Dear Mr. Totoiu:

This letter is a consolidated response to the objections you and the other objectors submitted to the draft Record of Decision (ROD) for the Beasley Pond project on the Apalachicola National Forest. I have considered the issues raised in all three objections, discussed your concerns with my staff, and reviewed the project’s analysis and documentation. In accordance with Forest Service regulations for administrative review of non-HFRA projects documented in an Environmental Impact Statement (EIS) (36 CFR 218 Subparts A and B), this written response to your objections provides resolution of the issues raised, my rationale for these decisions, and instructions for District Ranger Marcus Beard regarding the actions authorized in the final ROD. An initial review of your objections found that they met the requirements for review (36 CFR 218.10), and an objection resolution meeting was held January 9, 2017 in Tallahassee, Florida to discuss objection issues. I appreciate the additional information and suggestions that you made in that meeting and have carefully considered those discussions. However, only the written objections are subject to my review.

Objection issues

The three objections we received contained many specific points but were generally related to three broad topics:

1. Management of older longleaf stands, particularly the potential for disturbing soil and groundcover vegetation from harvest and disagreement with the proposed thinning to a basal area of 50ft²/ac. The objection letters specifically suggested that no timber harvest be conducted in eight older longleaf stands.

2. Wet savanna restoration, particularly the potential for disturbing soil and groundcover vegetation from timber harvest and uncertainty regarding effects of the proposed activities. The objection letters and discussions included the suggestion that an adaptive management approach would be appropriate for addressing uncertainty.

3. The potential effects of timber harvest on red-cockaded woodpeckers (RCW), including in older longleaf stands and for wet savanna restoration. The objection letters suggested
that reduced timber harvest in older longleaf stands and for wet savanna restoration would minimize effects to RCW. Additionally, one objector suggested providing cavity inserts to mitigate disturbance from harvesting in other stands.

These issues were considered by my staff during project development and analysis, and the uncertainty and potential adverse effects associated with the latter two were among the primary reasons that the analysis was documented in an EIS. As described in the introduction to the FEIS, the Beasley Pond project was developed to implement National Forests in Florida forest plan objectives and management direction related to longleaf pine, rare habitats and rare species.

Resolution of objection

Management of older longleaf stands. The proposed action included timber harvest in several older longleaf pine stands. Comments earlier in the process prompted review of the proposed actions for eight such stands focused on evaluating stand condition and potential consequences of different actions (e.g., no harvest, modified action). Prior to issuing the draft ROD, the team determined it was reasonable to drop proposed activities in four of these (Compartment/Stand 28/5, 28/7, 28/22 and 27/23) due to either their overall good condition or operational constraints. Objectors suggested that the remaining four stands (25/17, 25/18, 26/24 and 27/34) should also be dropped. These stands contain many desirable elements, including larger, older longleaf pine trees, natural longleaf regeneration and multi-aged structure. However, after visiting the stands and reviewing the available stand information, I have determined that thinning these stands is appropriate and aligns the project with forest plan objectives and management direction as described in the FEIS. Furthermore, the proposed actions in stand 27/34 comply with Regional direction for old growth management, which does not prohibit timber harvest or other management that is consistent with forest plan direction.

Direction: In addition to implementation direction in the forest plan and described in the draft ROD, I have determined that the following changes and implementation measures shall be taken to minimize adverse effects of timber harvest in these four stands and other longleaf pine stands in the project.

1. Stands 25/17, 25/18, 26/24 and 27/34 shall be thinned to a minimum of 60ft²/acre of basal area, but may be higher at the discretion of the district forest management staff. Relic and flattop longleaf pines shall be retained, as should some longleaf from all size classes. Harvest in these stands will emphasize removal of non-longleaf pine species.

2. Harvest should focus on slash and loblolly pine while retaining longleaf pine (project-wide).
3. Group selection cuts will be conducted around existing longleaf regeneration (project-wide, where prescribed) following methods described in the forest plan. Protection of relic and flattop longleaf applies to group selection cuts.

*Wet savanna restoration.* The proposed action included timber harvest or girdling in 811 acres of stands identified as historical wet savanna. This habitat is characterized by distinct soils, seasonal but shallow inundation, dense cover of grasses and herbaceous vegetation and less than 10% canopy cover primarily from longleaf pine. As described in the FEIS, most of the areas identified as historical wet savanna currently have tree density far above what is considered to be the natural range of variation for this system due to planting slash pine or encroachment. Objectors described several concerns related to the proposed action, including that timber harvest would cause soil and groundcover vegetation disturbance, that timber harvest would reduce RCW habitat and that removing trees would not accomplish the goal of restoration. Additionally, objectors suggested monitoring effects and developing a formal adaptive management framework for wet savanna restoration.

Based on past, current and desired conditions, I have determined that all of the stands proposed for wet savanna restoration are appropriate for this activity. The FEIS evaluates effects of these activities, including uncertainty and potential undesired effects, and I have considered this in my review.

**Direction:** In addition to implementation direction in the forest plan and described in the draft ROD, I have determined that the following additional measures shall be taken to minimize adverse effects of timber harvest in wet savanna sites and to learn from this project to inform future restoration efforts.

