

Wednesday, September 28, 2022

Sent via Email: [objections-southern-regional-office@usda.gov](mailto:objections-southern-regional-office@usda.gov)

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**Subject:** Ozark-St. Francis National Forests Appendix F Plan Amendment

The written objection contacts office and subject lines provided in USDA letter, August 30, 2022, File Code 1950 & 1920, page 2 of 3, and USDA Draft Decision Notice and FONSI Plan Amendment, page 8 of 11 are different. These differences were taken into account when preparing this objection.

**Reference:** D. Brown, Comment Letter, dated Wednesday, April 6, 2022, Re: Ozark Vegetation Management Project 61695.

**Reference:** USDA, Forest Service, July 2022, Plan Amendment, Update to the Vegetation Management Practices Described in Appendix F of the 2005 Revised Land and Resource Management Plan, Environmental Assessment, Ozark-St. Francis National Forests, Arkansas (**Appendix F Plan Amendment**).

**Objection 1:** Purposed and Need for Appendix F Plan Amendment, pg. 2, 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’m in complete agreement with this statement. However, substituting the term “prescriptions” with “vegetation treatments” does **nothing** to alleviate Appendix F’s confused bureaucratic cross-referencing. As way of example read the explanation given on pages 10 and 11 of the Final EA, Changes to Appendix F including Tables F1 and F2.

**Observation 2:** Old-Growth, it means allowing native species to achieve, over time, a natural balance; that existed prior to settlement by the European. 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 180+ years.

**Observation 3:** Appendix F Plan Amendment, Table 2, Prescription 102 (page 15) Old Growth gives no clear reference justifying an old growth age range of 130 to 180+ years. The USDA FS stretches credibility when it proposes to manage old growth conditions while allowing multiple harvests. Including the removal of all overstory within the first 80 years.

**Observation 4:** Recommend the modification of Appendix F Plan Amendment, Table 2, Prescription 102 (page 15) Old Growth prescription to promote old-growth that more closely mimics forest compositions detailed in *Table 1, pg. 45, Old-Growth Wooded Pasture in the Ozarks*.<sup>1</sup>



**Observation 5:** Recommend the modification of Appendix F Plan Amendment, Table 2, Prescription 102 (page 15) Old Growth prescription rationale to emphasis returning old-growth to pre-19<sup>th</sup> century settlement conditions see *Defining Old-Growth: Implications for Management*.<sup>2</sup>

**Observation 6:** Appendix F Plan Amendment, Table F2, Vegetation Treatment Parameters by Community, (pages A-4 thru A-6). It is obvious by the organization of Table F2 that Old Growth is not managed as a community of 130 to 180+ years old vegetation but small individual disassociated clusters of trees. Such an approach dilutes the unique distinction that is an Old Growth stand. Ultimately, the distinct nature of Old Growth will be lost and will eventually merge with the dominant community type. Old Growth will become no different than bottomland forest, loess slope forest, riparian forest, mesic hardwood forest, dry-mesic oak forest, shortleaf pine-oak forest, or dry oak forest.

Sincerely,

*David Brown*

David Brown (*Lead Objector*)



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<sup>1</sup> 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.

<sup>2</sup> 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.