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Wayne National Forest Plan Revision Effort

March 21, 2020

Ms. Carrie Gilbert, Supervisor

Wayne National Forest Headquarters

13700 US Route 33

Nelsonville, Ohio 45764

Dear Ms. Gilbert,

We have individually read the Draft Assessment and submitted specific comments through the CARA site. This letter provides a summary of our more general impressions. A draft has been reviewed and approved by the thirteen active members of the Biodiversity Working Group.

First, we appreciate having been invited to participate in the planning process. We recognize that an open planning process is a departure from historical practice within the US Forest Service, but notwithstanding its novelty it has attracted considerable interest. These are public forests and we value them greatly. We also understand that National Forest policy is not purely an exercise in resource management, but also requires a balance in political forces, and the political climate has been turbulent in recent years. We are happy to work through this difficult period. In retrospect, participation in the planning process has been an exciting and educational experience for all of us.

We have taken the process seriously and invested considerable time and thought in our contributions. The goal of incorporating the best available and most recent science in a data-driven planning process (Draft Assessment, page 117) particularly appeals to us. We respect the Forest Service's desire to apply management practices informed by our developing understanding of forest biology. As a group we have enormous professional experience in wildlife management, environmental science, law, and planning, and much personal familiarity with the Wayne National Forest in particular.

Given the unpredictability of environmental and economic conditions in the future (for example, who would have predicted a global pandemic?) breadth of experience is very important. We believe that a broad, inclusive assessment of challenges is the most flexible and, thus, most powerful means of effective forest management. The goal should be to bring in the widest range of evidence, and to avoid narrow doctrinaire interpretations.

With these principles in mind, we brought our collective experience to bear in our initial contribution (Biodiversity Working Group, January 2019) and eagerly awaited the release of the Draft Assessment although its appearance was somewhat delayed. But the Assessment document turns out to be quite puzzling. Many sections do not seem to represent the true state of the Forest, and numerous important issues appear to be omitted entirely. Although we recognize some passing references to our work, most of the issues we raised have not been included in any substantive form. Particular problems include:

1. A failure to recognize the diversity of community types within the forests of southeast Ohio. All biological interpretation seems to be focused on regeneration of oak communities, which actually represent only a small portion of diversity within the Wayne National Forest.
2. Failure to acknowledge the complex land use history of the region, which has a long-lasting legacy in the structure and composition of the modern forest community.
3. Chronic misinterpretation of forest stand dynamics and forest age. Young stands which have not yet begun gap-phase replacement are repeatedly characterized as "mature". Natural disturbance processes are not acknowledged. This presentation appears to reflect a silvicultural bias rather than any biological understanding of stand structure or ecological succession.
4. Selective use of early successional birds and oak-barren indicator species as proxies for biological diversity in general. The vastly greater numbers of soil organisms, invertebrates, amphibians, forest bird species, and shade-tolerant forest herbs are ignored.
5. Selective use of the scientific and professional literature. Very few of the critical references included in our report appear in the text. Our citations come from a broad spectrum of scientists and represent up-to-date international thinking. Many of our citations refer to work done right here in Athens County and are directly relevant to WNF. Instead, the Assessment is supported by publications from a small number of scientists, usually a recognizable group within the Forest Service, and many who are working outside our area. Too often conclusions in the Draft Assessment are supported by vague reference to general review papers or agency reports which often do not apply to the forests of SE Ohio.
6. Several critical issues arising since the 2006 management plan are completely ignored. For example, climate change is hardly mentioned and the role of long-established forest in carbon sequestration is completely missing. The recent scientific reassessment of herbicide and pesticide use is not mentioned at all despite a high likelihood of groundwater contamination. Likewise, modern thinking on biological impacts of invasive species is not included. Other examples abound.

In summary, it appears that the Draft Assessment has failed to meet its primary goal of incorporating the best available (and most current) science. Instead, it presents a view of forest science current 20-40 years ago, and it buttresses its assessment by an extremely selective use of published papers and many unpublished reports. This document in its present form is outdated, narrowly focused, poorly supported, and unlikely to form the basis of a workable management plan.

We have submitted extensive comments on the Draft Assessment; hopefully the Planning Team will find them helpful in revising the Assessment document. In the meantime, we remain engaged in the planning process, and look forward to contributing in later stages of plan development.

Respectfully submitted,

Representing the Biodiversity Working Group

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