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02/28/02 05:17 PM

To: <jgreis@fs.fed.us>, <dwear@fs.fed.us>
cc:
Subject: Acknowledge Unsustainable Timber Industry in SFRA

Dear Mr. Sargent,

Dear Mr. Greis and Mr. Wear,
SFRA comments.

I wish to commend you for protecting the interests of the deforestation industry over the public interest. This draft is magnificently blatant in that regard. I wish for all who do seek truth and are deeply concerned over the potential for corruption in this study, to contact Public Employees For Environmental Ethics (PEER). http://www.peer.org/ PEER will help with whistle blower protection and legal advisement should illegal activities or lawsuits occur. They also provide a sense that there are those with conscience, trying to protect the public interest in the course of the love of their work. I wish you all well in the final SFRA and that you allow truth to prevail over corporate influence.

The SFRA thus far, fails to adequately address forest trends and acceleration of native forest replacement and simplification and shortened rotations of remaining native woodlands. You are still using old figures and not extrapolating adequately the true trends. Please address the average cutting age of plantations in 1980 vs. today. I was told then, that rotations would be on the order of 40 years in the deep south, and today they are at 15-18 years rotations in those areas. In 1980 I was told that 20 million acres would more than supply demand for paper in the US in perpetuity. Now that the demand pine desert acreage is doubling, what are the real future projections. The conversion is occurring much faster than your report indicates.

Though much of the establishment of pine farms was on degraded CRP lands and other disturbed lands, a large portion of the planting I did in the early 80s was done in drained swamps, denuded forests, and estuary islands. It seems that nearly all the current pine farm conversion is occurring on native forest lands clearcut for the pine deserts. What have been the trends in what sorts of lands are targeted for conversion. What percentage of current and future pine farms are to be established by clearing native woodlands. Virtually all pine farm establishing is occurring on native woodlands in my bioregion. Please be truthful. What percentage of the south's wetlands have been lost due draining and subsequent pine conversion and how much will remain when all conversion is completed. Will the 25% of southern forests converted to pine deserts be adequate for industry demands for profit. For how long will they be satisfied with only 25%. How much more of native woodlands will be used to supplement pine crops in pulp and paper and biomass energy demands for the industry.

Please discuss nutrient equilibrium age of plantation pine farms. TVA intimated that nutrient equilibrium with the soil was not reached till pines were 30-35 years of age. Please address the implications of repeated shortened rotations of cutting. Address the borderline acidic soils of the Cumberland Plateau and how many rotations of pine farms can occur before growth rates are decimated by nutrient depletions. How many rotations can all soils of the south sustain? What have been the trends in loss of soil nutrients, soil diversity, beneficial soil fungi, acidification, compaction and recovery times, increases in compaction from newer larger, faster machines, and reduced recovery times between logging. How much of the south?s forest soils have been lost in the last hundred years and what are the trends. How much time will it take to rebuild lost soils. How much time will it take to rebuild healthy soil, forest

overstory and understory ecosystems using benign neglect. Just as the mixed mesophytic forest has served as the genetic library for all eastern forests and beyond for the last 150 million years, how much native forests should be left as a genetic library as a hedge against the inevitable collapse of the industrial forestry experiment. Converting a quarter of the south?s forests to pine farms and the degradation of adjacent forests from pine deserts, combined with human sprawl seems to leave too little of the biological commons intact and healthy. Please play god and tell us how much would ever be too much to cut before recovery opportunity is irreparably harmed. How much of the south?s pine deserts are experiencing declining growth rates. Does this correspond with increases in chemical fertilizer dependency. What are the full implications of fertilizer dependency on adjacent waters, groundwater, adjacent forests, and US security in needing more wars to supply raw materials for fertilizer production. How many soldiers and civilians must die, because we killed our soil productivity and have to fight for pipelines to make fertilizers for pine farms.. but I digress.

Address soil acidification and projected pine growth rates around the south. Address how much acidification is antropogenic airborne deposition, how much is from nitrogen fertilization and N drift. Address aluminum toxicity resulting from repeated soil depletion regimes of pine farms. Address how many adjacent native forest acres are affected by each acre of native forests converted to pine farms and attendant hotter and drier conditions, herbicide and fertilizer drift. In the PNW, the ratio was 1.4 additional acres degraded per acre of neighboring clearcut. What is it in the south.

