

Appendix A—Public Involvement, Responses to Comments on the Draft EIS/Proposed Revised Plan, and Comment Letters from Federal, State, and Local Agencies and Elected Officials

Public Involvement

Public involvement was encouraged throughout revision of the 1990 Amended Forest Plan. Many opportunities for public involvement were provided during the multi-year process, including 19 public meetings held across the planning area; use of a website where documents were posted as they became available for review and comments could be received; personal contacts; presentations to groups and organizations; news releases; and newsletters. The Plan Revision Team engaged in dialogue with interested groups, agencies, and individuals throughout the revision. In accordance with 36 *CFR* 219.6, owners of lands intermingled with or dependent for access upon National Forest System lands were notified of forest planning activities along with the general public through notices in the Federal Register, local newspapers, radio announcements, posted bulletins, and the Plan Revision newsletter.

Forest Plan Mailing List

The Plan Revision Team utilized a mailing database to maintain a current list of interested agencies, groups, and individuals. The mailing list was updated via periodic requests through the newsletter, cards at open houses, and specific mail-outs requesting updates. After each mail-out, the mailing list was adjusted to reflect returned items or notification of changes of address. Individual requests to update the mailing list were promptly accommodated. The Forest Plan mailing list was used to solicit preferences on how the draft and final documents were to be distributed.

Plan Revision Newsletter

The *Plan Revision News* newsletter was used to announce all public meetings and was mailed to all persons on the mailing list. Beginning February 2003, Plan Revision newsletters were periodically published and distributed to the forest plan mailing list (consisting of approximately 2,500 individuals, groups, agencies, and organizations). Six issues of *Plan Revision News* were mailed during the period February 2003 to January 2005. The newsletter primarily served as an informational tool to inform interested agencies, groups, and persons of the status of Plan revision and upcoming events. Newsletters were mailed in advance of all public meetings and contained information about the location, time, and subjects to be discussed.

Forest Website

Information posted on the Forest website (<http://www.fs.fed.us/r8/ouachita>) was utilized to keep the public informed and to provide a variety of opportunities to be involved with Forest Plan revision. In addition to information posted to the website, a Forest Plan

revision email address presented the public with the opportunity to interact with the Plan Revision Team on a continuous basis. The website provided a key opportunity for the public to access the proposed Revised Forest Plan, the Draft Environmental Impact Statement (DEIS), the Summary Documents, the Plan map, and the Appendices to the DEIS. Comments on these documents were accepted via e-mail during the comment period.

Ozark-Ouachita Highlands Assessment (OOHA)

The groundwork for revising the Forest Plan began well before the Notice of Intent to prepare an environmental impact statement was published in May 2002. Some of the groundwork was completed between 1996 and 2000, when teams of scientists and resource specialists from the Forest Service, other Federal and State agencies, and universities cooperatively conducted the Ozark-Ouachita Highlands Assessment (OOHA), available at <http://www.srs.fs.usda.gov/pubs/index.htm>.

Working meetings open to the public were held in Little Rock, Harrison, Russellville, Hot Springs, and Fayetteville, Arkansas, and in Springfield and West Plains, Missouri. Hundreds of citizens participated in these meetings. OOHA provided a synthesis of the best information available on conditions and trends likely to affect management of the region's four National Forests—the Mark Twain, Ouachita, and Ozark/St. Francis.

Issue Identification and Notice of Intent

The Notice of Intent to prepare an EIS to accompany the Revised Forest Plan for the Ouachita National Forest was published in the Federal Register on May 1, 2002, and the formal public comment period (scoping) was initiated immediately thereafter. Through the Federal Register, the Forest Plan mailing list, and widespread media coverage, preliminary issues for Forest Plan revision were described and a series of four public meetings was announced. These meetings were conducted in June 2002 to provide information about the revision process and to solicit public comments. These meetings were open to the public in the following cities: Broken Bow and Poteau, Oklahoma, and Hot Springs and Mena, Arkansas. A total of 55 people attended these sessions.

