

Comments RE Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

On behalf of The Huckleberry Friends, a group of hikers in the north Alabama area that coalesced in 2009 and has been led by the same valiant naturalist since that time, we want to thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

For the purpose of composing our group comments regarding this draft EIS, we have read much of the supporting documentation and find it most commendable that the US Forest Service has undertaken the formidable task of evaluating the historic, current and likely future of the mature and old growth forests under your protection.

We are particularly grateful that the USFS shares our appreciation for the many ways the existence of mature and old growth forests benefit EVERYONE who lives and breathes whether or not they have ever stepped foot on a forest floor.

Given their individual and collective experiences, many members of the Friends' group have an in-depth knowledge of the Bankhead National Forest and the Sipsey Wilderness area which is included within the National Forest boundaries.

Over the years group members have worked closely with USFS officials directly and through the Liaison Committee to help protect the forest, providing an alternative point of view to that of the logging interests which are dominant in this area, and to educate people we encounter about safely and sustainably enjoying the many recreational opportunities to be found within the boundaries of this amazing natural resource.

We understand that the Request for Comments and the DEIS primarily pertains to Old Growth Forest Management; however, because all forests are Future Old Growth Forests, we agree that the NFS goal should be to expand a forest's overall old growth footprint. We also agree that through active management and flexibility at the local level, land managers have the opportunity to promote forest conditions that recruit mature forests into old growth forests. We are concerned, however, that flexibility at the local level in the Alabama forests has been and will be heavily weighted in favor of the interests of the timber industry.

Our comments address our concerns regarding the continued use of controlled burning as a widespread rather than case-by-case method to reduce the amount of combustible fuel used, our concerns about privileging timber harvest, our concerns about the use of herbicides for understory vegetation management, and our concerns about trails that allow forest access for ATV/OHV and horseback riders.

1. We disagree with the practice of controlled burning for vegetation management in the Bankhead National Forest because of its adverse impact on this unique ecosystem.

In many of the national forests, using controlled burning to reduce the amount of fuel present in the forest to prevent wildfires that potentially spread into populated areas and destroy lives and property may be accepted practice, but because every forest is a unique ecosystem, what is responsible stewardship in the management of one forest is very likely to destroy another. Bankhead is one of those cases.

Most importantly, controlled burning in Bankhead is counter-productive to managing the natural environment in Bankhead and should be used on a very limited basis in areas of timber production, limited to ridges only, and restrained from entering areas where sensitive vegetation and landform are found: on slopes and in riparian areas -- if used at all.

The Bankhead Forest terrain is characterized by many narrow ridge tops that descend steeply into narrow valleys, each with numerous streams and waterfalls. Most of these streams flow into the tributaries of the Sipsey River system or into the Warrior River farther south, and both the Sipsey and the Warrior flow into the Tombigbee. As a result, what happens to the ecosystem in the Bankhead has a direct effect on the environmental health of over half of the watershed that carries downstream to the Tensaw Delta area and into Mobile Bay.

The Bankhead area is currently blessed with fairly regular rainfall and moist understory habitats where potential “fuel” rapidly decays to contribute to a rich forest duff. This moist layer of decayed organic matter protects the soil from becoming overly dry during drought periods, nourishes the natural flora, provides habitat for a diverse wildlife population, discourages the potential for wildfire, and prevents erosion of the soil into the streams and rivers. The native trees and understory, if undisturbed, work in unison to ensure that there is no over-competition for moisture and nutrients.

This rich natural environment in Bankhead stands in stark contrast to Bankhead after controlled burning: The native habitat is destroyed because it cannot survive the disruption, and the natural flora is replaced by invasive species such as Chinese privet and honeysuckle which do create the very flammable understory the burning activity is intended to control.

Additionally, and importantly, the populations of many of the native ground birds, ground nesting birds, and other ground dwelling animals have been severely depleted because of the controlled burning, which is scheduled in winter or spring. In the spring, controlled burning disrupts nesting season and gestational cycles, or it occurs before the young are old enough to escape.

Because of the moist layer of decaying organic material, controlled burning in those areas often requires the use of accelerants, resulting in hotter fires which destroy that moist layer and sometimes burn more acreage than intended. The creation of buffer areas, if they are enforced, is insufficient protection because the slopes are so steep.

