

File Code: 1570
Date: January 5, 2021

Ms. Barbara Lund
2635 Hamilton Road
Lynx, OH 45650-9742

Dear Ms. Lund:

This letter is in response to your objection to the Draft Decision Notice (DDN) for the Marietta-Athens Pine Project Environmental Assessment (EA) and Finding of No Significant Impact (FONSI).

To be eligible to object to a project, one must have submitted timely and specific written comments for an eligible proposed project or activity subject to the objections process during a designated opportunity for public comment. Eligibility may also be established by basing the objection on project-related new information that had not previously been available for comment per 36 Code of Federal Regulations (CFR) 218.5 and 218.7.

You submitted two objection letters, one dated October 3, 2020, and one dated November 10, 2020. Both were timely objections for this project. In this letter, I am responding to your objections, the only objections the Agency received for the project.

Background

The Marietta-Athens Pine Project (henceforth MAPP) is in the Athens and Marietta Units of the Athens Ranger District in Hocking, Athens, Perry, Washington, Monroe, and Noble Counties. The project's purposes include improving wildlife habitat by converting pine plantations to diverse, mixed hardwood forests and by creating young, brushy forest (early successional habitat). MAPP moves the Wayne National Forest toward the goals outlined in the 2006 Land and Resource Management Plan. The proposed action is to clearcut approximately 3,000 acres of pine plantations in 208 stands located across the Athens Ranger District.

Objection and Review

I have read your objection and have reviewed the EA, FONSI, and DDN.

You raised an issue stating that the symbiotic mycorrhizal fungi, essential bacteria, and other soil microorganisms and their tie to the carbon cycle were not considered. This issue was not based on prior specific written comments or new information and therefore is not eligible for review.

What follows is a summary of the analysis of your eligible issue on global warming, climate change, and best science regarding climate change.

Issue 1

The proposed logging activities of this project will contribute to carbon dioxide emissions. I object to the Forest Service taking actions on federal land that would contribute to global



warming. The forest ecosystem carbon cycle was not considered. Failure to consider the project effects on climate change and its related factors is a willful disregard of using science.

Analysis: Your objection letter claimed that the MAPP impact on climate change was not considered and that the best science on climate change was disregarded when developing the project. In fact, climate change is discussed in the EA and project record. Scientific reports on climate change were used and referenced in the analysis, including *Facilitating Adaptive Forest Management under Climate Change: A Spatially Specific Synthesis of 125 Species for Habitat Changes and Assisted Migration over the Eastern United States* (Iverson, 2019); *Carbon Assessment Supplemental Report Wayne National Forest* (USDA 2020, Dugan and McKinley); and *Forest Carbon FAQs* (USDA Office of Sustainability and Climate). These reports are based on and cite numerous climate change scientific reports and research.

When discussing MAPP relationship to climate change, it is important to consider the project's purpose and need. Two purposes of MAPP are to convert pine plantations to native mixed hardwood forests and create young, brushy forests. These will improve wildlife habitat (EA, p. 2). The EA gives numerous reasons why clearcut is an optimum method for meeting these purposes. For example, as a one-entry treatment, clearcut minimizes disturbance (EA, p. 11). Clearcutting will also more rapidly convert pine monocultures to diverse native forests, which improves the forest's resiliency to insects and disease and increases its probability of adaptation to climate change (EA, p. 11).

The scoping response to comments (RTC; EA, Appendix B, #2-1, #2-3, #5-3, and #19-1) discusses the MAPP relationship to a changing climate. Specifically, RTC #2-1 and #2-3 note that the project's action to convert pine plantations to diverse hardwood forest should increase the forest's resilience to climate change. RTC #2-1 points out that the MAPP harvest activities will affect such a small share of the Wayne National Forest total stored carbon that the project's impact on global climate change is negligible, especially if the longer-term carbon benefits of a young hardwood forest are taken into account:

Likewise, MAPP activities are expected to have little discernible impact on global climate change. In the supplemental report Carbon report that was prepared for the Wayne's recent assessment of forest conditions and trends, it was concluded that "forest carbon losses associated with harvests have been small compared to the total amount of carbon stored in the Wayne," especially if one accounts for harvested carbon stored in wood products (USDA FS 2020a). The report goes on to note that the land use history of southeast Ohio, which has led to a preponderance of middle-aged forest in the Wayne is likely the biggest influence on current carbon dynamics in the Wayne because "young to middle-aged stands are generally productive and accumulate carbon rapidly (USDA FS 2020a)." It is important to keep in mind that MAPP proposes harvests on just over 1% of the Wayne over a ten year period, amounting to about one tenth of 1% of the Wayne per year during the life of the project. The harvested stands will also contribute to carbon sequestration as the young hardwood forest grows. (EA, Appendix B, RTC #2-1)

The 30-day RTC (DDN, Appendix B) also addresses climate change concerns. RTC #8-1 summarizes the forest-level supplemental carbon report, which discusses the Wayne's status as a strong carbon sink. Any negative impacts on carbon stocks from disturbance or environmental conditions on the Wayne have been minimal and offset by forest growth. The Wayne is expected to maintain its status as a carbon sink even with the MAPP harvest, which is anticipated

to affect just 0.1 percent of the Wayne each year over a 10-year period (DDN, Appendix B, RTC #8-1). Multiple reasons are provided to support the conclusion that the Wayne will remain a carbon sink following the MAPP harvest. First, "the harvested areas will remain forested, just forest of a different age and species composition;" second, the young, rapidly growing forest that replaces the older, harvested forest will rapidly sequester carbon; and, third, wood products made from the harvested pine will continue to store carbon (DDN, Appendix B, RTC #8-1).

Conclusion: I find that the issues of global warming, climate change, and best science regarding climate change were considered for this project. You requested that the project area be treated as a natural ecosystem and to preserve the existing mature trees. I find that the project's purpose and need persuasively demonstrate that converting forests in this area will help to build a more sustainable forest in the face of climate change.

Conclusion

As specified at 36 CFR 218.11 (b), I must provide a written response to objections; however, this response need not be point-by-point. This letter satisfies the requirements of 36 CFR 218.11, Resolution of Objections. I have reviewed the project in light of the objection issues and find the Responsible Official has considered and, where needed, documented responses to these comments. These are all in the project record.

My review finds that the project is in compliance with all applicable laws and the forest plan. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available (36 CFR 218.11(b)(2)). The Responsible Official may sign the Decision Notice for this project.

Sincerely,



GORDON BLUM
Deputy Regional Forester
Review

cc: Brenda Quale; Daniel Giannamore