After the Notice of Intent was published, the formal public comment period for defining the scope of the Environmental Impact Statement began and lasted from May 1 through August 2, 2002. Written public comments were received and logged in at the Forest Supervisor's Office in Hot Springs, Arkansas, during this period. A total of 29 emails, cards, and letters were received.

As a result of this public involvement and additional internal scoping, the Forest Leadership Team refined the major issues to be considered during revision. Significant issues were grouped into four major categories, with more specific concerns listed under each:

1. Ecosystem Health and Sustainability
 - a. Oak Decline and Mortality
 - b. Viability of Threatened, Endangered, and Other Species of Concern
 - c. Use of Prescribed Fire in Vegetation Management
 - d. Use of Uneven-aged and Irregular Even-aged Silviculture
2. Land Use Designations
 - a. Changes needed in Water and Riparian Areas, Management Area 9
 - b. Roadless Areas eligible and suitable for Wilderness (36 CFR 219.17)
 - c. Suitability determinations, including land suitable for timber production (36 CFR 219.14 (d))
3. Public Access and Recreational Activities
 - a. Changes needed in management standards and desired conditions for the transportation system within the Ouachita National Forest, including road densities
 - b. Changes needed to address existing and likely future conflicts among dispersed recreation activities
 - c. The mix of developed and dispersed recreation opportunities on the Forest
 - d. Forest Plan direction concerning off road use of motorized vehicles (OHV)
 - e. Relationship of the Ouachita National Forest to Communities
4. Changes in harvest levels and their projected effects on local economies
 - a. Effects of recreation, wildlife-related activities, and tourism on local economies
 - b. Effect of fuels management within the national forest in relation to communities at risk

Off-highway Vehicle Issue

In September 2003, anticipating that growing OHV use and possible changes in existing Forest management direction on OHV use could overshadow the entire Forest Plan revision effort, the Plan Revision Team organized a series of six open houses, or “listening posts,” to gain input from the public. An array of press releases, outreach materials, exhibits, and presentations were prepared. The meetings were held in a variety of locations in Arkansas—Little Rock, Mena, Booneville, Hot Springs, and Mt. Ida—and at one Oklahoma location, Poteau. Meeting locations were chosen so that a wide segment of the public could meet directly with Forest Service staff, share their opinions and concerns, and access information related to OHV policies. While OHV use was the major focus at the meetings, Forest Service personnel also answered questions and addressed other issues related to Forest Plan revision.

Public attendance at the September 2003 meetings was as follows: Little Rock, 34; Mena, 90; Booneville, 31; Hot Springs, 78; Mt. Ida, 92; and Poteau, 62, for a total of 387. Public input was also received via email (138 responses). Independently, a concerned citizen collected signatures at community stores, OHV dealers, and sports suppliers resulting in approximately 2,500 signatures on a petition that was submitted to the Forest Service. The petition supported the opening of roads that are currently closed for use by OHVs.

Forest Inholders

Forest inholders were included on the Forest Plan mailing list and received the Forest Plan newsletters as well as other announcements. The many public meetings held to discuss issues, present inventories, and alternatives, and later to explain the commenting process, all presented excellent opportunities for discourse with inholders on topics related to plan revision, and many took advantage of these opportunities. As a result of interaction in person with inholders and through comments delivered by other means, particular attention was directed to how the Forest Plan addresses use of herbicides, the quality of the transportation system, the maintenance and enhancement of scenery and recreation opportunities, special forest products, OHV use, firewood availability, local economic opportunities, and desires for high quality streams and lakes and abundant wildlife. During Forest Plan implementation, other, more specific, individual concerns of inholders will be addressed at the project-planning level.

