

Data Submitted (UTC 11): 7/30/2021 12:06:17 PM

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Organization: The Hardwood Federation

Title: Executive Director

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,

On behalf of the Hardwood Federation, I am pleased to provide comments regarding the Upper Cheat River Project and Order of Entry Strategy. The Hardwood Federation is the united voice of the industry in Washington, D.C. representing twenty-eight (28) hardwood related trade and manufacturing organizations from across the country, including the West Virginia Forestry Association.

The Hardwood Federation is a long-time advocate for improved management of our federal forest lands, specifically those held by the U.S. Forest Service. Smart, sustainable management leads to healthy, resilient forests, improved wildlife habitat, clean waterways, and strong local economies, often dependent on the forest products industry that relies on raw materials from public lands.

We support using a 10-year scheduling of proposed actions on what is the first Order of Entry Project on the Monongahela. We believe this planning approach will lead to a more efficient and cohesive management of the forest as it enables interested parties to comment on all proposed actions and significantly reduce the administrative burden of holding public comment and response on each proposed action. It also enables all the consultations with other agencies to be completed, reducing those agencies administrative and regulatory oversight costs.

Below are comments and recommendations to improve the planning approach and to increase revenues to the national forest system.

Low acreage harvest goals: 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 not had much harvesting over several decades, indicating a more aggressive harvesting approach should be considered. The detailed assessment of the present condition of the forest is welcome information although unfortunately it describes an overmature, diseased and in need of improved species diversity and size class distribution.

Recommendation: Expand 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.

Recommendation: We support the continued 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 harvesting provide the surrounding communities with a measure of vitality and opportunity to service the forest products industry.

Commercial Harvesting: The Hardwood Federation also supports the West Virginia Forestry Association's

position on commercial harvesting proposals included in the Upper Cheat River Project. This includes support for even-aged management on the 3,467 acres over the 10-years.

However, we also agree with their concerns related to high-cost helicopter and cable logging which will provide very little, if any, financial benefit to the local communities due to the steep costs of the operations and the lack of in-state helicopter and cable yarding companies to do the work. Both methods are also more costly than conventional logging, which reduces the revenues to the USFS and the local communities.

Thank you for this opportunity to comment.

Sincerely,

Dana Lee Cole
Executive Director
Hardwood Federation