Data Submitted (UTC 11): 7/22/2021 4:00:00 AM
First name: Tony
Last name: Honeycutt
Organization: Mullican Flooring
Title: VP Lumber Purchasing
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,

I am Tony Honeycutt providing comments regarding the Upper Cheat River Project. I am also commenting on the Order of Entry Strategy.

Since this is the first Order of Entry Project on the Monongahela, I am pleased to see the approach using a 10-year scheduling of proposed actions. My hope is this new planning approach will improve the timing of individual actions to provide a more cohesive management of the forest. Using a 10-year span of proposed actions in one detailed scoping document, is an excellent approach to assessing the many potential impacts and should enable 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.

My comments on the proposed actions are provided to improve the planning approach and offer suggestions for increasing revenues to the national forest system while improving the health and resiliency of this forest.

My main concern with the project is the low acreage being harvested. 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. I recommend expanding 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.

I am pleased to see the detailed assessment of the present condition of the forest, which is overmature, diseased and in need of improved species diversity and size class distribution. I am also are pleased to see the continuing 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 Comments:

Planned harvests: Total: 3,467 acres (Commercial) [bull] 1,050 acres [ndash] Conventional method [bull] 549 acres [ndash] Cable yarding method [bull] 1,868 acres [ndash] Helicopter method

I support using even-aged management on the 3,467 acres over the 10-years. Many studies referenced in the scoping document have shown over the past 50 years the benefits to improving species diversity, and wildlife habitat using even-aged management, especially where heavy deer browsing is major impediment to regenerating desired species.

I do have concerns over the harvesting methods being proposed. The document states methods were chosen for landscape position, value of the timber, and road locations. However, the most common selection is of helicopter logging, 54% of all harvests, should be reconsidered. The scoping documents acknowledge this fact about the high cost of helicopter logging, suggesting the reliance on these methods should be reconsidered. In the past few years, helicopter logging sales offered on the Monongahela National Forest have resulted in no bids or minimum bids. So, it is mystifying why this method is preferred. One option would be to allow a contractor the option to use other harvesting methods if they can demonstrate they will protect critical resources.

The proposed use of cable logging on steep slopes is also concerning. Harvests of less than or equal 40 acres, which is 100% of all harvests in the scoping document, is extremely expensive, and looking at the location of the blocks widely spaced over the forest it would require numerous setups and thus costly to conduct, assuming there are contractors willing to invest in cable systems with such little acreage to harvest. We do have one large forest landowner in West Virginia that is using a tethered cable logging system specially designed for the large tracts where it will be harvesting continuously for decades. I am unaware of any true cable logging systems operating in West Virginia, so that obtaining bids on these sales will be nearly impossible. Only 30% of all planned harvests are using conventional ground equipment, yet modern felling equipment minimizes impacts to soils and careful planning can minimize skid trails, roads and landings, while providing the largest return for bid sales to the national forest system in the eastern US.

The proposed actions will only create disturbances with skid trails, roads, and landings, 0.5% of the entire Upper Cheat River Project area over a 10-year period. The slight increase in disturbance of conventional harvesting would only disturb an additional 0.3% of the Upper Cheat River Project area. This minimal impact could significantly increase revenue for the forest and communities. I recommend you reconsider sites where conventional ground harvesting could be an option. Further, the additional roads and skid trails would enhance recreational use, provide access for fire and rescue, and enable future treatments, if needed, without additional disturbance.

Comments on other proposed actions.

Planned: Timber stand improvement to 1,058 acres of stands 6-40 years old.

Based on the scoping documents discussion of forest conditions, this appears to be a small amount of acreage over the 10-year period. The scoping document states the use of herbicides and prescribed fire to control non-native invasives, while also removing overmature and diseased trees. I support such actions to develop a healthier forest and improve the vigor for the more desirable tree species.

Future Salvage Opportunities:

Based on the ongoing impacts from gypsy moth, emerald ash borer, and likely woolly adelgid and other pests and disease, I am pleased to see mention in the document that this could be addressed during the 10-year period. Incorporating such salvage operations adjacent to planned harvest would be an excellent method to improve the likelihood of obtaining bids for such low value harvesting.

Respectfully,

Tony Honeycutt

Mullican Flooring