

February 28, 2005

Louisiana Purchase Cypress Legacy
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Dr. Len Bahr
Chair, Advisory Panel
Governor's Coastal Wetland Forest Conservation and Use
Science Working Group

Dear Dr. Bahr:

The Louisiana Purchase Cypress Legacy Campaign offers the following comments on the Science Working Group's draft final report:

Old Growth Cypress

For reasons understandable due to the limited scope of the report, little was mentioned about the presence and value of existing old growth cypress/tupelo in the study area. We suggest that the following comments and proposals be included in the report's recommendations:

1. **Definition** Defining "old-growth cypress" in Louisiana is not easy, but a good starting point would be to include as old-growth any existing cypress/tupelo that were alive before the onset of significant logging in the state. A good benchmark date would be 1803, the date of the Louisiana Purchase. Please see the attached reports that detail a methodological analysis for determining old growth cypress in Louisiana-- Margaret S Devall et al, *Defining Old Growth in the Southeast: Example of Cypress* (1999), and Margaret S. Devall, *An Interim Old-Growth Definition for Cypress-Tupelo Communities in the Southeast* (1998)
2. **Significance:** In the latter referenced report, Devall states that "Old growth is widely acknowledged today as an essential part of managed public forests, particularly on public lands... The ecological significance of old growth and its contribution to biodiversity were apparent to the [National Forest Service's] National Old-Growth Task Group, formed in 1988. At the recommendation of this committee, old growth was officially recognized as a distinct resource by the Forest Service, greatly enhancing its status in forest management planning". In *Defining Old Growth...* Devall et al. state that cores from cypress trees over 400 years of age are being used by the USDA Southern Global Climate Change Program for paleoclimatology... "because annual variation of tree ring widths provide some of best proxy records for reconstruction of past climate."

The historical, aesthetic, and eco-tourism significance of old growth cypress in Louisiana is well stated by Kelby Ouchley, manager of the Black Bayou Lake and D'Arbonne National Wildlife refuges:

“Most cypress today are second growth, but there still remain a few giants among us. They exist because they are hollow and thus not merchantable or because they grow in an area so remote as to make harvest unfeasible. They tower one hundred feet above the earth and laid down their first annular rings during the classical period of the Mayan culture. They germinated and grew into seedlings as Charlemagne was crowned Holy Roman Emperor. They were sound and mature when the sun gleamed from the swords of Hernando DeSoto's men as they marched across northeast Louisiana in a fruitless search for gold. It is possible that their limbs were once laden with the weight of a thousand passenger pigeons and that their bark was probed by ivory billed woodpeckers. Cougars and bears may have sought refuge in their hollows. It is likely too that a few of these will still be greeting each spring with a fresh feathering of needle-like leaves in centuries to come.”

3. Extent and Location of Old Growth Cypress/Tupelo in Coastal Louisiana -- The “few giants among us” described above are actually much more than a “few”, as those who have extensively fished, explored, and done research in Louisiana's wetland forests will acknowledge. When old growth is considered to be 200 years or older, many, many thousands of existing cypress in Louisiana would qualify, according to Louisiana based cypress dendrochronologists. Areas of cypress several hundred years old exist in isolated pockets around the state, but they are plentiful enough to merit attention and conservation. A particularly good example of potentially threatened large old growth is the long strip of forested wetlands west of the West Pearl in the Pearl River watershed. This private land is outside national and state refuge boundaries and contains many examples of large old growth specimens (16+ feet in circumference). Particular sites of note in this area include the Goat Island area (bounded by Porter and Morgans River) Ernest's Slough (above Lock 1) and Gum Bayou (off Davis landing)

Attachment 3 is a preliminary, in progress, selected inventory of old growth cypress in Louisiana conducted by the Cypress Legacy campaign. The approximate age of several of the trees in this inventory have been corroborated by Margaret Devall, cypress dendrochronologist and author of the attached reports.

4. Logging Threats to Old Growth Unfortunately, Old growth cypress and tupelo are subject to the same threat of logging as younger trees. Devall et al. (*Defining Old Growth...*) note that “solid trees 200-400 years old are numerous, but beyond this age many of the trees are hollow.” Hollow or not, the cypress mulch industry likely does not discriminate in the choice for trees to be logged for mulch. The recent logging of large old growth cypress in the Catahoula Lake area (Lasalle Parish), attests to the looming logging threat.

5. Protection and Stewardship of Old Growth Cypress/Tupelo-- The Science Working Group has deservedly put strong emphasis on conservation and stewardship of our coastal forests, and this should particularly include the remaining pockets of old growth in coastal Louisiana, and ideally, throughout the state. The proposed Coastal Wetland Reserve System is a worthy approach.

The Louisiana Purchase Cypress Legacy's Campaign's limited but successful work with private landowners in inventorying and land marking old growth cypress on their property has demonstrated that there is likely an eagerness by many landowners to be good stewards of their old growth trees. (Louisiana Purchase Cypress Legacy plaques have been presented to several property owners throughout the state thus far.)

The Department of Wildlife and Fisheries' Natural Areas Registry Program has been successful in promoting good stewardship by property owners of unique habitat on their property.. This Program has demonstrated a proven, established method of protecting ecologically significant private property habitat, and could be expanded to include identified stands of cypress/tupelo in coastal Louisiana and throughout the state.

Working Group Recommendation 5 (Exec Summary)

Due to the acknowledged ecological fragility of SWG Condition 2 sites, we recommend that any forest management plan should require that successful regeneration/replanting of seedlings (monitored for 2-3(?) years) has occurred **BEFORE** harvesting of trees takes place.

Working Group Recommendation 10-- Mitigation

Off-site mitigation has a generally very poor track record in Louisiana. We recommend that the state follow the Corps of Engineers 404 sequencing requirements regarding permitting and mitigation; specifically that off-site mitigation be considered only after alternative site analysis, and minimizing of on-site impacts (eg reduced logging footprint, assurance of BMP) has been achieved. Legally binding assurances for long term monitoring and management of the area where off site mitigation occurs should be in place before logging begins.

We commend the Science Working Group on a credible and cogent report, and support all recommendations, subject to the revisions proposed above.

Sincerely,
Harvey Stern, Coordinator
Louisiana Purchase Cypress Legacy

