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Title:

Comments: July 29, 2021

Mr. Morgan, USFS

Potomac Ranger District

2499 North Fork Highway

Petersburg, WV 26847

Subject: Upper Cheat River Project

Dear Mr. Morgan, USFS

As the owner of a company who depends upon the forest, I am encouraged but also upset with the United States Forest Service's procedures and plans for the Upper Cheat River Project in Monongahela Nation Forest. I am very much encouraged by the plans to increase timber harvesting which has been woefully behind similar National Forests around the county. I am disappointed with the lack of volume being put up for sale and the amount of outrageously expensive helicopter and cable logging required to harvest what is being sold.

What is most upsetting about this project is that it does not go far enough. The increase in harvesting falls well short of the amount allowed under the current forest plan. Although this project only addresses a portion of the forest, the problems with this plan are indicative of problems in the management of the forest. The Monongahela has a current plan that calls for 65,000,000 board feet of harvesting per year. In 2020 the forest struggled to sell 6,000,000 board feet. In 2019 the Monongahela sold over 16,000,000 board feet, the highest amount sold in a year in over a decade, but still fell woefully short of the annual allowable cut or ASQ of 65 million board feet. The Allegheny National Forest, by comparison, has sold over 120 million board feet more than the Monongahela over the last four years (2016-2020) and accomplishing this despite having less acreage and having an ASQ that is 11 million less than the Monongahela. The amount of harvesting is not the only troubling fact when comparing these two forests. The Allegheny Forest averaging nearly twice as much per board foot from their sales. In my opinion this is due to the excessive conditions that the Monongahela puts on its timber sales relative to the Allegheny.

My company has purchased multiple sales from both forests. I have been able to harvest conventionally in the Allegheny, which has allowed me to bid a much higher price. Almost all the sales I have purchased in the Monongahela have been jobs that require helicopter logging. Helicopter logging is outrageously expensive and requires the use of out of state companies providing very little to the local economy and money back to the forest. Nearly all the revenues from these sales go to the helicopter companies and the extreme cost of their services making some of the sales unprofitable and has prevented the Service from receiving any bids. In West Virginia, loggers are held to a high standard under the state's Logging and Sedimentation Control Act. The results achieved by the Best Management Practices (BMP's) required under this act show a proven track record of achieving protection for the environment and maintaining the sustainability of our forests through conventional logging practices. The managers of the Allegheny National Forest must recognize this as well with essentially all their sales being sold as conventional logging jobs.

In conclusion, I would again express my support of the plan's increased management and harvesting of the forest. I would also strongly urge an increase in the amount of harvesting and elimination or drastic reduction in the amount of helicopter or cable logging required in the planned sales. I believe that this not only would benefit the industry but also the communities surrounding the forest and can be done so in an environmentally sound and beneficial manner.

Thank you for your consideration,