



May 15, 2020

Monongahela National Forest, Greenbrier District

PO Box 67

Bartow, WV 24920

Attn: Jack Tribble

Re: Greenbrier Southeast Project

West Virginia Rivers Coalition, on behalf of our members, respectfully submits the following comments on the Draft Environmental Assessment (EA) for the Greenbrier Southeast Project. In addition to the comments outlined below, we have grave concerns that the project's impacts on the endangered Candy Darter are not properly addressed.

Biological Assessment

The EA states, "a biological assessment (BA) to determine the effects of the proposed action alternative on the federally listed candy darter is located in the project record." However, no BA is located in the record, nor was it provided to the public. Absent this information, we cannot accurately comment on whether the EA is sufficient in addressing the impacts to the Candy Darter. Likewise, the EA concludes, "For candy darter, the proposed action may affect, but is not likely to adversely affect the species or proposed critical habitat." We feel this statement is misleading to the public since the BA has not determined that the proposed action will not adversely affect the species. Therefore, lacking sufficient information, we feel the EA does not adequately satisfy the requirements of the National Environmental Policy Act.

Under the Freedom of Information Act, WV Rivers requests a copy of the Biological Assessment for the Candy Darter and an extension of the comment period on the EA until the document is provided and the public has sufficient time to review.

No Management Direction for Candy Darter

Because the Candy Darter was listed in 2017, The Forest Management Plan (Plan) does not provide specific management direction for this species. There are no standards, guidelines or goals in relation to the Candy Darter habitat which may make it more vulnerable to impacts from specific projects.

Drinking Water Protection Areas

This project area intersects with the Wellhead Protection Areas (WHPA) for Pocahontas 4H Camp along East Fork of the Greenbrier and Camp Hidden Meadows at the confluence of Rambottom Run and East Fork of the Greenbrier. Units T77 and H39, where spot where spot foliar spraying is proposed, are in close proximity to the WHPA for Camp Hidden Meadows. In the draft environmental assessment for the Greenbrier Southeast project, there is no mention of protective measures that will be in place to prevent impacts to drinking water sources. We urge the Forest Service to consider reducing herbicide use in wellhead protection areas and follow Guideline SW27 in the Forest Plan to coordinate with the Camps for activities that have the potential to affect the drinking water supplies.

Tier 3 Streams

The project area includes several Tier 3, high quality streams including Little Creek, East Fork, Long Run and Poca Run. The erosion potential of the soils in the area are listed as severe. We encourage the Forest Service to follow all Standards and Guidelines in the Forest Plan for the Management Direction of Soil and Water to protect high quality water resources.

Brook Trout Habitat

We support the activities to improve brook trout habitat as long as there are no impacts to candy darter habitat. We are encouraged to see the long-term brook trout study results in Lick Run. WV Rivers has partnered with Trout Unlimited to develop the WV Wild Trout Atlas to map brook trout streams that are not included in the State's list of documented trout streams. Lick Run was on our list as undocumented, as well as Slab Camp Run and Walderman Run. We encourage USFS to determine if Slab Camp and Walderman also contain populations of brook trout and manage them accordingly.

We look forward to reviewing the BA for the candy darter and making additional comments. Thank you for the opportunity to comment and your dedication to serve as stewards of our public lands.

Signed,



Angie Rosser, Executive Director

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