheat River's success story is grounded in the protection of the Cheat's headwaters through the establishment of the Monongahela National Forest, which allows for water quality improvements to be achieved downstream. Our work includes watershed restoration efforts on private lands within the Upper Cheat River Project boundary, such as widespread riparian reforestation efforts and Aquatic Organism Passage (AOP) Improvement projects. Thus, our organization has a vested interest in the activities proposed under the Upper Cheat River Project.

First, we are immensely supportive of the watershed and fisheries restoration activities proposed under this project, specifically the large woody material additions, Aquatic Organism Passage (AOP) Improvement projects, and the riparian reforestation efforts that were described in the Draft EA, which will compound with our restoration efforts on adjacent private lands.

However, our primary concerns in relation to the proposed actions under the Upper Cheat River Project are increased stream temperatures and sedimentation. As noted in the Pre-Scoping presentation, many of the high quality brook trout streams within the project boundary are already thermally stressed, with marginal or sub-optimal stream temperatures, and none are considered optimal. Additionally, brook trout and Regional Forester Sensitive Species such as Eastern hellbender (both having documented occurrences within the project boundary) are sensitive to sedimentation.

In relation to these concerns, we are excited to see the USFS propose soil restoration activities on existing haul roads and skid trails, or existing linear features, which will decrease sedimentation and artificial warming of groundwater, and applaud the additional protective measures proposed in the Draft EA, such as the following:

> "All new skid trails would be treated with USFS and WV best management practices following harvest, as weather and soil conditions allow, to reduce the risk of effects to soil and water quality and hydrologic function. If field observations indicate impaired recovery of hydrologic function, poor soil quality, or are located on slopes greater than 40%, enhanced treatment would be applied

on those trails. Enhanced treatments could include surface decompaction by ripping to a minimum of 12 inches or decompacting and recontouring the surface to achieve a minimum of 20 percent outslope. Indicators that would result in the application of these enhanced treatments may include: groundwater interception in the cut slope, rills or surface flow on the trail surface, ponding of water, lack of growing vegetation, or indicators of poor soil quality."

While we are immensely supportive of these measures and commend the USFS on this proactive approach, we also offer the following guidelines for the USFS to consider adopting in regard to the protocol for assessing impaired recovery of hydrologic function in relation to the creation of new skid trails:

- Watershed and/or soil specialists will lead and implement the assessment.

- Appropriate funding and staffing will be reserved for watershed and soil specialists to implement this work.

- It should be assumed that during the assessment, a proportion of the created skid trails will show impacts to soil and water. We request adequate funding be reserved so that the USFS may take action to mitigate these issues via the appropriate techniques as soon as feasible after the impacts are discovered.

- The assessment will take place during high flow/high precipitation periods. Many skid trails do not reveal impacts to soil and water resources during low flow/low precipitation months, but can be extremely problematic during high flow/high precipitation months.

- The assessment is performed within the same calendar year of the completion of the timber harvest. We would like to see this guideline adopted in particular because it would help meet Forest Plan Guideline SW15, which states that "Topsoil should be retained to improve the soil medium for plant growth on areas to be disturbed by construction. Topsoil should be salvaged from an area during construction and stockpiled for use during subsequent reclamation, or obtained from an alternate site." If assessments and subsequent treatment of impacts do not occur in a timely manner, natural precipitation events will wash away the original topsoil that could have otherwise been retained and used to restore the skid trail to its natural topography and maintain soil productivity.

We hope to see more specific information and adoption of some or all of the above suggested guidelines in regard to the assessment protocol in the final Decision Notice.

Additionally, other USFS Timber Management projects have taken place within the Upper Cheat Project Boundary within the last two decades, specifically the Hogback and Lower Clover Projects. Some of the timber harvests within these former project areas are very recent, and even the most current aerial imagery and Lidar may not be up to date. We ask that assessments of skid trails for soil and water related impacts within the Hogback and Lower Clover project areas also be listed in the proposed activities of the final Upper Cheat River Project EA. We also ask that the skid trails that are deemed an issue to soil and water resources from the assessments in these former project areas receive the appropriate restoration measures, and adequate funding be reserved to implement this work. We make this request because the Upper Cheat River Project boundary covers the Hogback and Lower Clover project areas and no similar soil restoration activities are proposed under the Hogback and Lower Clover EAs. Including the

restoration of soil and water resources impacted by timber harvests of prior NEPA projects within the Upper Cheat River Project boundary will also maintain the consistency of the cumulative effects analysis for the Upper Cheat River Project EA.

