

Data Submitted (UTC 11): 7/19/2021 12:39:36 PM

First name: Bill

Last name: Robinson

Organization: West Virginia Loggers Council

Title: Chairman

Comments: Jon Morgan, District Ranger

Cheat-Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

RE: Upper Cheat River Plan

Dear Mr. Morgan:

The West Virginia Loggers Council (WVLC) is pleased to have the opportunity to comment on the Upper Cheat River Project and most specifically on the planned harvesting program.

First, we are pleased to see that 3,467 acres will be receiving some level of silvicultural treatment, with the vast majority being in the form of silvicultural clearcuts. However, this amounts to only 347 acres harvested annually. It is difficult to see how this level of harvesting will achieve the balanced age class distribution anticipated by the plan. The 3,467 acres proposed for treatment does not even equal the 4,694 acres of overmature stands (>120 years) that certainly need dealt with. Further, it is not clear why 5-10 % of the Project area is intended to be maintained in stands that exceed 120 years in age. What is the justification for rotation ages in excess of 120 years? For the logging and sawmill communities, many of 120+ year old trees are difficult to handle both in the woods and in the sawmill. Mills today are not equipped to handle the very large logs that will result from these harvests. Therefore, we recommend a more aggressive approach to harvesting that will achieve the more desirable age class structure and to minimize the proportion of stands that exceed 100 years of age.

The second concern is over the type of harvesting systems being proposed in the plan. We are happy to see that 30% of the harvests will be using conventional ground-based systems. However, the logging community does not understand why 54% of the harvest areas are requiring helicopter logging and 16% require cable logging systems. The prevailing impression is that helicopter jobs are necessary on the Forest because of steep slopes. However, based on a review of the maps provided, it seems that other factors are perhaps more important. As an example on the page 27 map, for harvest units R39, R40 and R41, harvests units R42, R43, and R44, and harvest units R8 thru R16, it appears that the primary reason for helicopter harvests is that there are no roads into these units that could accommodate a conventional harvest. Therefore, all future harvest units in these blocks are destined for helicopter logging, unless a road is built into the block. And, there are other examples of this on the page 27 and page 28 maps.

Further, there are harvest units, such as R1 and R2, that are designated for helicopter sales that lie along an existing road and throughout the designated sale boundary no contour line is crossed. Finally, there are other examples of harvest units (e.g., R60 thru R63) that have road access, but are still designated as helicopter units.

We recommend that these helicopter units be reconsidered for conventional ground based harvesting units and that those blocks without existing roads use these initial harvest units to offset the cost of roadbuilding so that the entire block can be considered for conventional harvesting in the future (in effect using the inevitable lost revenue from helicopter sales to build the necessary road infrastructure to accommodate conventional harvesting). This not only provides for more income from Forest timber assets but will provide access that does not currently exist, including access for fire suppression efforts, non-commercial silvicultural prescriptions, and perhaps recreational purposes.

Conventional ground-based harvesting systems are used almost exclusively in West Virginia, in many instances

where slopes are greater than on the Forest. And, operating under existing BMP regulations the impacts to the harvested acreage are minimized. There are no helicopter logging businesses in WV and the WVLC is not aware of any active cable logging systems, inevitably leading to unsuccessful sale offerings on those harvest units. As loggers, we do not understand why the Forest Service requires helicopter or cable logging when adjacent private timberland with similar terrain features is successfully harvested with conventional logging systems. The current approach using helicopter logging does not support the rural communities and the wood-based sectors of our economy who have a right to expect more consideration from the Forest Service and the Monongahela National Forest in particular.

The WVLC would be willing and able to work with Forest Service personnel to provide a professional logging perspective on how many of these helicopter units could be harvested with conventional ground-based systems. Our members are well-versed in successfully dealing with a range of slope and terrain conditions and could provide valuable insight on how best to approach harvesting activities on the Forest.