Data Submitted (UTC 11): 3/23/2020 4:00:00 AM
First name: Loraine
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Organization: Ohio Sierra Club Forests and Public Lands
Title:
Comments: This is Loraine McCosker Ohio Sierra Club. I realized that we have made an error in our comments and incorrectly requested that the Department of Interior declare a climate emergency for our national forests while the USFS is within the Department of Agriculture.

Thus we request that the Department of Agriculture declare a climate emergency and restrict all logging for the sake of the ecological services of the forest NOW, not in 50 years.

Ohio Sierra Club Forests and Public Lands

PO Box 585

Athens Ohio 45701

March 21, 2020

Wayne National Forest Supervisor[rsquo]s Office,

Attn: Plan Revision

13700 US Highway 33, Nelsonville, OH 45764

Wayne National Forest Assessment Comments

Dear Supervisor Gilbert,

The Forest and Public Lands Committee writes these comments in the midst of a global pandemic and national emergency as declared by the president and on the day of International Forests, March 21, 2020.

The urgency of our planetary limitations are coming to bear all too clearly. The Forests and Public Land Committee supports the USFS in its mission to protect the heritage of the American people, its land, water, biological systems and minerals. However, we generally differ as to how that mandate is to be interpreted and implemented. It is essential that the Wayne National Forest, USFS and DOI recognize the urgency and address the following in their draft EIS.

The DOI, the agency directly overseeing the Wayne National Forest must declare a Climate Emergency on all public lands overseen by these entities and ensure that the Forest Service maintains a mandate to address climate change in all of its proposed actions and is its central premise. Climate Change should be the core of any and all stewardship activities on the Wayne. Such a mandate would:

[bull] Champion maintenance of intact native forests,

[bull] Preserve older growth for its carbon storage values and ecological systems,

[bull] Initiate a fossil fuel extraction ban protecting any minerals and relinquishing all contracts,

[bull] Elimination of prescribed burns of any forests (prairies excluded),

[bull] Removal of invasives without the use of herbicides heavy machinery,

[bull] Protection and support of Endangered Species will become a critical mandate,

[bull] Creation of an extensive and inclusive support for biological surveys of all Wayne units with extensive funds allocated for biologists, ecologists and scientists on a continual basis,

[bull] Biological Diversity protections are key to all actions on the Wayne.

The current pandemic illuminates the challenges we face on this planet with its finite resources and ever growing human population. The Forest Service maintains the opportunity to protect its forests for climate regulation and biodiversity rather than extraction and economic development.

To quote the USFS publication Changing Climate, Changing Forests:

"Several recent reports in the Northeast and wider United States suggest that the first and best action to help mitigate climate change is to conserve existing forest land. A recent report by the Hubbard Brook Research Foundation presented carbon budgets for eight counties in New England. Their results show that heavily forested areas sequester more carbon than they emit, whereas developed lands are net sources of CO2 to the atmosphere (Fahey et al. 2011.) The Hubbard Brook Research Foundation study also showed that forests, despite their variability, provided far greater benefits to climate stabilization than the alternative of land development. The cost of conserving forest land to secure carbon storage in perpetuity may be viewed as expensive. However, when additional benefits of forest protection[mdash]such as clean drinking water, flood protection, wildlife habitat, and recreational opportunities[mdash]are considered, the investment can be quite attractive." p.36 (one may assume that logging, prescribed burn, as well as oil and gas development are development strategies). (1)

(1) Changing Climate, Changing Forests: The Impacts of Climate Change on Forests of the Northeastern United States and Eastern Canada. USFS, 2011.

Forests have become an integral part in international climate conferences. Quoting the Ministerial Katowice Declaration on Forests for the Climate. COP 24, 2018. (2)

(2) The Ministerial Katowice Declaration on Forests for the Climate. COP 24, Katowice 2018, United Nations Climate Change Conference.

[bull] " Affirming that there is no future without addressing climate change, and forests are a key component to achieve the goals of the Paris Agreement, which will contribute to building a community with a shared future for humankind,

[bull] Acknowledging the important role of forests as sinks and reservoirs of greenhouse gases, in mitigating climate change and simultaneously recognizing the need for reducing emissions from deforestation and forest

degradation, and forest conservation, sustainable management of forests, enhancement of forest carbon stocks, as well as alternative policy approaches, such as joint mitigation and adaptation approaches for the integral and sustainable management of forests, while addressing and respecting social and environmental safeguards and objectives,

[bull] Recognizing that climate change is affecting forests, under certain circumstances, as a result of natural disasters, leading to increased emissions, affecting the carbon storage capacity of forests and underlining the need to increase the capacity of forests to adapt to climate change."

The International Union of Conservation of Nature (IUCN), United Nations Environmental Program (UNEP) have recognized the critical nature of stabilization of forests and climate regulation. They suggest:

? "Halting the loss and degradation of forest ecosystems and promoting their restoration have the potential to contribute over one-third of the total climate change mitigation that scientists say is required by 2030 to meet the objectives of the Paris Agreement.

[bull]Globally, 1.6 billion people (nearly 25% of the world[rsquo]s population) rely on forests for their livelihoods, many of whom are the world[rsquo]s poorest.

