



# **West Virginia Forestry Association**

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Jon Morgan, District Ranger,  
Cheat-Potomac Ranger District,  
2499 North Fork Highway,  
Petersburg, WV 26847

**Subject: Upper Cheat River Project – Environmental Assessment**

Dear Mr. Morgan,

On behalf of the West Virginia Forestry Association (WVFA), I am providing comments regarding the Upper Cheat River Project and specifically the Environmental Assessment. WVFA is a nonprofit association of citizens, forest owners, loggers, and manufacturers who assist the US Forest Service in the management of the Monongahela National Forest by purchasing, harvesting, transporting, and manufacturing the forest products to customers throughout the world.

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.

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 timber harvesting provide the surrounding communities with a measure of vitality and opportunity to service the forest products industry.

We are disappointed that following the large response to the scoping document from many parties to consider options for cable and helicopter harvesting methods, the final Environmental Assessment has changed and has proportionally increased cable and helicopter methods.

We do understand the possible implications to additional disturbances that would require more robust control of erosion and sedimentation when using conventional ground harvesting methods. However, we believe the economic benefits well outweigh this minimal impact.

**Commercial Harvesting Comments:**

Planned harvests: Total: 3,463 acres (Commercial) • 982 acres – Conventional method • 576 acres – Cable yarding method • 1905 acres – Helicopter method

We support using even-aged management on the 3,464 acres over the 10-year plan. 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 major impediment to regenerating desired species.

Collectively, this 10-year schedule will treat over 14% of the entire federal forest in the project area, a long needed outcome for this forest to achieve the desired species mixture and age structure that will provide resiliency an a healthy forest condition and significantly improve habitat for species of concern.

We continue to have serious concerns over the harvesting methods being proposed. The document states that harvesting methods were chosen based on landscape position, value of the timber, and road locations. However, the most common selection is of helicopter logging, 55% of all harvests, has increased from the scoping document.

The Environmental Assessment acknowledges the high cost of helicopter logging, stating that this cost source makes this entire project cost/benefit ratio negative. It is not clear, and particularly troublesome, that the harvesting plan costs taxpayers (and increases the debt) \$1,336,012, the amount determined to be lost by the proposed harvesting plan. It is also not clear how harvesting costs for each method and the revenue estimates were generated, as there are no references to any data sources.

In the past few years, helicopter logging sales offered on the Monongahela National Forest have resulted in no bids or minimum bids. We would encourage alternative harvesting methods be considered as an option for each prospective sale so long as the alternative is demonstrated to protect critical resources and comply with the Environmental Assessment.

The proposed use of cable logging on steep slopes and the proposed income stated is also concerning. Harvests of less than or equal 40 acres, which is 100% of all harvests, is extremely expensive, and looking at the location of the blocks, widely spaced over the forest, would require numerous setups and thus costly to conduct, assuming there are contractors willing to invest in cable systems with such little acreage to harvest. Obtaining competitive bids on these sales will be unlikely, like helicopter logging. Only 30% of all planned harvests are using conventional ground equipment, yet modern felling equipment minimizes impacts to soils and careful planning can minimize skid trails, roads, and landings, while providing the largest return for bid sales to the national forest system in the eastern US.

The proposed actions will only create disturbances with skid trails, roads, and landings, 0.5% of the entire Upper Cheat River Project area over a 10-year period. The slight increase in disturbance of conventional harvesting would only disturb an additional 0.3% of the Upper Cheat River Project area. This minimal impact could significantly increase revenue for the forest and communities. We recommend you reconsider sites where conventional ground harvesting as an option within the bidding process. Further, the additional roads and skid trails would enhance recreational use, provide access for fire and rescue, and enable future treatments, if needed, without additional disturbance.

**Endangered and Threatened Species:** We are extremely supportive of the careful analysis of minimizing any possible "taking" of federally listed species. Additionally, this project will create and enhance habitat for a long list of federally listed species. There is a well-documented need to provide earlier successional habitat in the Monongahela National Forest and the proper use of regeneration harvesting methods to provide this habitat.

**Timber stand improvement to 1,060 acres of stands 6-40 years old:**

Based on the document's discussion of forest conditions, this appears to be a small amount of acreage over the 10-year period. We support the use of herbicides and prescribed fire to control non-native invasives, while also removing overmature and diseased trees to develop a healthier forest and improve the vigor for the more desirable tree species.

**Future Salvage Opportunities:**

Based on the ongoing impacts from gypsy moth, emerald ash borer, and likely woolly adelgid and other pests and disease, we are pleased to see mention in the document that this could be addressed during the 10-year period. Incorporating such salvage operations adjacent to planned harvest would be an excellent method to improve the likelihood of obtaining bids for such low value harvesting.

Respectfully,

Eric Carlson



Executive Director