1. Heavy equipment shall make every effort to avoid currently open areas in stands proposed for restoration. Equipment use and log landings shall be limited as much as operationally feasible to areas with higher current tree density and lower quality groundcover.

2. Effects of timber harvest on soil and vegetation will be monitored to evaluate the effects wet savanna restoration. Survey methods will be developed to address monitoring requirements for *Scutellaria floridana* from the USFWS Biological Opinion as well as issues raised by objectors (e.g., wiregrass mortality, rutting, plant species diversity). We will make any data we collect publicly available and welcome any independent monitoring data. A detailed monitoring plan is being developed and will be available when the final ROD is signed.

3. Implementation of the activities will be phased over time, perhaps as much as 10 years after authorization depending on timing of sales and soil conditions that limit heavy equipment use. Stands in Compartment 27 are expected to be sold and harvested first, and vegetation monitoring data from those areas will be considered prior to implementation of the remaining savanna restoration stands. This is not
intended to be a formal adaptive management alternative subject to requirements in 36 CFR 220.5(e)(2) nor a rigorous scientific study, but simply a recognition that changed circumstances or new information from monitoring may merit changes in analysis and actions before implementation of the Beasley Pond project has been completed. The process for considering new information is described in the Forest Service Handbook (FSH 1909.15, Ch. 10, Sect. 18) and the process for supplementing an EIS if necessary is described in CEQ NEPA regulations (40 CFR 1502.9(e)).

**Effects of project implementation on RCW.** Objectors raised several concerns related to potential adverse effects of implementing the proposed activities on RCW. The effects of the proposed activities on RCW were analyzed in accordance with the species’ recovery plan and consultation regarding these effects was completed with the USFWS. I recognize that implementing the Beasley Pond project may adversely affect some RCW by disturbing individuals during breeding season. I also realize that objectors were concerned that habitat modification from timber harvest may adversely affect RCW. However, a detailed analysis of foraging habitat did not show this outcome, and the USFWS Biological Opinion did not identify errors in that analysis. The Apalachicola National Forest has been very successful in balancing management for many rare species and habitats with providing for multiple uses of forest resources, including timber harvest. In many cases, habitat conditions for rare species are improved by timber harvest, and I expect that to be true in much of the Beasley Pond project area. I have determined that no additional changes are required to the proposed action to address concerns related to RCW. Dropping four older longleaf stands and modifying the others to a residual BA of at least 60ft$^2$/acre will provide additional foraging habitat (i.e., 10+in dbh longleaf pine trees) across ~ 423 acres within the foraging partitions of eight RCW clusters. Additionally, the phased implementation of wet savanna restoration should allow the RCW time to adjust to changing foraging habitat conditions.

Both of these changes are within the scope of the original proposed action subject to consultation with USFWS, and neither is related to activities that the Biological Assessment suggested could adversely affect RCW, so no detailed analysis is required for this change. As required by the USFWS BO, RCW will be monitored throughout the Beasley Pond project area to quantify effects of implementation and assure they are within the permitted incidental take.

**Conclusion**

I want to thank you again for taking the time to provide detailed comments at multiple stages of project development and analysis and for meeting with us to discuss your objection. I also want to reiterate that we are committed to working together on our many shared objectives for management of the Apalachicola National Forest, including improving our understanding of how activities proposed in the Beasley Pond project will affect a range of resources.
This letter documents the completion of my objection review process. Once the forest addresses my instructions, District Ranger Marcus Beard will sign a ROD approving implementation of the Beasley Pond project. This project is not subject to further administrative review by the Forest Service or the Department of Agriculture (36 CFR 218.11(b)). If you have questions concerning the processing of your objection, please contact Matthew Trager at (850) 523-8582.

Sincerely,

KELLY RUSSELL
Forest Supervisor, National Forests in Florida

cc: Todd Engstrom, Margaret Copeland, Marcus Beard
• DT 7900 - C2 (will offer replacements of Standard +GIS (C2) desktop or laptop)
• DT 7900 – C3 (will offer replacements of Standard +GIS (C2) desktop or laptop)
• DT 7800 - C3 (will offer replacements of Standard +GIS (C2) desktop or laptop)

Only the primary PCs or laptops for users will be replaced though the TMR process. Any other devices are the responsibility of the unit to replace. Secondary PCs or laptops of these models will be the responsibility for the unit and should be ordered through either the Unit Pay Program (UPP) or Business Need process (BN). UPP is for in-kind replacement of equipment for which the unit will pay. BN is for upgrades of existing equipment and will also be paid for by the unit.

Additionally, the pending upgrade to Windows 10 will affect the timing for replacement of old PCs. The USDA deadline for installation of Windows 10 is November 2018. The computer models in the list above are too old to run Windows 10. There are 14,000 of these old machines across the agency. The CIO is planning to replace 8,000 of these machines in FY17 and FY18. The remaining machines will have to be replaced through UPP or retired.

If your unit has PCs or laptops to purchase you should proceed with orders to meet this deadline, using the Online Tool as soon as possible and before the 3/17/17 cut-off. Each line officer should appoint one Local-Site UPP Coordinator who should complete the ordering process of all devices ordered for the unit. Attached is additional information for choosing a replacement machine. Advanced workstations are also available but are ordered through a different process.

David