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To: jgreis@fs.fed.us
cc:
Subject: Southern Forest Resource Assessment

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USDA Forest Service
Southern Region
attn John Greis
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I am writing to submit comments regarding the Southern Forest Resource Assessment.

While we appreciate the work involved in researching and producing this report, we view the report as limited in several regards.

The report highlights the impact of sprawl on southern forests. We strongly agree that sprawl is a threat to southern forests. The spread of suburban sprawl reduces the number of acres of forested lands and the dispersion of residences can also influence the quality of remaining acres. However, the main threat from sprawl is the sheer reduction of numbers of forested acres. Sprawl is a significant threat to many types of natural habitats in the south and other areas of the country. However, we fear that the emphasis placed on sprawl in the report may detract from other threats, including threats for which the agencies involved in the study have more responsibility. The emphasis on sprawl as a threat diverts attention from forest management issues.

The report minimizes the importance of the quality of forested acres as compared to mere numbers of acres with significant tree density. The report does describe impacted ecosystem functions and the importance of native forests with a full array of native biodiversity. But throughout the report the critical distinction between richly diverse forests and the many variants of impoverished forested lands is often lost. Thus the report easily slips into sometimes optimistic projections of forested lands without admitting serious concerns about the quality of those acres. This is because, despite some efforts to the contrary, the report's fallback position seems to be to view forests primarily as a timber resource.

The report notes the importance of old growth and rare forest communities found on public lands. It notes that many of those areas are protected, but not all. Yet the report fails to point out the need to fully protect all old growth areas on public lands.

Considering the opposite extreme of forest types, the report asserts that most pine plantation expansion will come at the expense of abandoned agricultural fields. But data in the report shows that the majority of increases in the south have come at the expense of natural forests. The report is not provide convincing support that this trend will shift.

The report rightly assumes the essential role of good management of privately held forest lands. It recognizes the role of best management practices on those lands, but places too much reliance on existing application and enforcement of those standards. It would not have taken much additional research to provide important information on the need for better standards and enforcement.

Continued expansion of reliance on the wood products industry will involve

economic trade offs
and the report minimizes the downside of such relationships. The report acknowledges that communities where the paper industry is concentrated are economically worse off than other communities and that communities where value-added wood products industries are concentrated are better off than those where the paper industry is concentrated. The report also points out that communities where outdoor recreation is concentrated are much better off economically. Yet, the conclusion drawn is that the wood products industry provides stability to the region's economy, in effect, failing to acknowledge the ecological tradeoffs involved. This is especially short sighted given the nature of much of the wood products industry, such as chip mills, which provide even less stable economic benefits than a wood industry based on value added products.

The reports overall conclusion that southern forests are sustainable is not supported. First, by placing too much emphasis on timber supply the report uses a skewed definition of sustainable. If the report had considered sustainability to require at minimum the long term survival of a healthy mix of native forests types across their natural ecological zones in the south, a different conclusion would have likely been reached.

Second, by focusing on the entire region, the report is less helpful than it could have been if it had pointed out problems in sub regions and made suggestions for change.

This report was initiated several years ago, based largely on the impacts of chip mills in the southeast. The pressures of production, consumption and expansion unfortunately continue.

Despite the shortcomings of the report we hope that the agencies responsible for this report and all the citizens engaged in its progress will continue to take seriously the issues raised and work for truly more sustainable forest management.

Thank you for consideration of our comments.

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