After the use of controlled burning, with the native understory and protective duff destroyed, erosion downslope causes silting which is threatening the species that live in the streams and rivers. Additionally, when a perennial stream is used as a fire line or is within a burn area, the vegetation in the riparian area can be altered. Riparian vegetation can be fire sensitive, easily consumed, and species’ recovery reluctant. Changes can result in streams open to more sunlight which can encourage invasive species and increase water temperature, changing the entire stream ecology. As a result, controlled burning seriously threatens or destroys the whole natural ecosystem of Bankhead.

To our point, the **Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management in Fulfillment of Section 2(c) of Executive Order No. 14072** contains this statement pertaining to fire exclusion and to “uncharacteristic structures” in mature and old growth forests that historically experienced frequent fires:

Increased vegetation density can also result in increased competition for site moisture and nutrients, resulting in stressed vegetation and the inability of the tree's natural defense to ward off insect attacks and mitigate disease infections. Forest development into *uncharacteristic structure* [italics added] has raised the likelihood of high-severity fire in some forest systems and the incidence of insects and disease.

An “uncharacteristic structure” was created in the Bankhead by the introduction of frequent fires, controlled burns, to areas that historically did not experience frequent fires because of the natural habitat that existed prior to the introduction of the practice of controlled burning.

In Bankhead the native hardwood forests on the ridge tops and upper slopes that were burned created ideal conditions for large “plantations” of loblolly pines which are native to the southeast but that naturally grow in low, flat areas near streams and that have commercial value to the timber industry; as a result, the burns did not reduce wildfire fuel for the protection of life and property; instead, intentionally or unintentionally, controlled burns created opportunities for pine plantations on ridge tops, which are earlier to manage and provide a more profitable timber harvest.

While we understand that the sale of timber in the National Forest is one of the few sources of outside revenue for the National Forest Service, we are concerned that our National Forests are being commoditized.

Even so, we are encouraged by the proposed implementation of the Pinetucky Longleaf Woodland Project in southern Bankhead as its intention is to recreate a historical forest type, provided that the reforestation planting/seeding of hardwoods is not being done to create a new monoculture of white oak intended for future harvest to supply barrel staves to a local cooperage or to produce woodchips to produce pellet fuels. Additionally, the soil composition in the southeastern portion of the forest lends itself to this manmade, managed area. However, there are reservations as the focus of the project, Longleaf pine for timber harvest, requires frequent burning and/or the use of herbicides to control encroaching hardwood, which would otherwise transition the forest to hardwood through natural succession.

In Bankhead, because controlled burning is expensive, both in manpower and equipment, we propose that money budgeted for controlled burning should be more effectively applied to a budget for improved supervision of logging activities and to more closely monitor – and evaluate -- the use of unauthorized trails by horseback riders and ATV riders because these activities often persist, in unauthorized areas, unchecked, an issue addressed in Item 3 (below).

2. We support the More Restrictive (Alt 3) of the Modified Proposed Actions identified in the DEIS as follows: “The land management plans would be exempted or amended as described for the Modified Proposed Action (Alt 2). • The plan components and content as described for the Modified Proposed Action (Alt 2) would apply, but Standard 3 would be updated to: ‘Proactive stewardship in old growth forests shall not result in commercial timber harvest.’”

Current NFS personnel staffing appears to be insufficient to monitor and supervise permitted logging activities to ensure the permits are carried out as intended. If budgets do not permit additional staffing to monitor and supervise logging in the NF, we propose that permits should not be issued.

If timber harvests are permitted, every logging contract should include not only a list of protected trees and shrubs but should specifically identify the trees that are and are not to be harvested. If the specifics of the permits are violated, the consequences should be severe: Fines should be imposed and collected when protected species are intentionally or “inadvertently” harvested; the timber company and its owners/members/employees should suffer the loss of privilege to log in NFS boundaries, as well as suffer the forfeiture of proceeds from the sale of the unpermitted harvest. Those monies should be invested in the appropriate reforestation of the area.

Our support of the More Restrictive Alternate of the Proposed Actions and the need for funding additional personnel stems from our direct experiences in the following two examples.

First, a clerical error that resulted in a hardwood harvest: On April 27, 2010, after parking at the junction of FS 223 and FS 229 to begin a hike in Bankhead National Forest, our group heard chain saws nearby. When the group returned to their vehicles post hike, they observed log hauling trucks loaded with hardwood, parked near the intersection. Group members contacted the local environmental group, Wild South, and the resulting investigation revealed that there had been a “mistake” by the FS personnel who were responsible for permitting. The permit had not been “ground-proofed”; instead, the permit was written from the office, and the person writing the permit indicated he assumed that it was for a pine sale.

