FRIENDS of BLACKWATER

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July 29, 2021

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

Re: Scoping comments by Friends of Blackwater on the proposed Upper Cheat Project

Dear Mr. Morgan:

With this letter, Friends of Blackwater (FOB) and Center for Biological Diversity provide scoping comments on the proposed Upper Cheat River project.

Friends of Blackwater's is a non-profit conservation organization working to protect biodiversity in the Mid-Atlantic Appalachian Highlands. FOB has 5,624 members and supporters across West Virginia and in the surrounding states, and works to protect public lands used by our members. During the past 20 years FOB has moved 4,650 acres of critical endangered species habitat into public ownership at Blackwater Falls State Park and in the Cheat Canyon. FOB has funded research and advocacy for the endangered Indiana bat, Virginia big-eared bat, Cheat Snail in the Cheat River Gorge, the Cheat Mountain salamander, and advocated for federal protections for the West Virginia northern flying squirrel, northern long-eared and little brown bats. Friends of Blackwater has a longstanding interest in the conservation of rare, threatened, and endangered species in the Monongahela National Forest (MNF), and has a track record of active engagement in MNF planning processes. FOB has a Memorandum of Understanding to work with the Monongahela National Forest on improving water quality, maintaining hiking and biking trails, and interpreting historic sites in Tucker County. FOB has done similar trail work in Blackwater Falls State Park and collaborated with Tucker County and the Town of Hendricks to place roadside markers at historic sites.

The **Center for Biological Diversity ("Center")** is a nonprofit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental and administrative law. The Center has over 1.6 million members and online activists dedicated to the protection and restoration of endangered species and wild places. The Center has worked for over twenty-five years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

Thank you for the opportunity to participate in the scoping of this proposal. FOB and the Center support the NEPA process, which allows for thorough public involvement in reviewing and commenting on proposals. We strongly support the use of the best available science in decision-making, and providing, without prejudgment, a wide range of alternatives to consider. We particularly appreciate face-to-face meetings on the issues raised by timbering proposals in the Cheat Potomac Ranger District.

Lack of discussion of meaningful alternatives is a particular problem for this proposal

The National Environmental Policy Act (NEPA) provides an important framework for developing, evaluating, and selecting from a range of alternatives. Rather than utilizing NEPA to do this, the Upper Cheat scoping document fails to evaluate a "range of reasonable alternatives". The scoping document simply posits logging as the one alternative, versus a no-action alternative. This ignores the alternatives of lesser amounts and types of logging and/or improving trails, improving wildlife openings and riparian habitat, reducing erosion and sediment from roads with improved drainage and culvert fixes, and without logging. This alternative would improve the forest for wildlife and outdoor recreation, and avoid adverse impacts from logging. It would also mitigate against climate change.

Inadequate justification for the proposal

The establishment of the baseline conditions of the affected environment is a practical requirement of the NEPA process. The scoping document makes the general assertion that older forests do not provide adequate habitat for wildlife, and that therefore more early successional habitat needs to be created within the project area. This justification fails to consider the current extensive logging going on surrounding private land where many acres of early successional habitat are being created with regeneration cuts. This private land borders and surrounds the National Forest which only manages one third of the acres in the Upper Cheat project area.

The Forest Service must provide a baseline of flora and fauna in the project area. It needs to provide population estimates and trends for management indicator species, Regional Forester Sensitive Species, and threatened and endangered species and quantifiable population goals that could be used to evaluate whether or not the project is successful. Without this information, the public has no way of knowing whether the project will promote diverse, sustainable wildlife populations in the Upper Cheat River project area. The Forest Service's failure to include Specialist Reports and previous surveys of wildlife, including aquatic species (see appendix with map of wild trout streams in the project area and plant species – and bat caves -- in the project area, would render the proposal fatally flawed, both procedurally and substantively.

