

February 27, 2002

The following is a comment about the recent
USFS Southern Forest Resource Assessment Nov. 2001

Dear Sirs; I have not yet had sufficient time to read the entire draft of the SFRA. However, I have read the execsumm, and have made notes where I found gaps in the research.

I direct my comments about the execsumm to David Wear and John Greis.

Land Markets: Forest gains in the West through agricultural land converted to forests will equate to lower potential timber products due to the decrease in moisture as one moves west. Please recognize this fact and include it in your report.

Timber Markets: Does not address the losses being realized on a broad scale from red oak borers (ROB), disease or other insects. The red oak borer has already removed 300,000 acres of USFS timber, and caused untold losses on private land. Also, the local loggers are harvesting red oak timber at rates above projections. In an attempt to salvage the trees, before they are killed by the ROB.

Biological Factors: You have ignored or over looked the issues involved in ROB and White Oak Borers, and the huge changes that are taking place right now in the forests with these pests.

Physical Factors: The statement 'many southern forests are fire adapted' is vague and not provable through time with research nor is there sufficient empirical evidence to support this claim. Please be more specific, rather than saying many give a specific number or percentage and locate these forest types. The statement '...increases in ozone will reduce growth' leaves out the logical conclusion that harvests will go down from the existing forecasts on both public and private forestlands.

Hardwood removal exceeds growth by 2025 is unacceptable, and tree harvest on public lands must be reduced to maintain sustainability.

Recreation: If the USFS would add new low impact or primitive recreation areas, this would expand the forest based recreational opportunities. Private lands can't be expected to expand forest based recreational opportunities, but public land with expanded recreation opportunities could help reduce congestion and competition between recreational groups. Please develop plans to address this potential problem.

With declining forestlands, we are faced with overgrown fields becoming the forest of the future, starting with zero tree volume in 2002. Therefore timber projections are doubtful, and timber harvests should be reduced to assure forest products remain sustainable.

Broad Forest Types: With pine plantations expected to increase, the USFS should emphasize naturally regenerated hardwoods, to offset the loss of species diversity that pine tree plantations can't fulfill.

Landscape Structure: In forest fragmentation, what about damage to areas other than the Piedmont being fragmented?

Terrestrial Ecosystems

Abundant forest communities: Oak decline (esp. the red oak borer) is having a devastating effect on the Ozark forests. Please note that old growth is a rare forest community, protect them, and make plans to restore old growth conditions where possible. Many insects devastating our Ozark forests are not exotics, and their overpopulation means the forest is out of balance. 'Northern part of the region,' please explain where this is and what % and how severely will the forests there be affected.

Effects of land use changes: Again you focus only on the Piedmont area. What about other regions with urban expansion? Northwest Arkansas for example is experiencing huge population

pressures. Dead oak trees and the openings their death creates will prevent any of loss of early succession forest types. Also, on private land these habitats are often abundant.

Effects of forest management: This dodges the issue of forest fragmentation of mature forests by attempting to compare it with potential loss of other habitat on shrub-scrub and grassland. This Southern Forest Resource Assessment is a discussion of forest conditions, please stick to the subject. Tell the general public how bad you think that the loss of endangered forest habitats really is, rather than comparing trees to grasslands.

Forest Management is management of forest conditions. Please leave out inappropriate statements like: '... support the array of grassland, shrub-scrub, and mature forests occurring within the same landscapes.'

The current forest mosaic has been caused by fragmentation and may not represent a natural, pre-historic mosaic pattern. The Ozark forest is a landscape level entity that needs to be and always was predominantly a closed canopy forest. Please maintain a complete forest canopy to protect forest water resources, and don't try to get early succession in the middle of a closed canopy forest. Nature will provide ample disturbances needed for regeneration. Recent ice and insect damage, for example will open up areas of the forest floor that have remained shaded for long periods of time.

Wildlife species of concern: This is a vague statement 'certain amphibians,' please make specific statements. Are you saying wet upland conditions for amphibians, or lumping these two opposite ecosystems (wet vs. upland conditions) into one discussion? There are rare relatively wet upland forests in the Ozark forests.

Conservation issues: Good to realize that private land will not be able to protect endangered forest ecosystems. Habitat on existing public land is our best hope for these forest ecosystems. Repeated fire is an unnatural disturbance in mature hardwood forests. So is everything else that man does in the forest. Please don't misuse fire, while pretending that it is a critical forest conservation tool. Reintroduction of fire (if it ever was widespread in the forests) to many forest ecosystems is some misguided goal of man to meddle with nature, in an ill-advised effort to improve upon it.