Plan Revision Progress and Presentation of Inventories for Comment

In October 2003, a second series of meetings using the open house format was offered. Notification procedures similar to those used to announce the OHV meetings were used. Meetings were held in Mena and Little Rock, Arkansas, and in Broken Bow, Oklahoma. The purpose of these meetings was to inform the public of the status of Forest Plan revision and present some of the work accomplished on needed inventories. Six information stations, manned by Plan Revision Team members, were available to discuss the status of inventories of information necessary for Forest Plan revision: Socio-Economic Data; Land Type Associations; Forest Roads Analysis; Roadless Evaluation; Species Viability Evaluation; the Scenery Management System and Recreation Opportunity Spectrum. Attendance at the second set of Open Houses was nominal, with only 44 members of the public visiting with Forest Service personnel. Visitor attendance at the three locations follows: Mena, Arkansas—22; Little Rock, Arkansas—12; and Broken Bow, Oklahoma—10.

Alternative Development

In April 2004, three Open Houses were held to provide information on the development of the draft alternatives. Information on five draft alternatives was available for discussion, including the 1990 Amended Forest Plan (the “no action” alternative). These meetings were open to the public in Poteau, Oklahoma; and Mt. Ida and Hot Springs, Arkansas. A total of 65 people attended these meetings with attendance as follows: Poteau, Oklahoma—6; Mt. Ida, Arkansas—27; and Hot Springs, Arkansas—32. Independently, but at about the same time, the Arkansas Chapter of the Sierra Club developed and presented a “Citizens’ Forest Plan” to the Forest Service for consideration.

Notice of Availability of the Proposed Revised Forest Plan and Draft EIS; 90-Day Comment Period

The proposed Revised Forest Plan and the Draft Environmental Impact Statement were distributed for public comment using the Forest Plan mailing list. A mail-out asking respondents to identify how they preferred to receive the documents for comment preceded the formal distribution of documents. The distribution of the proposed Revised Forest Plan and the DEIS occurred immediately before the formal public notification via the Notice of Availability published in the Federal Register on February 25, 2005. The date of publication in the Federal Register established the required 90-day public comment period, which ended on May 27, 2005.

How-to-Comment Meetings

In order to communicate the status of Plan Revision and to prepare the public to effectively comment on the draft documents, a series of three public meetings was held. Public meetings to discuss the draft Plan and DEIS were held February 28, 2005 in Poteau, Oklahoma; March 1, 2005 in Hot Springs, Arkansas; and March 3, 2005 in Mount Ida, Arkansas. A total of 100 people attended these meetings with attendance at as follows: Poteau—15; Mt. Ida—66; and Hot Springs—19.

Comments on the Revised Forest Plan and Final EIS

The Forest received 478 documents, including two petitions, during the formal comment period. The Plan Revision Team reviewed and analyzed all written comments that were received or postmarked by the end of the comment period. Each document was numbered as it was received. Each substantive comment was assigned a number.

Agency responses to substantive comments were completed by the interdisciplinary team and approved by the Forest Supervisor. A substantive comment is one that is within the scope of, is specific to, and has a direct relationship to the proposed action and includes supporting reasons for the Responsible Official to consider. The scope of the issues addressed in the DEIS was established after publication of the Notice of Intent in the Federal Register in May 2002 and following four public meetings in June 2002.

Consistent with Forest Service directives, copies of comments received on the DEIS and the Proposed Revised Forest Plan from Federal, State, and local agencies and elected officials are included in this appendix (following Responses to Comments on the DEIS and Proposed Revised Forest Plan).

A summary of changes made to the proposed Revised Forest Plan and the EIS appears in the Record of Decision. The Forest Service expresses its sincere appreciation to all who commented and is grateful for the recommendations and critiques received.

Responses to Comments from the Public, Other Agencies, and Elected Officials

The Forest Service received comments on the draft documents in various formats, as listed in the following tabulation:

Format	Definition
Comment Card	Card available at Open House meetings or from newsletters
Post Card	Card with comment
E-Mail	Messages received by E-Mail
E-Mail/Form Letter	A form letter received by E-Mail
Modified E-Mail/Form Letter	A form letter received by E-Mail but altered with personal comments
Letter	Self explanatory
Form Letter	A letter identical in content but with differing signatures
Petition	A message with multiple signatures

During the comment period, 478 documents were received. The following tabulation displays the number of each type of document received:

Format	# Received
Comment Card	1
Post Card	4
E-Mail	71
E-Mail/Form Letter	246
Letter	57
Form Letter	98
Petition*	2
Total	478

*One petition was filed as an attachment to a comment letter. It was counted as a letter, but also recorded in this tabulation.