Climate change issues must be analyzed using the latest available science

The scoping document's discussion of climate change has a number of substantial gaps and mistakes; to proceed further without addressing those gaps and mistakes would be improper.

One glaring omission is the lack of any discussion of the effect of the proposed logging on the actual ongoing, current carbon sequestration of the existing trees in the proposed project area – taken alone and taken in combination and in cumulative impact with other similar projects.

Older-aged trees sequester far more carbon than new growth, and this disparity lasts for decades. Thanks to its older-growth trees, the MNF is currently a major carbon sink. The logging of older trees in this proposal would significantly reduce the annual carbon sequestration rate of the project area. This is not addressed in the scoping document. The document's failure to address this immediate and significant reduction in carbon sequestration must furthermore be seen combined with the same omission in other logging projects in the MNF – and indeed, in the entire National Forest system. The scoping document is based upon an age-distribution goal (Figure 1) that will *cut the carbon sequestration ability of the Forest in half* -- or more. But this important aspect of the project proposal is not discussed, scientifically or otherwise. There is thus a gaping scientific hole in the scoping document's effort to assess the environmental consequences of the proposal. For scientific support for this submission, see appendix to this comment letter.

West Virginia northern flying squirrel issues

Friends of Blackwater continues to be concerned about the management of the West Virginia northern flying squirrel (WVNFS) on the Monongahela National Forest. This creature has been found within the proposal area at Big Run and Close Mountain. Under the Forest plan of 2006 and the delisting plan promulgated by the US Fish and Wildlife Service and implemented in 2013, protection of this rare mammal is the responsibility of the Forest Service.

Suitable habitat for the WVNFS is defined in the Forest Plan: *"SUITABLE HABITAT (for WV Northern Flying Squirrel) – Areas that have habitat characteristics required by WV northern flying squirrels as indicated by known capture locations. All suitable habitat is assumed to be potentially occupied by the WVNFS, even if no WVNFS have been captured in it (USFWS 2001). Generally, it includes forest habitat with red spruce and mixed red spruce/northern hardwood forest, Norway spruce plantations, mixed eastern hemlock/northern hardwoods, and overstory eastern hemlock or balsam fir with red spruce present in the understory. Suitable habitat also includes an 80-meter buffer around areas with the above-listed characteristics, as well as corridors to provide linkages for habitat areas and prevent barriers to movement." V-16 Glossary*

Hemlock is a very important component of WVNFS habitat as are older northern hardwoods by themselves. This has been demonstrated by captures in Blackwater Falls State Park and Blackwater Canyon as well as Middle Run and Big Run on the Monongahela National Forest. We are concerned that the exclusion of MP 4.1 from project actions does not exclude all possible flying squirrel habitat in the project area.

Flooding Concerns

We note that the Scoping document lists helicopter logging as a technique to be used. We calculated that 1,911 acres would be logged by helicopter. Of this total 1,345 acres are on slopes of 40%+, 868 on acres at 60% slope and 478 are on slopes greater than 60%. While helicopter logging reduces roadbuilding, it can still increase runoff, which can lead to flooding by removing the tree canopy which stabilizes soils on sensitive ridgelines. These are very steep slopes in the project area have multiple waterways, that have experienced major flooding in 2017 and 2019. (See appendix with articles and photos.) The recent flooding has required emergency rescue of folks from truck roofs and telephone poles. Roads have been washed away in Leadmine and Horseshoe, which are in the project area. Climate change may be increasing rainfall in this area and the threat of flooding will likely continue.

Has the Forest Service reviewed the cumulative impact of the private logging and Forest Service logging in the area to be assured that the Upper Cheat project will not cause flooding? Has the Forest Service reviewed past attempts to repair flood damage in Horseshoe Run such as the work done by the Canaan Valley Institute and the USDA Natural Resources Conservation Service in 2006? There must be an assessment of flood risks in the scoping analysis.

