2 December 2016

Mr. Marcus Beard, District Ranger
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Dear Marcus,

We have reviewed the draft Record of Decision (dated 10-18-2016) on the Beasley Pond Analysis Area for compartments 25, 26, 27, 28, and 29 in the Apalachicola National Forest, and note your response to our concerns (pages 132-134) in the Beasley Pond Analysis Area Final Environmental Impact Statement (EIS) dated 10-18-16. We would like to address your responses to each of our comments.

Pg. 132, 6.a. ***Ground cover disturbance***. We laud your effort to minimize ground cover disturbance in the 16 stands (811 acres) designated for savanna restoration. ANF could distinguish itself as an innovator in ecosystem management by fostering restoration technologies, such as use of low-pressure tracked skidders, as we recommended.

Pg. 132, 6.b. ***Necessity of harvest***. The Beasley Pond ROD identifies some mature longleaf stands as being "overstocked" and state that the "primary purpose of this proposal is to maintain, improve, and restore a healthy forest ecosystem by: thinning both longleaf and slash pine stands to allow for further tree growth…" We note that the FS removed four stands (27.23, 28.5, 28.7, and 28.22) from the proposed action. Yet we stand by our contention that the other stands that we identified as being in the desired future condition (Stands 25.17, 25.18, 26.24, and 27.34 as listed in Appendix B of our comments in April) are not in need of thinning to become healthy. The USFWS also strongly encourages the FS to reconsider the need to harvest in these stands (USFWS Biological Opinion, 9-27-16, pg. 40). These stands already have all the components of a healthy longleaf pine ecosystem: ground cover dominated by grasses and herbaceous vegetation, small gaps filling with natural regeneration, and numerous older trees.

Pg. 132, 6.c. ***RCW foraging guidelines***. Your point is duly noted that if we have a problem with the FWS guidelines, we should take up the point with the FWS, but, as we mentioned, Will McDearman has stated that using 50 BA as a goal for restoration to good RCW foraging habitat is a misinterpretation of the guidelines.

Pg. 133, 6.d. ***Savanna restoration***. The FS proposes to girdle in three plots to serve as a comparison of different overstory removal methods. In order to have the strongest inference from adaptive management, we recommended splitting three plots and applying two methods of restoration in each plot, because splitting the plots would minimize spatial variation. If you decide to proceed as stated in the ROD, we strongly recommend that the FS select three additional stands that are as close to the composition and structure of each of the stands selected for girdling and conduct pre- and post-restoration harvest vegetation sampling in those as well. Also, 27.55 is a natural strand of slash and cypress and should not be included in the restoration effort. Instead of removing naturally occurring

slash pine in this stand, restoration of old, deep fire breaks on the edge of the stand would be a significant improvement.

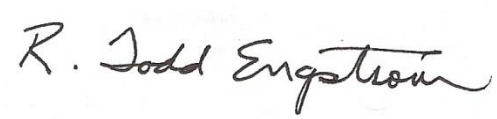
Pg. 133, 6.e. See “Necessity of harvest” and “RCW foraging guidelines” above.

Pg. 134, 6.f. **Conversion from slash to longleaf**. The Friends of ANF support the ANF long-term goal of restoring longleaf to stands that have been planted with slash as stated in the 1999 Management Plan for the National Forests of Florida. We also agree that there is substantial variation in the structure, age, and composition of slash pine stands in ANF and that some stands in wetter areas should likely stay in slash. We would like to work with ANF to come up with a comprehensive plan to restore longleaf pine where appropriate, and, given the wide variation in slash pine plantation current conditions, do so within an adaptive management framework (see below). Thinning is just one step in a long-process. Ground cover management and re-introduction of longleaf are additional critical steps that are poorly understood in wetter soils.

Pg. 134, 6.g. **Adaptive approach to management**. Our point here is that the alternatives proposed, with the exception of the preferred alternative, are not very interesting or viable strategies. They read more like straw men. Given the variation in nature and fact that we should always be in the process of refining and improving management techniques, we feel that a more productive way of framing management alternatives would be to offer different approaches to solve the same management challenges. For example, probably the cheapest restoration technique for many of the management goals would be to simply increase the fire frequency.

We thank you for your consideration and look forward to hearing back from you.

Sincerely,



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