Please address potential for albedo effect to significantly change the regional macroclimate. Droughts are increasingly common in the lee side forests of the cutover PNW. The conversion of vast areas of forests between the Gulf of Mexico and the Atlantic Ocean would seem to have serious implications for inland bioregions dependent on the moisture from those bodies of water in critical times of the year.

Please address the full changes in hydrology from conversion of native woodlands to pine farms. Pine farm conversion has less to many boom bust hydrological cycles in affected areas of the Cumberland Plateau. Spring City Tennessee, provides a case in point with increasingly occurring hundred year floods, after a majority of the watersheds? forests were converted to pines farms. We as taxpayers, subsidized the buyout of landholders downstream in the new floodplain and helped engineer the creek bed to accommodate the boom/bust hydrology of the damaged watershed.

Please address the potential of turing a quarter of native forests into pine farms. How many additional acres of native woodlands will be negatively affected by invasive species coming out of pine farms. How will the pine farms affect breeding patterns and promote yet more pine beetle infestations of adjacent woodlands. Are pine farms indeed pine beetle condominiums. Does the proliferation of pine deserts contribute to a negative feedback loop in moisture regimes, drought, wildfire, water tables, flooding damages. Again, please address the potential for Albedo effect in the region from forest loss due to pine sprawl and urban sprawl.

Address where the pine dependent corporations will be harvesting trees, when/if a pine collapse occurs from a current or future pest or disease. Please address potential for introduction of invasive exotics, bioengineered tree crops, and invasive hybrids. Please address projected environmental impacts of such introductions. Please address the number of exotic pests and diseases to come into our forests from the global market in the survey time period. Please address how many species will be lost in that time period.

Please address how many acres of remaining native forests are dominated by stump sprouts. How many acres of remaining native forests are destined to be only pulpwood lots due to excessive stump sprout trees

that are too twisted, young and experiencing outgrowth. Put this pulpwood lot scenario for native woodlands in context of the inordinate current demands as well as projected increases in demand from corporate pillage people. What is the trend for sawlog forest regimes vs. pulpwood lots in native forest growth. How much biodiversity has been lost in forest plant communities in the last hundred years, the last 30 and what are the trends. What are the implications for forest resiliency and health from simplification from repeated short rotation cutting.

Address the synergistic effects on remaining native forests, of changing micro and macro climates from clear cutting, conversion, and global climate change combined with biodiversity loss in forests from past cutting excesses, invasive exotics, pests and pathogens, anthropogenic airborne deposition of acid, nitrogen, fertilizer and pesticide drift, air pollution including ozone, and impending pests and diseases due to be imported from overcutting shortages. You are still describing the elephant focusing on one limb at a time, without a full understanding of what is killing the elephant. Please remove blinders.
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The FS studied Dogwood Anthracnose and found that the combined effects of acid rain and the antracnose exposure caused far higher mortality rates than just antracnose exposure itself. Why is that report not considered when you discuss forest health and impending and occurring pest and disease outbreaks. Please fully address the impacts of all acidification and nitrogen assaults in conjunction with susceptibility of declining and threatened forest species. How many plant species are in decline from the combined effects of high impact forest intrusions and airborne assaults.
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Where is the line at which ecosystem collapse can be expected with species loss and simplification. How much of the southern native forests are threatened with oversimplification. What effect has clearcutting had on introducing non native invasives in former native woodland sites. What percentage of native woodlands have experienced clear cut induced invasives proliferation vs. non clearcut woodlands.

How many working on this report are involved in industry or have been involved in the private forest sector and how does this affect objectivity in finding palatable conclusion for public consumption. What part has understory diversity loss played in allowing invasive exotics to establish. How much understory diversity is lost in each successive clearcut.

