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Comments:

I would like to make the following comment on the EA of the Improving Conditions in the Blackwater Watershed Project.

I found it challenging to make "specific written comments (§218.2)" on an EA that has no specific projects. For example about 14 miles of stream segments have been highlighted and named where stream restorations may happen in the future. I could not find how many years the EA encompasses for either stream restoration projects or silvacultural projects. I suspect that only certain locations and small sections of these streams will have specific engineering designs for what work needs to be done. Without knowing these locations, when the projects would occur or seeing the project engineering designs it is not possible to make specific comment. Likewise with silviculture projects, a map is provided with thousands of acres where various silviculture prescriptions are highlighted in different colors. However without site specific locations and specific projects detailed it is not possible to make specific comment.

I participated in most of the Blackwater meetings between 2016 and 2018. I strongly support the collaborative approach this project began with and the stream restoration possibilities, possible trails, increased access, more parking and additional camping possibilities. The EA mentions that collaborators will be encouraged to participate in monitoring various projects. This is good. This collaborative approach would be strengthening by having collaborators contribute in the creation of alternates. The most important part of the EA process is developing the set of alternatives that become the choice set and the center of analyses. I feel the range of alternates is inadequate. Alternatives should consider a range of alternative approaches to accomplish the objectives of the action. The two action alternates are so similar that they do not constitute a range of alternates. Several collaborators including myself and many comments received by the FS requested more old growth forest. While the preferred alternate will increase old growth forest from slightly less than 300 acres to a little more than 1600 acres that does not adequately address what many wanted. An alternate could have been created that greatly expanded the number of acres dedicated to future old growth forest. With this hypothetical alternate all the area that has been designated for two age systems would be designated for silvicultural approaches for enhancing old-growth structure in forests with a goal of achieving older forests. The increasing violent wind and ice storms predicted with climate change will produce all the wildlife openings and younger forest needed. This would allow for some commercial timber harvest done in a way that does the least environmental damage.

Most people who visit national forests including The Daniel Boone National Forest enjoy older forests. The only parcel of old growth in the Blackwater area is small, remote and difficult to access. At collaborator meetings I had requested that the Craney Creek and Minor Creek watersheds be considered for future old growth designation. These streams have many larger trees near them, several stands of old hemlock and good access via a forest service road. However the map for silvaculture has designated two age prescriptions all though the watersheds right down to near the streams.

Improving Conditions in the Blackwater Watershed: Improve public access, dispersed recreation, and trail development.

At Blackwater collaborator meetings many people attending requested greater access, dispersed recreation and trail development yet the EA has almost nothing to say about possible projects. When asked about this District Ranger Jon Kazmierski said that because collaborators could not agree this area had been "pulled from the EA" until a later time. It would have been good if all collaborators had been notified that there were unresolved issues and steps begun immediately to move forward. This process is in its fourth year and it is unacceptable to have this important component on indefinite hold.

The Recreation section of the EA has a chart I found remarkable. Table 7: Recreational use estimates and projections in the Blackwater Watershed. It compares recreational use with and without climate change from 2008 until 2060. Do the writers of the EA believe that climate change may not occur? Of what possible use is

this table? What data was used to prepare this table? The scientific community overwhelmingly believes that there will be major climatic changes. Its clear climate change will adversely impact the Daniel Boone National Forest. These impacts include more frequent violent ice storms, windstorms, torrential rainfall, more frequent droughts and changing temperature patterns. There will be profound impacts to streams and forests, yet no attempt has been made to do a detailed analysis of climate change on either the forest, the use of prescriptions or the stream restoration projects proposed in this EA.

Because the EA does not name specific projects, does not cover a specific amount of time (a visitor usage table has projection until 2060), does not include a full climate change analysis, does not have true alternates, does not adequately incorporate collaborators and commenters desire for significant increases of old growth forest and dropped the recreational component it is deficient. Additionally, the Blackwater EA's dependence upon failed silvicultural practices of shelterwood two age prescriptions means the Purpose and Need of this EA will not be met. It is not clear if the full Administrative Review process will be available for individual commenters for each project covered in this EA when it is proposed or if standing for administrative review will be established on a project by project basis.

The past 40 years of silviculture practices in the Cumberland Ranger District and across the Daniel Boone National Forest are largely falling short of adequately producing the goals of The Land and Resource Management Plan. Thousands of acres were harvested over the past 35 years with the promise that the early seral habitat created would increase grouse populations and that oak hickory forests would regenerate. Grouse populations have not rebounded and regeneration of the predominantly oak hickory forests that were felled have largely failed. A 2019 forest survey from dozens of harvest sites over the past 35 years in the Cumberland Ranger District consistently showed that predominately oak hickory forests that were felled are converting to predominately poplar red maple forest. The Forest Service needs to retire the failed silviculture methods of clear cutting and two stage shelter wood harvests and begin uneven aged forest management. This will greatly reduce the amount of sediments reaching streams that contain threatened and endangered species and allow oak hickory forests to regenerate. The increasing number of severe weather events predicted by climate change will create numerous openings that will produce adequate habitat for grouse and other early seral habitat dependent species.