Second, a disregard for the forest ecosystem by loggers: On Walston Ridge, in Bankhead, an area was clear cut, and loggers cut the dogwood trees but left them as refuse lying on the ground.

These examples are so much more than an “uh-oh moment” because once areas such as these are lost, they are gone for generations -- assuming they ever really recover.

3. Informed by our observations, shared here, we have similar stewardship concerns regarding the use of herbicides for vegetation control and the use of FS trails for horse riding and ATV activity because of the apparent difficulty of providing adequate monitoring or supervision.

Herbicidal treatment for vegetation management: In the recent past the FS contracted for understory removal in an “effort to curb Chinese privet” invading the area around Brushy Lake, a popular camping and picnic area with extensive nature trails in Bankhead.

Apparently, the workers were not properly prepared to identify the invading privet, or they were inadequately supervised. As a result, they destroyed *Stewartia ovata*, the native camelia, that grew in the area near the trail that leads to Brushy Lake Dam, and they destroyed jewel weed, which had been growing along the lake shore near the picnic area, a native plant that blooms in late summer and fall providing a food source for migrating hummingbirds. Because of this mismanaged use of herbicides, these native plants have been permanently lost to this area.

Additionally, workers applied herbicide to the area around the bird nesting boxes that had been placed in the vegetation near the same picnic area, destroying the cover the birds need for nesting and endangering the health of the birds.

In another example, around five years ago, a birding trail in Bankhead National Forest on Walston Ridge was treated with an herbicide which was improperly applied, killing the vegetation including the trees in a large area. FS personnel explained that the herbicide had not been mixed properly on the second application.

ATV/OHV and horseback riding activity: Off-road vehicles are allowed on designated trails, created specifically for ATVs/OHVs in two National Forests in Alabama, Talladega and Bankhead. As with many national parks in Alabama, Bankhead and its Sipsey Wilderness also have designated trails for use by horse riders, but there is inadequate personnel for monitoring that activity.

Both groups of riders not only cut vegetation that is in their way but also cut new trails with chain saws: We have encountered these trails in the Sipsey Wilderness and along a tributary to Borden Creek. These newly cut trails are often marked with colored plastic ribbons tied to branches five feet off the ground.

An additional issue with horses is that the horse’s considerable weight is concentrated in their hooves which cause significant damage to soft ground and/or streambeds where riders choose to explore off designated trails, and that damage is particularly significant when riders are in a group, following a leader. When the ground is damp, areas where the horses pass resemble areas visited by rooting feral hogs, which the FS is

working to remove because of the damage they cause. But, even when horses are in designated areas, they trample and destroy the plants and chew on trees.

In Bankhead, unfortunately, some ATV riders also have pulled up posts and removed gates or simply go around berms and gates that were put in place to prevent vehicular traffic. Additionally, evidence indicates that when they ride off designated trails, these unauthorized trails cause erosion and destruction to the terrain. These unauthorized trails also appear on the banks of streams and creeks, which is devastating for aquatic life that depends on clear streambeds for egg laying and habitat.

Because of these observations, we propose that designated trails for ATV/OHVs or horseback riding should NOT be permitted in the new plan for Old Growth and Future Old-Growth public forests.

As a group that is intimately familiar with vast swaths of Bankhead, our concerns and proposals stem from our observations as hikers who admire and appreciate the beauty and wonder we have found in our time exploring the ridges and draws of Bankhead and the Sipsey Wilderness, the fragile beauty of its ephemeral spring wild flowers, the stillness in the shade of the hemlocks, the majesty of the Big Tree and other Old Growth, and the sounds of the crystal-clear water that runs in its streams and cascades off its bluffs. We appreciate the opportunity to support a proposal that will promote, preserve, and expand the beauty and majesty of Old Growth Forests and the vision for Potential Old Growth Forests.

Having observed the impact of some of the shortcomings of current practices, we are heartened by the acknowledgement that the old way of managing the forests created missteps that have resulted in significant, irreversible destruction of parts of this extraordinary place and resource.

And, we are buoyed by the recognition that there can be a better way forward for the future of our National Forests, a future that includes but is not limited to Bankhead National Forest.

Respectfully submitted on behalf of the Huckleberry Friends