



May 25, 2011

Dear Devala J. Clark, District Ranger, Athens District,

Buckeye Forest Council (BFC) submits these comments in response to your request for comments on the Environmental Analysis (EA) for the Wayne National Forest, Athens District's "Pleasant Bear Vegetation Management Project," dated April 25, 2011.

The No-Action Alternative (Alternative 1) is inadequately developed and must be revisited and redeveloped in greater detail. In its current form, Alternative 1 essentially amounts to an empty shell with little to no consideration of the significant roles natural processes play in the development of forest structure and habitat; as such, it serves as a poor baseline for evaluating the pros and cons of the two Action Alternatives (Nos. 2 & 3), and fails to serve as a fair and adequate consideration of naturally occurring forest dynamics.

The current draft of Alternative 1 does not consider the gap formation dynamics that occur in older mixed-mesophytic and oak-hickory forest types. Lost in the EA's overall discussion is the fact that the NFS lands in the Marietta District are predominantly quite young. The vast majority of the forest is less than 100+ years in age, reflecting a recent history of heavy-handed human intervention. Were large, interior blocks of forest allowed to truly mature (beyond the EA's commercially-framed and environmentally misleading "overmature" designations), canopy falls would provide a natural and consistently reoccurring source of early successional habitat. The EA does not examine or consider this natural component of forest dynamics; nor does it examine or consider the efficacy of oak-hickory regeneration in this context. Passing reference is made to "natural catastrophic effects" regarding oak-hickory regeneration at section 3-20, but no critical consideration is provided. Moreover, "catastrophic events" should be distinguished from the gap-formation dynamics that naturally occur in truly mature forests – again, a subject that is not given consideration in the EA in its present form.

Truly mature, "old-growth" forest, let alone contiguous forest, is what is in short supply in Ohio and the Eastern half of the nation, in general. The EA needs to consider the role that these forest types play in connection with its management objectives and goals, especially with regards to the Diverse Continuous Forest management area contained in the project area in question.

Moreover, this proposal, if implemented as "Alternative 2" in the EA, would have significant direct, indirect, and cumulative impacts on the environment. The EA needs to

accurately consider such issues as climate change and ecosystem services. This project is clearly a “major federal action” pursuant to the National Environmental Policy Act (NEPA). It should therefore be subject to the highest level of environmental impact study and public scrutiny. Per NEPA, an Environmental Impact Statement (EIS) is required.

Sincerely,

/s/ Nathan G. Johnson .

Nathan G. Johnson

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