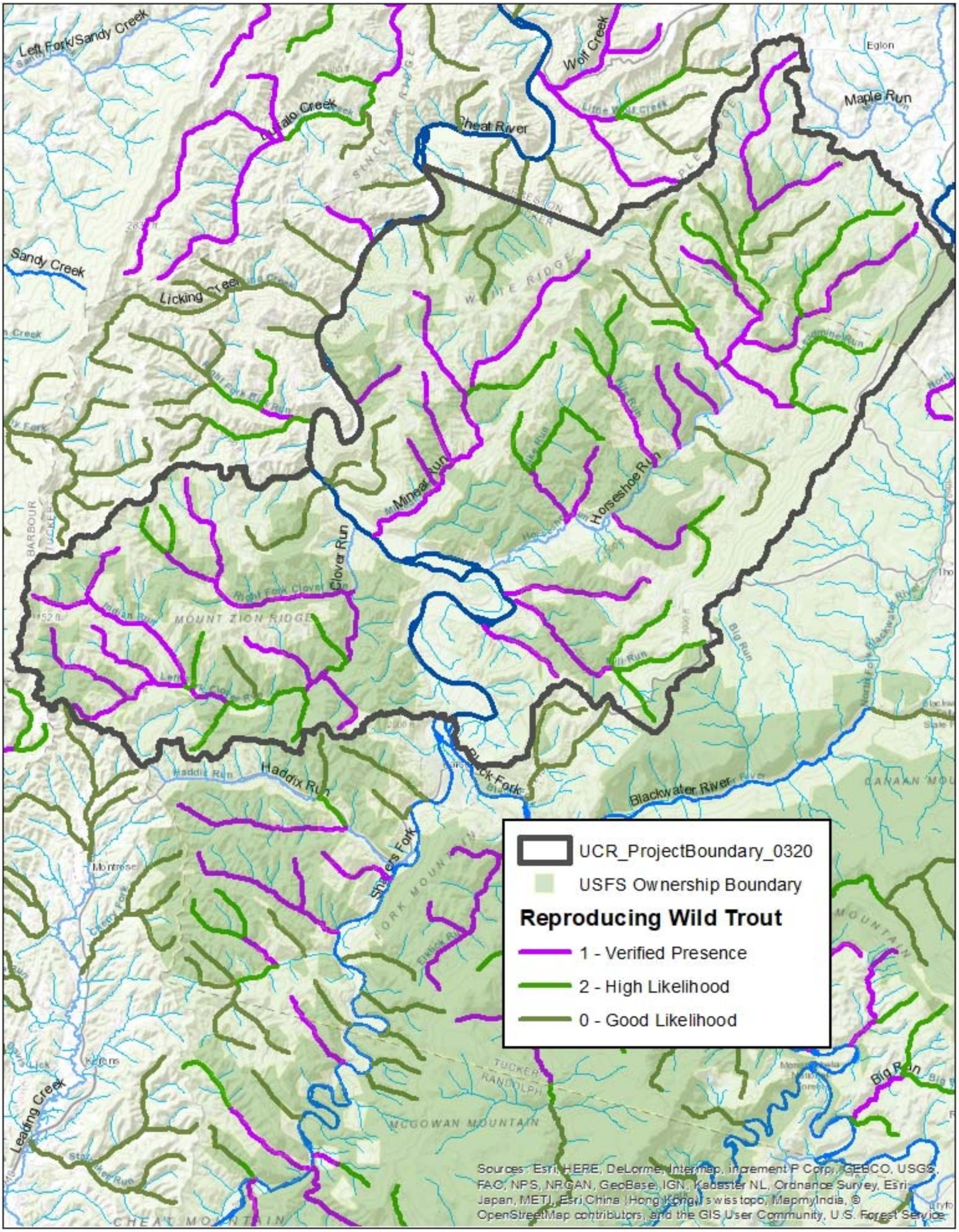
Trails and Tourists:

