

White Township Draft Stewardship Plan: Document Review by Friends of White's Woods

Friends of White's Woods Board members spent four days reading the recently posted White Township DRAFT Stewardship plan, taking notes, and following up citations and references. We took special note of 1) the stated goals of the plan, 2) the size and purpose of the timber harvest in White's Woods, 3) the method for treatment of invasive species, 4) the data on which the plan is based (and the data that is absent), 5) stormwater management, and 6) comparison of this plan to the previously released Millstone documents. FWW considered all of the information made available in the newly posted White Township plan in the context of available expert opinion.

What follows is the Executive Summary of the FWW review. The extended analysis of the draft plan's goals, approach to invasive plant species treatment, and comparison to the previous Millstone plan that was released to the public on April 16, 2020 can be found in Appendix B.

FWW Executive Summary: WT DRAFT Stewardship* Plan

June 30, 2020 (revised July 13, 2020)

Friends of White's Woods Board members spent four days reading the recently posted White Township DRAFT Stewardship plan, taking notes, and following up citations and references. We took special note of 1) the stated goals of the plan, 2) the size and purpose of the timber harvest in White's Woods, 3) the method for treatment of invasive species, 4) the data on which the plan is based (and the data that is absent), 5) stormwater management, and 6) comparison of this plan to the previously released Millstone documents. FWW considered all of the information made available in the newly posted White Township plan in the context of available expert opinion.

Below is a summary of FWW observations and concerns. The White Township plan is posted at friendsofwhiteswoods.org, along with the extended section-by-section analysis provided by the FWW Board.

I. Goals: Recently Posted WT Stewardship* Plan

Goals of the recently posted DRAFT White Township Stewardship Plan are (a) stated in the first two pages of the document and (b) articulated in various sections throughout the plan (e.g. "Millstone Land Management Objectives for WT Properties," p. 4; "enhancing the growth and performance of the timber," Millstone contract, p. 13).

a. Township stated "Goals for Woodlot Management of WT Properties," pp. 2-3

1. [I]mprove the overall health and sustainability of all township-owned properties

Summary Goal 1: This is a generic goal for all White Township recreational parks, and is meaningless due to the diverse nature of the parks. For this goal to be functional, there should be separate sub-goal(s) for each park, with specific, measurable, achievable objectives for each goal. For instance, dead trees, rarely a problem in a 250-acre forest, might be a significant concern in a small community park. It is interesting that the Supervisors note in discussing this goal that they wish to combat climate change: Given the carbon-capturing potential of a 250 acre forest, this seems to be a good argument for keeping WWNC untouched and intact.

2. Enhance recreational activities for all community members:

Summary Goal 2: This section does not address any aspect of "enhance(ing) recreation activities" in WWNC. The properties cited in this goal ("17 acres of community parks (3) and a 90 acre recreation complex") specifically exclude the WWNC. Given that the overall goal of the WT DRAFT plan as it pertains to the WWNC is to remove invasive species by rototilling the floor of the park and remove as much timber as they can get past DCNR, this plan promises to destroy the quality experience currently treasured in WWNC.

3. **Summary Goal 3:** Goal 3 is unclear. It appears that this goal is announcing a plan to develop a comprehensive plan for WT recreation **in the future**. In this sense, Goal 3 seems irrelevant to this document –or might even suggest that this document is premature. In any case, readers should note that WT is working on a comprehensive plan and should be looking for means for input!

Conclusion: The stated goals for this project are vague and poorly written to the point that they are difficult to discern. They are not formatted appropriately for a planning document, and the attempts to provide supporting evidence cite a plethora of irrelevant, largely undocumented, unproven claims. From the perspective of 25 years of fighting desecration in WWNC, this “plan” is a thinly veiled attempt at (1) selling timber and (2) providing employment for the “consultant,” which should more accurately be the stated goals.

***Relevance to DCNR and Project 70 land use**

WWNC was purchased with Project 70 funds, which are intended to be used for recreation, conservation, and historic preservation. Stewardship plans for public lands should be driven by community values, which are used to define goals and measurable objectives. The Millstone plan fails to consider either in its stated goals.

b. WT DRAFT Plan Goals and Objectives Articulated Throughout the Document

Statements throughout the White Township Draft Stewardship plan make clear, as Consultant Forester Mike Wolf noted in his own report, that, as it pertains to White’s Woods, this is a timbering plan.

