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First name: Tom

Last name: Inman

Organization: Appalachian Hardwood Manufacturers Inc

Title: President

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

Subject: Upper Cheat River Project - Scoping

Dear Mr. Morgan,

I am writing you to provide comments regarding the Upper Cheat River Project and comment on the Order of Entry Strategy. I represent an association of hardwood foresters, sawmills and distribution yards in West Virginia and bordering states.

We are pleased to see the approach using a 10-year scheduling of proposed actions for the Order of Entry Strategy. Our hope is this new planning approach will improve the timing of individual actions to provide a more cohesive management of the forest and believe a 10-year span of proposed actions in one detailed scoping document, is an excellent approach to assessing the many potential impacts. It also allows consultations with other agencies to be completed, reducing those agencies administrative and regulatory oversight costs.

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

Our main concern with the project is the low acreage being harvested. Only about 1% of the federally owned portion of the project area is expected to be commercially harvested annually. The data confirms this unit has had little harvesting in recent decades and we believe a more aggressive harvesting approach should be considered.

We recommend increasing the overall harvest acreage to compensate for the decades of neglect of the project area and reach that desired future forest structure much faster. This 10- year plan should state the total acres needing harvested for improving forest structure for the project area and the expectation when that future forest structure will be met.

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 applaud the continuing use of private contractors to harvest timber who have a proven 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.

We support using even-aged management on the 3,467 acres over the 10-years. 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 browse is major impediment to regenerating desired species.

We do have concerns over the harvesting methods being proposed. The document states methods were chosen for landscape position, value of the timber, and road locations. However, the most common selection is of helicopter logging, 54% of all harvests, should be reconsidered.

The scoping documents acknowledge the high cost of helicopter logging and because of this we believe the result has been no bids or minimum bids on sales for the Monongahela National Forest. This method should not be preferred but contractors should have the option to use other harvesting methods if they can demonstrate they will protect critical resources.

The proposed use of cable logging on steep slopes is also concerning. Harvests of less than or equal 40 acres, which is 100% of all harvests in the scoping document, is extremely expensive. The proposed locations of the blocks are widely spaced over the forest requiring numerous setups and thus costly to conduct. This assumes there are contractors willing to invest in cable systems with such little acreage to harvest.

We are unaware of any true cable logging systems operating in West Virginia so obtaining bids on these sales will be nearly impossible. 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 United States.

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 could be an option. 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.

Based on the scoping documents discussion of forest conditions, timber stand improvements to 1,058 acres of stands that are 6-40 years old is a small amount of acreage over the 10-year period. The scoping document states the use of herbicides and prescribed fire to control non- native invasives, while also removing overmature and diseased trees. We support such actions to develop a healthier forest and improve the vigor for the more desirable tree species.

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 salvage operations 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.

We appreciate the opportunity to comment.

Respectfully,

Thomas R. Inman President

Appalachian Hardwood Manufacturers, Inc.