Furthermore, we are encouraged that a large proportion of the timber units proposed will utilize helicopter logging or cable yarding practices, particularly in units with steep slopes. However, in the event the USFS cannot procure a contract to harvest via helicopter or cable yarding it is critical to FOC that these units be dropped and cannot be considered for conventional ground-based harvest due to their steep topography and the potential for impacts to soil and water quality, and hope to see this stipulation written into the final Decision Notice.

While we are supportive of these proactive approaches to timber management, ultimately we must voice our concern regarding the observed changes to climate specific to Tucker and Preston Counties which were described in our NASA DEVELOP study that was included in our scoping period comments. We understand that the USFS Upper Cheat River Project must comply and meet goals outlined in the Monongahela National Forest Land and Management Plan published in 2006, and the project is intended to abide by the Multiple-Use Sustained-Yield Act, with one of those uses being to provide a sustainable source of timber for the nation.

However, when looking at the project on a watershed scale, which is critical to assessing overall watershed and stream health, it is clear there has been abundant timber harvest and creation of early successional habitat within the project boundary on private lands, and additional lands have been cleared for the development of Corridor H, as shown in Table 28 in the Draft EA. Scientific references in the Draft EA on page 43 reveal the following:

> "If multiple harvests in a catchment overlap within a 1-3 year timeframe and approach the 20-25% threshold of vegetation removal, storm flows can increase to volumes which would change stream channels by scouring and incision. These changes to the channel would perpetuate far longer than the altered hydrologic response."

Some of the catchments listed in Table 28 are near to or over this 20% threshold when considering past private harvests, including: Thunderstruck Run, Tobes Run, and Upper Hile Run, and as such we recommend decreasing the proposed timber harvest acreage in these catchments, especially Thunderstruck Run.

While Table 28 discloses past private timber harvests within the project area from 2016 to 2021, has the USFS attempted to forecast what amount of future timber harvest is projected to occur within the project area during the same timeframe of project implementation under the Upper Cheat River Project? If so, what does this process consist of? If this has not been attempted, we recommend coordinating with the private timber companies owning large tracts (10 acres or greater) within the project area to gather information about the land management activities that are likely already planned for these tracts that could occur in conjunction with the proposed timber activities under the Upper Cheat River Project. While we understand that the USFS cannot predict every timber sale that will occur on private lands within the project area, we believe that gathering the above information from large parcels managed specifically for timber will lead to a more accurate calculation of the percentage of private and public timber harvest acreage during the project's implementation period. After this information is collected and a more accurate percentage of timber harvest acreage per catchment is calculated, we would then ask the

USFS adjust the proposed acreage for harvest per catchment on public lands accordingly so that catchments are under the 20% threshold.

Additionally, deer populations, as mentioned in the Draft EA, have impacted the entire project area. However, the creation of early successional habitat via timber harvest is beneficial to deer populations, providing a new forage base which will then increase populations further, in turn increasing disease-harboring ticks and amplifying the risk of Lyme disease to the local communities within the project boundary. Managing the timber stands against deer browse and undesirable species is labor intensive and costly, thus begging the question if this is the most efficient and cost effective strategy to improving forest health and composition and if the benefits of timber harvest outweigh the threat to public health, economic efficiency, and other resources.

While we understand the USFS must abide by the guidance and direction given by the Forest Plan, it was published in 2006 and amended in 2011, and conditions on the ground in the project area as well as global projections of climate change have changed dramatically over this timeframe. We hope to provide further input on the management of public lands in the Cheat River watershed the Monongahela National Forest Land and Management Plan Update occurs.

Ultimately we provide these comments to voice our support for most aspects of the project, and to provide some of our constructive thoughts on areas of concern. We look forward to working with you on the USFS Upper Cheat Project.

Sincerely,

Amanda Pitzer
Executive Director
Friends of the Cheat