February 15, 2018

Chief Tony Tooke
USDA Forest Service
1400 Independence Ave. SW
Washington, DC 20250
Via email: ttooke@fs.fed.us

Re: Forest Health Crisis and Need for More Active Forest Management in the South

Chief Tooke,

The Southern Group of State Foresters would like to thank you for the work you’ve begun as Chief, especially on improving the health of our southern forests. My colleagues and I truly appreciate the vision of shared stewardship of our federal lands that you have laid out, which is especially important in our region of the country where federal lands are intermingled with other ownerships and local communities, and where all of us are linked into a common future. I write today to ask for your attention to a number of urgent aspects of that shared stewardship vision for our southern forests.

As you know from your time in the South, our association represents the state forestry directors from 13 states across the South, as well as Puerto Rico and the Virgin Islands. We provide leadership in sustaining the economic, environmental and social benefits of the South's forests, and work to identify and address existing and emerging issues and challenges that are important to southern forests and citizens. We consider our ongoing partnership with the Forest Service (USFS) at the national, regional and state levels to be one of the most important aspects of our work.

A Southern Forest Health Crisis

As I know you are intimately aware, there is an ongoing forest health crisis in our southern forests. This is most readily apparent with Southern Pine Bark Beetle (SPB) outbreaks centered in Mississippi and Alabama. Unfortunately, the challenges with SPB are not unique in our region, as every state faces infestations from both native and invasive pests. Additionally, my colleagues and their Forest Service partners are facing significant forest health threats from Ips beetles, cogongrass, hemlock woolly adelgid, and hardwood pests like emerald ash borer and gypsy moth to name just a few. However, the current case with SPB is the most severe and urgent.

The current outbreak of SPB is primarily impacting the forests in Mississippi, Alabama, and central Georgia, and to a lesser extent Florida, North Carolina, South Carolina and Louisiana. I have attached a recent map of the outbreak for reference. In 2017, over 7,500 infestations or “spots” were detected across the region, affecting greater than 30,000 acres. There are currently over 4,200 separate spots in
Mississippi alone, impacting over 19,000 acres of public, private and industrial forests. With another 300,000 acres of high-risk loblolly and shortleaf pine stands identified by the USFS in Mississippi, and millions of acres similarly at risk across the South, potential impacts may grow by an order of magnitude unless a broad-scale and effective prevention and suppression effort is instituted. While we appreciate an Incident Command Team being organized to lead suppression and restoration efforts in Mississippi, we strongly feel that additional resources (funds, personnel, and expedited procedures) are required to implement comprehensive SPB prevention, suppression and resulting restoration work across the region. Despite the success of the Southern Pine Beetle Prevention Program, which has been responsible for more than 1.2 million acres of treatments on federal, state and private forest lands, there are still a multitude of overstocked stands that haven’t received adequate management. The SPB Prevention Program provides an excellent framework for managing bark beetle outbreaks, but there has been a steady decline in funding for this program over the past 10 years. The recent SPB activity in the South demonstrates the need for additional funding for forest management.

A Need for More Active Management

One thing that is readily apparent from the attached SPB map as well as anecdotal evidence from my colleagues on the ground is that the location of beetle activity is highly correlated with federal land ownership. The aerial flights that detected the beetles in Mississippi crossed the entire state; however, the largest beetle spots were found entirely on National Forest System (NFS) land. For those of us who work in the South, this is unfortunately not a surprise. The pace of management on federal lands has been inadequate, declining over the past 20-30 years for a variety of reasons internal and external to the agency, leading to deteriorating forest health.

The important national dialogue on increasing management on NFS lands has largely focused on the Western US, with the South being lauded for comparatively more active management. It is true that the majority of the acres the USFS has identified to be in need of restoration are located in the West, where the national forests and the communities that surround them would greatly benefit from more management. We also recognize that addressing lack of management on those western lands would have benefits for the South, as reduced fire risk on the landscape would ideally lead to less of the USFS budget being spent on western wildfire suppression and more on other priorities, including those referenced in this letter.

