

20 May 2020

Tim Fitchett, Esq.  
Staff Attorney  
Fair Shake Environmental Legal Services  
5614 Elgin Street  
Pittsburgh, Pennsylvania 15206

Dear Mr. Fitchett:

Friends of Whites Woods requested that we evaluate from an objective scientific perspective the Whites Woods Tract #1 - Treatment of Invasive Plant Species proposed activities within the context of more extensive follow-up timbering activities 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 proposed activities, we conducted a preliminary survey of the 50 acres Whites Woods Tract #1 in which trees were being marked; met with Millstone owner Michael Lawer onsite to discuss his approach; 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 available documents released by White Township, and shared by Friends of Whites Woods to date.

According to the 'Bid Advertisement' all invasive plants will be mulched, mowed, ground, and cut by both mechanized machine work and hand work. During our discussion with Mike Lawer, he indicated that mechanized machine work will also entail tilling soil throughout the tract to a depth of eight inches. According to the 'White Township, Sustainable Forest Management Overview' mechanized forest mulching will remove invasive and non-desirable plants and synergistically create invigorated rich topsoil free of compaction and replace a barren, compacted soil that is a duff layer. The 'Overview' also states that treating invasive plants will be followed at a later date by a selective timber removal, and a press release and email message communicate White Township's intent to selectively remove timber this year after invasive plant treatment. Lastly, the 'Overview' states that this treatment of Whites Woods will be to complete similar objectives that were executed on the Recreation Complex Tract, indicating that the Recreation Complex Tract can be used as a valid comparison to envision a post-treatment Whites Woods.

The 'Overview' and 'Bid Advertisement' rightfully point out that there is a serious invasive plant issue in Whites Woods. The 'Overview' and 'White's Woods Timber Valuation' also note that there is a stagnant understory and zero to no regeneration of desirable plants which these documents attribute to poor soil quality and lack of sunlight blocked by a heavily stocked mature timber stand. In our professional opinion after reviewing the materials and visiting the sites, the activities outlined in the 'Overview' and described in other documents are ill-conceived and will not effectively correct these problems. No soil indicator or tree site index data have been presented to justify or support the proposed tilling of the soil to improve forest health, and no Silviculture of Allegheny Hardwoods (SILVAH) data for making silvicultural decisions have been presented to justify and support the proposed timbering activities. There is however ample visual evidence that heavy deer browse is adversely impacting forest health by eliminating tree seedlings and desirable plants, and that there is a significant onsite source of several invasive plant species.

We predict that disturbance of soil, especially in combination with opening the forest canopy to allow sunlight penetration to the forest floor will create conditions ideal for colonization and proliferation of invasive species driven by propagules leftover from mechanized machine work and seeds from the onsite power line right-of-way and adjacent properties. In addition, lack of deer management will prevent forest regeneration and sustainability.

Because of these deficiencies, we believe that implementation of the Whites Woods Tract #1 - Treatment of Invasive Plant Species proposed activities, as well as additional activities outlined in the 'Overview' and described in other documents have the potential to cause significant and long-lasting harm to White Woods from a forest ecology standpoint.

Much more data and time is needed to make informed evidence-based decisions for forest stewardship of Whites Woods. The first step being the completion of a data-driven Comprehensive Forest Management Plan for the entirety of Whites Woods.

Respectfully yours,

Handwritten signatures of Jeffery L. Larkin and Thomas W. Simmons in cursive script.

Jeffery Larkin, Ph.D.

Thomas Simmons, Ph.D.

cc. Friends of Whites Woods