1. The statement of Millstone Land Management Objectives for WT Properties (p. 4) includes plans to: (1) mow, mulch, and **harvest timber** to treat invasive plants and to address the “issue” of “overstocked timber stands” and (2) to utilize ...harvests to offset the costs of land management

(FWW note: Offset the cost of management of the Rec Center? Investment in WWNC, as noted in two places in this document, is minimal.)

2. The September, 2019 Millstone Contract (p. 13) specifies Millstone’s obligation to “perform consulting services for the purpose of removal of invasive plant species and enhancing the growth and performance of the timber.”
3. The stated Millstone Management Goals and Objectives for White’s Woods (p. 18) confirms that:
 - a. “[w]ood products were assessed and valued on species, quality, and merchantability.”
 - b. the highest volume of tree species to be harvested are “high-quality” (merchantable) trees (p.20).

4. The worth of White's Woods?

If a tree or log was too small or too low of quality and was at least 10 inches DBH (Depth Breast Height), it was scaled as pulp" (p.20).

The total “pulp” to be “harvested”: 131 Tons, valued at \$5 a ton (p. 20-21).

II. TIMBERING IN THE WWNC: WT DRAFT STEWARDSHIP PLAN—KEY POINTS

See Select Timber Harvest, p. 19- 28; 47-48

- a. **The amount of timbering is more than excessive.** 125,668 board feet of timber PLUS 131.1 tons of wood pulp are planned for harvest from just Tract #1 (50 acres). Lawer does not specify how much timber he intends to take from the other 6 tracts (Tracts #2-7) of White's Woods, but if similar to Tract #1, he would be removing 628,000 board feet total, far more than the proposed timbering of 555,000 board feet from all 250 acres of White's Woods, which DCNR called “excessive” in 2008. Forester Mike Wolf also stated that removing the canopy would KILL the remaining trees in White's Woods, as they are the same age as the large ones (from prior clear-cut timber harvests) and have adapted to lower light levels. This will look more like a clear-cut than a “selective harvest.”
- b. **Lawer’s rationale for timbering—“promote wildlife habitat, improve forest health, and maintain trail safety”— is nonsense.** According to forester Wolf, the trees that comprise the canopy of WW (overstory) are very healthy, not overly mature, and do not need to be timbered for the health of the forest. Because there are almost no seedlings on the forest floor, WW would not be able to regrow trees by adding light to the forest floor, as Lawer proposes. Wolf states: “Contrary to popular belief, tree seeds do not need added light to germinate and tree seedlings do not need added light to begin growing.”
- c. **The costs and revenue of timbering are incomplete and misleading.** Once Lawer’s “Consultant Cost” is deducted (as the costs for Cutting/Skidding and Hauling have been), the Total Net Revenue comes to only \$24,662.43. for 50 acres of trees, while the cost of the above will be \$36,666.57. No road work or stormwater mitigation are included in the costs. This work is likely to cost the taxpayers far more than is represented in the plan.
- d. **The 5-year timeline is overly aggressive yet lacking in detail.** According to Wolf, “There would be no way to ensure sustainability in a proposed regeneration harvest that would all be accomplished in a 5-year period. In fact, a sustainable outcome actually takes 10-15 years at least. ... doing this improperly, as proposed, would forever change the forest.” Again, the total amount of timber to be harvested from WW is not specified, which is more than troubling. It is also questionable what money from timbering WW would be put back into WWNC as opposed to the other township parks (namely the Rec Complex).
- e. **The plan proposes deer hunting in WWNC.** “Deer harvest,” which Forester Wolf states would be completely ineffective, is tentatively scheduled for this upcoming Winter (2020). This is

incredibly unsafe to do in a small park that many people visit daily year-round and that is bordered by neighborhoods, especially given the Supervisors' poor track record of communication with the public.

