



Friends of White's Woods, Inc.

P.O. Box 1271
Indiana, PA 15701

April 20, 2021

White Township Supervisors
Indian Springs Road
Indiana, PA 15701

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

White Township's most recent action (April 14, 2021) regarding development of a new White's Woods Nature Center (WWNC) management plan appears to be wholly inconsistent with the guidance provided by the DCNR Bureau of Forestry's (BOF) "Response to the White's Woods Stewardship Plan," dated March 23, 2021: At the April 14, 2021 Board of Supervisors (BOS) meeting, the Township handpicked and summarily appointed-- to the public's complete surprise - a committee of three foresters, one BOS Supervisor, and one unnamed citizen to develop the new WWNC management plan. Friends of White's Woods (FWW) asserts that this initial step is so misguided as to invalidate, or render ineffective, anything that this haphazard "planning" process might produce.

I. The Importance of Public Input

In the March 23, 2021 DCNR/BOF response, the importance of public input was clearly underscored at every point in the planning process:

"The Bureau of Forestry recommends the township implement a public input process to help inform both development and implementation of a forest stewardship plan. As a community-owned forest, we believe 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." (See BOF Response, p. 4, pp. 1.)

What is key here is the DCNR emphasis on the fact that a sound community forest management plan must begin with community goals: It isn't possible to create a successful plan in the absence of goals - and these goals must be rooted in community values.

"Based on these community values, specific goals and management objectives could then be developed to identify practices and activities to maintain and/or enhance community values. For example, reducing invasive species impact would be a management objective or activity to help achieve a broader goal or value around wildlife habitat and forest health. Many options exist for assessing and incorporating public input, and it appears that local residents are ready and willing to provide constructive viewpoints and feedback." (See BOF Response, p. 4, pp. 1.)

It is true that public preference for the *primary management goal* for the WWNC has been clearly articulated by the public over the last year: Over a thousand petition signatures, survey respondents, and letter-writers have spoken: A management plan for the WWNC must abide by the original White Township/Indiana Recreation Board Project 70 commitment to leave the WWNC "largely in its natural state." Leave it as a natural area.

This public conviction has, in fact, been reiterated three times in the past twenty-five years.

But after a year of working with DCNR documents and with forest management plan experts, an arborist, along with experts in forestry, forest songbirds, and invasive plant species, Friends of White's Woods (FWW) has learned that many other forest management goals - working in an interlocking way with the primary goal - can be helpful, or even essential for the development of a successful, sequential, sophisticated, long-term management plan.

Examples of important secondary goals include: (1) preserve the WWNC as older growth forest (to support BOFs goal of achieving a minimum of 20% of old growth forests in PA public lands); (2) secure a carbon sequestration contract (to coincide with DCNR's goals regarding climate change adaptation and mitigation - and to secure continuing revenue for the Township); (3) execute minimally intrusive invasive plant removal - with maximum use of volunteers, so as to expand public engagement with WWNC; (4) rely on minimally-invasive means for promoting native plant species regeneration; (5) maximize the potential for the WWNC in realizing the goals of the DNCR plan Recreation for All (See attached.)

The very first step, which White Township has apparently ignored, in developing a WWNC management plan is to work with the public to identify community goals and to make sure that the consensus about WWNC management goals is apparent. WWNC management plans should meet the needs of the public.

II. Who Should Assist in Planning?

DCNR guidance documents also provide examples of those *who* should be involved in a successful community park planning process. For instance, the DCNR Bureau of Recreation and Conservation's "Public Participation Guide" notes that "[a]fter years of funding planned projects, the Bureau has found that substantial public involvement at the planning stage increases the likelihood that recreation projects will go beyond the planning stage to implementation. These experiences have prompted the Bureau to require significant public participation throughout the planning process." (See attached.)

