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Organization:

Title:

Comments: Mr. John Morgan, District Ranger

Cheat Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

Subject: Upper Cheat River Project

Dear Mr. Morgan:

As a lifelong WV hunter and fisherman as well as a forestry professional for almost 35 years, I am both pleased and disappointed with the USFS plans for the Upper Cheat River Project Area Plan. Specifically, I am pleased that there is an increased emphasis in Timber Harvesting within the area to diversify the wildlife habitat and to bring the forest more into balance with respect to the age class distribution across the project area. However, that is where my positive comments end.

Unfortunately, the scope of the annual harvests (roughly 1% per year) will fall woefully short of the goal to significantly change the overall stand structure and the harvest methods, primarily helicopter (51%) and cable yarding (15%) will provide very little if any financial benefit to the local communities due to the outrageous costs of the operations and the lack of [ldquo]local[rdquo] helicopter and cable yarding companies to do the work. Based on my experience the American public will receive 10 cents on the dollar for the helicopter jobs (if they sell at all) and the majority of the money paid will go to the out of state helicopter companies who mostly use their own labor force which they bring in from out west. As for cable yarding, there is only 1 current operator I know of that is working in the state and as far as I know they do not work in the project area. Cable yarding is also more costly than helicopter logging, which reduces the revenues to the USFS and the local communities. All WV loggers are held to a high performance standard through the Logging and Sedimentation Control Act and Mandatory BMP[rsquo]s (Best Management Practices) and have proven throughout the years that environmental quality and sustainable practices can be and are achieved through conventional harvest methods throughout WV including some of the steepest slopes in the mountain state

The bottom line is that the forest is way behind its management and ASQ (allowable sale quotient) goals and there is a need to increase harvesting aggressively, not in small increments as proposed. Additionally, get rid of the ineffective and very costly helicopter and cable yarding methods in favor of proven ground based conventional harvests which are proven to protect the land and provide valuable jobs of revenue to the local communities.

Thanks for your consideration

Kelly S. Riddle, RPF #535