For each substantive comment reviewed, the interdisciplinary team determined an appropriate response from among the following options:

- Modify alternatives, including the proposed action
- Develop and evaluate alternatives not previously given serious consideration by the agency (not used)
- Supplement, improve, or modify the analyses
- Make factual corrections
- Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

All documents did not contain substantive comments, but some documents contained more than one substantive comment. Similar comments were grouped, and responses to the grouped comments were prepared. The comments and comment responses are documented in this report.

Every comment received was read, and many of these comments helped the interdisciplinary team refine and clarify the plan documents. During the review process, many valuable suggestions and ideas were presented that were not within the scope of plan revision and, therefore, were not “substantive.” However, it is important for all who commented to know that their views are valuable and will inform implementation of the Revised Forest Plan.

**Responses to Comments on the Proposed Revised
Land and Resource Management Plan for the Ouachita National Forest
and the Accompanying Draft Environmental Impact Statement**

Proposed, Endangered, Threatened, and Sensitive Species and Other Species of Concern

Agency Concern: Management of Federally Listed (Proposed, Threatened, or Endangered) Species

Doc#	Cmt#	Comment
292	79	"We [US Fish and Wildlife Service] offer our staff experts for final collaborative development of standards for the following listed species known to occur on or adjacent to the Ouachita National Forest: Indiana Bat, American burying beetle, Bald Eagle, Red-cockaded Woodpecker, Leopard Darter, Ouachita rock pocketbook, Scaleshell, Winged mapleleaf, Harperella, Pink mucket, Arkansas fat mucket."
292	80	"...standards will not be needed for the following species...Piping Plover, Interior Least Tern, American alligator."
292	89	"While bird species can be an indicator of habitat condition, the DEIS cites only two references for endangered birds, each dating from the 1980s...use of more current data on bird occurrence may aid in determining the ecological status of habitat condition...trends in bird occurrence can be accessed from the URL http://www.pwrc.usga.gov/bbs/ ."
292	94	"Impacts to federally listed species are not 'mitigated'. If road construction may affect or result in the possibility of 'take,' endangered species consultation should be initiated."

Response

The Revised Forest Plan benefited greatly from the collaborative effort with the USFWS to refine management direction for federally listed and proposed species. Design criteria specific to listed species and groups of listed species were added to the final Revised Forest Plan. The literature citations for all the species of viability concern, including Proposed, Endangered, Threatened and Sensitive (PETS) species addressed in the "Species Viability Evaluation" (which utilized nearly 800 of the most current scientific publications and information available) are available at this link: <http://www.fs.fed.us/r8/ouachita/planning/index.shtml>; short references to these sources of data (author, year) are presented in Appendix E with each species included in the evaluation. The most recent Ouachita Breeding Bird Surveys and Arkansas Natural Heritage Commission element occurrence records (EORs) were used in the Species Viability Evaluation; however, ornithology experts such as Doug James/University of Arkansas, Catherine Rideout/Arkansas Game and Fish Commission, Jim Bednarz/Arkansas State University, Bill Shepard/Audubon Society, Chris Kellner/Arkansas Tech University, and Bill Hollimon/Arkansas Natural Heritage Commission were the primary sources of local expert information concerning the status of bird species of concern on the Ouachita NF. References to "mitigation" were removed and replaced with more appropriate language aimed at avoiding impacts to federally listed species and, as needed, consulting with the USFWS.

Public Concern: Management of Federally Listed (Proposed, Threatened, Endangered) and Sensitive Species

337	150	“The Draft Plan should include a provision for all rare and sensitive species to be inventoried wherever they occur, whether in Suitable for Timber areas or not.”
337	156	“Protection of federally listed threatened and endangered species should be the highest priority of the plan. This is what the Endangered Species Act requires...Detailed and enforceable standards and guidelines should be developed for the protection of each listed species. Species identified as state listed should also be given top priority.”
375	256	“Inventories of all endangered species should be collected. The benefit of the doubt in protecting endangered species should go toward the species.”

