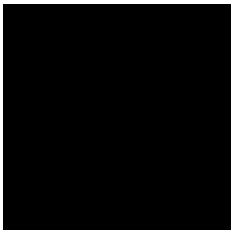

January 11, 2019

Rachel Reed
Forest NEPA Planner
Wayne National Forest
6518 SR 93
Pedro, OH 45659
rorwan@fs.fed.us

Submitted via: comments-eastern-wayne-ironton@fs.fed.us

RE: Sunny Oaks Project Draft Environmental Assessment

Dear Rachel,

The [redacted] submit the following comments on the Draft Environmental Assessment (EA) for the Sunny Oaks Project.

The [redacted] strives for the purity of water, the clarity of the air, and the wise stewardship of the land and its resources; to know the beauty and understanding of nature, and the value of wildlife, woodlands and open spaces; to the preservation of this heritage and to man's sharing in it. We greatly value the oak-hickory ecosystem because of its unrivaled value in this region for providing abundant wildlife food and habitat. We are concerned about the decline and unsustainable harvest of white oak (*Quercus alba*) in Ohio, as reflected in U.S. Forest Service Forest Inventory and Analysis (FIA) data published in 2018. We recognize that U.S. Forest Service (USFS) and state and local land management agencies in the region will be vital to the future success of this species and the region's oak-hickory ecosystems. Our members have a long history of hunting, fishing, camping, and outdoor recreation in the Ironton Unit of the Wayne National Forest (WNF), including within and near many parcels included in the Sunny Oaks Project. The [redacted] lake and forested property shares boundary lines with the WNF, and several proposed harvest units are in close proximity to [redacted] property.

We have a number of concerns with the Sunny Oaks project. Unfortunately, there is no such thing as "instant oak." Ultimately, this project will diminish the oak ecosystem because the necessary front-end investments in preparing the project's stands for overstory removals have not been made. Oak seedlings in the region are generally scarce, absent, or too small to compete after overstory removal. Based on the available data, it is clear that the WNF's understories are no exception. Sufficient number, distribution, and size of oak saplings must be present prior to clearcut harvest if oak ecosystem maintenance and regeneration is an objective. Similarly, oak

seedlings must be present in sufficient numbers and spatial distribution prior to shelterwood overstory removals if oak ecosystem maintenance and regeneration is an objective. Shelterwood treatments can be used to grow already established oak seedlings that are small yet abundant, but they often fail when seedlings are absent or sparse.

Generally, acorn counts, stand inventories, and stand preparation via prescribed fire, mechanical thinning from below, and/or herbicide treatments are needed to successfully establish sufficient numbers and spatial distributions of oak seedlings when and where they are scarce or absent. It is widely accepted in the scientific literature that 10 to 30 years of stand preparation is often needed prior to significant overstory removal (clearcut or shelterwood) where oak regeneration is an objective. However, it appears that USFS has conducted very little if any site preparation work (e.g., fire and/or thinning) in these stands over the past 10 to 30 years. The results are evident. The vast majority of these stands are simply not ready for clearcut or shelterwood treatments.

We are concerned that understory plot data (SILVAH:OAK) is not available for many of the stands in this project. The public and USFS therefore lack crucial site-specific information necessary for an adequate evaluation of the appropriateness of harvest prescriptions for these specific stands. In addition, most of the understory inventories that were conducted for this project do not meet basic (SILVAH:OAK) sampling standards regarding minimum number of plots sampled.

And, the stand understory data (SILVAH:OAK) that has been made available to the public is very concerning. This data shows that there are very few competitively-sized oak seedling and saplings in the stands in question. As a result, clearcutting these stands will result in the sharp decline of oak. In the future, these stands would likely be dominated by competing species such as red maple and tulip poplar, which have far less wildlife value than oak. Clearcutting is not an appropriate method of oak regeneration in these stands. Nor, for the same reasons, are clearcut with reserves or “two-age” prescriptions that retain no more than 15 square feet of basal area per acre.

The available understory data also shows that very few small or “new” oak seedlings are present in this project’s stands. As a result, shelterwood prescriptions are also inappropriate for these stands.

In addition, many of the project’s proposed harvests are in excess of 40 acres, which is not optimal for game species like ruffed grouse, and which exceeds limits found in the WNF’s forest plan (G-FSM-WLF-1, 2-30 acres) and the National Forest Management Act (NFMA).

We are opposed to the timber harvests proposed in the Cannons Creek-Slab Fork Road area (Compartment 452). This area is directly adjacent to the [redacted] property. No SILVAH:OAK reports for the stands in this compartment have been provided to the public. We can only assume, therefore, that USFS has not conducted site-specific surveys to assess and verify the current oak regeneration potential of these stands. Given the publicly available data for the region and for the stands in this project that do have SILVAH data, the current oak potential for these stands should be presumed to be very low. Nor is the creation of early successional habitat a desirable outcome for these parcels. There are currently numerous

large early successional habitat parcels in the general vicinity due to recent clearcut harvesting on private and/or state-owned land.

We are opposed to the timber harvests proposed in the Slab Fork Road area (Compartments 446 and 447). Stand 446-31 is a proposed 280-acre shelterwood harvest unit for oak regeneration purposes. Even if riparian buffers are accounted for, the size of this proposed harvest far exceeds the basic threshold limits found in the forest plan and NFMA. Per the available SILVAH report, less than half of the minimum SILVAH understory plots were taken for this stand. And, very few oak seedlings are present in the understory, let alone large seedlings or saplings in the established or competitive classes. A shelterwood treatment is therefore inappropriate in this stand. Shelterwood treatments generally fail to successfully regenerate oak when insufficient numbers and distribution of oak seedlings are present. This stand's SILVAH report notes that "seedlings are too scarce at this time." The report therefore recommends monitoring for acorns, re-inventorying the stand, and site preparation via prescribed fire and/or herbicide treatment.

Stand 447-19 (Slab Fork Road) contains a proposed shelterwood prescription for oak regeneration purposes. The SILVAH report for this stand notes that the understory regeneration data "is not based on an adequate number of plots," with only 9 of a minimum 34 plots having been taken. The report further notes that "seedlings are too scarce at this time," and recommends monitoring for acorns, re-inventorying the stand, and site preparation via prescribed fire and/or herbicide treatment.

In addition, the Cannons Creek-Slab Fork Road and Slab Fork Road area stands are fully contained within roadless parcels USFS has inventoried as part of its pending forest plan revision process. These roadless parcels are being considered for eligibility for designation as federal wilderness areas, as well as potentially other protective designations. Because these roadless areas are being evaluated for wilderness protection, even-age timber harvesting is not appropriate within their borders.

Thank you for considering our comments. We look forward to working with USFS to help improve this project.

Sincerely,