However, there is a significant need and opportunity for active management in the South as well, the pace of which has not been nearly aggressive enough to maintain forest health for the acres and management regimes the USFS initiated decades ago. This lack of management and resulting decline in forest health impacts wildlife habitat, water quality, wildfire risk, and other ecosystem services. In addition, the pace of management, including harvesting, has negatively affected local communities through reduced “25% payments” to counties. With the recent expiration of the Secure Rural Schools authorization, a return to severely deficient county payments has meant reduced community services to those citizens living closest to the forest. The South is in need of dedicated funding and resources to address the current bark beetle outbreaks, as well as a long-term investment in active management to address these ecological and social crises.

Southern Support for USFS Timber Goals

I have been glad to see the importance you have placed as Chief on increasing active timber management, and restoring our unhealthy federal forests. I have been following the discussions in the agency and in
Congress about increasing the agency timber target to 4 billion board feet, and strongly support such a
goal in part due to the need for active management to improve forest health as described above. In
looking across the country at where additional federal investment in the timber program would be most
efficient and would generate the greatest board-foot return on investment, it is clear that the South is the
answer.

According to USFS data, Region 8 was the most efficient timber producer in FY16 ($73/MBF), a 30%
better return on investment than the next closest region (Region 9), and over 60% better return on
investment than any western forest service region. Put quite simply, the most efficient use of taxpayer
dollars to get to a 4 billion board foot goal is in the South, where there is a proven system in place to
increase workload and where most importantly there are forested acres in dire need of management. I
would ask that you highlight these efficiencies in any conversations with Congress or the Office of
Management and Budget (OMB) on the topic of timber targets.

Partnering with States

I have also been glad to see that as Chief you have put an emphasis on shared stewardship and on
collaborating with state and private landowners whose forests, by geographic proximity, are directly
impacted by the health of federal lands. The South is in need of dedicated attention and resources to
tackle unmanaged and unhealthy federal forests, but it is not the agency’s job alone. State Foresters are
ready and willing to support the USFS in every way possible in improving forest health and getting more
active management completed.

While state forestry agencies primarily focus our work on private lands, the level of management of NFS
lands can significantly impact the condition and exposure to risk of adjacent private lands which is a
primary reason for our engagement on this issue. In addition, many state forestry agencies manage state
forests with successful timber production programs. These programs generate revenue for their states,
while still maintaining equivalent if not healthier environmental conditions to National Forests. We
believe that there are lessons that can be learned from our management processes that would be beneficial
to local Forest Service units.

The authorization of Good Neighbor Authority (GNA) in the 2014 Farm Bill has created a space for
unprecedented partnership between State agencies and the USFS on managing federal lands. There are
currently master agreements or project agreements between state forestry agencies and USFS in 8 states
in the South, and in another 3 southern states between state fish and wildlife agencies and USFS. GNA
has allowed state forestry agencies to partner with USFS forests and districts in getting more work done
more efficiently in many different ways. We ask that the national forests in the South, jointly with states,
identify barriers to active management, and proactively seek to use GNA and state partnerships to
overcome those barriers.

Conclusion

Chief, thank you again for the work you are doing leading the USFS, and the trajectory you are setting for
the agency’s policies, programs and services. It is urgently needed for the health of our southern federal
forests, as well as the state and private lands and communities that surround them. I would like to
summarize the three main requests from the Southern State Foresters, as laid out in the above:

- Provide dedicated resources (funds, personnel, and expedited procedures) to address the current
  forest health crisis in the South. Pests like SPB, Ips and others are primed to make a significant
detrimental impact on our forests in 2018, and the agency needs to commit the resources to monitor and address this crisis through comprehensive outbreak suppression efforts and increasing active timber management.

- In conversations with Congress and OMB on increasing the agency timber target and making additional program investments, recognize that the South would provide the greatest “bang for the buck”, and would allow the most additional timber volume and forest health improvement for the least amount of additional taxpayer investment.

- Direct National Forest units in the South to jointly, with state forestry agencies, identify barriers to getting more work done on the ground so that States can assist in timber sale preparation, staffing capacity, and other tasks through Good Neighbor Authority.

I look forward to additional conversation with you and with your regional staff on these issues, and to continuing our strong partnership with the agency going forward.

Sincerely,

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Joe Fox
State Forester, Arkansas
Chair, Southern Group of State Foresters

CC: Ken Arney; Rob Doudrick

Attachments: 2017 Southern Pine Beetle Map