[bull]Forests provide US$ 75[ndash]100 billion per year in goods and services such as clean water and healthy soils

[bull]Forests are home to 80% of the world[rsquo]s terrestrial biodiversity. "

https://www.iucn.org/resources/issues-briefs/forests-and-climate-change (3)

(3) International Union for Conservation of Nature (IUCN) Forests Brief. November 2017. https://www.iucn.org/resources/issues-briefs/forests-and-climate-change

The Forest Service Global Change Research Strategy 2009-2019, states that in keeping with research goals of the US Climate change Science Program, the Research and Development agenda of the Forest Service, US Department of Agriculture helps to[hellip]develop best management practices for forests.

[bull]"These actions are taken to sustain ecosystem health, adjust management for ecosystem services and increase carbon sequestration under changing climate conditions." p. 4 (4)

(4) The Forest Service Global Change Research Strategy 2009-2019.

[bull]"Land managers have conveyed a sense of urgency and a real-time need for information. They are faced with planning for and making climate change related decision today. They need all available scientific information." p. 6. (4)

(4) The Forest Service Global Change Research Strategy 2009-2019.

According to the Forest Service: Strategic Framework for responding to climate change. The forest service is to follow these guidelines.

1.1 Develop and implement internal mechanisms to assure a systematic, interactive dialogue between researchers, public and private land and resource managers, and other users to promote effective alignment of climate change science delivery efforts.

1.3 Effectively move science into application, including synthesis of current research and monitoring information, incorporating science into decision support tools, disseminating new knowledge to managers, and integrating tools into common data and analysis structures. Among other things, decision support tools should focus on:

[bull]Predicting the ecological effects of climate change at national, regional and local scales,

[bull]Predicting the effects of management activities on the ability of forest and grassland communities and their component species to adapt to climate change and provide ecosystem services,

[bull]Assisting public and private land managers in prioritizing activities to maximize effectiveness of adaptation strategies in the face of limited resources, and

[bull]Assessing the long-term implications of adaptation actions and their effects on carbon storage and greenhouse gases over time.

2.3 Assess how land management activities contribute toward adaptation objectives and how they can be modified to better facilitate adaptation to climate change at various spatial scales. (5)

(5) Forest Service: Strategic Framework for Responding to climate change. Version 1, 2008.

The Wayne has did not address climate change in the 2006 plan and continues to ignore climate change in its proposed projects as Sunny Oaks and now implemented Long Ridge project not because there is no climate crisis but because this does not need to be addressed under the 2006 plan. The Sierra Club Forests and Public Lands Committee asks the Wayne National Forest supervisor, what is right? What is true and good? What would Aldo Leopold say?

""Quit thinking about decent land-use as solely an economic problem. Examine each question in terms of what is ethically and aesthetically right, as well as what is economically expedient. A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise." (6)

(6) Sand Hill Almanac, Aldo Leopold, 1949.

The Wayne must steward its lands to maintain old growth larger trees rather than cutting and selling for the short term to regenerate a species that has been declining since European settlement. (7) Rather than cut trees at 50-80 years, maintenance of such trees for their carbon is essential. Older larger trees maintain more carbon while that intact stand of forest is critical for its maintenance of biodiversity. (8)

(7) Witness trees to access forest change in SE Ohio. Canadian Journal of Forest Research, 31: 1708-1718. Jim Dyer, Geography, Nancy Bain, Ohio University Geography

(8) Rate of tree carbon accumulation increases continuously with tree size. Stephenson, etal. 2014, Nature. (see attachment of article for use)

The Wayne has continued to request incidental take permits for the Indiana Bat (Myotis sodalist) regardless of its population declines. (62% since 2007) Since the bats listing in 1967 there has been a precipitous decline in populations in Ohio and the Wayne must take some responsibility. The cumulative effects of actions on and off of the Wayne has led to declines. The Wayne has failed to uphold the Endangered Species protections that are necessary to assist in the recovery of this species most recently requesting an incidental take for the Sunny Oaks project (utilizing the biological opinion from 2005 pre-white nose syndrome) and ignoring the impact of hydraulic fracturing on the Marietta unit to the species. It is essential that the Wayne create their own recovery plan for the bat and utilize bat experts on staff that may be surveying and mapping hibernaculum and roosting areas. Banning logging, herbicide use and forest prescribed burns will assist in their recovery. (9)

(9) 2019 Indiana Bat (Myotis sodalis) Population Status Update https://www.fws.gov/midwest/endangered/mammals/inba/pdf/2019_IBat_Pop_Estimate_6_27_2019a.pdf (attached for use)

We urge the Wayne National Forest to address the climate crisis and biodiversity crisis.

[bull]All forests to be considered solely for their climate remediation and ecosystem services

[bull]FS recognizes the science when it comes to extraction and negate any extractive activities including refraining of cutting mature trees for future trees

[bull]Recognizes the ecological and climate impacts of prescribed fire

[bull]Adheres to the global call for forest protections

[bull]Addresses the crisis of the sixth extinction and takes the mandate of protecting species as of critical import as

[bull]Addresses the cumulative effects of all actions are considered particularly in regard to endangered species

Sincerely,

Loraine McCosker

Dave Ackerman

Ohio Sierra Club Forests and Public Lands

(1) Changing Climate, Changing Forests: The Impacts of Climate Change on Forests of the Northeastern United States and Eastern Canada. USFS, 2011.

(2) The Ministerial Katowice Declaration on Forests for the Climate. COP 24, Katowice 2018, United Nations Climate Change Conference.

(3) International Union for Conservation of Nature (IUCN) Forests Brief. November 2017. https://www.iucn.org/resources/issues-briefs/forests-and-climate-change

(4) The Forest Service Global Change Research Strategy 2009-2019.

(5) Forest Service: Strategic Framework for Responding to climate change. Version 1, 2008.

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