III. INVASIVE PLANT (and tree) SPECIES REMOVAL

- a. **Without research or evidence**, Mike Lawer has proposed to remove and treat "invasive species" in White's Woods by using heavy equipment to uproot undesired plants and trees, and to mulch and till the soil in the entire 50-acre Area #1 in White's Woods. The goals were to be to aerate the soil and let additional sunlight reach the forest floor.
- b. **This plan is the same for all parks in White township.** "Using mechanized mulching equipment (see Appendix 8), areas affected by invasive plant species will be mulched up to 6 inches in order to uproot undesirable plants. The mulching process will aerate soil and address soil compaction issues. In addition, mulched material remaining on the surface of the soil will provide an excellent stormwater management practice that limits runoff and sedimentation."(p.18) "Upon completion of the mulching process, an over seeding of the treated area (seed mix to be specified) will take place to establish a new layer of native desirable plants." (p.19)
- c. Experts in Forest Management, Ecology, Conservation Biology, and related fields carefully studied Lawer's proposal and relevant professional research. They concluded: **"the combination of opening-up the canopy to allow sunlight penetration to the forest floor, disturbing the forest floor by mechanical mulching of invasive plants, and rototilling the soil as proposed in the Millstone plan; and not excluding white-tailed deer will unquestionably create conditions that are ideal for invasive plant colonization and proliferation,** and are detrimental to forest regeneration and sustainability. Once this takes place it will require constant, expensive, and intensive intervention to restore."
- d. Mike Wolf, a forester of 30 years with a strong background in forest management additionally opposed Millstone's plans to improve the forest soil by tilling and aerating it. "Typically, trees don't grow to the size of the trees in Whites Woods in only 70 or 80 years, but this indicates a very productive soil and nutrient component." His recommendation: "Just let the timber grow, occasionally take care of dangerous trees along the trail, build a small deer enclosure...Final thought...until substantial understory work is done properly (not using a mulcher and throwing a non-native wildflower mix on it), light is the enemy to the forest floor. **If you think the understory is bad now, wait until Millstone adds light...total disaster.**"
- e. The deer overpopulation and deer appetite for hardwood buds has prevented seedlings from growing in the understory to replace fallen or harvested overstory trees. Millstone's only proposal is to overseed the tilled forest bed with non-native wildflowers to feed the deer, which our experts say will not work to permit seedlings to grow. Therefore, there will

be no seedlings to grow to replace the trees that have been timbered.

Conclusion: The invasive that will create the most damage to White's Woods is Mike Lawer of Millstone Land Management and his mulching machinery. Under the guise of concern for White's Woods, both Lawer and the supervisors have agreed on a plan to remove the invasive plants in the understory. However, 680 trees are marked for timber in just phase one of 7 phases, and by the time Lawer is finished over 50% of the trees will be timbered.

IV. THE USE OF DATA IN THE NEWLY POSTED WT STEWARDSHIP* PLAN

- a. The stewardship plan is sparse on data except for timbering information (board feet, number, value and type of trees). Specific information on diseased trees is also not provided. Other data necessary for a complete stewardship plan are missing: survey instrument, number of respondents, results; soil tests and results; wildlife variety and quantity; vegetation other than trees and invasive species; research on use of mechanized mulching and rototilling in a 70- to-80-year-old forest; effects of deer population on tree seedlings; assessment mechanisms for forest health, among others.
- b. In addition, there is NO data in the DRAFT stewardship plan on community input (survey, focus groups), wildlife, location of invasive species and level of proliferation, soil analysis, stormwater runoff problems, soil compaction, other flora, park usage per season.
- c. **In fact, the only data provided is about trees – board feet, types, value, and size. This is obviously a timbering plan and not a stewardship plan based on data provided and lack of data in areas specified in a and b.**

V. STORMWATER MANAGEMENT

- a. Lawer's answer to **stormwater runoff** (p. 18) is that: "mulched material will limit runoff and sedimentation and provide an excellent stormwater management practice." Twigs and bushes are going to be broken up and the soil tilled to a depth of 6 inches and in a heavy rain will not stay in place very long. Bales of straw or other items such as the newer socks with switchgrass in them are needed for this project the same as a construction site.
- b. **Streambank Improvements:** 1650 feet of streambank to be covered with Fascines (bundles of living stems of native species that will establish a streambank cover), (p.23). **The report does not say where this to be used. Two streams come off the White's Woods property.** One flows to the northeast and one to the southwest. Another stream flows to the northwest and will get runoff from White's Woods after crossing IUP property. The White's Woods park has elevation differences of almost 300 feet and the plan calls for 1650 feet of streambank protection.

