

Data Submitted (UTC 11): 8/15/2018 4:00:00 AM

First name: Sherm

Last name: Koons

Organization:

Title:

Comments: Wayne Forest Plan

To the Wayne Planning Team:

I have lived in Washington County near the Wayne National Forest for the last 40 years. During that time I have spent innumerable hours in the Wayne and surrounding forests hiking, birdwatching, enjoying the flora and fauna, and generally developing a deep appreciation for the natural beauty of SE Ohio.

Also during that time I have lived through oil and gas booms that, while enriching a few landowners, have had an extremely negative effect on the forests, the county infrastructure, and rural life in Washington County. It's time for some new, long term thinking about the future of the Wayne National Forest. Turning the Wayne and surrounding area into an industrial park with well pads, pipelines, compressor stations, roads filled with diesel trucks carrying brine, logging, and pollution is not the answer. I have canvassed residents at the Washington County Fair, The Sternwheel Festival, and the Rivers, Trails, and Ales Festival in Marietta, and the vast majority of local residents want to see the Wayne preserved from the incursions of the oil and gas industry. The most common remark from people has been, "Let the forest grow back to its natural, old growth state." I fully concur with the following recommendations of the "Economic Analysis of the 2006 Wayne National Forest Plan," Prepared by Christine Glaser, PhD and Karyn Moskowitz, MBA, GreenFire Consulting Group, LLC, Bloomington, IN, May 2008.

"These recommendations are based on the findings of this report, and are derived from basic principles of economic reasoning, which demand the maximization of net public benefit.

Simply put, net public benefit is maximized by preferring activities that generate a high net public benefit (= benefits minus costs) over those that create a lower net benefit. Net public benefit for any activity increases when costs of achieving that benefit go down, and decreases when costs go up. For this analysis, costs and benefits have both monetary and non-monetary components.

Net public benefit cannot be maximized when activities that have a low net public benefit (or that generate a net public loss), are preferred over activities that have a high net public benefit (large benefit, low cost).

Basically, our recommendations consist of pointing out activities that are likely to generate the largest possible positive difference between costs and benefits.

1. The Forest Service activities that generate the highest (long and short-term) financial costs on the WNF-prescribed burns, logging, mining, and OHV use-are also the ones that generate the most pollution and that most

diminish the capacity of the Forest to provide highly valued ecosystem services related to air, water, climate, recreation, and biodiversity. Therefore, by simply stopping logging, burning and mining, the Forest Service can at once cut short-term and long-term costs considerably (including future costs of mine reclamation, or costs of removing roadbeds that were constructed to facilitate logging), and provide much larger public benefits from ecosystem services.

2. Stopping logging, mining and prescribed burning will give the forest the opportunity to heal from centuries of heavy abuse. With trees being allowed to grow beyond the age when it is economical to log them, second growth forest will, over 200 to 300 years, develop into old growth forests, in which early successional habitat is provided by natural disturbances, and the forest develops a fine grained structure of habitats at various stages of succession. Old growth forests have all but disappeared from the landscape, and facilitating its recovery will greatly enhance one of the most valuable of all ecosystem services, the provision of rare interior forest habitats that keep associated species from going extinct (currently valued at over \$900 per acre/per year).

3. To further enhance the potential of the WNF to provide highly valued ecosystem services, the Forest Service needs to put increased emphasis on mine reclamation, removal of roads and trails, on reclaiming and reforesting areas with highly compacted or eroded soils, repairing damaged stream banks, and restoring wetlands. Forested wetlands and riparian areas have the highest ecosystem values of all forest land, and should therefore receive priority with regard to any necessary restoration work. (Ecosystem services from general forest land are currently valued at \$1,476 per acre/per year, from wetlands at \$11,568 per year, and riparian buffers at 3,383 per year).

