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Mr. Milton Lady
White Township Manager
950 Indiana Springs Road
Indiana, Pennsylvania 15701

Dear Mr. Lady:

Friends of Whites Woods requested that we evaluate from an objective and scientific perspective the land management plan for Whites Woods proposed by Millstone Land Management, LLC. We have significant applied research experience and expertise in the fields of forestry, forest ecology and restoration, wildlife ecology and management, and disease ecology. To evaluate the plan, we conducted a preliminary survey of the 50 acres Whites Woods Tract #1 in which trees are being marked for removal; met with Millstone owner Michael Lawer onsite to discuss his plan; visited the 34 acres White Township Recreation Complex Tract in which invasive species and the soil were mechanically treated earlier this year; and studied all relevant publicly available documents released by White Township to date. Below is a summary of our findings and recommendations which are limited because the Millstone plan is rather cursory and incomplete, and from our understanding is a work in progress.

From an ecological standpoint, Whites Woods is obviously in need of evidence-based and scientifically sound forest management to improve its health and strengthen its resilience. However, 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.

From a planning standpoint, it is apparent that the views of Michael Lower, Friends of Whites Woods, and ours (as applied ecologists) of how Whites Woods should be managed and for what purpose are different, but not mutually exclusive of one another. We make this point to emphasize that although there are diverging opinions and viewpoints, there is still an opportunity to work together and develop a common goal and set of objectives for improvement and multi-use of Whites Woods.

We recommend that the Whites Woods project be immediately halted until the following are addressed: 1) All stakeholders, including the public, have had a chance to provide input; 2) A *comprehensive stewardship plan* has been developed based on this input and on a Silviculture for Allegheny Hardwoods (SILVAH) assessment; and 3) The comprehensive forest stewardship plan has been fully vetted by the Pennsylvania Department of Conservation and Natural Resources (DCNR).

Respectfully yours,

Jeffery Larkin, Ph.D.
Thomas Simmons, Ph.D.
Michael Tyree, Ph.D.

cc. Friends of Whites Woods
Millstone Land Management, LLC