

FLORIDA CHAPTER
THE WILDLIFE SOCIETY



1805 NW 39th Terrace
Gainesville, FL 32605
March 24, 1986

Mr. Don Percival
Forest Supervisor
U. S. Forest Service
227 North Bronough Street Suite 4061
Tallahassee, FL 32301

Dear Mr. Percival:

The Florida Chapter of The Wildlife Society was generally pleased with the revisions that have been made to the Final Environmental Impact Statement (EIS) and National Forests in Florida Land and Resource Management Plan (LRMP). The tabulated data were very much improved.

Our comments on the earlier drafts of these documents were primarily concerned with the maintenance and improvement of wildlife habitat diversity in the National Forests. Again, we are very pleased with the revisions that have been included in the latest LRMP. We think that there is room for even more wildlife habitat improvement, without significantly affecting the other multiple-use management practices. We would like to see the following modifications incorporated.

- 1) Complete removal of longleaf pines should not be a management practice in Management Area 6, because pines increase the diversity and niche breadth in these areas.
- 2) Include management guidelines for snags and live perch trees in Management Areas 1, 2, 5, 6, 11, 12, and 15. These trees should not have to be removed unless they are a definite safety hazard or interfere with a specific research project. Guidelines for protection of mast tree and shrub inclusions also should be included in these 7 management areas.
- 3) The use of the term "yellow pine" is still unsettling to us, particularly in Figure 4-30, pages IV-85 thru IV-90, IV-115, and IV-120. For purposes of wildlife habitat monitoring and improvement, these areas should be categorized into a) slash pine, b) longleaf pine, c) loblolly pine, and d) mixed stands based on the dominant (in terms of density) tree species.

4) We think there should be a reduction in the acreage that is to be clearcut in some of the Range and Timber Management Prescriptions so that a more equitable distribution of clearcut and shelterwood pine sites will be achieved. Under the current revised plan there is 9 times as much "yellow pine" acreage generated by clearcut than by shelterwood in the Range (ME-5) and Timber (ME-6) Management Prescriptions (Table 1).

We recommend that the rotation 70-90 and 80-100 management prescriptions that are to be regenerated by clearcut (i.e., E6I19, E6I20, E6I21, E7I24, and E7I26) should be regenerated by shelterwood. This would reduce the total pine acreage clearcut from 379,030 to 331,582 and increase the total pine acreage in shelterwood from 42,000 to 89,448. There would still be 3.7 times as much pine acreage regenerated by clearcut as by shelterwood.

"Shelterwood" must be defined in the glossary of terms as to how it will be applied in Florida. "Shelterwood" is currently not in the glossary of terms.

There are two major arguments from our viewpoint for increasing the acreage of shelterwood regeneration:

a) It will increase wildlife habitat diversity.

b) Clearcutting will not "enhance the habitat of the Red-cockaded woodpecker" as the plan states on page IV-90. Clearcutting will eliminate the habitat of the Red-cockaded woodpecker!

Also, the point we made earlier about "yellow pine" needs to be addressed with regard to the Range and Timber Management Prescriptions, both clearcut and shelterwood. The yellow pine prescriptions in Figure 4-30 of the LRMP and in the accompanying text need to be broken down into acreages of slash pine, longleaf pine, and loblolly pine (and mixed stands if necessary).

We would like to see this statement added to the Standards and Guidelines under Management Areas 7 and 8:

When yellow pine sites regenerated by the shelterwood method become suitable as nesting habitat for Red-cockaded woodpeckers, transfer those areas to Management Area 5.

Attempts should be made, where possible, to evenly distribute the shelterwood prescriptions across the Management Districts. Shelterwood cuts should not be restricted to areas of high visibility (i.e., roadways) as is implied in EIS page III-23.

5) This point is similar to the last, but involves the bottomland hardwood prescriptions (E7I20 and E7I21) in the Timber Management Area.

Mr. Don Percival
March 24, 1986
Page 3

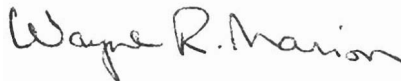
Any animal and plant communities that will have become established in these hardwood forests will be obliterated when the sites are clearcut. Preferred habitat for the pileated woodpecker, one of the 10 indicator species, will be eliminated by clearcutting.

What is the total acreage of bottomland hardwood forest in the National Forests in Florida? Are the 20,477 acres in the bottomland hardwood prescription, 5%, 50% or 95% of all the bottomland forests? Because of the limited availability of the bottomland forest type, we think that none of the 20,477 acres should be clearcut. If cut at all, it should be regenerated with a shelterwood method, such as a strip-shelterwood method (Smith 1962).

Guidelines for snags and live perch trees should be implemented in all bottomland hardwood prescriptions, both shelterwood and clearcut.

6) Please include an Appendix that describes the alternative for Red-cock aded woodpeckers management by the Florida Forestry Association (referred to in EIS page I-18), particularly if this plan is to be used.

Sincerely,



Wayne R. Marion
President

Table 1. Acres of yellow pine in the Range and Timber Management Prescriptions derived from Figure 4-30 and pages IV-86 through IV-87 of the LRMP.

<u>Intensity Number</u>		<u>Acres in Regeneration Method</u>	
<u>Range</u>	<u>Timber</u>	<u>Shelterwood</u>	<u>Clearcut</u>
2 and 11	3	34,599	
	7	3,201	
	23	4,200	
3 and 12	5		232,957
4 and 13	8		62,487
5	9		36,138
19 and 21	24		36,315
	20	26	11,133
Total Acres		42,000	379,030

Literature Cited

Smith, D. M. 1962. The practice of silviculture. John Wiley & Sons,
New York. 578pp.