Response

The Revised Forest Plan includes many provisions regarding federally proposed, endangered, threatened, and sensitive (PETS) species, including an objective to “maintain or improve the population status of all species federally listed or proposed for listing” and both Forest-wide and Management Area-specific standards for managing habitat for PETS species. As noted in Forest Service Manual (FSM) 2671, the Forest Service “cooperates with State agencies to inventory, protect, manage, and plan for threatened, endangered, proposed, and sensitive species.” Southern Region supplement R8-2600-2002-2 to the FSM (Chapter 2670) provides guidance to determine when project-level inventories of such species are needed. No additional Forest Plan guidance is warranted.

Agency Concern: Wildland Fire Suppression Concerning Proposed, Endangered and Threatened Species

Doc#	Cmt#	Comment
292	98	“[Wildland Fire Suppression] Add the following text: ‘When catastrophic wildfire events occur on the Ouachita National Forest that threaten known federally listed species or other important forest resource, the local FWS Ecological Service Field Offices would gladly provide support when the incident commander deems it necessary for minimizing impacts and emergency consultation.’”

Response

The Forest Service appreciates the willingness of the USFWS to be available, as needed, during catastrophic wildfire events when federally listed species may be affected; however, coordination and consultation procedures in such circumstances are adequately addressed in existing interagency agreements and agency directives.

Agency Concern: Red-cockaded Woodpecker/Pine-Bluestem Management

Doc#	Cmt#	Comment
292	90	“We would like to see the range [for the pine blue stem subsystem] narrowed to the higher side of the previously stated range, (i.e., from 7-20 percent to 12-20 percent) [of all known pine-oak dominated systems]. This will facilitate the recovery of the Red-cockaded Woodpecker through a greater expansion of dependent habitat types, maintenance of this subsystem, and subsequent positive effects on ...species associated with this subsystem... help reduce grazing allotment pressure on existing openings and riparian corridors...by expanding the forage base outside of just those areas and providing alternative forage sites....[and] potentially reduce impacts to sensitive aquatic species, such as the leopard darter.”

Response

In addition to the shortleaf pine-bluestem grass and pine-oak ecosystem restoration taking place in MAs 21 and 22, the Revised Forest Plan projects that an additional 70,000 acres of this pine-bluestem or pine-oak woodland will be restored and that, by 2021, approximately 350,000 acres will be in one of these woodland conditions. Based on these projections, it is highly likely that the upper end of the stated range of desired conditions for pine-bluestem ecosystems will be achieved. If additional habitat for Red-cockaded Woodpeckers is needed (outside the existing designated Habitat Management Areas), some of the pine-oak woodland should be suitable, particularly if the prescribed burning frequency meets objectives.

Public Concern: Indiana Bat Management

Doc#	Cmt#	Comment
337	184	“The FS must prohibit logging, mining, off-road vehicle use, application of chemical agents, and prescribed burning in or near areas of known bat populations, particularly known summer roosting areas and hibernacula. Known hibernating caves should be gated and monitored for malicious activities in or near the caves... Eliminating alteration of habitat is essential if populations of these endangered bat species are to recover.”
337	187	“The ESA requires the FS to use “the best scientific and commercial data available” to fulfill its Section 7 obligations. The analysis needs to consider the summer habitat required by female Indiana bats for maternity roosts (e.g. roost trees, protection from disturbance, and foraging habitat). The analysis also needs to consider the summer roosting and foraging needs of male Indiana bats.”

Response

The only endangered bat species known to occur on the ONF is the Indiana bat, which is represented during some months by 1 to 10 individuals hibernating in a protected crevice cave in southeastern Oklahoma. The Forest Service worked closely with the USFWS to ensure that the Revised Forest Plan appropriately addresses all concerns about Indiana bats on the Forest, including habitat management recommendations from the USFWS Indiana Bat Recovery Plan. Two additional standards to address Indiana bat conservation have been added since the proposed Revised Plan was published.

