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Comments: March 9, 2020

RE: Wayne National Forest Draft Assessment for Forest Plan Revision

To whom it may concern:

The Ohio Chapter of Backcountry Hunters & Anglers, representing sportsmen and women of Ohio, are commenting with regards to the Wayne National Forest's call for input during the Forest Plan Revision's Assessment Phase. We are one of the nation's fastest growing conservation organizations and one of the most vocal and energetic membership cores in that space. The rapid growth of Backcountry Hunters and Anglers is indicative of the expanding interest in the very notion of and demand for backcountry - enjoying and protecting our wild things and wild places.

On behalf of the Board, we have reviewed the Draft Assessment document and supplemental reports and are mostly encouraged by the thorough review conducted by the Wayne National Forest. We were encouraged to see the four focal areas of change identified by Ms. Carrie Gilbert at the March 2, 2020, public open house - changing infrastructure demand and use, changing forests, changing climate, and changing recreation. We believe the important linkages between changing climatic conditions (oaks will be favored under most future climate scenarios), the need to aggressively promote oak regeneration and address the paucity of early successional habitat (0.1% of the forest is <10 years old!), and acknowledging that oaks and a diversity of forest ages are tied to wildlife and recreation is of utmost importance. On those collective fronts, we offer a few observations as well as seek clarification on a few statements.

In the Draft Assessment, it was noted that hunting use days in the Wayne National Forest are declining ("preferences shifting away from dispersed recreation such as hunting and wildlife-viewing", page 71). That is hard to argue given any other data source one might choose to look at regarding declining hunter participation and license/permit sales. However, the second wildlife-related activity that was cited as declining was a surprise - wildlife-viewing. By any account and according to most any resource consulted, wildlife photography is growing exponentially, birdwatchers are more numerous and more avid than ever before, and overall wildlife viewing is increasingly important as a consideration of local, state, and federal public lands. Backcountry Hunters and Anglers urges the Wayne National Forest to maintain and enhance opportunities for anglers (one activity that does appear to be increasing in popularity according to the Draft Assessment), hunters, and wildlife watchers. Based on the tenuous ground of some of the Draft Assessment's claims regarding popularity of certain forms of recreation, we hope we do not also observe a shift in emphasis to some newer, more "popular" (at least in terms of relative percentage growth, certainly not gross numbers!) forms of recreation (e.g., e-bikes). And bringing this paragraph back to the paragraph prior, the staggering drop in early successional habitat on Wayne National Forest will likely have continued impacts on declining participation by hunters and other wildlife enthusiasts until that trend can be corrected. For many non-game and game species alike, early successional habitat is the key seral stage for one, many, or all stages of their annual cycle.

While we do not yet have a specific tract or parcel to offer as a suggestion, Ohio Backcountry Hunters and Anglers would be in favor of a formal "Backcountry" designation of one or more roadless tracts. For an example, one need only look east to the Cranberry Backcountry in the Monongahela National Forest in West Virginia. Parameters such as no non-motorized access, primitive dispersed camping, no active forest harvest would all contribute to a reliable and formal "Backcountry" experience here in Ohio. Harkening back to the opening paragraph of the letter, the rapid growth of Backcountry Hunters and Anglers is a reflection of a larger

groundswell of public support to more formally identify, restore, and enhance wild things and wild places termed "backcountry" or "wilderness", however you choose to name them.

Our last comment on recreation - more an observation, even though foot trail use is by far the most popular form of recreation and motorized use recreation was identified as one of the activities most in decline on Wayne National Forest, 32 miles of additional motorized trails were constructed since 2006 yet only 16 miles combined of trails for foot use and horses were constructed over the same time period.

The importance of data underscores Backcountry Hunters and Anglers position on active forest management with the objective of oak regeneration. We implore the Forest (and have been given no reasons as of yet to believe otherwise) to use science-guided and empirically-based decisions about oak harvest methods. For instance, regarding the shelterwood method, documenting sufficient oak regeneration and competitive advantage before removing the "shelter" to release oak seedlings and saplings. An additional resource we did not see cited that provides excellent data on long-term trends in tree regeneration is Donald Radcliffe's graduate thesis work which is in the process of being published. The data was collected from the Athens and Marietta Units of the Wayne National Forest, and the title of his 2019 thesis is "Topographic, edaphic, and stand structural factors associated with oak and hickory mortality and maple and beech regeneration in mature forests of Appalachian Ohio." Please consult these data in your future decision-making and plan revision.

While the list of federally listed threatened and endangered species is relatively short, the list of species of conservation concern is expansive (though explicitly unlisted in the reports). Of some concern is the central role that the Regional Forester plays in identifying and managing for those identified species - so long as the Regional Forester is conservation-minded and values biodiversity, this is likely okay; however, the authority structure to change and alter that list seems questionable and subject to oversight abuse. Rather than centralize that responsibility, we urge Wayne National Forest to rely more firmly on other conservation data to prioritize species of conservation concern (e.g., Ohio Breeding Bird Atlas, Rodewald et al. 2016).

Regarding changing use and demand of infrastructure, we believe - based on comments heard at the Public Open House meeting, the referred to infrastructure is primarily roads and utilities. We would encourage Wayne National Forest to be pro-active in working with state agencies and companies within the energy sector to pursue conservation best practices when managing vegetation on and along these different corridors. For instance, the Ohio Department of Transportation has made tremendous progress statewide on pollinator habitat through a reduced mowing schedule also resulting in man hours and cost savings. American Electric Power, who has utility easements throughout different portions of Wayne National Forest, is another important partner. Doing vegetation management under utility lines and in pipelines to advance habitat objectives and be complimentary in the Forest's attempt at controlling invasive plant species is imperative. Lastly, Backcountry Hunters and Anglers urges strict use of the precautionary principle when considering additional shale gas or other mineral leases on the Wayne National Forest. Given the overall lack of public lands in Ohio, the already fragmented nature of the Wayne National Forest, and the importance of having wild and relatively pristine places to enjoy, creating additional disturbance within any of the identified roadless tracts would be strictly opposed.

Please also note that we embrace the Wayne leadership's objective of "shared stewardship by increasing partnership and volunteerism". We look forward to engaging further with this process and remaining one of the Wayne's valuable partnering organizations.

Thanks for the consideration.

Sincerely,

Ohio Chapter of Backcountry Hunters & Anglers

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