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Comments: Overall, reading the draft assessment gave me the impression that the WNF already has a management plan in mind (i.e., more prescribed fires to increase oak regeneration and more clear-cutting to create young forests). Although not the stated intention, clearly this assessment was written to support your pre-determined forest management plans. With that in mind, several critical issues are missing or incorrect.

1. The impact of fire management (or fire suppression) on species other than oak needs to be included in the assessment. Fire as a management tool can certain increase oak regeneration, but what about the impact of fire on herbaceous plants? Most of the plant biodiversity in the WNF is contained in the understory. Please include any information you have from your monitoring of prescribed fires, for how herbaceous plant species respond to fire. If this information is not available, please include this as an "information gap" that needs to be filled.

2. The health and status of non-timber forest products needs to be included in the assessment (i.e., population size and growth rates of ginseng, goldenseal, mushrooms, and other species that are currently harvested via permits). If the information is available for the WNF, it would also be helpful to include how populations have changed in the recent past, and how they have responded to forest management (i.e., timber harvesting, prescribed fires, etc.).

3. In the assessment, only those pathogens that impact oak regeneration are mentioned in the section on Biodiversity (e.g., Page 22). Insect pests and pathogens that are missing from this section include: hemlock woolly adelgid, Emerald ash borer, butternut canker, beech bark disease, Asian long-horned beetle, and all of the various white pine diseases. Although some of these are mentioned under the section "Forest Products", they also need to be mentioned in the Biodiversity section of the assessment, as they impact overall forest health and biodiversity.

4. The use of herbicides to treat non-native invasive plants is currently missing from the assessment (the only mention is on Page 23, "biological and mechanical controls of invasive plants" - are herbicides the mechanical control?). The assessment needs to recognize the current application of herbicides and how this is likely to increase in the future, as invasive plants continue to spread throughout the WNF.

5. Page 34, first paragraph. "…species reach their biological rotation" implies that these oaks stands are in decline due to old age. This is not true. As stated several times throughout the assessment, most of these forests are between 60 - 100 years old, and all of them are <200 years old. Oak trees live for hundreds of years and 150 years would still be considered pretty young for them.