Public Concern: Mountain Lions

Doc#	Cmt#	Comment
337	157	“The Forest Service must give full consideration to the habitat needs of the mountain lion...increasing number of verified sightings of this animal in Arkansas...planning for their protection...ONF has been identified by the USFWS as one of a few ideal locations for reestablishing the cougar...revised Forest Plan must account for these habitat needs...likely that mountain lions in Arkansas deserve protection under the federal Endangered Species Act...”

Response

The mountain lion was not included in the biological evaluation of “species of viability concern” based on the recommendations of the Arkansas Game and Fish Commission Non-game Mammal Program Coordinator and other local mammal experts and current best science as cited below. There is considerable doubt that any wild mountain lions exist on the Ouachita NF, although lions are known to have escaped from confinement or been released in the Ouachita Mountains. Nonetheless, habitat management recommendations for the mountain lion are compatible with the Forest biodiversity management direction.

1. Bowers, A.K.; Lucio, L.D.; Clark, D.W.; Rakow, S.P.; Heidt, G.A. 2001. Early history of the wolf, black bear, and mountain lion in Arkansas. Proceedings of the Arkansas Academy of Science. 55:22-27.
2. Arkansas Natural Heritage Inventory. 2003. Arkansas element of occurrence records.
3. Clark, D.W.; White, S.C.; Bowers, A.K.; Lucio, L.D.; Heidt, G.A. 2002. A survey of recent accounts of the mountain lion (*Puma concolor*) in Arkansas. Southeastern Naturalist. 1(3):269-278.
4. Sasse, D.B. 2001. Status of pet mountain lions (*Puma concolor*) in Arkansas. Proceedings of the Arkansas Academy of Science. 55:188.
5. Witsell, T.; Heidt, G.A.; Dozier, P.L.; Frothingham T.; Lynn, M. 1999. Recent documentation of mountain lion (*Puma concolor*) in Arkansas. Proceedings of the Arkansas Academy of Science. 53:157-158.

Public Concern: Direct Impacts of Management on Individual Animals (Species or Groups of Concern)

Doc#	Cmt#	Comment
337	174	“The Forest Service needs to develop alternatives and mitigation measures to minimize the death and suffering the logging causes. For example, the alternative/mitigation measure of not cutting in the nesting season needs to be developed and considered. The analysis also need to disclose the indirect impacts to the species that are not directly killed by the trees being cut down or run over by logging equipment....please explain why you believe killing and causing pain and suffering to forest creatures is justified so that you can get the cut out.”
337	175	“The analysis needs to address this [Migratory Bird Treaty Act] prohibits the direct take of migratory birds, nestlings and eggs by persons] and develop mitigation measures to assure the loggers will not violate the MBTA [such as limiting logging to winter months].”
337	180	“The impacts of compaction, vegetation removal and erosion must be considered [on invertebrates and microorganisms].”
337	182	“Research indicates logging devastates salamander populations.” “...effects to these species needs to be evaluated.”

Response

The Biological Assessment, Biological Evaluation, and EIS for this plan revision present the results of a thorough and careful analysis of the effects of logging, compaction, and erosion (among other possible influences) on Proposed, Endangered, Threatened, and Sensitive species and other species of viability concern. These documents acknowledge that some individual plants or animals may be harmed within a project area during certain management activities. How forest management activities affect federally listed species and how they affect overall population viability and persistence of sensitive species within the landscape are evaluated at the project-level in Biological Evaluations. Timber harvesting activities are seasonally limited (see Forest-wide Soil and Water standards) to avoid soil compaction. The primary preferred habitat of most salamander species known to occur on the Forest is within streamside management areas, which are excluded from most ground disturbing activities; most upland slopes that Ouachita-endemic salamander species use (generally moist, north-facing ones) will not be subject to extensive logging under the 2005 Revised Forest Plan.

Public Concern: Mercury in Fish

Doc#	Cmt#	Comment
337	126	“The DEIS fails to analyze and disclose the very serious cumulative impact of <i>mercury</i> in minute amounts washing from Ouachita soil and rocks and adding to the build up of mercury in fish.”

