Patrick Mercer
Wayne National Forest
Ironton Ranger District
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Pedro, OH 45659
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Dear Mr. Mercer:
The unscientifically based bias of the USFS toward extraction is clear in many of the FS stated goals as well as the terminology used by the USFS and this scoping letter. The term "overmature" is absurd. Only a Forest Service whose real motive is to supply wood to loggers would call a forest overmature. Scientists would call it either mature or old growth, a term not even mentioned in this scoping letter. The lack of old-growth both in the broader landscape and the Wayne make prioritizing recovery of old growth of the utmost importance and the highest economic benefit to the public, which is required to determine FS actions by congressional mandate. Provision of ecosystem services by old growth forests makes them far more valuable than any benefit that can be attained by the public from early successional forest, which provides far fewer ecosystem services.

Furthermore, the Forest Plan on which the scoping letter is based designates hardwood trees as young as 100 years old as overmature. It also designates trees as young as 60 years old as "late successional." Scientists describe a 60 year old Eastern deciduous forest mid-aged or transitional.

Even more alarming (but not surprising given that this is all a cover to log mature woods and produce more of the trees the most sought after by loggers) is that the so-called "late successional" forest now makes up MORE Wayne land than the FS wants. The FS claims that so-called "late successional (60-99 yrs) makes up 39% of Wayne land when the FS wants it to be no more than 27%. This suggests the FS will allow commercial logging of these healthy forests, which are just beginning to approach maturity according to scientists (read non-FS scientists), to create the less valuable early successional forest, which is already far more prevalent than old forests and much more frequently created than old forest can be on private land. The FS goals and the Buckeye Project's are inappropriate because they do not account for the ease and frequency of creating early successional forest on private land and the extreme difficulty of protecting the most valuable old forests anywhere except on public land.

FS stated goals of promoting oak-hickory are contradicted by FS plans to log oak-hickory. These plans should be stopped.

Furthermore, the FS here uses flawed assumptions on the efficacy of fire to achieve its stated goals. Please accept the attached statement of Dr. Glenn Matlack, Ohio University forest ecologist, as my comments on the inappropriateness of using fire in Eastern deciduous forests, even if one accepts the goal of encouraging oak-hickory as a legitimate FS goal of forest intervention, which is itself debatable (see Matlack discussion of this as well). Fire not only destroys fire-intolerant herbaceous species but also threatens reptiles, amphibians, fungi, and other native species that have not evolved to tolerate the large, hot, and habitat-inappropriate fires created by the FS for timber management. Fire also encourages invasive species as Glenn Matlack's research demonstrates. These fires should be halted and stricken from FS management plans, based as they are on inadequate and flawed science.

The FS is required by Congress to serve the public good. Since ecosystem services provided by forests are far more valuable than forest goods (i.e., wood) and since ecosystem services (including carbon sequestration, biodiversity, soil conservation, and air and water purification) are provided far more by old forest than by young forest, this scoping letter outlines a plan that is contrary to FS mandates, is therefore illegal, and to which I strongly object.

Furthermore, FS directives require consideration of climate impacts of the proposed project. This project cannot meet FS goals of climate protection and amelioration because logging, burning, soil disturbance, forest fragmentation, and extraction equipment and transportation activities will all increase CO2 emissions greatly. These must be quantified and evaluated for their impact on climate stability and FS carbon emissions before this disastrous project is further considered.

Please record and acknowledge my strong objection to this industry-driven proposal that has no scientific justification and does not serve the public good as required by federal mandates.

Heather Cantino
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