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First name: Curt

Last name: Hassler

Organization: Mountain Loggers Group

Title: Board Member

Comments: Mr. Jon Morgan

District Ranger

Cheat-Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

RE: Upper Cheat River Project Scoping

Dear Mr. Morgan:

The Mountain Loggers Group (MLG) is a non-profit association of loggers, foresters, and allied businesses. Logger members are located primarily in the northern half of West Virginia and western Maryland. As a group we support more timber harvesting on public land and in particular the Monongahela National Forest. In furthering that support we are pleased to comment on the Upper Cheat River Project.

We see increased harvesting activity on the Forest to be a great benefit to the rural WV communities that lie within close proximity of the Forest. It has been an ongoing concern in the forestry community that the lack of active management on the Forest has skewed the age class distributions toward very high proportions of overmature stands that are in decline both physically and financially. Although the proposed plan does begin to address the out of balance age class structure, we believe that it does not accelerate that process nearly enough. The 3,467 acres of harvesting only translates to 347 acres annually over the course of the 10-year plan. At a rate of harvest at about 1 percent of the total forested acreage per year, there will still be about a 100-year rotation age within the District.

Our other major concern is with the level of scheduled helicopter and cable yarding harvest units. A number of our members work for or have worked for mills that have traditionally bid on and bought Mon forest timber sales. We are also aware that many of these sales go without bids or are negotiated for very low prices. It is simply unreasonable for buyers to try to engage with helicopter logging companies from the Western US to come east for the size and volume of harvests that are available. We are well experienced in working successfully in steep terrain and are disappointed that the Forest Service, in essence, favors out-of-state companies for harvesting much of its timber in WV at the expense of our rural WV economy and the precious jobs that are at stake.

We work in difficult terrain most of the time and our overall performance with regard to implementing and sustaining Best Management Practices, including specific practices for both stream management zones and steep slopes, is excellent. Each timber harvest in West Virginia requires a notification with a plan on how the harvest will be conducted (submitted to the WV Division of Forestry (WVDOF)), as well as, inspection(s) by a qualified forester from the WVDOF. In reviewing the WVDOF BMPs noncompliance reports for over 6000 timber harvests in the past several years, the actual compliance for all BMPS exceeds 95% and the actual compliance in the stream management zones is nearly 100%. This clearly indicates that the common methods of conventional ground-based timber harvesting systems in WV strongly comply with BMPs, thereby protecting soil and water resources.

Of equal concern is that utilization from helicopter logging of the felled timber is significantly below that of conventional logging as many merchantable products such as lower grade sawlogs of higher valued species, higher grade sawlogs from lesser valued species, scragg logs (smaller diameter, poorer quality logs that serve as raw material to pallet manufacturer's), and pulpwood are simply left in the woods because they cannot pay their

way out, which is ultimately reflected in low competitive bid prices (or in many cases no bids at all). These additional products are important raw material inputs for a variety of wood products businesses in WV. Other issues with helicopter logging include: negatively impacting the job opportunities for West Virginians; helicopter log landings are at least 2 to 4 times large than conventional log landings, thereby significantly impacting a larger area when using helicopter logging; and lack of competition, especially from smaller forest product businesses, that cannot afford to engage the services of a helicopter logging company.

It our sincere hope that the Monongahela National Forest staff will seriously consider: 1) increasing the annual harvest acreage in the Plan in an effort to balance the age class structure in a shorter timeframe and 2) reconsider the use of helicopter and cable logging in favor of a much greater proportion of conventional ground-based harvesting systems.