



File Code: 2400
Route To:

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Subject: Request for Additional Insect and Disease Landscape-Scale Area Designations
To: Chief

In response to your memo of July 10, 2015, Region 9 proposes that additional watersheds on the Mark Twain National Forest (Forest) be designated as insect and disease landscape-scale areas under the provisions of Section 8204 of the Agricultural Act of 2014 (Farm Bill).

With more than 200,000 acres of red oak in the susceptible age classes, red oak decline is a significant problem for the Forest which has worked aggressively within the conventional review process to address this issue by treating 10 to 12,000 acres a year. This schedule only allows a small portion of the oak decline problem on the Forest to be treated. Making progress toward the national strategic objective of fostering a resilient, adaptive ecosystem will require treating many more acres. The Forest has started a collaborative process to address this problem which would allow it to use the expedited EA/EIS process under the Farm Bill to speed up the process. This process uncovered additional high risk stands outside the boundary of the existing Insect and Disease Landscape-Scale Areas. The Forest proposes adding 12 watersheds to the existing designated area to facilitate the development of additional projects.

When one looks at the Forest Health Technology Enterprise Team (FHTET) site, oak decline does not seem to be a problem in the areas being proposed. This is misleading. All but one of the watersheds are on the edge of the Forest and typically, Forest Service lands make up about 20 percent of these watersheds. Oak decline is more of a problem and more visible on Forest Service lands than on non-Forest Service lands; the trees are older and the stands are denser. While the risk of oak decline appears low on a watershed level, it is actually quite high on Forest Service lands within the watershed where the work would be done.

The Forest has had extensive experience with oak decline. Certified silviculturists have been on the ground in stands and in each of the proposed watersheds and verified that oak decline is already a problem. It would seem reasonable to accept these ground-level surveys as strong evidence of oak decline regardless of what the FHTET site shows.

If you have questions, please contact Paul Berrang pberrang@fs.fed.us at (414) 297-3569.

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Enclosure (4)

cc: William Nightingale; Jacob Donnay, Carrie Gilbert, Paul Berrang