Response

Mercury in its elemental form is found throughout the Forest. It is when mercury goes through an anaerobic methylation process that it becomes available for biotic uptake. Erosion and sedimentation are not contributing to this process.

Management Indicator Species

Public and Agency Concern: Aquatic Management Indicator Species

Doc#	Cmt#	Comment
143	55	"...impractical to use smallmouth bass (<i>Micropterus dolomieu</i>) as the sole management indicator species (MIS for larger stream of the forest (pg 3-103)...include the presence and/or absence of intolerant fish species found in riffle communities.)"
374	244	"Under the guidelines of Management Indicator Species (MIS), the revised plan falls short in species indicative of the various aquatic systems within the National Forest boundary... For the Ouachita National Forest, the health of the aquatic community and especially the fish population, would be best monitored by conducting fish samples targeting the entire community, utilizing the Index of Biotic Integrity (IVBI or a modification following Karr's work)...We support a monitoring system that samples every stream within a three (3) to five (5) year rotation. "
259	70	"...recommend that the Forest Service also use a community metric, such as the index of biotic integrity, to track the health of river and stream communities."

Response

The Management Indicator Species list has been expanded significantly by restoring the fish MIS in place prior to revising the Forest Plan. Certain streams and segments of other streams are permanent monitoring stations and are surveyed on a three-to-five year rotation using Basin Area Stream Survey methodology.

Public Concern: Terrestrial Management Indicator Species

337	145	“The list of MIS provided in the Draft Revised Plan is minimal and weighted toward species that benefit from logging...The Plan should also include as MIS, the eastern gray squirrel for mature forests...more forest interior species, such as the cerulean warbler and those listed in association with the wormeating warbler, should be included as MIS...very important to include appropriate salamanders as MIS...due to planned heavy burning, the yellow lady slipper should be a MIS...the current list [MIS] also lacks indicators for water quality, such as the fat mucket muscle, the longnose darter, and the Ouachita Mountain Shiner. Other appropriate indicators for water quality should include those listed for the appropriate ecoregion in Arkansas Department of Environmental Quality, Regulation No. 2, Water Quality Standards. The revised list of MIS should also include large predators, as they are at the top of the food chain. In addition to the mountain lion, the black bear is also an appropriate choice...The Plan should include key species which are primarily dependent upon large cavities for breeding and winter cover such as the Barred Owl, Eastern Gray Squirrel, Eastern Fox Squirrel and Black Bear.”
337	148	“The Forest Service MIS category list ignored a habitat category which is in very short supply. This category is for late successional unfragmented forest which is very important for some migratory bird species such as the Cerulean Warbler. It is not sufficiently widespread because late successional unfragmented forest is not widespread.”
356	202	“The preferred alternative places emphasis on maximizing game and disturbance-dependant species populations, using a short list of indicator species. We recommend that management activities should try to stabilize, rather than maximize, game species populations while placing emphasis on naturally occurring wildlife diversity.”

Response

The scarlet tanager (*Piranga olivacea*) is a neo-tropical migratory bird of international concern (Partners in Flight and Project Tanager). This species, which is area-sensitive and usually not found in habitat patches smaller than 100 hectares (250 acres), is commonly found in mature hardwood and hardwood-pine habitats on the Ouachita NF. As an MIS, the scarlet tanager addresses concerns about forest fragmentation as well as mature forest habitats. Another MIS that reflects less disturbed habitat conditions is the pileated woodpecker. The 17 aquatic MIS from the Amended Forest Plan have been retained in the revised Plan; some of the Arkansas Department of Environmental Quality recommended MIS are inappropriate for the Ouachita NF because they either do not occur in streams within the Forest or occur in such low numbers that they cannot serve well as MIS. Large predators are not appropriate MIS due to the difficulty of obtaining accurate population estimates. The habitats of the yellow lady slipper and endemic salamanders are already protected due to their status as Southern Region Sensitive species; more importantly, they are not good candidates to serve as MIS due either to the extreme difficulty in accurately tracking population trends (salamanders) or, in the case of the lady's slipper, because its population trends indicate little if anything about the effects of management (because all populations are protected within Management Area 9, Water and Riparian Communities).

