



SOUTHERN GROUP OF STATE FORESTERS

Wib L. Owen, RF 1094, Executive Director
1109 Woodbrook Way, Garner, NC 27529
wib.owen@southernforests.org
office 919-779-6091, mobile 919-218-7321

November 11, 2015

Mr. Rick Lint
Forest Supervisor
National Forests in South Carolina
4931 Broad River Road
Columbia, SC 29212

Re: Comments on Draft Management Plan and DEIS for the Francis Marion NF Plan Revision

Dear Mr. Lint,

The Southern Group of State Foresters (SGSF) appreciates the opportunity to offer these comments on the development of the Forest Plan for the Francis Marion National Forest. SGSF represents the interests of the State Foresters from across a 13-State area of the southern United States, including the South Carolina Forestry Commission (SCFC). The SGSF mission is to provide leadership in sustaining the economic, environmental, and social benefits of the South's forests, both public and private, and thus we recognize the importance of the forest plan revision process in incorporating the full suite of forest values desired by the public.

We first would like to echo our support for the comments submitted by the SCFC on plan revision, which we have included as an attachment to this letter. As one of our member organizations, the SCFC comments include the on-the-ground expertise relative to the landscapes in question, as well the knowledge of private forest landowner desires and forest products markets in the region to complement our broader recommendations. In addition to supporting SCFC comments, SGSF would also like to take this opportunity to comment more generally on forest management trends across the South and how they relate to this forest planning process.

In light of the Forest Service's Congressional mandate to manage the National Forest System for multiple uses, SGSF believes that a forest-wide planning document should inherently recognize and manage for the full suite of benefits desired by the public. Our National Forests are valued for many things, from wildlife habitat to local job creation, and from recreation opportunities to abundant clean water. All of these aspects of forest management and many more can and should be captured in the forest planning process. When looking at the themes your draft Forest Plan lays out in section 1.6 - *Future Direction of the Forest*, it is clear the forest is keenly aware of the vast array of interconnected services the forest provides. What is only briefly recognized in this section however, is the critical importance of timber harvest and active forest management in maintaining these economic and environmental services.

Across the South, the pace of active management on National Forest System lands has declined over the course of the past 30 years, which can be attributed to many factors from decreases in funding to an abundance of appeals and litigation on timber projects. This decline has had a variety of detrimental impacts on forests and private forestland owners in the South. Fewer harvests, especially reduced small

diameter thinning, as well as a reduction in prescribed burning has made the southern national forests more prone to wildland fire and more susceptible to devastating insect infestations. This has in turn elevated those risks on adjacent state and private lands, as these threats do not recognize ownership boundaries. The reduction in management has also led to a decline in quality wildlife habitat, especially a reduction in early successional habitat. Our southern national forests no longer have the diversity of age classes and densities that adequately support healthy populations of wildlife species. Finally, a reduction in NFS active management across the South has played a role in job losses, mill closures, and decline in economic prosperity in our rural communities. The level of active management needs to increase for all these and other reasons, and the forest planning process is a crucial place to start.

The forest planning process is essentially about setting up a broad framework for designation of what activities would be appropriate on a given landscape, under which subsequent project development can occur. Active forest management is appropriate and necessary on a substantial portion of the National Forest System, including the Francis Marion NF given the goals and themes laid out in this draft Forest Plan. We applaud the USFS for recognizing the challenges facing the forest associated with reducing fire risk, creating and maintaining quality wildlife habitat, promoting forest health, and more, and urge you to remember the essential role that active forest management plays in addressing those challenges as well as supporting local economies.

Thank you for the opportunity to weigh in on Forest Plan revision. We would once again like to emphasize our support for the comments the SCFC has submitted in your process, which provide the necessary specificity to our broadly stated interests in this letter.

Sincerely,



Robert Farris
State Forester, Georgia
Chair, Southern Group of State Foresters

Enclosure



PO Box 21707
Columbia, SC 29221
(p) (803) 896-8800
(f) (803) 798-8097
www.trees.sc.gov

Henry E. (Gene) Kodama, State Forester

11/9/2015

Mr. Rick Lint
Forest Supervisor
National Forests in South Carolina
4931 Broad River Road
Columbia, SC 29212

Dear Rick:

The Francis Marion and Sumter NF's are prominent features in South Carolina and play a significant role in our state's economy, environment, and society. I am sure our citizens appreciate the opportunities that you have provided for all of us to be a part of the planning process.

As you are aware, private landowners own most of the state's forest land and provide around 96% of the wood supply that keeps the forest industry solvent and provides about 90,000 jobs for its citizens. State and federal government also play a significant role in the forestry community by supporting the forestry cycle from land ownership, timber production, and ecosystem services to wood product manufacturing and its many jobs. With that in mind, we suggest that timber production be a more deliberate emphasis in the Francis Marion forest management plan and also on the ground. We are encouraging private landowners to be more active forest managers to ensure forest economic and environmental health and their own financial success, and we as government landowners should do likewise.

Pine timber production is especially important right now in South Carolina because of a dramatically imbalanced pine age class structure that has created a scarcity of small diameter pine. Unfortunately, this condition will worsen before improving. We can help alleviate this problem by planting as many acres as we are able to on our own properties to increase timber production and by producing as much pulpwood as possible over the next 10 to 20 years. We can also ensure the public knows that we are working hard to help address this challenge and to support our share of the jobs in forestry while serving as responsible stewards of the environment. We should also remind them that our forests provide other values like recreational opportunities, wildlife habitat, clean water, and carbon sequestration while providing valuable fiber for our mills and providing employment.

Seeing that timber harvests are now being planned to exceed pre-Hugo levels is good news for the National Forests and for South Carolina. The Francis Marion contains some of the most productive timber growing land in the country, so it can produce significant additional wood volumes on just a portion of the total Forest area through tree planting and active timber management. This national forest also happens to be located in the part of the state with the highest scarcity of small diameter pines. Because of these factors, the Francis Marion National Forest is poised to provide significant relief to this wood supply problem.

Increased timber harvesting on the Forest will not only help support South Carolina's forest industry, but it will also provide other benefits. The South Carolina Forestry Commission and



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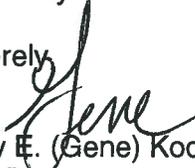
the USDA Forest Service are partners in wildfire prevention and control, so we are keenly aware of the high fire danger that results from over-stocked forests. The work that is planned on the Francis Marion to reduce fuel loadings will help mitigate this risk and is extremely important to citizens who live in this area as well as adjacent landowners.

Timber sales, especially final harvests, help to break up an otherwise homogeneous forest. Additional early successional habitat in a mosaic pattern will be a positive result from harvesting and tree planting and is being promoted as a need by organizations like the Quality Deer Management Association and the National Wild Turkey Federation. This variety of habitat will benefit numerous wildlife species and will increase diversity across the Forest.

Active forest management through timber harvests can help reduce the incidence of forest pest outbreaks as well. Controlling stand density and replacing over mature stands with vigorously growing seedlings are two very effective strategies to help prevent attacks from southern pine beetles and other pathogens. Maintaining the health of stands of trees on the Francis Marion is important not only for the sake of this ownership, but it also helps ensure that pest outbreaks do not begin on the Forest and spread to adjacent private land.

Thank you for the opportunity to provide comments on this plan revision. We look forward to continuing our productive partnership as we serve as leaders in our South Carolina forestry community.

Sincerely,


Henry E. (Gene) Kodama
State Forester

CC: Tom Patton, Deputy State Forester