Water Quality: With only less than 1/3 of all water supplies considered to be even at a relative good quality level, and with sediment being the number one water quality for Beaver Lake (the major water supply for the entire Northwest region of Arkansas), timber harvests, associated road building and skidding in USFS land should not contribute to this water quality degradation problem in any way. Sediment and water degradation from logging operations is a case of the Federal Government destroying the state's water resources. Sounds like a violation of States rights. In areas of large forest (like the Ozarks) logging will be found to be the major source of sediment pollution. Please show some responsible leadership in water quality protection.

Discussion: With no net increase in forest acreage, but a gradual acreage expansion towards the west, the future forests will be drought prone, lower production forests that will especially lack the rich mesic ecosystems of the East. I am concerned about the potential over-harvesting projections for hardwood forests by the year 2025. What will the USFS do to prevent a decrease in future timber production, and maintenance of forest reserves? Large changes in pine plantations will have a broad landscape level of implications, and should not be limited to the stand level analysis. This will lessen the noticeable, reported impact from pine plantations. By my calculations, public forest harvests only account for 0.7 to 0.8 % of all jobs in the South. Seems pretty small and many more people are negatively affected from the loss of aesthetics, wildlife habitat, and environmental quality, that are direct effects of logging operations. Again, this report makes no mention of water quality value from a protected, pristine forest. I agree that biodiversity in rare forests have a disproportional high ecology value, especially with increasing scarcity of forest based recreational opportunities for city folks. I found no mention of the

Ozarks as a sub-region that will be suffering with the broad changes from blight (dogwood anthracnose has almost eliminated this species from the forests), disease (Amarillo root rot and hypoxal cankers) and insect infestations (esp. the ROB). To refer to these problems as oak decline diminishes the true impact that their combined effect will have on the forest.

Scientific Uncertainties: I would like to complete the sentences that were left unanswered.

- 1) The effects of population growth on forests ecosystems... will be negative.
- 2) Influence of changing markets... will increase pressure on private landowners to cut their timber reserves, especially the soon to be rare red, white, and black Oak trees.
- 3) What determines a public forest's value would be its productivity of benefits for all people. Most all timber management activities degrade the resource for non-game species, water quality, and most types of recreation and aesthetics values.

Explain what is meant by 'changes in ecological structure and function'. I agree that more research will be needed, and questions of Regional Scale must be addressed. Forest ecology changes in structure (over-story, mid-story, under-story, and even at the ground cover level) are happening in the Ozarks, and we must passively observe, record, and hopefully learn the function and course this change will produce. Fire has a limited role in most forests. However, glades, ridge tops, and exposed sites often are shaped and maintained by fire as in prairie and chaparral areas.

If pine plantations predominate our forests, all wildlife will suffer. This will put increased pressure on national and state public lands to perform all other functions of a natural forest. This is especially true in upland habitats. Overall, ecosystem balance and stable diversity will decrease in any managed forest, especially in a monoculture pine plantation. The use of fuel, erosion from maintenance and re-establishment, and chemicals used to control competition in pine plantations will increase runoff and pollution in an already over-taxed ecosystem. What will the USFS do to counter-balance this trend?

The last 'scientific uncertainty' should be scientific unexplored territory. This is the job of the USFS, and our public forests need less management, not new strategies or excuses to once again exploit Native Americans; this time by saying that they created the forests with fire before European settlement (especially in the Ozarks). These are unproven pre-historic myths that claim Man and not God created our beloved forests by repeated, calculated, deliberately set forest fires. It would be fair to speculate that there were not enough Native Americans to physically burn the woods with the frequency claimed in this work. Were this true, there would have been constant seasonal smoke from the smoldering fires, or these fires would have burned so hot that the natives would have destroyed the forest they were reputed to be developing.

We all need to think about global climate change, accept it as a planning tool, and plan activities accordingly. With the climate changing, we will see increased thunderstorm frequency and intensity, and more chances of natural lightning fires (to add to man's false attempts to show that controlled fire is generally good for the forest). There will also be more openings in the canopy from the tree dieback, blow downs, and tree-throws, altering our future view of the forest resources. Unfortunately man has altered the look and composition in ways that we may or may not have desired. These changes have the potential to forever change the forests we have become accustomed to.

Thanks for the opportunity to comment on this report.

Sincerely,

George Imrie

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