To: Devela J. Clark, District Ranger – Athens Ranger District

From: David Maywhoor, Executive Director – Buckeye Forest Council

Date: January 22, 2009

Re: File Code: 1950

 Subject: Scoping Invitation: Pleasant Bear Habitat Improvement Project

 Issue Date: December 23, 2008

These are comments regarding File Code 1950, Scoping Invitation: Pleasant Bear Habitat Improvement Project

According to the Scoping Letter, The Athens Ranger District of the Wayne National Forest proposes to: “…improve wildlife habitat on a portion of the Marietta Unit. We wish to begin to move even aged forest stands to uneven aged stands, regenerate native pine stands, regenerate oak, treat non-native invasive species (NNIS) populations, improve stand health; all in appropriate management areas; and provide support to the local economy. (pg 1 para 1)”

and

“Create wildlife habitat conditions that are missing or are in less than adequate supply.” (pg 4 para 7)”

General BFC comments: The statement of purpose and need are flawed for a multitude of reasons. The assumption that a reversion to oak dominance is ecologically appropriate has no basis in science. Oak’s dominance, pre-settlement, is a historic fact but does not legitimate attempts to restore this dominance, which was most likely caused by historic environmental and human circumstances and actions. The environmental and economic costs of such a goal, including increased air pollution, ecosystem destruction, and economic loss to the region, make it inappropriate and illegal, based on USFS’s mandates from Congress.

Furthermore, the justification of logging and burning intact forest to create conditions that provide “hard mast crops” or create “snags and canopy openings favorable to a variety of wildlife species such as the Indiana bat and cerulean warbler” is misguided and counterproductive. These two species especially require large areas of mature forest. They are cited by the Wayne FEIS as examples of forest interior species; the likelihood of their occurrence increases with the size of the mature forest area. They are considered **area-sensitive species**, or species whose occurrence or reproductive success is reduced in smaller habitat patches. (FEIS p. 3-68)

In addition, bemoaning that “large blocks of continuous forest are uncommon in southeastern Ohio today” and that “Remaining forest blocks are very important because they are resilient enough to funcion as full ecosystems” but then four paragraphs later bemoaning that “in all three Management Areas there is little to no early successional habitat” and that “the DCF Management Area is somewhat over represented in both the mid-successional and late successional states and even slightly over withing the mature age class” is contradictory and misguided. In fact, the broader SE Ohio landscape has plenty of early successional habitat. Only public lands can provide the valuable and scarce interior forest in large enough tracts to benefit endangered species and provide this valuable and scarce forest type and only public land can be protected for centuries. It is scientifically and ethically unsound for USFS to value early successional land at the expense of large undisturbed forest tracts. It is also illegal, because USFS is to provide economic benefit to the public. As the Greenfire Analysis documents extensively, USFS management of the Wayne does not create a net economic benefit. Much of the economic loss comes as the result of destructive activities by USFS that result in fragmentation, loss of the most valuable and scarce forest types, and lost ecosystem services.

(Reference: *An Economic Analysis of the 2006 Wayne National Forest Plan*, Greenfire Consulting Group, 2008, available at heartwood.org)

Following are Athens Ranger District proposed actions “…in order to create favorable habitat conditions.” We are including with each proposed action literature references and Buckeye Forest Council (BFC) questions that support our final recommendations.

**BFC General Comment** The maps included with this Scoping Invitation do not clearly show in which area each of these proposed actions will occur.

*Athens Ranger District proposes:*

1. ***Uneven aged vegetation management which includes single tree selection, group selection and thinning of approximately 1500 acres*** – **BFC Comment:** These proposed actions will impact an area roughly the equivalent of 1,136 football fields, will result in forest fragmentation and ultimately will encourage the growth of non-native invasive species, the reduction of which this project proposes in other actions.

*Athens Ranger District proposes:*

1. ***Hardwood shelterwood of approximately 675 acres –***
2. ***Hardwood regeneration clearcut of approximately 400 acres*** – **BFC Comment and Literature References:** According to an Alabama Cooperative Extension System publication dated January 19, 2009 *Management of Hardwood Forests for Timber in Alabama*, The shelterwood method is much like clearcutting except that partial cuts are used to encourage development of seedlings in the forest understory several years prior to the final harvest. **Both clearcutting and shelterwood cutting result in even-aged forests**--that is, trees of all the same age. (Reprinted Apr 1996 Mark R. Dubois, Extension Forester, Assistant Professor, Forestry Auburn University.)