How much of remaining native forests does your group consider to be healthy. How much remaining native forests retain over 90% of original biodiversity. What are the trends. What is the true biodiversity loss in conversion of native forests to pine deserts. Harvard biologist E.O. Wilson, noted that 90-95% of biodiversity is missing in a pine desert. The UN considers desertification to be occurring when 25% of biodiversity is lost. What is the official party line of the Corporate Forest Service, formerly USFS. www.peer.org

The report indicates that the South is now on a 40 year rotation for all forests. How will this affect hard mast production and wildlife trends in the future. What is the earliest and optimum mast production age of regional forests and what are the trends projected for hard mast production. What are the implications for understory diversity loss. How much of that loss is due to nitrogen drift, airborne acid deposition, clearcutting, compaction, herbicide drift and hotter and drier conditions from clearcutting and associated silvacultural abuses.

You have ignored the impending biomass energy industry and the current amount of forests consumed for biomass energy at existing plants. Please address the implications of tripling bioenergy production the the south. Clinton and Bush have both vowed to support this emerging industry. The pulp and paper industry currently is the largest biomass energy industry in the South. How much is currently being burned, and how much more is

projected to be burned for energy projects. How much is the current pulp and paper industry projected to increase their reliance on biomass energy from forests to make their own power. What are the implications for the incidence of and intensity of clearcuts for bioenergy. We are seeing far more inwoods chipping operations vacuuming sites clean of virtually all remaining biomass for dirty chips for power. What are the trends past, current and projected. The biomass energy segment currently accounts for more forest consumption than either the solid wood segment or the pulp and paper industry. What are the trends on who will get the biggest piece of the pie in the projected time period. What are the implications for site productivity from increased inwoods chipping operations removing too much biomass for fuels. What are the implications of such whole tree removal operations in promoting more wind and sheet erosion.

Best Management Practices are touted as a means to reduce damage from deforestation practices. Please address how BMPs have anything to do with soil health, minimizing compaction, maintaining understory and overstory diversity of flora and fauna. What is the incidence of compliance with even minimal basic recommended BMPs . What have been the trends in forest diversity and soil health on lands subjected to so called BMPs and the majority of lands where not used. How have BMPs promoted forest health and resiliency, soil building, and soil ecosystem health.

How have BMPs improved non shootable wildlife populations. You seem to inordinately measure success in wildlife populations by focusing on shootable animals. Why ignore complimentary wildlife species.

How does the loss of neotropical migrant bird species affect proliferation of pine beetles and other pestilence. What is the synergistic effect of bird species loss, pine conversion, changing climate, fertilizer drift, toxics from the air and soil abuse in creating pine beetle condominiums. Though you maintain that mature pines are most susceptible to pine beetle parties, how do you reconcile the brownouts of young plantations. This sounds too much like a party line developed by corporate pine-dependent humans. What are the full implications of neotropical migrant bird losses for forest health in the future. What is the effect of a new clearing becoming an attractive nuisance in drawing in disturbance opportunistic species and how are those species affected by the subsequent poisoning from herbicides, pesticides and toxic fertilizers demanded by industry for pine deserts.

The Draft frequently implies that proper ?management? is the key to dealing with various challenges to diversity and forest health. I seem to have missed the importance of benign neglect management of forests; allowing time to heal from past abuses. Most landholders surveyed by Stephan Jones indicated that they did not wish to intensely mangage their woodlands and preferred much gentler management regimes if they were to cut anything at all. (The NIPF owner..It?s Time to stop talking and start listening. Penn State) The sour flavor of this draft too readily prescribes some sort of intensive management regime to cure all ills. Just as your brethren in the pulp and paper industry prescribe clear cutting as the cure all for selective cutting mistakes in the past, you too promote the party line of more cutting to fix forests. How in the hell did the mixed mesophytic forest evolve to such health and complexity without chain saw and skidders for the last 150 million years. Mimic of nature is often sited, but nature has left biological libraries intact, and the time frames were much more elongated and smaller in disturbances. Mimicking industry bullshit will do nothing to ensure an increase in healthy forests. You touted that this was to be ?non-prescriptive? but repeatedly parrot the propaganda of your corporate masters or mentors. Please be more objective and realistic. www.peer.org

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Sincerely,

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