



West Virginia Forestry Association

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Cynthia Sandeno, District Ranger

Monongahela National Forest

1627 Cemetery Road

Marlinton, WV 24954

Subject: Upper Elk Ecological Restoration Project (Upper Elk) -Draft Environmental Assessment

Dear Ms. Sandeno,

I am Eric Carlson, Executive Director of the West Virginia Forestry Association providing comments regarding the **Upper Elk Ecological Restoration Project (Upper Elk)** Project.

Our comments on the proposed actions are provided to improve the planning approach and offer suggestions for increasing revenues to the national forest system while improving the health and resiliency of this forest.

The proposed actions over the 33,328 acres administered by the National Forest System (NFS) will impact 31% of the entire project area with 62% of all harvesting to be done commercially.

The primary goal of this project is to restore red spruce forests that existed prior to the 20th century, in theory, to restore habitat for species that have become threatened and endangered because of an ever-changing forest landscape and other factors, including acidic deposition, invasive species, disease, insect infestations, and climate change.

We are concerned that 38% of the treatment proposed are non-commercial thinning, and whether this costly and dangerous felling treatment will be effective. The continual impacts of many factors including climate change are beyond the scope of this project but in fact may impact the outcome substantially. Restoring the old growth red spruce forest is a great challenge and we suggest lowering the non-commercial thinning acreage until a few sites have been treated and can be evaluated.

We are pleased to see the detailed assessment of the present condition of the forest, which is overmature, diseased and in need of improved species diversity and size class distribution. We also are pleased to see the continuing use of private contractors to harvest timber. Private timber contractors have a proven track record of complying with all requirements to harvest while protecting important resources on the national forest. The jobs created through harvesting provide the surrounding communities with a measure of vitality and opportunity to service the forest products industry.

Our main concern is the reliance on the use of helicopter logging for much of the proposed thinning of standing forests. The stands with limited ground access will require hand felling for Helicopter logging working in a standing forest with a significant number of dead and dying trees substantially increasing the risk of safe timber felling. We would encourage a thorough review of alternatives to use more

mechanized harvesting methods to improve safety of loggers and retain the proposed level of harvesting.

Commercial Harvesting Comments:

Planned harvests: Total: 6,244 acres (Commercial) • 4,980 acres – Conventional method • 1,264 acres – Helicopter method

We support using development of more early successional forests. Many studies referenced in the scoping document have shown over the past 50 years the benefits to improving species diversity, and wildlife habitat using even-aged management, especially where heavy deer browsing is a major impediment to regenerating desired species.

We are pleased to see a reliance on ground harvesting methods being proposed. The document states methods were chosen for landscape position, value of the timber, and road locations. The most common selection is of ground harvesting, 80% of all harvests. In the past few years, helicopter logging sales offered on the Monongahela National Forest have resulted in no bids or minimum bids. We support the use of ground harvesting as the preferred method and would recommend that the 1,264 acres designated for helicopter logging be reconsidered for conventional ground base harvesting systems.

Comments on other proposed actions.

Planned: Roads and trails

We are pleased to see the development of new roads and improving existing roads. We are also supportive of improving existing roads to accommodate the planned uses.

We do have some concerns over the proposed use of feel and appearance to determine soil moisture. for decisions over whether to allow skid and trail use. This is a very subjective technique that could easily lead to unintentional interruptions in activities. We would encourage the use of more direct measurements for determining soil moisture saturation and a sampling methodology representative for the overall site.

We are not supportive of decommissioning roads. We recognize the lack of maintenance by the USDA Forest Service over decades has deteriorated these roads. We would like to see some analysis on the costs of decommissioning compared to improving some of these roads to reduce erosion and sedimentation and limiting vehicular access with gates to minimize annual maintenance costs yet provide access for multiple uses over the ensuing decades of use. Because of the remote nature of much of this project area, search and rescue operations and wildfire control access would be vastly enhanced by such a practice.

Threatened and Endangered Species.

We are supportive of protecting these species and the use of harvesting as a tool for increasing habitat for many species. Our only concern is the document recognizing the one species, Running Buffalo Clover, is being proposed for delisting by the US Fish and Wildlife Service. The document should be adjusted with this new development.

Respectfully,

Eric Carlson

Executive Director