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cc: lynne@dogwoodalliance.org
Subject: comments on SFRA draft

02/18/02 09:27 PM

Dear Mr. Greis and Mr. Wear -

On behalf of Virginia Forest Watch, Shenandoah Ecosystems Defense Group, and Virginians for Wilderness, I am submitting the following comments and concerns on the Southern Forest Resource Assessment. We appreciate the Forest Service undertaking a study of this magnitude, but are concerned about the nature of findings. While sprawl is clearly a huge concern in Southern states, so too is the impact of industrial logging, herbiciding, and conversion to monoculture pine plantations. We request that the Forest Service integrate these issues into the study's findings and also include suggested solutions to these critical issues for retaining forest sustainability and biodiversity.

In addition:

1- THE IMPACTS OF THE TIMBER INDUSTRY AND INDUSTRIAL FORESTRY PRACTICES ARE GROSSLY UNDERSTATED IN THE SUMMARY
The SFRA documents that while 30 million acres of forest will be lost to sprawl through 2040, at least 250 million acres of forests will be heavily logged by big timber companies to produce products such as paper. Removals of the South's hardwood forests will exceed growth by 2025. In addition, approximately one in every four acres of the South's "forest" will be a single-species pine plantation by 2040. The use of chemicals in pine plantations will more than double. Despite these alarming trends, the primary conclusion drawn in the SFRA is that sprawl poses the single biggest threat to Southern forests-- a finding that is grossly misleading. The impacts of big timber companies are exacerbated, not diminished, by increased urbanization, as remaining natural forests become even more important to sustaining wildlife populations, water quality, scenic beauty, recreation, tourism and value-added, quality woodproducts businesses.

2- THE ECOLOGICAL IMPLICATIONS OF INTENSIVE PLANTATION MANAGEMENT AND INCREASED LOGGING ARE NOT ADDRESSED

The SFRA documents that by 2040 one in every four acres of Southern forests will be an intensively managed plantation, representing a 63% increase and covering an area equivalent in size to the states of North Carolina and South Carolina combined. The SFRA suggests that more intensive management of pine plantations that result in greater production per acre will relieve pressure on natural forests. Yet, there is no detailed analysis of the ecological tradeoffs (long-term soil productivity, pine beetle infestation, water quality, biodiversity) involved with increased use of chemicals, genetically modified trees and such wide-scale monoculture plantation management. Nor is there any analysis of the impact of this type of forest management on quality of life for local communities.

In fact, the SFRA repeatedly includes intensively managed plantations in it's discussion of southern "forests". This has the overall effect of minimizing the actual loss of southern forests.

Similarly, the report does not adequately address the wide-scale increase in logging (clearcutting and other forms of even-aged management) on birds and other key species. Finally, the SFRA fails to acknowledge the role that forestry has played in the loss of wetlands (including wetland forests) due to logging, ditching, draining and conversion to plantations across the South and the impacts of these

practices on wetlands.

3- THE CONCLUSION THAT MOST OF THE GAIN IN PINE PLANTATIONS WILL COME FROM ABANDONED AGRICULTURAL FIELDS IS NOT STRONGLY SUPPORTED
Data in the report document that 75% of the increases in plantations across the South have come at the expense of natural forests. However, the USFS assumes that through 2040 most of the plantations will occur on abandoned agricultural fields. This is patently absurd.

4- THE REPORT FAILS TO ACKNOWLEDGE THE ECONOMIC TRADEOFFS OF A CONTINUED EXPANSION IN THE WOOD PRODUCTS INDUSTRY

The SFRA 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.

5- THE CONCLUSION THAT SOUTHERN FORESTS ARE "SUSTAINABLE" IS NOT HELPFUL

First, the USFS definition of "sustainability" seems to be focused on a sustainable wood fiber supply, rather than ecological sustainability (as set forth above). Second, a broad statement about the southern region does little to address key areas under intense pressure from the timber industry and/or urbanization. the report alludes to the fact that trends in certain subregional areas are cause for alarm, but fails to identify these areas or the trends that affect them in the executive summary. The USFS should break their analysis of "sustainability" into sub-regional areas to provide a better sense of areas of concern.

Thank you for your consideration of these issues. We look forward to future drafts of the SFRA which include more robust analysis of the on-the-ground situation of forests in the Southern states.

Sincerely,
Christina Wulf