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December 29, 2006
By Email and U.S. Mail

Claire Harper, USDA Forest Service
Cooperative Forestry
Mail Stop Code 1123
1400 Independence Avenue, SW
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Re Comments Regarding Forest Open Space Plan

Dear Ms. Harper:

I represent EcoLogic Partners, Inc. (“EcoLogic”), a non-profit organization that supports family-oriented outdoor recreation. On behalf of EcoLogic, I have reviewed *Cooperating Across Boundaries: Partnerships to Conserve Open Space in Rural America*, which the United States Department of Agriculture and United States Forest Service are using as the base document for an “Open Space Conservation Plan.” My comments on this document, and on the Forest Service’s overall effort to influence development on private lands outside its jurisdiction, are as follows:

At the outset, let me say that I have reviewed the comments submitted by the Stewards of the Sequoia on December 22, 2006. EcoLogic concurs and joins in those comments, and incorporates them by this reference.

When reading *Cooperating Across Boundaries*, one is struck by its inability to support its basic claim, which is that residential development in rural areas of the country is causing significant environmental damage to forests and watersheds. Repeatedly, the document declares that it does not concern itself with the affects of urban development or suburban sprawl; the focus, according to the document, is solely on the “growing trend” of city dwellers to establish homesites on large lots (1 d.u. per 2 to 40 acres) in rural America. However, when it comes to providing evidence of the alleged loss of forest land on rural private parcels, the document relies almost exclusively on studies and data dealing with urban and suburban development, not rural development. This is worse than a scientific *non-sequitur*; it amounts to deception – a kind of bureaucratic bait-and-switch.

One need not look hard for examples of this practice. On page 15, for instance, the document discusses habitat loss in the Southeast and then states: “A comprehensive assessment of southern forests concluded that **urbanization** will have the ‘most direct, immediate and permanent’ effects on southern forests – of all forces of change. (Wear and Greis, Oct 2002).” This raises the obvious question: If urbanization is the “most direct, immediate and permanent” force of change with respect to southern forests, why is the Forest Service spending money to thwart rural homesites? Another example of this disconnect is the bird diversity study conducted by Thompson and Burhans in 2003 in Missouri. (See, p. 24.) That study compared an **urban** open field with a **rural** open field, and determined – not surprisingly – that the urban field supported a narrower range of birds. However, no one is disputing that **urban** development reduces biodiversity. The issue here – as reiterated throughout the document – is whether rural homesites reduce biodiversity. On this question, the Forest Service has no data to support its claims or concerns.

There are a host of other logical flaws in *Cooperating Across Boundaries*. For example, the document makes the non-sensical argument that a 160-acre hay meadow creates less economic drag than a residential development on the same piece of property, citing the increased public service costs associated with the latter use. (See, p. 35) However, the document conveniently forgets that the people who live in the residential development spend thousands of dollars at nearby grocery stores, gas stations, barber shops, restaurants, and other business establishments, and are constantly pumping money into the local economy. Hay doesn’t have that kind of spending clout. So the economic claim is weak and should be abandoned.

The larger problem with *Cooperating Across Boundaries*, however, is that it attempts to “sell” a problem that doesn’t exist. And it does so solely to give the Forest Service a toe-hold in local planning decisions. Even if one were to accept the assertion that more and more people are buying woodlots and other large parcels in rural areas to escape urban life, this fact does not necessarily equate to a significant loss of forest cover or biodiversity, or to degradation of water quality. *Cooperating Across Boundaries* is devoid of data showing that such impacts are taking place.

Indeed, tucked within the document are admissions that, in key areas of the country, forest cover on private parcels has actually increased over the last ten years. For example, on page 11, the document includes the following Forest Service quote regarding forest cover in Virginia: “Two-thirds of the state is in forest cover. The trend is an increasing amount of forest cover. But if we could see property lines out there, we’d see many more forest landowners owning smaller and smaller parcels of land.” This quotation betrays the true intent behind the Forest Service’s interest in privately held rural lands. The issue is not so much the loss of forest cover – because there is no evidence that this is a significant problem – but the number of private person’s who now own rural forest property. This is what the Forest Service doesn’t like – all the property lines. Despite all the window-dressing about the ecology of forests, this entire Forest Service “strategy” has little to do with the environment and almost everything to do with people and property interests.

Claire Harper, USDA Forest Service

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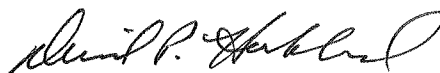
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The Forest Service should acknowledge that its "Open Space" plan is simply a collection of strategies designed to give the Forest Service influence over land use on private parcels *outside* Forest Service jurisdiction. One wonders why the Forest Service, despite purported budget constraints, has elected to spend so much money on an issue that (1) has not blossomed into a substantiated ecological problem, (2) shows no imminent potential for growing into such a problem, and (3) is outside Forest Service jurisdiction. Meanwhile, the millions of acres of forest lands *within* the management realm of the Forest Service are being neglected. Due to inadequate thinning of forests, decadent timber remains *in situ* where it serves as fuel for wildfire. These wildfires, in turn, destroy hundreds of thousands of trees, imperil lives and property, and leave the soil vulnerable to excessive erosion. The environmental damage caused by this one aspect of management neglect eclipses all impacts associated with the development of homesites on large rural lots. Failure by the Forest Service to replant the required number of new trees has only exacerbated this situation.

In short, the Forest Service should take care of the resources currently under its authority. When it has these well in hand, perhaps then it can speak with moral authority on land use matters outside its boundaries. Until that time, however, we suggest that the Forest Service direct its dollars and personnel to the many serious and neglected problems that beset the Nation's *public* forests.

Thank you for this opportunity to comment on this important issue. Should you have any question regarding this letter, please feel free to contact me.

Sincerely,



DAVID P. HUBBARD, ESQ.

cc: EcoLogic Partners Board of Directors
Stewards of the Sequoia