Trager, Matthew D -FS

From: J.T. Copeland <copeland@maxxsouth.net>
Sent: Monday, December 05, 2016 12:54 PM
To: FS-objections-southern-florida
Cc: 'Jason Totoiu'
Subject: Beasley Pond Project Objection Letter

In addition to the objection filed on my behalf by Jason Totoiu and the Center for Biological Diversity, these are my personal comments concerning the impacts of the Beasley Pond Project on the RCWs in the perhaps as many as 36 clusters within the project area.

Thank you for the work on this project; it has been massive as it should be. I appreciate the opportunity to continue to share my concerns as the proposal impacts RCWs. I also appreciate the FS answering many of my questions and sending me information that I needed as I studied this project.

The "primary purpose" stated is "to maintain improve, and restore...." by "thinning longleaf and slash pine stands to allow for further tree growth, restoring remnant wet savannas and controlling overabundant woody plant species". Secondary benefits include "maintaining and growing a stable red-cockaded woodpecker habitat" ...."while maintaining a stable RCW population". I submit that a massive reducing of BA to 50 across the board in pine stands (1,987 acres for "thins" and 696 acres of modified group selection plus across the stand lowering to BA 50) and further reducing BA to 0 to 30 or perhaps 40 in the savanna restoration areas (811 acres) will NOT maintain a stable RCW population. The USFWS BO states (page 16): "***Low-quality foraging habitat and large reductions in available foraging habitat can cause RCWs to abandon clusters, reduce fledging rates, and disrupt social interactions*** (Conner and Rudolph 1991; DeLotelle *et al.* 1995; Jackson and Parris 1995)." (emphasis added) On page 16 of the USFWS BO also states: "Cluster abandonment may also occur as a result of displacement by competing cavity dwellers, or meteorological event such as hurricanes (Conner and O'Halloran 1987)." Both statements acknowledge problems that likely will occur.

Cluster 28.06 does not need BA of 76 in Stand 5 reduced to 50--your proposal will reduce the very trees most valuable to this cluster and their only foraging and cluster area available (1932 longleaf pine). The major part of their partition is wetland. I note there are 2 inactive trees to the north of the active part of the cluster. If the trees around those two inactive trees were preserved, this could possibly be a recruitment cluster. Or is this proposal's intention to limit RCW success and expansion?

Given the density of clusters, the already crowded (reduced size) partitions, and the reduction of BA to 50 hidden in the "modified group selection" cuts, the competition for food and foraging areas will result in a "take" in many areas. Because RCW boundary identification markers (known only to the RCWs) will be massively impacted, the resulting and inevitable fights for foraging territories will decrease RCW survival and production of young. No where in this proposal is this problem addressed.

The lack of fire frequency and incorrect timing of burns through the years have resulted in the present conditions on the savannas To expect to correct years of neglect and/or poor management with a 3-5 year logging entry that mostly impacts RCWs cannot even suggest that RCWs populations will remain stable much less be increasing.

Unfortunately the project seems to suggest a lowering of RCW clusters from the 30 to 32 reported active down to 26 (suggested as the carrying capacity of the compartments in your EIS) would be acceptable. This absolutely cannot be allowed regardless of the logging waivers sanctioned by the USFWS BO.

To anticipate problems with RCW nest cavities being impacted by logging and do nothing to mitigate the problem seems an illogical, head-in-the-sand approach.
By observation of clusters to be impacted to identify the nest cavities which could/would be subjected to "harassment" and simply adding an insert further from the harassing activity might possibly reduce the anticipated loss. That is a small step (perhaps a 45 to 60 minute activity to add an insert) to lessen harassment in a cluster.

I did note the USFWS BO recommended (page 40) further assessments to develop with the RCW Recovery Coordinator recommendations for the guidelines for good quality foraging habitat. I hope that the FS plans to follow that recommendation. And, note that the second recommendation requests that certain stands be removed from the project until the first recommendation has been implemented. I am pleased to see 4 (28.05, 28.17, 28.22, and

27.23) of those 8 stands were removed from the project. I request that the other 4 stands also be protected (25.17, 25.18, 26.24, and 27.34) and removed from the proposal. Except for the removal of 4 stands from the proposal, nothing else recommended was mentioned in the final report. I request those recommendations be followed.

I also request that BA in the 80 to 141 year-old long-leaf pine stands (slated for "modified group selection) not be lowered to 50 but be preserved at closer to 70 BA "across the stand". All the "modified group selection" cuts are sufficient to encourage long-leaf pine regeneration in these older stands without the severe loss of foraging trees that are now available to the Beasley Pond RCW clusters. This would be a very small step to take to allow a future "gradual" reduction after USFWS BO Recommendation 1 has been implemented. A 5 to 10 year evaluation of the successes/failures of the RCW clusters in the Telogia and Kennedy Creek projects (following the timber removal) would be helpful in evaluating the impact of lowering BA to 50.

Thinning in younger pine plantations should reflect consideration for future cluster sites by encouraging some clumping of trees as logging areas are marked
I asked in my initial comment letter that a more individual approach to cluster foraging be adopted. Following minimum MSS standards should not be the criteria utilized by the FS in planning forestry cuts. I still ask that those individual cluster modifications be made.

I ask that your reviewing official be extra cognizant of his responsibility to offer RCWs more than the minimum and be very prepared to allow his biologists and foresters to work with the RCW Recovery Coordinator to develop the best recommendations possible for longleaf pine ecosystems. There is still much to learn about RCW habitat in longleaf pine ecosystems. Being able to study old-growth longleaf pine within RCW habitat offers a unique opportunity for researchers on the ANF. Please take advantage of this opportunity.

Thank you for considering my comments.

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