



March 31, 2022

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

RE: Comments regarding the US Forest Service Draft Environment Assessment (EA) on the proposed Upper Cheat River Project

Submitted via email to: jonathan.morgan@usda.gov

Dear Mr. Morgan:

West Virginia Rivers Coalition (WV Rivers) appreciates the opportunity to make comments on the Draft Environment Assessment (EA) for the proposed Upper Cheat River Project in the Monongahela National Forest (MNF). In addition to the comments below, we also endorse the comments submitted by Friends of the Cheat and West Virginia Highlands Conservancy.

The draft EA does not adequately address sedimentation impacts on water quality and aquatic species.

We support the United States Forest Service's (USFS) efforts to improve watershed health by designing this project to avoid new road construction. Further, we are hopeful that the proposed decommissioning of all new and re-used skid roads for this project will be helpful to restoring watershed hydrology in the harvest areas. Not building new roads, and decommissioning skid roads, will avoid sedimentation in the waterways. Sedimentation is a leading cause of water pollution. Additional sedimentation in the headwater streams within the project area will cause harm to the Eastern Hellbender and Brook Trout. Ten sites considered for conventional harvest units appear to have slopes in excess of 40% which raise additional concerns for possible soil disturbance and the resulting sedimentation and temperature increases. However, there is no verification in the EA that this method will not result in soil destabilization and increased sedimentation.

We hope that sufficient funds and personnel will be budgeted to assure that these planned skid road decommissioning will be implemented at the conclusion of the project. Previous USFS Lower

Clover and Hogback projects required large number of skid roads for those projects. Those previous plans were not as forward looking as is this plan, so we hope that assessment for decommissioning of all skids roads in these two projects will be included in the decommissioning and restoration at the conclusion of this Upper Cheat project.

Late-Successional Forest and Climate Change Mitigation

We support including the analysis of carbon sequestration in the EA, as a welcome addition to USFS analysis; and we encourage continued inclusion of this analysis in future EAs and management plans. The carbon sequestration analysis in this draft EA could be enhanced with estimation of the amount of carbon lost through all activities and an assessment of the change in the carbon sequestration in the entire project area.

The draft EA lists the acreage of private lands that has seen timber harvests. However, there is no assessment as to the size and age of trees removed privately; nor is there an assessment of the overall carbon sequestration change resulting from both the proposed USFS project and reasonably concurrent private harvesting. Additionally, there is no area-wide assessment of the stock age. Old growth forest is at optimal level on USFS lands; therefore, we encourage USFS to assess the amount of old growth harvested by private owners as well as assess the carbon sequestration change over the entire area. Old growth (120 + year stock) forests are currently at the recommended level in the area and hold substantial amounts of stored carbon. Aging of younger stock is not a comparable replacement for the carbon sequestration capacity of older stock. Per the USFS forest Management Plan, we encourage use of the over-abundant of mid-late succession stands to meet the harvest objectives permitted under Management Prescription 3.0 and avoid old growth stands.

Proximity to Waterways Potentially Suitable for W&S Rivers Designation

The USFS has long recognized that 12 waterways in the MNF are potentially eligible for designation under the Wild and Scenic Rivers Act.¹ The waterways closest to the Upper Cheat project are the Blackwater, Shaver's Fork, Dry Fork, and Otter Creek. We believe that the draft EA should be revised to consider any possible implications to these waterways.

Conclusion

Other organizations situated in the project area have detailed knowledge of specific local conditions. We encourage you to consider carefully the comments made by WV Highlands Conservancy, Friends of the Cheat, and other groups and individuals in the area impacted by the proposed project.

Again, thank you for the opportunity to present comments on the draft Environmental Assessment for the Upper Cheat Project. We appreciate the careful consideration of these comments as the stewards of our public lands.

Sincerely,

Angie Rosser
Executive Director
West Virginia Rivers Coalition