

FLORIDA CHAPTER
THE WILDLIFE SOCIETY



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February 9, 1987

U.S.D.A. Forest Service
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Atlanta, GA 30367

Gentlepersons:

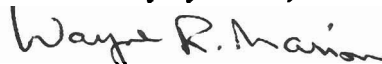
Thank you for the opportunity to contribute to the environmental impact statements that are to address alternative methods of vegetation management on national forests in the South. Issues that the Florida Chapter of The Wildlife Society would like to see addressed, particularly as they relate to national forests in Florida, include:

1. Production of cover, forage, and mast for wildlife species as affected by alternative vegetation management techniques. Different management techniques will have different effects on these important aspects of wildlife habitat and will have different effects on different wildlife species.
2. Conversion of natural plant communities to artificial assemblages of plant species as a result of mechanical control and herbicide treatments. Most Coastal Plain forests and their associated wildlife populations are historically adapted to a regime of periodic fires. How will alternative vegetation control methods alter this natural system?
3. Use of winter burning versus summer burning for vegetation control. Most Coastal Plain forests and associated wildlife populations were historically adapted to a natural cycle of summer burns. How will proposed cycles of vegetation control affect forests and wildlife populations?
4. Effects of mechanical site preparation on threatened and endangered species. Some state and federally listed species such as the flatwoods salamander, eastern Indigo snake, gopher tortoise, sand skink, gopher frog, and short-tailed snake may be directly imported by some methods of mechanical site preparation.

5. Loss of snags, wildlife den trees, and downed logs as a result of vegetation management. These provide important habitat components for many wildlife species. Procedures for preventing their destruction should be addressed with respect to different vegetation management techniques.
6. Effects of understory vegetation management on threatened and endangered species. Method, extent, and timing of understory vegetation control is important in determining habitat suitability for many state and federally listed species such as the gopher tortoise, Florida scrub jay, southeastern kestrel, red-cockaded woodpecker, and Florida black bear.
7. Loss of mast producing hardwoods in pine forests as a result of vegetation control. Mast is a critical food source for many hunted and non-hunted wildlife species. Effects of alternative management techniques and procedures for preserving mast producing hardwoods should be addressed.
8. Effects of site conversion from shrub or hardwood stands to pine plantations as a result of vegetation management. Shrub and hardwood stands are important components of wildlife habitats and forest diversity in forests otherwise managed for yellow pines.
9. Effects of herbicide applications on surface water quality, ground water quality, off-site vegetation, aquatic and terrestrial invertebrates, and aquatic and terrestrial wildlife. The potential for pollution of water supplies, destruction of non-target vegetation, direct and indirect impacts on invertebrates which are important food sources for many wildlife species, and toxicological effects on aquatic and terrestrial wildlife should be addressed.
10. Effects of alternative vegetation management techniques in the context of regional and state-wide diversity. The opportunity exists for national forests to enhance wildlife habitat and forest diversity on a regional or statewide scale by implementing vegetation management techniques, such as summer burning, that are not commonly practiced on private forest lands.

Impacts of vegetation management on wildlife populations and habitat quality are important considerations in multiple-use management of our national forests. We look forward to a detailed discussion of these issues in the environmental impact statements.

Sincerely yours,



Wayne R. Marion
President

cc: Executive Board