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First name: Todd
Last name: Engstrom
Organization:
Title:
Comments: 29 April 2024

Birk Roseman
District Ranger
57 Taff Drive
Crawfordville, FL 32327

Dear Birk,

The Friends of the Apalachicola National Forest strongly support restoration of ephemeral wetlands and adjacent uplands that provide known and potential breeding ponds and habitat for the federally listed frosted flatwoods salamander, striped newt, and other animals (e.g., crayfish) described in your letter of 19 March 2024. We recognize that many of the target ponds have degraded far past the point of being able to support imperiled amphibian populations. Some of us have visited the wetlands that have already been restored using the techniques identified in the Full Proposed Action # 1 (i.e., light mechanical equipment treatment) and been impressed by the improvement in habitat structure.

We note that heavy mechanical techniques (Full Proposed Action #2) have been used on Eglin AFB and Escribano Pt WMA for flatwoods salamander wetland restoration have produced good results. In these efforts, machinery has only been deployed when soils are relatively dry (focal sites monitored using piezometers). The pond basins are scraped back down to mineral soil and most organic material (peat and tree trunks) are removed from the basin. Herbicide use is strictly controlled with volume/acreage limits and only applied to stumps within minutes of cutting.

As you develop the plan to restore ephemeral wetlands in ANF, we recommend the following:

*Take special restoration measures (e.g., leaving seed stock) or avoid wetlands and buffer zones with intact floral communities.
*Take special restoration measures (e.g., limit treatment to larger shrubs and trees) or avoid wetlands with populations of federal, state, or FNAI tracked plant species in or around the wetlands within the buffer zone.
*Avoid traversing sensitive habitats (e.g. wet prairie) en route to wetlands.
*Use equipment with large tires or tracks that minimizes damage to soil. ANF should be a leader in development of restoration and management techniques that protect its ecologically sensitive habitats.
*Repair any ruts or tracks that might disrupt surface hydrology.
*Use an adaptive management approach to restore lower priority wetlands (i.e., try different things and monitor).
*We understand that these restoration techniques are primarily a means to return wetland habitats to a pyrogenic condition. It is essential to couple restoration with sustained application of appropriate prescribed fire otherwise the effort to restore the wetlands will be wasted. The Friends would be interested in the plans to manage these habitats following restoration.
*Contract with FNAI or some other qualified contractor to monitor impacts to plant species and communities as well as the targeted and other herpetofauna.

Thanks for the opportunity to comment on these proposed management actions. We look forward to seeing more detailed plans.

Sincerely,

R. Todd Engstrom
President
Friends of the Apalachicola National Forest