Data Submitted (UTC 11): 8/11/2024 3:47:38 PM
First name: Todd
Last name: Engstrom
Organization:
Title:
Comments: Thank you for your second request for comments regarding the Helen Light Analysis Area after the first request in 2021. The proposed management actions include thinning, chemical and mechanical hardwood removal, modified group selection of mature longleaf pine, and clearcut and conversion of natural stands and plantations in compartments 227, 247, 248, and 249 in the Wakulla Ranger District. As we understand it, the only change from the first proposal is that you changed stands 19 and 34 in compartment 247 from clearcut to timber stand improvement that involves midstory removal.

Neither of these sites were in our 2021 comments, so we re-submit our original concerns.
In general, the Friends of the Apalachicola National Forest support the goal of converting off-site planted pines to longleaf, but we are concerned that the proposed forest management operations could:

1.Damage in situ populations of rare plants,
2.Disturb and reduce native ground cover that facilitates fire and provides wildlife habitat (e.g., wiregrass),
3.Remove an excessive number of hardwoods native to the upland longleaf pine ecosystem (e.g., Quercus laevis),
4.Diminish fine fuels by reducing the pine canopy, and
5.Damage in situ longleaf regeneration.

We would feel more comfortable about the proposed management actions if the FS collected data and maintained a database on the ecological conditions of individual stands, such as the Ecological Condition Model developed in ANF. Some stands are so extremely disturbed that intensive management actions may be justified, but most stands have ecological characteristics that warrant special attention, such as excellent natural longleaf regeneration or a population of Pityopsis flexuosa, a globally rare, state endangered and endemic species. Two critical steps of good management are to know what you have and to monitor so that you better understand the effects of management actions. The FS should fine-tune its management to protect extant ecological attributes and document-even crudely-the results of that management.

We have the following specific comments and questions.

1.Clearcut and Conversion (736 acres in 18 stands)
Some of the stands have significant amounts of advanced longleaf regeneration (e.g., the southeast end of 247-4). How will that be protected? It would be a shame to replace the local genetic stock with seedlings from a distant population. One stand, 227-26, did not seem to need any sivlicultural treatment. It looked to be in good shape with a low hardwood component, good age distribution and stocking of longleaf pine, very few slash pine, and excellent ground cover composition of native species (i.e., wiregrass). There was a strip of planted longleaf between FS-369 and 247-26 that could use thinning and the ground cover was much more disturbed. If we were in the right stand, we strongly disagree that 247-26 should be clearcut.
In general, the quality of the native ground cover in the stands proposed to be clearcut and converted to longleaf was quite variable. About half of the stands had native groundcover quality rated from fair to absent. In some cases, these stands were barely recognizable as a longleaf community, and wiregrass was not seen in any of them. However, five of the stands had native groundcover quality rated as good. Presence of wiregrass ranged from occasional to very frequent. The southeast end of Stand 247-04 had best groundcover of these stands. Stands 227-05, 247-07, 227-11 and 247-18 had groundcover in fair condition. These stands should be designated for reduction or removal of slash pine and hardwoods only. Site prep for planting longleaf seems likely to negatively affect the groundcover. These stands either had extant natural longleaf regeneration or had the potential for natural regeneration of longleaf.

2.Pre-commercial thinning to 60 BA (43 acres in stands 247-21 and 247-22)
In these are longleaf pine plantations, all the trees have small diameter, although they were not particularly dense. Pityopsis flexuosa was seen in Stand 247-22, and groundcover was rated in Fair condition. Our concern is that sending in heavy machinery to cut the trees may do more harm than good to the ground cover. With frequent application of prescribed fire, these stands will self-thin, which would save money and eliminate collateral ecological damage.

3.Thinning to 50 BA (2,736 acres in 48 stands)
Groundcover quality in these stands ranged from very good to poor with wiregrass presence ranging from abundant to absent. Some stands (e.g., 249-7 and 249-15) are in excellent shape and do not need to be thinned, but desperately need to be burned. Stand 249-6 needs to be thinned. Its native ground cover is in poor condition that could use some improvement.
Stand 227-32 was identified as a potential old growth stand by the Forest Service in 2010, according to data obtained several years ago. The nearby Stand 227-29, not part of the Helen Light Analysis Area, was also identified as a potential old growth stand by the USFS. Stands 227-30 and 227-31, proposed for thinning, are located between them, making a continuous series of four mature longleaf stands with groundcover quality ranging from very good to very fair, and abundant to frequent wiregrass, located along the east bank of Fisher Creek. The year of origin for these stands ranges from 1891 to 1934, and they comprise a scenic corridor along Fisher Creek. These stands should be considered to be designated together as a Special Interest Area and unsuitable for timber production. They give a glimpse of what Indians and early settlers might have seen in this area.

4.Group selection (147 acres in 2 stands)
What determines a group selection versus a thinning? Need to create gaps? Lack of regen?

5.Remove Hardwoods (4057 acres all stands, but only remove on 12 stands)
Stands designated, Remove Hardwoods, have abundant hardwoods, either turkey oaks almost as tall as the longleaf, laurel oaks, and/or shrubs near breast height. Stand 249-01 had groundcover rated in good to fair condition, with abundant to frequent wiregrass. Pityopsis flexuosa was observed, and there was abundant longleaf regeneration. Stand 248-20 had groundcover in fair to poor condition, but P. flexuosa was frequent. Stand 249-306 had groundcover rated poor to absent, with laurel oak in the canopy and beneath. We recommend that ground cover quality should be taken into consideration when applying any hardwood removal.

6.Herbicide to control woody component (77 acres in Stand 249-02)
Groundcover quality was rated fair to poor, but wiregrass was frequent and some Pityopsis flexuosa was seen. Sparkleberry is abundant in large patches and is often taller than breast height. Apparently, the stand has not been burned in many years.

7.Modified Group Selection
Stands 248-25 and 248-26 are both plantations that have groundcover in Fair to Poor condition, with occasional wiregrass. It would be useful to better understand why some stands are assigned modified group selection and some are assigned to be thinned.

Thanks for the opportunity to comment.
Sincerely,

R. Todd Engstrom
President
Friends of the Apalachicola National Forest