

Wednesday, March 16, 2022

Sent via email: comments-southern-ozark-stfrancis@usda.gov Re: Forest Plan Amendment for Appendix F

Attn: Lori Wood, Forest Supervisor
and
Janine Book, Forest Environmental Coordinator
605 W. Main St.
Russellville, AR 72801

Written comments are made in response to *USDA, Forest Service, Ozark-St. Francis National Forest Plan, (Forest Plan) Amendment to Vegetation Management Practices (Appendix F), Draft EA Review and Comment dated March 4, 2022.*

USDA, SOPA, Ozark-St. Francis National Forests, 01-01-2022 to 03-31-2022, planning and decision dates conflict with USDA, FS, letter dated March 4, 2022. Comments fall outside of the SOPA's written comment period beginning 01/2022. In the event of a decision to disregard written comments, due to timeliness per the SOPA, I reserve the right to file an objection pursuant to 36 CFR 218 & 219.¹

1. Draft EA, Amendment to Appendix F, **(Draft EA)** Purposed and Need for a Plan Amendment, pg. 1, states *"The naming convention and descriptions for the prescriptions in Appendix F, pages F3 thru F10, are confusing and need to be reviewed and corrected..."* I am in complete agreement with this statement.
2. Draft EA, Table 1, pg. 4, removes Prescription 102 - *Old Growth*; which would effectively remove old-growth prescription 102 from Forest Plan Table F-1.
3. Draft EA, pg. 9, *allocates all 3.F.*, Old-Growth Management Areas to the Forest Plan; which effectively places all old-growth stands under the Forest Plan, Crowley's Ridge Upland Hardwood, Management Area 3.G.
4. Draft EA, Table 2, Prescription 102, pg. 12, *removes old-growth* from Appendix F and allocates all Old-Growth 102 Prescriptions to the Forest Plan, Crowley's Ridge Upland Hardwood, Management Area 3.G.
5. Draft EA, removal of Prescription 102 and the allocating of all old-growth management to the Forest Plan 3.G. Management Area would also result in the removal of Management Area 3.F., from Forest Plan, Table F-1 and Table G-1.

Comment 1: *Do not remove*, Prescription 102 – Old-Growth from Draft EA, Table 1.

Comment 2: Forest Plan, Management Area 3.G., pgs. 2-67 and 3-36, details the prescription for Crowley's Ridge Upland Hardwood – St. Francis NF *not Old-Growth Areas*. Correct Draft EA to read Management Area 3.F Old-Growth Areas, pgs. 2-66 and 3-36.

Comment 3: Draft EA, Table 2, Prescription 102, Current Prescription Condition. Modify current condition prescriptions to promote old-growth that more closely mimics forest compositions detailed in *Table 1, pg. 45, Old-Growth Wooded Pasture in the Ozarks.*²

Comment 4: Draft EA, Table 2, Prescription 102, Rationale for Proposed Change. Modify rationale to emphasize returning old-growth to pre-19th century settlement conditions see *Defining Old-Growth: Implications for Management.*³

¹ Email thread, 03/14/2022 08:27am, from, Janine.book@usda.gov, to [REDACTED], Re: FS Draft EA and Appendix F Amendment Update.

² Jurney, David H.; Stahle, David W. 2004. Old-growth Wooded Pasture in the Ozarks. Gen. Tech. Rep. SRS-73. Asheville, NC: U.S. Department of Agriculture, Forest Service, Southern Research Station. pp. 42-52.

³ White, David L.; Lloyd, F. Thomas. 1994. Defining Old Growth: Implications for Management. Paper presented at the Eighth Biennial Southern Silvicultural Research Conference, Auburn, AL, Nov. 1-3, 1994.

Comment 5: Old-Growth means old. It means allowing native species to achieve, over time, a natural balance; that existed prior to settlement by man. It does not mean applying a 3-phased wood products silviculture prescription to old-growth stands, nor does it mean establishing a maximum stand age of 130 to 200 years.

Comment 6: Forest Plan, Management Area 3.F, Old-Growth, pg. 2-66, states “*This management area is not intended to encompass all old growth forest conditions on the OSFNFs.*” Which old-growth forest conditions are not covered by 3.F? How is/was this decision reached? Have these excluded old-growth conditions been identified and mapped?

Comment 7: Forest Plan, Table F-1, Management Area 3.F. Old-Growth, ***eliminate prescription 100 from Site Index 80 and Above.***

Comment 8: Forest Plan, on pg. 1-23, states “*Old growth conditions are concentrated within management areas with low emphasis on active vegetation management...*” Forest Plan’s statement is inconsistent with prescription 100. Once an old-growth stand is cut, it’s no longer old-growth.

Comment 9: Forest Plan, Table 2-12, Management Area 3.F. Change ‘*Timber Suitability*’ to ‘*When Justified*’ **and** change ‘*Mineral Leases*’ to ‘*No Surface Occupancy*’. Existing leases allowed to expire.

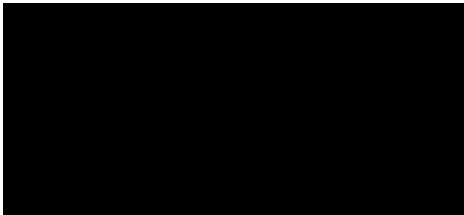
Comment 10: Old-growth management prescriptions to *prioritize* the eradication of invasive species.⁴

Comments address both the Forest Plan and the Draft EA. Since the old-growth prescriptions in both documents are inter-related. Comments directed at both are appropriate and reasonable within the scope of the environmental assessment’s written comment period.

The Forest Plan and an updated Appendix F, can work in concert to both strengthen and protect Ozark-St. Francis National Forests old-growth stands; enhancing the natural beauty of the Natural State.

Sincerely,

David E. Brown



⁴ Federal Land Policy and Management Act of 1976, as amended and the Federal Noxious Weed Act of 1975, as amended.