

2/28/2020

USDA Forest Service, Eastern Div.
Gaslight Bldg #700
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Sunny Oaks Project, WNF Ironton Ranger Dist., Tim Slone

WNF's April 2018 Newsletter lists specific bird species. Some of these nest right on the ground, others in low shrubs or tree cavities, or higher up in trees. But what about all those other nesting birds found around here (great documentation of these in The Second Atlas of Breeding Birds in Ohio, 2016 by Paul G. Rodewald et al, Penn State University Press)? ???

But here's where a significant extermination problem arises. A dramatic Audubon study released 9/19/2019 states that there are three billion fewer birds currently than in 1970. Lots of people in birding circles are talking about this. The lead author states that this has been happening right before our eyes! And more than three quarters of these birds are quite rare. Habitat alteration (mismanagement) is blamed as one of the primary causes of this species reduction. This wasn't in compliance with the Migratory Bird Treaty Act.

This Report has been published in the prestigious journal SCIENCE. It made the front page of the NEW YORK TIMES, 9/20/-2019 edition. The study's lead author was Kenneth Rosenberg of Cornell U. He worked in collaboration with Audubon, American Bird Conservancy, and other agencies.

Regarding those imperilled plant and animal species, referred to in the Endangered Species Act and in other Listings, in early May of 2019, the UN's Intergovernmental Science-Policy Platform on Biodiversity & Ecosystem Services issued a mass extinction report. I'd suggest that you need to get your own copy of this, to examine. Up to one million of the World's species are facing extinction. Threats to their life habitat is cited as a primary cause for their forthcoming demise. Apparently some people aren't too concerned about that, as they're slipping away!

I believe it would serve a good purpose if you would get an extra copy to forward to WNF officials. Existing protections for T & E Species need to be reinforced. It also would be helpful to get some copies of a Report published 11/18/2019 in the British journal NATURE CLIMATE CHANGE. It declares that the United States is not doing enough to protect 459 Endangered animal species that are threatened by human-caused climate change. (Exactly how WNF is fostering climate change will be discussed later.) The authors are Aimee Delach and Astrid Caldas.

On Page 6 of WNF's Draft Decision Notice, some species decline numbers are already being acknowledged.

In my Comments for today I want to present new information, as is provided for in 40 CFR §1502.9(c)(1)(ii). The first of these deals with the Federally-endangered Rusty-patched bumble bee. WNF's April, 2018 Newsletter, P.1, refers to "various pollinators"

that are reliant on young forests.

In a previous letter I sent to the Wayne about this bumble bee, the response was that they didn't have any terrain for that bumble bee there. My own visits to the Wayne allowed me to form an opposite conclusion. This is borne out in pages 122-123 that I am enclosing from Bumble Bees of North America, by Williams, Thorp, Richardson, and Colla; 2014 by Princeton University Press.

Wayne's biologists have only to take their small nets out into the fields there to verify this! If they are unwilling to do that, perhaps a federal lawsuit would remedy that situation. (Or-- do they expect environmentalists to undertake such a task?)

Regarding two threatened and Endangered bat species, on Page 12 of the Draft Decision Notice is mentioned a possible affect of roost trees being cut down not being very great. What's ignored thereby is the number of young bats in these roost trees, which are much too young to flee elsewhere.

This FS likes to do EAs instead of EISs. For example, they're predisposed to stating that Federally-endangered mussels remain in the Ohio River, rather than agreeing that said mussels go Northward in Ohio River tributaries. Mussels have that peculiar reproductive strategy of their young being injected into the gills of the host fish(es) preferred by each particular species.

Said host fishes then swim Northward into Forest waters, where the young mussels drop off before too long. (It's weird-- perhaps that's why they don't know about it!)

Enclosed is previous correspondence where I try to explain this to them. But this is one way they can deny any Endangered mussels are in the Project area, in their EAs.

I agree with the [REDACTED] in their Comments of 22-22. The number of T & E Species in the affected Project areas does require an EIS rather than an EA, like I've been saying. It's sheer boldness for them to suggest a FONSI will do (violations: NEPA §102(2)(c), 40 CFR §1502.3, §1502.4, 1502.9(c)(ii), §1508.27-(b) (9 and 10). The FS should act to prevent any exterminations of such species, rather than excusing their demise (whether or not the FS's actions cause direct or indirect harm, or these are cumulatively done in concert with other factors.

As I stated in my enclosed Comments of 4/4/1918, the prescribed burns will kill and /or harm a number of species. This would apply to a number of plant species like Running buffalo clover, young bats too young to flee from maternity colonies, migratory bird chicks, the young of Rusty-patched bumble bees, Box turtles, the young of turkees and Black bear, Carolina thistle, Fern-leaf false foxglove, White Fringetree, Plain gentian. Silt runoff

buries the eggs of aquatic species. But see Pp.91-95 of Forest Service publication Gen.Tech. Rep. SRS-199 (Sept.2014).

I was pleased to read [REDACTED] Comments [REDACTED]. This argument is one I have been making for some years against WNF's Prescribed Burn projects, as to the resulting fire damage to trees, short-term and long-term.

As I mentioned in my 4/4 Comments for this Project, Pages 1,2, [REDACTED] the current Ironton District Ranger has stated a policy in his project intentions of killing off other valuable oak species-- in favor of White oaks, on ridgetops and Southern-facing slopes. There are other tree species there of considerable commercial value, which I believe should not be sacrificed.

IN my enclosed letter to the FS of 10/23/2018, I comment on the contributions these prescribed burns make to global warming, in addition to killing of various species. There is also the matter of what the air pollutants do to public health.

In my 4/4 Comment letter, P.3, I refer to the harm herbicide use does to public drinking water supplies. There is also harm to Forest animals drinking such water, aquatic species, and Federally-endangered mussels in particular.

Yours
[REDACTED]