As documented by *An Economic Analysis of the 2006 Wayne National Forest Plan* (Greenfire Consulting Group, 2008, available at heartwood.org), such logging has significant negative ecological and economic impacts, including fragmentation of the most valuable forest type and consequent negative impacts on Indiana bats and other endangered species as well as destruction of ecosystem services, including air and water purification, soil preservation, carbon sequestration, and the capacity of the forest to provide low-impact, high-economic value recreation.

If USFS really values oak and the animals that eat acorns so much, why does it permit oaks to be logged for private corporations at great taxpayer expense, both directly and indirectly in the loss of ecosystem services that result when our public lands are logged?

*Athens Ranger District proposes:*

1. ***Crop tree release of approximately 1200 acres*** – **BFC Literature Reference:** According to December 2005 USDA “Crop Tree Management” – Conservation Practice Information Sheet (IS-MO666ctm), “This technique focuses on releasing individual trees that have been pre-selected to produce benefits consistent with landowner goals and site objectives…This means the entire perimeter of each crop tree’s crown is “released” from competing tree crowns, (Figure 1) thereby redistributing the growth potential of the site to the best trees so that they get bigger, grow faster and move into larger diameter forest products sooner. Neighboring trees are cut if their crowns touch or extend over the crown of the crop tree. Crop trees are typically high value timber species or high value mast producing wildlife species.”

**BFC Comment:** It is frightening that no detail is offered here. How many trees will be cut down so that the chosen few can more effectively do their job of becoming a crop? Is the intent here to move the remaining trees into forest products sooner?

*Athens Ranger District proposes:*

1. ***Prescribed fire of approximately 2266 acres.*** “Prescribed burning will take place when forest conditions are conducive to preferred weather parameters set forth by a burn plan for each area. Mechanical treatments to reduce fuel accumulation and assist in vegetation management practices will be used as an alternate to prescribed burning when the Burn Plan parameters cannot be met. Frequency of the prescribed burns will depend on post burn monitoring of fuel consumption and vegetation response. “

**BFC Comment:** On May 8, 2008 Aaron Adams, D.O., F.A.A.F.P. – Scioto County Health Commissioner called on Governor Ted Strickland to stop prescribed burns in the Shawnee State Forest, noting that “the smoke and air pollution endangers…residents to serious complications with respiratory and heart disease.”

**BFC Recommendation for Proposal #5**: Prescribed burning is an inappropriate tool in eastern deciduous forests, where a humid climate and the native tree species prevent excessive “fuel loads,” where historic fire was apparently human-generated, where NNIS are a growing threat exacerbated by prescribed fire, and where even the effectiveness of the burning for stated aims is highly questionable. Native flora and fauna are not evolutionarily adapted to fire. The promotion of prescribed fire is a smokescreen to access fire-related funding and is not scientifically sound.

**BFC Literature Reference**: A December 2007 report from the EPA lists Washington County in nonattainment status for air quality. See also Glasgow, L.S. and G.R.Matlack (2007), “Prescribed burning and understory composition in a a temperate deciduous forest, Ohio, USA,” *Forest Ecology and Management* 238: 54-64 and Glasgow and Matlack (2007), “The effects of prescribed burning and canopy openness on establishment of two non-native plant species in a deciduous forest, southeast Ohio, USA.” *Forest Ecology and Management,* **238**: 319–329.

*Athens Ranger District proposes:*

1. ***Treating native pine stands to maintain native pines as a component of the local ecosystem. Even-aged timber management along with prescribed fire are management tools that can promote and create this type of habitat. Native regeneration – 200 acres***

**BFC Comment:** The use of prescribed fire is an unproven forest management technique. As additional findings about the damage being caused by prescribed burns becomes available, the notion that human induced burning in the forest is a helpful action is quickly coming under greater scrutiny and is raising more and more questions about the appropriateness of intentionally burning the forest.

