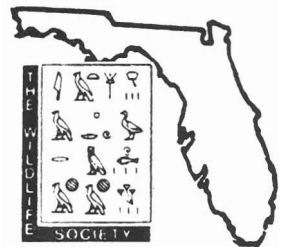


FLORIDA CHAPTER
THE WILDLIFE SOCIETY



1807 NW 39th Terrace
Gainesville, Fl. 32605
January 5, 1987

Mr. Joe White
Refuge Manager
St. Marks National Wildlife Refuge
P.O. Box 68
St. Marks, Fl. 32355

Dear Mr. White:

I understand that the forestry-related wildlife management practices on the St. Marks National Wildlife Refuge have once again become at least locally controversial. The practice currently in question is the commercial thinning of coastal pine stands as part of a bald eagle management plan.

The Florida Chapter of The Wildlife Society is the professional organization of wildlife biologists in Florida. We were involved in the initial controversy over forest management on the Refuge in 1977 and have been favorably impressed by the quality of work that went into the development of subsequent wildlife management plans. We also were impressed by the extent to which you used public input and kept interested citizens and organizations involved in the development of these plans. It seems that the current issue is relatively minor compared with past problems and, hopefully, can be resolved with the same type of public involvement as occurred in the development of the overall plan.

Criticisms of the current thinning program seem to fall into the following categories:


1. The need for specific eagle nesting habitat enhancement actions is unclear, beyond preservation of relatively mature trees in existing stands.
2. Efficacy of thinning as a technique for increasing the probability of eagle use is questionable.

3. Potentially harmful effects on remaining pines of removing surrounding vegetation remain unclear. How well, for instance, did recently thinned sites fare in the 1985 hurricanes?
4. The degree of soil and drainage disturbance that results from commercial operations may be unacceptable within those parts of the Refuge adjacent to creeks and bays.

We have not been able to investigate these criticisms but we do feel that the questions raised deserve consideration. We are keenly aware of the problems involved in slowing down management activities whenever they are questioned by the public. In those situations where the responsible biologists recommend a course of action they feel is urgently needed, such as in the 1982 Everglades deer issues, we would not recommend a possibly disastrous delay simply to gather more input. In this instance, however, the management action in question is not urgently and immediately needed and delaying its implementation would have little adverse biological impact and might allow for a more finely tuned management strategy. We therefore request that you suspend existing and proposed commercial thinning in the coastal buffer zones for one year to provide time for resolving remaining problems.

Please call me (904) 392-5420 or Brad Hartman (904) 488-6661 if we may assist you in this process.

Sincerely yours,



Wayne R. Marion
President

cc: Executive Board



United States Department of the Interior

FISH AND WILDLIFE SERVICE

St. Marks National Wildlife Refuge

P. O. Box 68

St. Marks, FL 32355-0068

January 21, 1987

Mr. Wayne R. Marion
Florida Chapter of The Wildlife Society
1807 N.W. 39th Terrace
Gainesville, Florida 32605

Dear Wayne:

In reference to your 1/5/87 letter concerning forest management issues at St. Marks National Wildlife Refuge, let me first say it's always good to hear from you, but I must admit that the subject is not one of my favorites at this time.

Please allow me to be just a tad lazy and close your information loop by providing you some copies of fairly recent pertinent correspondence on the subject. This will save me considerable writing and probably serve your needs just as well. In addition, I am also providing you with an information sheet and copies of some recent amendments and guidelines to the Forest Management Plan.

As you probably know, Mr. Jack Rudloe of Panacea, Florida, is the source of all of St. Marks National Wildlife Refuge's forest management complaints. Jack has a corps of supporters who speak for him but be assured that Jack is the organizer and prime mover for all forest management complaints. Jack has left a couple of meetings at the refuge within the last two years "promising trouble" if his recommendations or demands on annual work plan issues were not met. They were not met and he apparently has. Jack may not have personally brought this current problem to your attention, but it is his doing. If necessary, Brad can confirm this for you. Insofar as St. Marks NWR and forest management and Jack is concerned, if the issue was not eagle corridor thinning it would be something else. Jack holds extreme views with respect to many issues including forest management on St. Marks. I, St. Marks NWR, and the U. S. Fish and Wildlife Service have not been able to respond favorably everytime Jack tries to raise the ante, consequently, I have spent a disproportionate share of my time over the past several years addressing Jack's concerns. The simple fact is that nothing short of getting out of active forest management, or giving Jack a voice in the management of the forest management program, or giving Jack veto power over forest management plans and recommendations will bring an end to these convulsions. I have neither the authority nor inclination to grant any of these options.

