

Data Submitted (UTC 11): 2/7/2020 6:41:57 PM

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Comments: The following comments refer to the Biodiversity chapter in the WNF Draft Assessment:

I could find no mention of managing for future old-growth. On p. 20, the first paragraph under "Uneven distribution of forest age classes" reads, "There is a general overrepresentation of middle-aged forest stands in the Wayne National Forest and a relative underrepresentation in availability of habitats such as early successional forest, permanent wildlife openings, grasslands and herbaceous vegetation, and oak woodlands dependent on disturbances based on LANDFIRE modeling of historic conditions (USDA 2018h; USDA 2018b; see Terrestrial Ecosystems Supplemental Report)." Long-established forest could be added to the list of underrepresented habitats relative to middle-aged forest.

In the next paragraph it says that 29% of the stands are 100 years or more old, but it would be worth knowing how many are 150 or more years old. Some of the older stands should be designated as future old-growth and be excluded from timber harvests. Two benefits would be protection of herb layer diversity and providing the public with opportunities to experience a taste of the grandeur of Ohio's primary forests. Choice of appropriate stands should be based partially on tree age/size but also on the abundance and diversity of native herbs in the understory.

The Biodiversity chapter says little or nothing about protecting biodiversity in the herb layer of closed-canopy forest. On p. 20 (second paragraph from bottom): "herbaceous vegetation now comprises an estimated 0.031% of the study area". This is such a small number that it must refer only to old field and prairielike (e.g., Buffalo Beats) habitat. What about forest herbs? Protecting biodiversity in a forested region should consider diversity in the forest understory. I haven't seen anything about that in the Biodiversity chapter. Decisions about management (logging, burning, recreation) should consider the impact on forest herb diversity. Stands of any age that have exceptional native herb diversity should be protected from timber harvest, the disturbance of which inevitably introduces invasive species.

The first paragraph under Information Gaps on p. 28 is important. I would add "rich forest herb layers" to the other items in parentheses on lines 1-2.

The following comments refer to the Draft Wildland Fire and Fuels Supplement Report (DWFFSR):

On pg. 13, right above Fig. 9: "It is estimated that 7% of this landtype [rolling bottomland mixed hardwood forest] historically burned annually, resulting in >110,000 acres burned over the study area and >15,000 acres within the Wayne National Forest proclamation boundary." How are estimates like that derived? No reference is cited.

Ditto for the estimate in the second paragraph on pg. 14 of DWFFSR that "86,000 acres within the WNF proclamation boundary would have historically burned annually."

On p.14 of the DWFFSR, the first sentence in the Discussion section reads "Fire as a landscape-level phenomenon burned regularly across most of southeastern Ohio, and the pervasiveness of pre-Euro-American-settlement fire explains oak (and associated pyrophiles) dominance throughout, especially on more rich and mesic locations-such as Rolling Bottomlands-where competition from shade-tolerant mesophytes is otherwise overwhelming (Iverson et al. 2018)." I can't find anything in Iverson et al. 2018 related to this statement.

On p. 32, the last paragraph is supposed to concern our region, but the Brose et al. (2008) paper that is cited twice in that paragraph concerns a study done in the mid-Atlantic region.