- (1) Where are the estimates of water runoff for certain strength storms?
- (2) Where are the runoff estimates from different soil types as shown on the maps?

- (3) Where are the runoff estimates from the tilled bare earth as seen on the recreation complex property after the mulching machine was used?
- (4) Where is the analysis of existing runoff problems and how to make them better not worse?

c. **Erosion and Sedimentation Plan** for a Timber Harvesting (Forest Mulching) Operation (p. 74) for Tract No 1. Dated 5/12/20 and signed by Milt and Millstone Land Management. **After page 3 it is missing every second page.** None of the drawings for silt barriers will be used along haul roads, skid roads or landings. A USGS Contour Map was not used as requested in the instructions (p. 83 or p.3 of E&S plan) it is filled out that zero acres will be disturbed. I am not sure if this plan went to the state or county.

VI. New Plan to Old Plan: Comparisons:

- a. **The “new” plan draws heavily from the following documents on which the previous plan was based:** (1) “Sustainable Management Forest Overview” (April 2020); (2) the “White Township Parks: Preliminary Assessment” (Dec 2018); and (3) the “White’s Woods: Timber Valuation” (February 2019).
- b. In some cases, sentences are cut and pasted from one document to another; in some cases, the order of paragraphs is reversed:
 - Objective Timber Harvest is the second objective in the “new” plan; it was listed as the first objective in the “old” one.
 - **New language reveals the same intent: “select trees for timber harvest, based on art and science in order to promote forest economics.”**
- c. **Some specific numerical information has been added; other information omitted:**
 1. The number of board feet--125,668 from Unit 1 alone (PLUS 131 TONS of PULP—is articulated here.
 2. The total volume of WW timber is NOT directly cited. However, figures that Lawer cited are clearly based on the total volume identified in the February 2019 White’s Woods Timber Valuation.
 3. The projected revenue derived from timbering all 7 WW “tracts” has been omitted.
- d. **What’s new?**

There is a signature page referencing “timber harvesting” over a “ten-year period.”

Summary of “old” and “new” plan comparison:

In this version, there is still the purported goal of “forest health,” but with more emphasis on recreation, likely to sound as if the parameters of Project 70 funding have been taken into account. However, **much of the language makes clear that the priority is timbering.**

Of note is that the reference to a “shelterwood” harvest is removed, likely because a “select” harvest sounds less destructive. This does not mean that the projected removal is reduced from the earlier version! In fact, the overall volume of timber is not listed here, nor are any percentages. This is a linguistic shift, not a shift in intent.

From the glossary: “Shelterwood—A regeneration cut designed to stimulate reproduction by removing all overstory trees. This is achieved by a series of cuts over several years.” Under Phase 11 — Select Timber Harvest is this: “there is zero desirable regeneration, and there is little to no sunlight filtering to the forest floor due to the overstocked stand” (19). **Every indication is that this is STILL by design a shelterwood timber harvest.**

Clearly, this new iteration is meant to obscure the intent and make estimating the total damage more difficult. It is also worth remembering that in Babyak’s plan the percentage targeted for removal was stated directly, and this is precisely the number that the DCNR said was “excessive.” Leaving out any estimated revenue for entire acreage is also problematic, since there is reference to “evaluate timber” in all the designated tracts (27-28).

FWW Review Summary:

In a letter dated April 27, DCNR Chief Mike Eschenmann requested the Township to demonstrate in a 10 year plan how the community goals for WWNC were enhanced or promoted by management of invasive species, timber harvesting, and any other strategies intended.

Although this WT plan does note, on page seven, that White’s Woods is used primarily for hiking and biking, NO PUBLIC INPUT was welcomed before the plan was developed. The survey data now being collected by White’s Woods does indicate that the Woods are important to people for hiking and biking –but also for birdwatching, education, cross-country skiing, relaxation, spiritual and mental health, observation of plants and animals, and more.

The WT plan now posted for public review does nothing to “enhance” these community goals for the WWNC. To the contrary, this plan promises to devastate White’s Woods.

*It should also be noted that the Millstone plan fails to qualify as a “stewardship plan,” by all standards. It does not provide the information that Mr. Eschenmann requested in his letter, does not provide identification of community values or goals, and does not include the sections listed in the DCNR sample stewardship plan or the Penn State stewardship guide.