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First name: John

Last name: Brubaker

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country: United States

Email: brubakerj@tds.net

Phone:

Comments:

Marry,

The \$22.5 million figure came from a highly respected local professional who deals w/large land transactions and land earnings for both public and private sectors. He has been involved w/a number of transfers to USDAFS in the recent past. The figure was arrived at trough approximation of value of the 259,625 acre Francis Marion, \$500,000,000 to \$1,000,000,000, based on best comparables. Minimal annual incomes generated by those lands is 6 to 7%. At 75% of the FM being impacted by some degree of forest product mgt., \$22,500,000/yr is what the owner should expect.

My figure for 2014 timber earnings were taken from the Francis Marion & Sumter National Forest FY 14 Fact Sheet Larry sent. My \$426,041.50 figure was arrived at by adding Returns to Berkeloey & Charleston Cos. from that fact sheet. That was my error. The value I should have used is what was realized from either 40.5 MMBF Harvest or 56.9 MMBF. The fact sheet discloses neither which represents actual net proceeds nor what those earnings were. It is not possible to determine or even approximate income from board feet.

My intent is not to make an issue over the figure, though best numbers would be helpful. As I have said earlier, the plan is excellent. There are, though, well established realities and past practices that threaten the Plan's ecological direction. The 3 I'm trying to address here are:

1. Upper level management, i.e., the day to day USDAFS executives who will determine actual practices, are, so far as I am able to determine, all Foresters. Some have noteworthy experience w/more holistic ecological matters, but all are none-the-less foresters.
2. Regardless of the management direction proposed, 70 to 75 % of the land is subject to some degree influence for timber management. Based on history, including the recent Macedonia project, what's billed as longleaf restoration in reality favors loblolly, complete w/chemicals and heavy equipment. Perhaps that comes from no higher level academic forestry program in longleaf. At any rate it will bring more harm than good to the ecological welfare of of the land included.
3. Forest products are important; in their own right and in particular to the economy of SC's agriculture. As much as I value our pre-Columbian natural heritage, I value our productive forests. As practiced today commercial forestry and ecological integrity are incompatible. They cannot occupy the same spot of land. Rather than continue to deny that reality, continue to try to rationalize through phrases like "early successional habitat," this is an opportunity to simply separate the two incompatible practices. I have little hope in the outcome, but must ask that. Whatever land it takes to generate historical income from forest products should be segregated from the main area managed for its ecology, and intensely managed to produce as much value as possible w/o regard to ecological impact. That's the compromise. The Francis Marion is the last of the best that remains here. What we loose entirely or by half measure cannot be recovered later.

I guess this qualifies as part of my official comment. I'm still working on the long version. Again, I thank you and all others who worked with you for this excellent plan. Is that due tomorrow or by midnight Wednesday?

Oh, did you see Jeff Glitzenstein's recent e-mail concerning the plowing-up, extirpation, of 2 of the 3 Witherby

populations of the Federally Endangered *Schwalbia americana*?

John

John A. Brubaker
600 Flatfield Farm Road
Awendaw, SC 29429
(843) 708-8091
brubakerj@tds.net