4. We recommend that the Forest Service increase the recreational value of the forest by excluding OHVs from the WNF, by closing and rehabilitating all illegal trails, and by enacting an effective program for monitoring and enforcement of forest regulations related to OHV. The existing OHV network is too large to be effectively monitored and maintained at a reasonable cost. The negative effects of both legal and illegal OHV usage-air, water and noise pollution, damage to wildlife habitat and conflicts with other high value, low impact recreation activities-outweigh any perceived benefits from OHV use. Providing ORV trails should be a private landowner function and the federal government shouldn't compete on this.

5. Instead of expanding OHV trails, we recommend that the Forest Service focuses on facilitating more highly valued uses, such as hiking, wildlife viewing, visits to historic/cultural sites, use of highly developed recreational sites, and swimming. This can be accomplished for example by offering more hiking trails that are not open to conflicting uses by horses or mountain bikes, and more opportunities for wildlife watching. We support the Forest Service identifying, protecting and developing recreational opportunities related to cultural and historic sites, which have already been identified by the Forest Service as a niche for the WNF.

6. We also support the Forest Service in consolidating forestland within the WNF proclamation area through purchases of land from willing sellers, and recommend that priority is given to high-value riparian areas, areas with wetlands, areas suitable for wetland restoration, and areas that could help expand and restore large, continuous blocks of interior forest.

7. In addition, we recommend that the Forest Service addresses ownership fragmentation through buying conservation easements from private land owners.

8. To increase the prospects of expanding habitat for rare and endangered forest species we recommend that the Forest Service partners with other public and private land owners to create wildlife corridors that connect small remnants of still existing original forest with each other and with the emerging old growth forest.

9. We recommend that as a rule, prescribed burns for treatment of hazardous fuels on the WNF not be used, since they are ineffective in protecting home sites, and the risk of wildland fires is low on the WNF. If and when abnormal, significantly higher fire risks do develop on the Wayne, appropriate risk reduction activities should be considered on a case by case basis.

10. We recommend that any future Forest Plans provide a rigorous, focused, and complete analysis of monetary and non-monetary costs and benefits associated with different activities (including detailed budget projections), inspired by the format developed in this report.

11. Future Forest Plans should include reports on the values of different ecosystem services, and how they are affected by management activities. The values of different ecosystem services (per acre/per year) can be expected to change over time. Forest plans should keep up with new developments in ecosystem valuation. At some time, it may be appropriate for the Forest Service to conduct original studies on specific ecosystem services that may be of special importance for the WNF.

12. Instead of conducting benchmark analyses showing the largest possible timber output or OHV trail length, the Forest Service should develop benchmarks related to the highest benefits derived from the forest, for example the number and size of unfragmented interior forest blocks, the consolidation of forest land, the development of high value/low impact recreation opportunities, the reintroduction of charismatic species, the restoration and rehabilitation of disturbed lands (including wetlands and riparian areas), the rehabilitation of illegal OHV trails, and the effective enforcement of regulations on existing trails.

13. There will be jobs and income for the Forest Service and local communities from the implementation of these recommendations, but they will be different jobs with new job descriptions. For example, the Forest Service would not need experts in timber management any more, but instead would need to hire or contract with professionals trained in different aspects of ecosystem restoration, and re-introduction of rare species. People would be hired or contracted for monitoring trails and enforcing regulations. Experts in identifying, protecting and developing historic/cultural sites would be needed, and jobs and income opportunities would develop around expanding opportunities for high value/low impact recreation.

14. Currently, off-budget funds such as K-V and Salvage Sale Fund, and the Fee Demo Project, creates incentives for Forest Service managers to continue logging, mining and offering high-impact recreation such as OHV use. We recommend that Congress remove such incentives. Instead, new incentives should be created for managers to give priority to forest restoration, endangered species protection, and to increasing the capacity of the forests to provide highly valued ecosystem services, including different forms of low impact recreation.

15. We recommend that the Forest Service put together a task force that includes low impact recreation groups, wilderness advocate groups, and other interested parties to do a serious survey of areas on the WNF that might be designated Wilderness."

Please listen to the voice of the majority of the residents of SE Ohio, and not just those with the most money.

Sincerely,

Sherm Koons