



Forest Stewards Guild Position Statement on “West Virginia State Parks Logging Bill” Senate Bill 270/House Bill 4182

The Forest Stewards Guild offers the following comments on Senate Bill 270/House Bill 4182, the proposed legislation to revise West Virginia State Parks rules and permit timber production as forest use and management goal.

We strongly oppose SB 270 and HB 4182 for their proposition of timber production as a forest management goal for West Virginia State Parks. This proposition conflicts with the key purpose and value of Parks to preserve scenic, aesthetic, scientific, cultural, archaeological, and historical values, natural wonders, and provide public recreation (1931 Code of West Virginia §20-1-7; is being planned without stakeholder input or public involvement in the process; and, is attempting to legislate the complex process of long-term public forest management.

The Forest Stewards Guild firmly believes in the importance of state parks for recreation and the enjoyment of nature. Forest preserves and parks provide an important balance to areas managed for timber and other forest products. For the Guild, both preserves and timber management areas are important. We practice and promote ecological forestry, which means timber harvests are designed to ensure all forest values are protected. At the same time, we value parks because they are crucial places where people connect with forests and where the next generation can develop a love for the woods. This proposed bill challenges our core values.

We see three crucial problems with these Bills:

1) The **central values of West Virginia State Parks** as areas for preserving special natural places and providing nature-based recreation and scenic beauty are not driving the proposed new State Park forest management goal. West Virginia State Parks provide places for citizens and visiting tourists to improve their wellbeing, view scenery, and connect with nature. State Park forests provide fresh water, clean air, wildlife habitat, and scenic and ecologically important old forests. Stewardship of West Virginia State Park forests should reflect that.

2) **Stakeholder input** on the users, uses, and values of West Virginia State Park forests is not informing the proposed new State Park forest management goal, and the public is not being included in the forest management goal-setting process. Stakeholders and the public deserve a voice at the table in the management of public forests. Responsible stewardship of West Virginia State Park forests requires understanding all the current uses and values of each forest area and incorporating public input.

3) A **comprehensive, public, stewardship planning process**, framed by clearly-defined West Virginia State Park forest management goals and informed by forest health specialists, recreation experts, wildlife scientists, and other stakeholders, is not directing the proposed forest management actions. Forests can benefit from good stewardship, and the stewardship planning process on public forests cannot be replaced by undercutting public engagement and legislating

forest management actions. By setting cutting limits, as proposed in each Bill, the State is setting its treasured Parks up for the practice of high-grading, which liquidates the value of the woods for short-term financial gain and leaves the weakest, least desirable trees to form the future forest. Such practices do not reflect the mission and values of the West Virginia Division of Forestry.

State Park forest purposes and values

West Virginia State Parks were created to provide the public places for recreation. West Virginia State Parks have extensive Park forests which provide opportunities for nature-based recreation and tourism. People say they choose to recreate on national forests mostly to improve their physical, psychological and/or spiritual wellbeing, and even more travel there to view scenery (USFS 2016). Scenic beauty preferences have been studied, and the public prefers large-diameter trees (typically older, taller, with wider spacing) (Gobster 1996). West Virginians value owning forests for their beauty, to pass on to children, to protect wildlife and water, for privacy, for hunting and fishing, and for conserving biological diversity (USFS 2013). Good stewardship of West Virginia State Park forests starts with recognizing the purposes and values of the forest and designing a forest stewardship plan that reflects that.

State Park forest stakeholders

West Virginia State Park mature forests have important benefits and a variety of users:

- Mature forest habitat for rare and declining wildlife species: At least five federally-listed species are known from West Virginia State Parks (Cheat Mountain salamander, West Virginia Northern Flying Squirrel, Indiana Bat, Northern long-eared Bat, and Virginia Big-eared Bat). Mature forests on West Virginia State Parks also harbor forest-interior nesting birds (e.g. cerulean warbler, wood thrush), some listed by West Virginia Division of Natural Resources' 2015 State Wildlife Action Plan (SWAP) as being species of greatest conservation need. The SWAP is a resource to be referenced in any forest stewardship planning activities.
- Conditions to supply clean sources of drinking water: Twelve of West Virginia Department of Environmental Protection's "Reference Streams" (the "best of the best" for water quality) are in mature, undisturbed forests on nine of West Virginia State Parks.
- Educators use the State Park's mature forests for teaching: West Virginia Division of Natural Resources "Becoming an Outdoorswomen" courses have included Backpacking into the "backcountry" at Watoga, Forest History at Tygart Lake, and Native Edible Plants at North Bend.
- Museums and Universities survey and collect specimens to grow the body of knowledge about West Virginia's diverse natural heritage.
- Extensive hiking trails are used by walkers, wildlife-observers, mountain bikers, and cross-country skiers.