Public citizens, community leaders - in fact, all of those who have a stake in the management of the WWNC should be involved in developing the WWNC management plan. Given that the WWNC is a township-owned area park held for recreation and conservation purposes in trust for the public and the Commonwealth, it would make sense for any WWNC planning process to include, for instance, the Indiana County Planning Commission Chair, the Director of Indiana County Parks & Trails, the president of the Indiana Borough Council, as well as leaders of local community groups who have demonstrated their profound interest in the management of the WWNC - most certainly including the Friends of White's Woods. (See attachment.)

In numerous letters to White Township, commencing in April, 2020, FWW has indicated our interest in a White's Woods management plan, as well as our willingness to help (April 20, 2020; May 8, 2020; July 22, 2020; July 20, 2020; November 12, 2020.) FWW's strong interest and willingness to assist is as vibrant as ever.

It is of note that the Bureau of Recreation and Conservation, as well as the Bureau of Forestry rely on comprehensive, inclusive plan development processes - as evidenced, for instance by the BOF's planning processes for State Forest lands during the past year.

III. Range of Professional Expertise

The March 23, 2021 BOF Response to the White Township Stewardship Plan also emphasizes the need for a range of expertise necessary for development and implementation of a management plan for WWNC and offers assistance, as well:

“. . . we offer continued involvement of our local Service Forester and expertise from specialists in our Central Office on wildlife habitat, botany, and riparian restoration; and recreation management advice from the Bureau of Recreation and Conservation as needed...

“We recommend the Township consider the services of an International Society of Arboriculture (ISA) certified arborist who have received advanced education and training. We also recommend this individual evaluate trees in high-public use areas of other parcels to assess danger trees in proximity to trails.”

On July 22, 2020, an FWW letter to the Township noted that “FWW strongly believes that the WWNC should be kept as a natural area and that a comprehensive, evidence-based park management plan be developed by experts in conservation, park management, recreation, biology, ecology, hydrology, forestry, and the input from all of the park's stakeholders, including Indiana Borough and those of us who frequent its trails each day.” Our experience over the past year in working with specialists noted on this list, along with additional specialists with expertise in other areas, has made clear to us the range of expertise that is necessary for a truly far-sighted management plan--expertise that should be secured after goals have been identified.

IV. Additional Consideration

DCNR documents make clear that many grants for Project 70 lands (e.g. Community Conservation Partnership Program) incorporate specifications for planning processes and consultant contracts that determine grant eligibility. Possible projects for WWNC, such as deer exclosures and treatment of invasive plant species, are likely to be suitable for such grant funding. It only makes sense to preserve grant eligibility by adopting acceptable practices.

The March 23, 2021 BOF Response to the White Township Stewardship Plan underscores that: “Understanding and articulating community values, interests, and objectives are especially critical for community-owned trees and forests.”

The WWNC helps to improve air and water quality, mitigate climate change and stormwater impact, provide a wonderful range of outdoor recreation opportunities, contribute to health and wellness, preserve wildlife habitat and peace and solitude, and, if left intact, provide a long-term revenue stream from carbon sequestration.

FWW believes that our community must have an inclusive planning project that relies on public input and a range of professional expertise to develop and implement a sophisticated, long-term WWNC management plan so that we can preserve this precious natural area for use by generations now and in the future.

To meet both the letter and the spirit of the DCNR Response, we are requesting that White Township implement a planning process regarding the stewardship of the WWNC that allows maximum public involvement, professional expertise, and sophistication of forest management goals and actions.

1. Begin with public input.
2. Appoint a study committee with membership to include all stakeholders - WWNC trail users; devoted citizens, regional park and planning specialists; Indiana Borough representatives, Township official and Recreation staff --to determine goals and objectives.
3. Hold public meetings so that the public can review these goals and objectives.
4. Gather information about the WWNC, conduct surveys as needed.
5. Seek professional assistance from multiple resource professionals.
6. Re-evaluate options, goals and objectives.
7. Draft a management plan.
8. Hold another round of public meetings for management plan review.
9. Revise as needed.
10. Seek DCNR review.
11. With approval, implement long-term plan.

We thank you for your attention to these matters.

Sincerely,
Board of Directors
Friends of White's Woods

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