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Subject: draft Southern Forest Resource Assessment

Comments:

I will state at the beginning that I have not perused the entire report; I have not had the time nor is my internet connection capable of handling files in excess of 10 MB. However, I have read the summaries and several chapters. My comments are thus more reflective of an overview than specific to detail.

Several things struck me as I read the report. The foremost was that the authors don't have a basic understanding of what a forest is. Throughout the report forests are at least implicitly defined as associations or collections of trees, with some brief attention given to economically important wildlife. Nowhere that I saw was there any recognition of the manifold species making up a fully functioning forest. I refer to the herbaceous layer, the understory shrubs, the invertebrate community inhabiting the litter layer, etc. Further, pine plantations are treated as equal in ecological status and function as undisturbed old growth mixed hardwood and conifer. The emphasis throughout the report is on forests as an economic resource, not on forests as valuable for their ecological functions or their social and cultural value.

The conclusion that urban sprawl poses the greatest risk to forests is misleading and false. The report documents that 30 million acres are expected to be lost through 2040, while 250 million acres will be lost through logging. The replacement of native forest by intensively managed pine plantations does not amount to "no net loss". Pine plantations are the silvicultural equivalent of corn fields. Any resemblance between either of those and a naturally functioning ecosystem is purely accidental. The recent epidemic of southern pine beetle damage should be a clear sign of the unsustainability of artificial monocultures.

The conclusion that most of the gain in pine plantations will come from abandoned agricultural fields is not supported. Data in the report document that 75% of the increases in plantations come after the native forest has been clearcut and destroyed.

The conclusion that southern forests are sustainable is not upheld. Even under the forest service perspective of forests as a supply of wood fiber, the data indicate that current and estimated cutting rates will exceed forest productivity. Under a perspective wherein forests are seen as ecological communities providing essential ecosystem services as well as social and economic benefits, the predicted impacts from wide-scale logging, urbanization, loss of wetlands, etc. will be devastating. Yet the report focuses on a narrow, economic view of southern forests and proclaims them "sustainable". I could not disagree more.

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