If all the facts are known, I think any prudent person or organization will agree that the U.S.F.W.S. and St. Marks National Wildlife Refuge has gone well beyond that which is reasonably expected of a public entity in providing the interested public access and input into one of the functions of a natural resource agency. Even though the programs of a National Wildlife Refuge are national in scope, it would be very difficult to find another national program that is so closely attuned to the mood of the local environmental concerns as the forest management program at St. Marks. This fact has a way of getting lost in all the negative publicity concerning St. Marks and forest management.

You do of course recall that the Florida Chapter of the Wildlife Society, along with numerous other environmental organizations and individuals, was involved in the review and development of the current Forest Management Plan at St. Marks. This plan was developed in 1977, 78, 79, approved, and implemented in 1980. What you may not know though is that several fine tuning amendments were approved and implemented in 1985. I did communicate with Dr. Larry Harris about these amendments. A couple of these amendments dealt with the eagle corridor and were specifically developed to address some of the currently expressed concerns. As previously noted, these amendments are attached for your information. After looking at and digesting these amendments, I think you will be impressed and will agree that they will make a significant difference in the kind of forest St. Marks NWR will eventually support.

Amendment #3 deals specifically with the eagle corridor and was developed even before this thinning flap developed. This specific amendment grew out of concerns voiced by the refuge staff at the tail end of the forest management planning period about 1979. We just did not have the time or opportunity to follow through and address that concern at that time, but we put it on the agenda to consider later and at a time when the emotional atmosphere had settled down. We eventually did just that, yet those who are now attempting to make this a major issue would pretend, and would have others pretend, that amendment #3 (and the thought process which went into eagle corridor management) never happened. The fact is though, that while we were unable to satisfy 100% of the concerns of those who hold extreme views, we did satisfy those professional concerns which balanced the need to perform some manipulative management in that corridor and protecting the more sensitive hydric areas.

As a matter of fact, this may be a good place to say something about all of these amendments. I place high value on good faith and go to extremes to maintain credibility by acting in good faith. These nine fine tuning amendments, in addition to being appropriate management actions for the resource, are acts of good faith. Almost all of these amendments have their roots in comments and recommendations made by the public in the final review of the draft Forest Management Plan and comments made by the public at the final public hearing. With all the internal pressure, we simply did not have time to address those concerns at that time, but at a quieter time some

four years later we did. We had an approved Forest Management Plan and we did not have to make these amendments but we said we would, and we did. As one who works at good faith, I am sensitive to and expect good faith in return. If I seem a little testy about this issue, it's probably because I don't have a good feeling about good faith being returned, particularly in view of all that went into the development of the Forest Management Plan, that went into those rather significant amendments, and the fairly constant stream of negative publicity and pressures being applied for alterations to annual work plans by those holding extreme views.

Your letter requested that St. Marks suspend thinning operations in the eagle corridor until this issue is resolved. Please recall that this is exactly what St. Marks did in 1977, 78, and 79. All forest management functions, except prescribed burning, were suspended during those years while the refuge staff developed the Forest Management Plan, which as you may recall, was done with monthly and bi-monthly meetings with local environmental groups for their continuous review and input. The final plan, which was virtually developed by committee contained thinning as a desirable management action, including thinning in the old growth corridor we call the eagle corridor. This plan is the one we operate under now and have been operating under since its approval in 1980. Annual work plans are annually developed under this approved general plan. This 100-year plan has built in reviews every ten years and this one comes up for review (and revision if desirable) in 1990. With all that went into the development of the current plan, the development of the amendments, the nearness of the next review period, and the good faith thing, I am not inclined to pause at this time and re-re-review an issue which was settled to everyone's satisfaction, except Jack's.

Me and/or mine stand ready to personally update you and/or yours on any or all of the forest management program. **This includes as much time as you may feel comfortable with on one or more field trips.** If I can't do it myself, I will make Joe Reinman, our uplands biologist, available. Joe, by the way, is an active member of the Florida Chapter and a University of Florida graduate, so you have an insider if you choose to use him.