**BFC Recommendation for both proposal #5 and #6:** Stop using prescribed burning as a means to restructure the forest. It damages the ecosystem in ways that are still being analyzed and won’t be realized until the earth’s water filtration systems are completely degraded.

*Athens Ranger District proposes:*

1. ***Develop access to allow habitat conditions to be changed***. Numerous public roads and Forest Service roads will be used for implementing this project. We propose to reconstruct approximately 15 miles of existing Forest Service roads for temporary use to access log landings.

**BFC Comment:** This activity will have immediate detrimental impacts and will help further fragment the forest. Longer-term impacts will further disrupt the ecosystem as “temporary” roads become illegal user-developed areas for ORV traffic.

**BFC Recommendation:** Use the money from this road improvement project to re-build and improve trails, rest rooms, gathering buildings, and campgrounds. Hire personnel who can act in an interpretive role helping visitors better know and understand the wonder of the ecosystem currently still intact in some places in the Forest.

*Athens Ranger District proposes:*

1. ***Treat non-native invasive species (NNIS). NNIS will include up to 550 acres***. Treatment will be achieved through integrated pest management, using mechanical, chemical and potentially biological controls to treat the highest priority acres of non-native invasive plants species within the project area, examples of target species for treatment include: tree-of-heaven, Japanese stiltgrass, garlic mustard, Oriental bittersweet and Japanese knotweed. In most cases re-treatments will be necessary for several years in order to exhaust NNIS seed banks.

**BFC Comment:** Elimination of NNIS is a laudable goal. Its importance highlights the destructiveness and inappropriateness of the other goals in this scoping project, because NNIS will be exacerbated, rather than controlled, by the use of prescribed fire, logging, and road building proposed by this project.

Integrated pest management, if done properly, is an appropriate approach, because it considers the impacts of treatments on the ecosystem. Howevr, our recommendation is that chemicals be avoided for all except emergency, last-resort situations, and that then only targeted, individual plant specific applications be used with least toxic materials. This is in keeping with IPM principles but is not necessarily the intent of this NNIS management proposal.

This is the perfect opportunity for the leadership at the Wayne National Forest to develop a set of goals which can maximize use of President Obama’s economic stimulus plans by creating jobs and protecting the environment from the inevitable problems created anytime chemical and biological treatments are used to control the earth and her inhabitants.

The November 2008 Ranking of Ohio County Unemployment Rates (Not Seasonally Adjusted) shows that while Washington County had just 5.5% unemployment, Noble County is struggling with 10% and Monroe County is at 9.4% unemployment. These rates reflect true human tragedy as families and individuals piece together part-time work without health benefits to make ends meet.

In a December 24th 2008 article in US News and World Report, Kent Garber wrote: “From what Obama has said thus far about the stimulus package, which is rumored to be in the $700 billion-to-$800 billion-plus range, he is hoping to accomplish two things at once: stabilize and restore the flagging economy while advancing his energy agenda. Observers say that to do so, he will have to strike an appropriate balance between short-term and long-term projects, a balance that delivers quick, tangible aid to the economy but also lays a foundation for transforming the country's energy portfolio.”

The apparent reality is that there will be funds available to stimulate the local economy.

The leadership at Wayne National Forest should create a true national economic development model by creating jobs that will nurture the forest into a low-impact Mecca, a place for hikers, campers and bird watchers to come, rest and recuperate.

**BFC Final Recommendation**

Through the various different forest management techniques, the management at the Athens Ranger District will impact over 6,700 acres of the 64,619 acres in the Marietta Unit or 10% of the Forest. These activities will:

* Create forest fragmentation,
* Encourage NNIS,
* Result in even-aged growth,
* Needlessly destroy the habitats of plants, animals, and other biota
* Disrupt the eco-services of water purification, air cleansing, carbon storage, flood control, and low-impact recreation
* Exacerbate air and water pollution and resulting negative economic and health impacts on the region, and
* Result in a net loss to the local economy, the state of Ohio and the nation.

It is therefore illegal, inappropriate, and has no scientific or economic justification.

A project of this size and scope should have complete and thorough public oversight – an EIS with full public involvement.