



Friends of White's Woods, Inc.

P.O. Box 1271
Indiana, PA 15701

April 28, 2021

White Township Supervisors
950 Indian Springs Road
Indiana, PA 15701

Dear White Township Supervisors Lenz, Gallo, Gemmell, Gillette, and McCauley:

On April 22, 2021 - in response to an Open Records request - the complete DCNR review documents regarding White Township's plan for the WWNC were, for the first time, made available to FWW. As such, we are now able to offer more detailed observations. The complete, two-part, DCNR Bureau of Recreation and Conservation response brought much into focus.

Specifically, the DCNR March 25, 2021 response from Director Ford, Bureau of Conservation and Recreation, confirmed the assertions and reservations regarding the White Township Stewardship/Millstone Plan that were underscored in the assembled citizen input to the Draft Stewardship Plan presented to you July 22, 2020, as well as in the numerous letters sent to you by FWW and other citizens over the past year:

I. WWNC is a Project 70 land held in trust by the Township for the residents of White Township, the Indiana region, and the state of Pennsylvania.

- All WWNC projects should be rooted in community values; management goals and objectives should be the product of community consensus.
- All work/projects in WWNC must be approved by DCNR in advance; in fact, White Township is required to notify DCNR within 30 days of any decision to do work in WWNC.
- All projects must be consistent with Project 70 guidelines; no project can detract from the recreation opportunities provided in the WWNC, nor disrupt the ecological function at the site.
- "The Township's decisions and consequent actions relating to site management may or may not result in a conversion of use. If actions are deemed to constitute a conversion of use, they will need to be addressed via Project 70 conversion processes." (Ford, March 25, 2021, p. 1.)

II. The 2020 White Township Stewardship/Millstone plan was inconsistent with community values and threatened not only the aesthetic and recreational value of the WWNC, but the very health of the woods, as well. Specifically, the DCNR BOF technical review made clear that:

- The White Township Stewardship plan appears to reflect "a disconnect among the stated goals, the proposed management activities and practices, and the wishes and desires of the public." (p.1)

- DCNR is “not familiar” with mulching a forest floor to a depth of 6 inches and is “highly concerned about the unintended consequences.” (p. 6)
- “Forest mulching is not a recommended method of invasive removal.” (p.6)
- “Mulching this entire tract is highly concerning and not recommended.” (p. 8)
- “[D]isturbing the soil typically promotes the spread of invasive plants and is even more concerning when coupled with opening the canopy and allowing more sunlight to the forest floor.” (p.2)
- “[T]he proposed harvest on White’s Woods could significantly alter recreation values, noticeably reducing overhead shade provided by a closed canopy and overall aesthetics.” (p.3)
- The Millstone plan for a “Select Timber Harvest” is, also, a practice unfamiliar to DCNR. As such, the report read, “the purpose of this harvest is not clear.” (p. 6)
- “Dead trees are natural and even beneficial in a forested settings.” (p. 3)
- DCNR questions the Millstone assertion that the stand is “overstocked.”(p. 7)
- “Any proposed timber management should be awarded to a contractor through a sealed bid process and administered by an independent consulting forester.” (p. 7)
- Any timber management plan must be “conducted only after a proper inventory and development of a science-based prescription,” one that assesses such factors as “regeneration” potential. (p. 7). In fact, DCNR offered to provide “additional details on developing an inventory.” (p.4)
- Extra care is necessary for the protection of vulnerable and at-risk plant and animal species (pp.5-6).
- DCNR emphasizes that “as a community-owned forest, we believe that it is critical for the township to understand the wishes and desires of its residents and, most importantly, identifying and understanding the values citizens hold and expect of these woodlands.” (p. 4)
- A WWNC management plan should be predicated on community values: “Based on these community values, specific goals and management activities **could then be developed...**” (p. 4)

For 26 years citizens and stakeholders have been clear: Do not timber White’s Woods. The White’s Woods Nature Center should remain as a natural area. Since 1995, thousands of White Township residents, along with other WWNC stakeholders, have returned ballots, filled out surveys, signed petitions, and sent letters. Every successive Township attempt to timber WWNC has been met with increasingly convergent and resolute opposition. Community values, according to the DCNR review documents, provide the starting point for a Project 70 land management plan.

In light of the two-part March 25, 2021 DCNR review, Friends of White’s Woods:

1. Urges the Township to request DCNR assistance with the development of a WWNC management plan, including the identification of appropriate procedures for plan development. Such a step would assure that the Township could qualify for substantial, available DCNR project funding.

The WWNC, as a Project 70 land, could qualify for such DCNR grants as the Community Conservation Partnership Grant, given that the projects for which funding is being

sought abide by the grant application requirements. DCNR offered assistance in their recent plan review. We urge the Township to accept it.

2. Requests that the complete (two-part) DCNR response be posted on the Township website. We are dismayed that attention to the basic open-government process regarding release of public information was omitted.

Friends of White's Woods has worked hard on behalf of the WWNC. Our organization has demonstrated our commitment, our willingness to provide valuable input, and our ability to assist in assembling valuable expertise. We have a stake in the future of the WWNC and look forward to the opportunity to work collaboratively with all WWNC stakeholders on behalf of our community forest to secure its future.

Sincerely,

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