Before I close this out, let me briefly comment on the four categories you mentioned in your letter. In reading through some of the copies provided to you I think you will find at least general answers to the first two points. Insofar as damage to the trees that remain on site after a thinning, relieving root and crown competition to favor and release the remaining trees is in part what this thinning is all about. As much as some would like to stretch the point, there is no discernible difference between hurricane damage (2 in 1985) to thinned and unthinned areas. **A few trees went down and/or were killed in both type sites but not in any significant numbers. Considered in the whole, these down and/or dead trees add desirable deadwood niches to these stands and we do not mourn their loss.**

Amendment #9 was enacted specifically to address soil and drainage disturbance. The thinning that was retained in the mesic portions of those corridors is all conducted in accordance with Silviculture Best Management Practice Manual, which are guidelines developed by the Florida Division of Forestry,

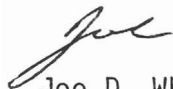
Department of Environmental Regulations, U. F. School of Forest Resources and Conservation, U.S.D.A. Forest Service and Soil Conservation Service, Florida Forestry Association, Florida Association of Consulting Foresters, and Florida's Forest Industry. This manual was developed by those entities in support of Section 208 of the Federal Water Pollution Control Act Amendments (P. L. 92-500) and St. Marks is bound by this guidance in all forest management activities, including streamside management. Back in 1985 when this thinning flap started, complaints were filed with D. E. R., D. N. R., and the Northwest Florida Water Management District by opponents. All of these agencies investigated, including a field trip by N. W. Florida Water Management District to a thinned area, and no violations of State statutes were found. I was comfortable at that time with respect to protecting State water resources and that good feeling has not changed.

After all that has been said, if you still feel the need to assure yourself of appropriateness of the refuge's actions with respect to bald eagle management, ask yourself the same set of general questions which follows and see if you come up with similar answers, realizing of course that this is a very general exercise and a world of detail has been left out of both the questions and my answers. (1) Is the natural and historical nesting habitat of the Southern bald eagle along streams, shorelines of lakes and ponds, and at the marsh/timberline interface? Yes. (2) Does the Southern bald eagle prefer old growth heavy crowned pine and cypress trees as nest trees? Yes. (3) In view of the fact that almost all forested habitat on St. Marks, including marsh/timberline interface, is relatively young (50-60 years) because almost all forested habitat was logged over prior to Federal acquisition, would removal by thinning of some of the trees in this eagle corridor release the remaining trees and make for more rapid development of crowns and trunks? Yes. This is a silvacultural fact, if these younger trees have not already stagnated because of prolonged root and crown competition. (4) Would such a management action and positive habitat reaction make for quicker and more attractive eagle nesting habitat? Yes, certainly quicker. (5) Would the bald eagle population respond favorably? Unknown for sure, but we can only speculate that an expanding eagle nesting population, which St. Marks is, will need expansion room over the next several decades and when they do the habitat will be there. (6) Are there other wildlife benefits which would accrue to eagle corridor thinning? Yes. It was planned that multiple wildlife benefits should accrue to any one management action. In view of the fact that the majority of wildlife species at St. Marks are more dependent upon the understory than the overstory for life requirements, general forestland thinning is also conducted to remove excess trees, to open the crown canopy, to allow more light penetration to the forest floor for a lusher and healthier understory. This same principle applies to the old growth corridor we refer to as the eagle corridor. (7) What is the overall habitat effect we are trying to achieve in the eagle corridor? Management actions are seeking a pine dominated old growth condition with large trunked/heavy crown pines with a moderate understory of native plant species. (8) Would not nature eventually produce such a condition if left alone? Yes, eventually given time and a totally natural fire regime. However, artificial thinnings can do the job decades sooner than waiting

for natural thinnings. Also, socioeconomic factors now prohibit a totally natural fire regime. (9) Should the U.S.F.W.S. be engaged in this type of short range and long range management? Yes. As interpreted by those professionals who have been given the charge and responsibility to make such determinations, the Service is mandated to not just preserve and protect habitat, but to enhance it as well. This means making decisions and accepting trade-offs that often times do not measure up to the expectations of those with extreme views, at both ends of the spectrum.

Despite all the shortcuts, I'm tired of writing and you're probably tired of reading so let's cut it off here. I hope I have been able to at least in part close some of the information loop. If I can be of further assistance to you or any of the Tallahassee members, please let me know.

Yours truly,



Joe D. White
Refuge Manager