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Organization: WestRock

Title:

Comments: July 28, 2021

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

Subject: Upper Cheat River Project and the Order of Entry Strategy [ndash] Scoping Dear Mr. Morgan,

On behalf of WestRock, a leading manufacturer of sustainable fiber-based packaging, I am writing to provide comments regarding the Upper Cheat River Project and the Order of Entry Strategy.

WestRock's Covington, VA paper mill employs nearly 1,200 individuals in modern family-wage jobs making paperboard that is sold around the world. The mill is a Cybersecurity and Infrastructure Security Agency-designated critical infrastructure facility and has been in operation throughout the pandemic. Given its location on the Virginia and West Virginia border, the Covington mill relies heavily on pulpwood and wood chips purchased from sustainably managed West Virginia forests. With that in mind, we offer the following comments which we believe will result in increased revenues for the national forest system and improved forest health and resiliency.

#### Use of a 10-Year Planning Cycle

Since this is the first Order of Entry Project on the Monongahela, we are pleased to see that it uses a 10-year scheduling of proposed actions. Our hope is this new planning approach will improve the timing of individual actions to provide a more cohesive management of the forest. Using a 10-year span of proposed actions in one detailed scoping document will enable interested parties to comment on all proposed actions while significantly reducing the administrative burden of holding public comment and response on each proposed action. It also enables consultations with other agencies to be completed, reducing those agencies administrative and regulatory oversight costs.

#### Harvest Acreage Should be Increased

We are concerned that the harvest acreage being proposed is too low and should be increased. Only approximately 1% of the federally owned portion of the project area is expected to be commercially harvested annually. The data confirms that this unit has not had much harvesting over several decades, indicating a more aggressive harvesting approach should be considered. This is confirmed by the detailed assessment of the current condition of the forest, which is over-mature, diseased, and in need of improved species diversity and tree class distribution.

We recommend expanding the overall harvest acreage to compensate for the decades of neglect of the project area.

#### Commercial Harvesting Comments

We support the use of even-aged management. 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. However, we are concerned about the scoping plan's emphasis on helicopter and cable logging, neither of which are economically or technically advisable for the small harvest areas in the scoping document. Conventional harvesting methods using modern harvesting equipment can minimize 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 use of helicopter or cable logging could be an option, but not a requirement.

#### Comments on Other Proposed Actions

The scoping plan includes improvements to roughly 1,000 acres of stands 6-40 years old using herbicides and prescribed fire burns to control non-native invasive species and remove over-mature or diseased trees. We support such actions to develop a healthier forest and improve the vigor for the more desirable tree species.

Finally, we note that the plan incorporates salvage operations adjacent to planned harvests. We believe this would be an excellent method to improve the likelihood of obtaining bids for such low value harvesting and support its inclusion.

In closing, we believe this new scoping plan, if properly developed and implemented, represents a significant opportunity to leverage sustainable forestry practices in the Monongahela National Forest.

Thank you for your consideration of our views.

Respectfully,

Kirby Funderburke

Region Fiber Supply Manager WestRock