This area of the Monongahela National Forest has numerous trails, including the famous long distance Allegheny Trail. These trails are widely used by the 1.5 million visitors who come to Tucker County to visit public lands and use recreational trails. Many small campgrounds are located in the project area especially along waterways. The Blackwater Outdoor Adventure business is on the banks of the Cheat at St. George. Camp Horseshoe is on the banks of Horseshoe Run. These businesses will not benefit from logging leading to scenic degradation and flooding. The scoping document focuses on the motorized use of the project area as the outdoor recreational resource available, and completely leaves out the popular hiking and biking trails, and boating opportunities and negative impacts that logging may have on the visitor experience. More research and analysis should be including in a scoping analysis on this issue.

Thank you for the opportunity to take part in scoping for the proposed Upper Cheat Project.

Judy Rodd, Executive Director
Friends of Blackwater

Jason Totoiu
Senior Attorney
Center for Biological Diversity


Left Fork Sandy Creek
Wolf Creek
Eglon
Maple Run
Buffalo Creek
Cheat River
Sandy Creek
Licking Creek
WHITE RIDGE
Minear Run
Horseshoe Run
Clover Run
MOUNT ZION RIDGE
Big Run
Haddix Run
Shavers Fork
Blackwater River
Montrose
Leading Creek
Kerens
TUCKER
RANDOLPH
McGOWAN MOUNTAIN
CHEAT MOUNTAIN
UCR_ProjectBoundary_0320
USFS Ownership Boundary
Reproducing Wild Trout
1 - Verified Presence
2 - High Likelihood
0 - Good Likelihood
Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, U.S. Forest Service

- **The flooding prompted evacuations of over 20 homes.**

Heavy rain triggered flash flooding overnight Saturday night and early Sunday morning in parts of northern West Virginia, prompting evacuations in several areas near the border with western Maryland.

About 20 homes were evacuated due to rising water in Bayard, West Virginia, early Sunday morning, local law enforcement told the National Weather Service. Two feet of water was reported across Front Street near the post office in Bayard, about 125 miles west-northwest of Washington, D.C. along the border with western Maryland.

Route 90, the primary highway in northwest Grant County was flooded in several locations between Bayard and Gormania, according to the local 911 call center. Numerous other roads were reported flooded in northwest Grant County.

The NWS estimated 2 to 7 inches of rain fell overnight in this part of northeast West Virginia and western Maryland, following an afternoon and evening of severe thunderstorms with damaging straight-line winds in the Mid-Atlantic states.

This heavy rain over hilly terrain lead to a 10-foot rise of the North Branch of the Potomac River at Steyer, Maryland, in four hours, leading the NWS to issue a rare flash flood emergency. The river, which also runs through Bayard, normally is only 2.5 feet deep.

Elsewhere, low-lying homes along Seneca Creek near the town of Seneca Rocks, West Virginia, were also evacuated. Route 33 between Onego and Seneca Rocks was flooded.

Swift-water rescues were ongoing Sunday morning in Randolph County, West Virginia, according to the NWS.

Water rescues were also ongoing Sunday morning at the Arnold Park Campground in Tucker County near the town of Lead Mine, West Virginia.

In Preston County, West Virginia, route 24 was closed in multiple locations near Eglon and a number of roads were closed near Aurora.

WV Gazette State of emergency declared due to flooding in 8 northern WV counties

Caity Coyne
Jul 29, 2017

Two swift-water rescues occurred Saturday morning in the Lead Mine area of Tucker County, according to Jason Myers, public information officer for the county's office of emergency management. One man was stranded on the roof of his truck and the other was rescued while clinging to a utility pole, Myers said.

Lead Mine and Horseshoe were the two areas in the county hit hardest by the flooding, but most of the water had receded asof Saturday afternoon, he said.

Metro News Photos Leadmine Area 2017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AMBULANCE

Effects of timber harvest in a deciduous forest on Carbon Sequestration

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