

Data Submitted (UTC 11): 10/7/2020 8:00:00 AM

First name: George

Last name: Woodbury

Organization:

Title:

Comments: Comments on South Revilla Integrated Resource Project

Following are comments on the Revilla Integrated Resource Project. An appraisal of the Shelter Cove portion of the project indicates that logging all of the 35.500MBF that is identified for the Shelter Cove Log Dump will result in only 19MMBF of non-deficit timber. An economic sale for the Shelter Cove area can be realized if the helicopter portion is hi-graded by logging only the Spruce and AYC volume in the helicopter area about 30MMBF of non-deficit can be logged.

This result is an indication of the failure of the current Forest Plan to create timber sales. If earlier sales had been designed with Regenerative Management principles this project would have a better chance for success in both economics and volume produced and create the area and volume of second growth to support a viable sustainable second growth industry if changes were made in the current Forest Plan. With partial cuts and other prescriptions that take patches scattered over large areas instead of logging concentrated areas that maximize volume recovery for miles of road constructed log all of the suitable timber that can be accessed to the roads using Regenerative Management Prescriptions, viable sales are not possible.

Regenerative Management will maximize second growth volume for transition to a sustainable, viable and adequate volume to support the infrastructure for a second growth industry. The current management system is not generating enough volume for a viable transition and the partial cut prescriptions are not maximizing the full capability of the stand.

Until there is major change in management prescriptions there is no way to create the stands of viable second growth needed to sustain a viable second growth industry. When an area is designated to timber production that area must be put under prescriptions that follow the regenerative management system.

This project is further proof that the current management methods are not sustainable and are not meeting the mandates of the National Forest System. Regenerative Management procedures will result in reduction of the acres necessary to support an integrated second growth industry. Concentration of harvest areas will make it possible to recover marginal timber that is not now recoverable because of the economics of scattering patches of harvest over large areas with excessive road costs. Concentrating cutting by taking all the suitable volume that can be accessed results in less total road, more volume recovery, and more acres in timber production and better economics.

There is another chance look at this project during the NEPA process. There may be opportunities to add volume

to the planned units which will add to total volume and reduce infrastructure cost. The appraisal made for these comments did not allow for reconstructing the Shelter Cove log dump, the roads were appraised using temporary road costs and there is no allowance for reconstruction of existing roads.