# Heather Cantino Comments re Wayne National Forest The Sunny Oaks Project #53742 ([www.fs.usda.gov/project/?project=53742](http://www.fs.usda.gov/project/?project=53742)) May 1, 2018

These are part of my comments regarding the USFS Wayne Sunny Oaks Project.  This project is in the Wayne Ironton Unit and will allow logging of up to 3,000 acres or more, prescribed burns of 20,000 acres or more, herbicide treatment as well as creation of 25 miles of old and uncreated roads. It is indeed a war on this forest.

If ever there was a definition of a major federal action, this is it.  The Wayne is the smallest national forest, and cutting, burning, herbiciding, and road building this amount of forest in such a manner will have a significant impact on the Wayne.  This should require the maximum in environmental studies and public involvement – an EIS with full public involvement.

This project is not providing adequate protection to protect unfragmented areas of mature forest. Why would you designate an unfragmented block of older forest, the most valuable forest for biodiversity, climate protection, and other ecosystem services and the type of forest that can be protected only on public land, to supply early successional?

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)

The claims about all of the benefits of burning the forest do not have supporting references and are greatly exaggerated.   Greenfire Consulting;s Eanalysis of the Wayne National Forest Plan found that prescribed burning was a net cost to the forest because the degrading of ecosystem services provided by the undisturbed forests outweighed the nebulous at best benefits from burning the forest.  These include such benefits as carbon storage, production of oxygen, cleansing of particulates, watershed protection, biodiversity, scenic beauty, and recreational capacity. All of these benefits are degraded to one degree or another, either short or long term, by the burning of the forest.  In addition, prescribed burning costs the taxpayers money, money that is getting increasingly tight, and for which the Forest Service has much more immediate uses which obviously benefit the public, such as repairing and reopening campgrounds, more regular law enforcement, and monitoring.

In order for prescribed burns on the Wayne to outweigh these costs and be in the public interest, the benefits of the burning would have to be extraordinary and obvious.  In fact, they aren’t.  In reality, experimental burns done in Ohio have failed at producing the predicted results, such as increasing the oak hickory component of the forest.  In fact, SE Ohio, while a transition forest,  is much closer to the source and more of a mixed mesophytic forest naturally.  Using these economically and environmentally costly manipulations of nature to force the forest to be more of an oak/hickory forest is not natural or safe for the survival of the countless species that have evolved without extensive hot fire, more characteristic of western forests, for which the federal fire money was designed (whether or not it is appropriate there, it is certainly not appropriate in eastern forests other than ridgetops in few acre units).

Herbicides should not be used to control vegetation.  The risk to the public and environment from the herbicides is just too great.  Other controls should be subject to the highest level of public involvement and environmental study.

The assumption that a reversion to oak dominance is ecologically appropriate has no basis in science. Whether or not oak was more dominant at the emergence of European domination of the region, the past tree dominance does not legitimate attempts to destroy a mature forest to force a particular tree dominance now (without chestnut or ash, it will certainly not be a resotration of any former times). 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 to benefit the American taxpayer. Local income from industrial logging or tax payouts are less beneficial economically to the region’s people in the long term, as the Greenfire Economic Analysis (referenced) documents in great detail.

Furthermore, any 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)

This project is not in the environmental or economic interest of most of the users of the Wayne National forest.  The Forest Service continually loses money on these kind of projects, and the environmental impact has been severe.  The agency has been repeatedly wrong about predicting the impact of its management activities.  The Wayne has much greater needs than to spend our dwindling public money on burning and logging the forest.  I oppose this project.

I therefore strongly object to the Sunny Oaks Project slash and burn project by the Wayne National Forest in the Ironton Unit. I don't have the stomach to spend another month of my life repeating the same arguments that have been made repeatedly by scientists, economists, and forest advocates against such deceptively packaged timber-industry driven raping of our public forest, so I attach and reference with these comments the 2008 Economic Analysis of the 2006 Wayne National Forest Plan, the 2009 Buckeye Forest Council Prescribed Burn policy and several peer-reviewed science articles to be in the public record as scientifically and economically based objections to this outrageous proposal. I also note yet again and speak for thousands of concerned citizens of the crime you commit as stewards of our public forest in your industry-driven rape of our public lands, cloaked as this assault is behind a veneer of bad science.

You are sanctioning authorization of the destruction of countless species, which are NOT being documented let alone evaluated (reptiles, amphibians, and fungi, to name a few clades among many not being adequately considered in any analysis of impacts you are supposedly having done) in addition to undocumented and significant climate change impacts that will result from the destruction of mature trees, extensive long-term emissions from soil disturbance, and direct emissions from prescribed burning.

The introduction of invasives is also not a trivial matter, as your ridiculous newsletter implies. Your rush to get this project through before a new plan is developed is also evidence of your disregard for science as well as of the biodiversity of our public lands that you are entrusted to protect (in spite of your misguided and manipulative reference to "multiple use", a policy that does not justify logging and burning at the expense of much more important biodiversity and climate, which you are *destroying)*.

As a board member of Buckeye Environmental Network (formerly Buckeye Forest Council), I also attach and reference BFC's 2006 announcement of our appeal of the 2006 Plan, obviously relevant to your current outrage against our Forest.

Attachments: Greenfire Economic Analysis of the 2006 Wayne National Forest Plan, Buckeye Forest Council 2006 announcement of appeal of the 2006 Wayne National Forest Plan, and Buckeye Forest Council prescribed burn policy (2009).

Other references:

Glasgow, L.S. and G.R. 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.

Glasgow, L.S. and G.R Matlack (2007). Prescribed burning and understory composition in a temperate deciduous forest, Ohio, USA. Forest Ecology and Management, **238:** 54–64.