The staff who manage and care for Park lands and those who enjoy Park forests are stakeholders who can speak for these many and varied uses and make sure the forest planners protect or enhance them. Other stakeholders are those who can bring valuable information and technical expertise to support stewardship managers in meeting goals at a Park. For instance, a recreational trail expert shared the following when asked about converting skid trails to recreation trails:

"People want narrow, natural-surfaced hiking and biking trails that are specifically and sustainably designed for their unique activities, bordered by pristine nature not huge piles

of logging slash...[we have] used old logging roads historically because of insufficient funding and staffing to create more optimal networks of recreational trails. Logging roads are not laid out for recreational goals and objectives. If your objective is to create enjoyable and sustainable trails for recreationists you would want to hire a Professional Trail Builder Association firm to accomplish specifically that.” – Jeff Marion, Adjunct Professor at Virginia Tech in Natural Resource Recreation, February 8, 2018.

Stakeholder input is a recognized component of sustainable forest management planning process. The Sustainable Forestry Initiative (SFI) is the most widely adopted forestry certification program with the timber industry in West Virginia. SFI includes a Standard for managing the forests of public land responsibly, and two Indicators of sustainable public land forest management are 1) involving appropriate governmental entities and the public in the planning process, and 2) contacting stakeholders (SFI 2015). The proposed Bills do not meet these Indicators.

The Guild believes that stakeholders deserve a voice at the table in the management of public forests to inform the planners of current uses and values of the forest areas. Responsible stewardship of West Virginia State Park forests requires understanding all the current uses and values of each forest area and incorporating public input.

Forest management process and expert input

Forest Stewardship Planning

The Forest Stewards Guild believes that when guided by ecological principles, silvicultural activities can be used to improve wildlife habitat, encourage the growth and diversity of forests, enhance recreation, and advance forest conservation. However, Senate Bill 270/House Bill 4182 removes the critical and essential first step of any professional, sustainable forest management project: a stewardship plan. The West Virginia State Parks forest stewardship planning process could be modeled after the USDA Forest Service Forest Stewardship Program that the WV Division of Forestry administers for private landowners, with the important distinction that it also involve public and essential government entities and seek stakeholder input. Clearly-identified goals for each State Park forest, based on its unique purposes and values, would determine the management objectives. Silvicultural and other activities would be determined last, and as the means to achieve specific objectives outlined for a forest area.

State Park forest stewardship plans, developed in a framework of clear Park goals in a transparent, professional process, can assure the public that good forest stewardship is being employed in the State Parks they love. After 80 years of passive forest management, another year or two to let the State Parks create stewardship plans for their forests is a worthwhile and smart investment in insuring the best forest stewardship will be implemented.

Forest health and other expert input

In the last 30 years, invasive forest pests (e.g. gypsy moth), diseases (e.g. beech bark disease), and non-native invasive plants (e.g. kudzu) have all negatively impacted the forests in our State Parks. Experts in these forest health threats, working for the State Department of Agriculture and USDA Forest Service State and Private Forestry, already participate in forest health management activities on State Park forests. Activities include implementing plans to treat invasive plants such as Japanese barberry (a plant correlated with high numbers of disease-carrying ticks) and reduce the impact of invasive pests such as the hemlock woolly adelgid. These experts bring resources and support to State Park forest managers.

The management and planning for State Park recreational assets is a specialized field of expertise to be included in forest planning as well. Parks and recreation experts can provide information about recreational users and trends, and technical experts can help design new assets and maintain existing ones.

About the Forest Stewards Guild

Forest Stewards Guild members include forestry and conservation professionals who manage some of the most beautiful forests on private and public lands across the United States. We practice and promote responsible forestry as a means of sustaining the integrity of forest ecosystems and the human communities dependent upon them. We support much-needed management of State Parks forests in ways that are transparent, science-based, expert-informed, and State Park-driven.

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