Friends of Blackwater
571 Douglas Road
Thomas, WV 26292
304-345-7663

Linda Walker
Acting Director
Ecosystem Management Coordination
United States Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Project No. 65356

Dear Ms. Walker,

Please accept these comments on behalf of Friends of Blackwater, Inc.

We commend the U.S. Forest Service in taking actions to amend each of its 128 land management plans for units of the National Forest System with the overall goal conserving existing and recruiting future old-growth forest conditions and monitor their condition. This is a monumental step towards climate mitigation, clean water protections, and increased biodiversity across the United States of America.

We have prepared these comments in relation to Eastern Forests specifically, with a special focus on the Monongahela National Forest in West Virginia. It is stated that "there are significant ecosystem and geographic differences that would require the development of geographically informed adaptive management strategies." We believe that addressing this need is a proper first step that must be acted upon when amending each forest management plan.

Focus on Unique Conditions of the Monongahela National Forest

It is stated that "mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease." While there is a risk of wildfire on the Monongahela National Forest (as seen historically when extensive fires swept through the Allegheny ecosystem in Grant, Tucker, Pendleton, and Randolph counties as a result of extensive logging), we believe there are other, unstated factors that threaten mature and

old-growth conditions here. We believe there is a culture among the Monongahela National Forest Service that results in the management of the forest to produce the highest yield of harvested timber and lacks the intent to manage the forest to better foster all uses of the forest, other than timber harvesting. There must be a greater focus on managing the Monongahela National Forest to foster recreation, clean water, and the conservation of existing and recruitment of future old-growth conditions. It is the responsibility of the U.S. Forest Service to manage our National Forests "for the sustainable yield of renewable resources such as water, forage, wildlife, wood, and recreation," as stated on its website. We recognize that in part, it is the responsibility of the Forest Service to manage for the harvesting of timber, but we feel there is a lack of management on the Monongahela National Forest for the other renewable resources stated here.

Managing for Clean Water, Protected, & Imperiled Species Resilience & Recovery

The Monongahela National Forest is unique in that it harbors a high-moisture ecosystem and a dynamic landscape containing abundant streams and rivers bordered by exceptionally steep, forested slopes. With that stated, it is of our recommendation that the Monongahela Forest Service place a special focus on the recruitment of future old-growth conditions along these steep slopes. Currently, the Upper Cheat River Project on the Monongahela National Forest plans to utilize helicopter logging to clearcut large sections of mature and old-growth stands that are directly adjacent to vital sources of clean water. Should these cuts be executed, the streams and rivers below them will receive high amounts of sedimentation and flooding, resulting in the degradation of their pristine conditions. The streams and rivers of the Monongahela National Forest provide habitat for imperiled, threatened, and endangered species and provide local communities with clean drinking water. Eastern Hellbenders (which are currently at an average population decline of 77%) have been documented within the Upper Cheat River Project area. Brook Trout, a sought-after game species, rely on these cold, rocky streams and rivers. These species rely on the gaps and spaces between large boulders and stones in streams and rivers for nesting and refugia that are destroyed through sedimentation. Another endangered species, the Candy Darter (*Etheostoma osburni*) inhabits streams and rivers on the Monongahela National Forest (outside of the scope of the Upper Cheat River Project).

The terrestrial ecosystems within the Monongahela National Forest support numerous imperiled, threatened, and endangered species. Found here are the endangered Indiana Bat (*Myotis* sodalist), Northern Long-eared Bat (*Myotis septentrionalis*), Virginia Big-eared Bat (*Corynorhinus townsendii* virginianus), Rusty-patched Bumble Bee (*Bombus affinis*), as well as, the threatened Cheat Mountain Salamander (*Plethodon nettingi*), the near-threatened Green Salamander (*Aneides aeneus*) and formerly listed West Virginia Northern Flying Squirrel (*Glaucomys sabrinus fuscus*) that is still considered protected on the National Forest. All of these species benefit from old-growth forest conditions and a focus must be put on managing the Monongahela National Forest to produce conditions that will benefit them and contribute to their resilience and recovery.

Change in Management Goals to Reflect Recent Findings

We believe there needs to be a greater emphasis on the management of our National forests for recreation. A draft report by the U.S. Forest Service stated that recreation on National Forests contributes $13.6 billion to the United States GDP each year, while forest products generate $2.7 billion. We would like to see these data put to use in the planning of management action on National Forests. Considering this disparity in the value between recreation and forest products, forest management plans must be modified in a way that fosters higher amounts of recreation, with a lessened focus on timber harvesting.

Importance of Conservation of Existing and Recruitment of Future Old-Growth Conditions

As previously stated, there must be a higher focus on the management of National Forests to conserve existing and recruit future old-growth conditions. One of the many benefits of old-growth forests is their impressive ability to sequester carbon from the atmosphere. We would like to see amendments to forest management plans that clearly state carbon storage goals for each forest and strategies to achieve them.

An additional trouble with the way the Monongahela National Forest is managed is the lack of inventory of private logging within the vicinity of the forest. Management practices are prescribed based only on the conditions inventoried on National Forest lands, with no focus on the entire landscape. We believe the Monongahela National Forest must take into account conditions across the entire landscape before describing desired future conditions and executing management practices.

Conclusion

Thank you for your consideration of these comments and continued work on this critical effort. We would be pleased to see these comments taken into consideration during the amendment of the 128 forest management plans across National Forests in the United States of America.

Sincerely,

Friends of Blackwater, Inc.