

Data Submitted (UTC 11): 7/28/2021 3:11:18 PM

First name: Tom

Last name: Plaugher

Organization:

Title:

Comments: Dear Mr. Morgan:

I am a native and lifelong resident of Tucker County, WV and also a professional forester who has spent 30 years working in the industry here in WV. I am writing to provide comments regarding the Upper Cheat River Project and the Order of Entry Strategy.

I was pleased to see the Monongahela adopting a 10 year schedule of actions in managing this portion of the forest. Much of the forest in this area is composed of overmatured stands in need of silviculture Ural treatment to enhance the quality of the stands for both timber production and wildlife resources. My biggest concern is the small acreage being harvest ed on an annual basis. According to the data provided, only 1% of the federally owned portion of the project area is slated to be harvested annually under this plan. In order to reach any goals of changing the overall stand structure and balancing the age class of the forest the rate of harvest would have to be accelerated. My second concern would be the harvest methods being required under this plan. The plan document explains the rationale for the harvesting method being selected, but the result is that helicopter logging is the chosen method on 54% of the harvests. Helicopter logging sales on t h e Monongahela in past years have resulted in no bids or minimum bids resulting in the lowest possible economic returns for the forest from a valuable timber base.

In my time in the forest industry here in WV I have worked around extremely competent and qualified logging contractors from one end of the stat e to the other. Some consideration needs to be given for the types of logging operations typically employed on the public lands in this same study area in order to make these sales proposed on the Monongahela economically viable. It is refreshing to see a ten year plan put forth in this fashion versus the past decades of neglect on the Monongahela and I appreciate the time and effort put forth in preparing the document.