



WEST VIRGINIA RIVERS

November 3, 2021

Gauley Ranger District
932 North Fork Cherry Road
Richwood, WV 26261

Attn: Sarah Dezelin

Re: Gauley Healthy Forest Restoration Project

Submitted via e-mail to Comments-eastern-monongahela-gauley@usda.gov

Dear Ms. Dezelin,

West Virginia Rivers Coalition (WV Rivers), on behalf of our members, respectfully submit the following comments to the U.S. Forest Service on the Gauley Healthy Forest Restoration Project (the “Gauley Project”). Additionally, we endorse the comments submitted by the West Virginia Highlands Conservancy.

The 919,000-acre Monongahela National Forest is one of the most biologically diverse areas in the nation and is considered to be an area of global ecological importance. Because of the sensitivity of the environment and the ecologically important habitats within the project area, we request the Gauley Project undergo a National Environmental Policy Act (NEPA) review instead of issuing a categorical exclusion (CE) for the project.

Improper Use of Categorical Exclusion

WV Rivers believes this project does not qualify for the use of a CE for the following reasons:

1. The use of a CE is not consistent with agency and departmental procedures and applicable resource management plans. Other projects similar in scope in other ranger districts have undergone the NEPA process with an environmental assessment. These projects include the Greenbrier Southeast, The Upper Elk Ecological Restoration, Upper Cheat, Grassy Ridge and Panther Ridge.
2. The justification of using a CE is under the guise of Section 603: Insect and Disease Infestation; however, the proposal information contains no detailed information about disease and insect infestations within the project area or how

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the proposed activities would alleviate insect and disease infestations.

3. A CE requires that the project be developed through a collaborative that is transparent and nonexclusive. To that effect, we submitted a letter on July 27, 2020 expressing interest in collaborating on this project and requesting detailed information on the project such as resource reports and biological assessments. We received a one-page fact sheet with none of the information that we requested.
4. A CE is not allowable if it impedes the suitability of a project for wilderness area. While this project does not impair a wilderness area, it may impair the North Fork of the Cherry's eligibility for Wild and Scenic River designation.
5. A condition of the use of a CE is that retention of old-growth trees is maximized. The proposed activities include thinning and clear-cutting, but there is no information provided that explains how the proposed activities will retain old-growth forest.

For these reasons, WV Rivers believes a CE is inappropriate and requests that the project undergo a full NEPA review. Additionally, we request the following issues to be analyzed within an environmental review of the project.

Impacts on the Candy Darter

The Gauley Project has the potential to impact the federally-listed Candy Darter Critical Habitat in the North Fork of the Cherry River. Candy darters are intolerant of excessive sedimentation and stream bottom embeddedness. Their habitat becomes unsuitable when silt and sediment fill in the spaces between the rocks, burying the places they need for shelter and egg-laying.

Timber harvest operations and road building within the critical habitat have the potential to introduce excess sediment. As you know, the Big Rock Project, located in the same vicinity as the Gauley Project, was abandoned due to potential impacts to Candy Darter habitat. For these reasons, WV Rivers requests a copy of the Biological Assessment and Specialist Reports for the Gauley Project.

Since 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. We request an amendment to the Forest

Plan that establishes a Forest-wide policy that provides a comprehensive assessment of land management and project implementation to minimize potential impacts on the Candy Darter.

Impacts on Native Brook Trout

The Gauley Project has the potential to impact Native Brook Trout streams within the project area including Hacking Run, Hunters Run and Coats Run. The temporary roads and burn block unit encroach within 50 feet of these trout streams. There appears to be approximately 30 miles of new roads in Hacking Creek watershed alone. The impacts of concentrated earth disturbance and resulting sedimentation and erosion needs to be fully analyzed within an environmental review to avoid and minimize impacts to sensitive brook trout habitat.

Impacts to Tier 3 Streams

With the lack of information provided, it is difficult to assess whether Tier 3 high quality streams would be impacted by the proposed project. There are several Tier 3 streams within the project area, including the North Fork of the Cherry River, Hunters Run, and Coats Run. The runoff class of the soils in the area is listed as high. With the high runoff class and the Tier 3 status, more analysis is needed in an environmental review to determine whether the project would degrade the Tier 3 streams in the vicinity of the project.

Conclusion

The proposed Gauley Project does not meet the requirements of a Section 603 Categorical Exclusion. Additionally, there are potential impacts to water quality and aquatic resources. For these reasons, WV Rivers requests the proposed Gauley Health Forest Restoration Project undergo a full NEPA analysis. Thank you for your careful consideration of these comments and your continued stewardship of our public lands.

Sincerely,



Angie Rosser
Executive Director
West Virginia Rivers Coalition

Co-Signing Organization:

Melissa Waggy
Public Lands Committee
WV Chapter of Sierra Club