



"Judy Hancock"
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01/31/02 03:34 PM

To: <jgreis@fs.fed.us>
cc:
Subject: Comments - Southern Forest Resource Assessment - November 2001

Post Office Box 2436

Lake City, Fl 32056

January 31, 2002

Mr. John Greis
U. S. Forest Service
Southern Region
1720 Peachtree Road, NW
Atlanta, Georgia 30367

Dear Mr. Greis:

The Florida Chapter of the Sierra Club appreciates the opportunity to offer the following comments on the Southern Forest Resource Assessment, dated November 2001.

The SFRA is the findings of a two-year study which began in April, 1999. The assessment was written in response to public concerns about forest management threats to Southern forests, among which are major concerns about the expansion of chip mills in the region and the increasing conversion of forests to intensively managed pine plantations.

The report addresses both public and private lands. It was compiled by the U. S. Forest Service, U. S. Fish and Wildlife Service, Environmental Protection Agency, Tennessee Valley Authority, and Southern states represented by their forestry and wildlife agencies.

States covered in the report are Virginia, North and South Carolina, Kentucky, Tennessee, Georgia, Florida, Alabama, Mississippi, Louisiana, Arkansas, and parts of Texas and Oklahoma.

Comments:

- the report does not adequately assess and recognize the critical difference between a fully functioning natural forest ecosystem and forests in which diversity has been significantly diminished. While it describes some impacted ecosystem functions, it refers to the total forest acreage (both public and private lands) without adequately recognizing the differences between intensively managed lands and those which are managed to maintain and restore all natural components. This tends to present a more optimistic picture in regard to trends in forest cover, since intensively managed lands contain much less biological diversity. Some are biological deserts and would be more appropriately classified as crops, not forests.

- the conclusion that most gains in pine plantation acreage will come from abandoned agricultural fields is not strongly supported. Sadly, we have observed many natural forests in Florida converted to plantation. These areas are rarely prescribed burned, which further diminishes their value to wildlife and biodiversity; most are bedded (uplands and flatwoods); and groundcover is reduced or eliminated.

- the report assumes the essential role of good management of privately held forest lands, with which we concur. It recognizes the role of Best Management Practices on those lands, but places too much reliance on existing application and enforcement of those standards. Further, while

BMPs in Florida are greatly improved over past standards, cutting in wetlands is allowed. Significant wetlands harvesting is occurring in the state, both cypress and bottomlands. BMPs provide guidelines for wetlands harvesting but do not discourage this practice and cannot prevent cutting during periods when these communities are very wet. It must be remembered that BMPs are voluntary guidelines.

- the report recognizes the role of urban sprawl as a major threat to southern forests. We certainly agree that this is a tremendous problem, and results in a number of very undesirable impacts, including the concern that reductions in forest acreage (due to development and infrastructure) lead to even higher levels of intensive management on private forest lands. However, the negative impacts of intensive forest management should not be understated.

- the ecological impacts of the wood industry should be more clearly recognized.

- the report notes the importance of old growth and rare forest communities found on public lands. It states that many of these areas are protected but not all. We strongly feel that the report should emphasize the need for full protection of all old growth and rare forest communities on public lands.

- the conclusion that southern forest are sustainable seems to focus on sustainable wood fiber, rather than ecological sustainability. In addition, the report should provide an analysis of sustainability into sub-regional areas to provide a better sense of areas of concern.

Thank you for the opportunity to offer these comments.

Sincerely,
Judy Hancock
Public Lands
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386/752-5886



"Judy Hancock"
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01/31/02 02:59 PM

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

Hi John, hope all's well with you. I would like to order a hard copy of the above report. Please send to:

Judy Hancock
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P. O. Box 2436
Lake City, Fl 32056

I'm going to submit brief comments for Fl Sierra, based on the Executive Summary, but would like very much to have a print copy of the whole assessment.

I do think that more emphasis needs to be put on the difference between (most) public lands forest management and the highly intensive practices used on most of the private lands. I think this will become even more intensive as time goes on, since we're losing so much land to development and infrastructure.

Best regards,
Judy