Public Concern: Purpose of Management Indicator Species

337	149	“The purpose of MIS is to detect significant changes in a certain area...what kinds of changes make up “significant changes”...Through the use of cutting, herbiciding, and repeated burning, the Forest Service drastically changes the very core of the forest, i.e. stand structure, stand composition, sexual reproduction, and the forest floor. The Forest Service, in the Draft Plan, must address concerns about ‘significant changes’ – what are they and what has the public complained about in the past.”
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Response

Management indicator species (MIS) are selected “because their [Forest-wide] population changes are believed to indicate the effects of management activities” (36 CFR 219 (a)(1)), particularly for comparing Forest Plan alternatives. The diversity of habitats and life histories represented by the pileated woodpecker, scarlet tanager, prairie warbler, red-cockaded woodpecker, wild turkey, northern Bobwhite, and the stream and pond MIS for the Ouachita NF are adequate to address the intended purpose of designating MIS.

Recreation

Public Concern: Recreation, General

Doc#	Cmt#	Comment
356	201	“Recreation... the preferred alternative provides no recognition of water-based recreation as a primary forest use. We recommend that water-based activities be recognized and emphasized as a primary forest recreational use, and that this emphasis be reflected in the final planning document... We request that addition of more and better quality hiking trails be added as a plan element.”
378	263	“...heavy use points directly to the need for more recreation opportunities as noted by the Southern Research Station in 1999...this issue is not adequately addressed in the plan. We urge you to seek increased funding for maintenance and repair of all existing facilities and to designate new ones.”
378	270	“Uncertainty about the cost and availability of fuels create the desire and need to seek recreation closer to home. The time is right for USFS in Arkansas to shift their primary focus from timber products to conservation and recreation.”

Response

The Forest added more specific references to water-based recreation in the Plan (Part 1). Future trail construction, as noted in Part 2 of the Plan (Public Use and Enjoyment priorities and objectives), will be considered when “partnerships are in place to support trail maintenance long term.” Efforts will continue to augment the budget for public recreation and outdoor activities and to pursue partnerships that leverage available funds to the greatest extent possible. Use projections (by activity) for the next 45 years (Table 3.98, DEIS; Table 3.102 in FEIS) indicate that the highest growth in Forest recreational activities is in viewing scenery, viewing wildlife, general relaxing and hiking/walking—which would not require significant additional developed recreation. Developed camping, swimming and picnicking show modest projected gains for the next two decades. Although, dispersed recreation uses of many kinds are increasing, adequate facilities and locations for most recreational activities should be available to satisfy future demand.

Public Concern: Integrity of Trails and Trail Corridors

Doc#	Cmt#	Comment
61	30	"...plan neglects to include language providing proper trail corridor protection...protected from logging and controlled burn activities."
80	32	"[thinning and burning] should be held to a minimum within a 100' corridor on each side of the trails...hikers also want to see outward and not feel 'fenced in' by a narrow trail corridor."
82	33	"Plan does not adequately address trail management and trail protection issues...eliminates Management Area 18."
82	34	"...alternatives uses(s) the same list of Management Areas...add a specific Management Area for Trails and Trail Protection Policy to your proposed plan."
82	35	"...specific standards should identify trail protection considerations...when cutting is required, destruction of the corridor should be minimized...Controlled burns should be limited in intensity within the corridor to prevent killing tress near the trail. Removal of tress should be acceptable only if such removal would not be harmful to the health, maintenance patterns, and scenic values of the trail."
86	37	"...it is [not] appropriate to exclude a MA for trails and retain MA 3 (Developed Recreation)...trail 'standards' and related 'management practices'...are [not] adequately addressed in the proposed Plan."
86	38	"Insect and disease control cuts, controlled burns, and other forest practices within the trail corridor should be done to different standards than those outside of the corridor. When cutting is required, the smallest and least destructive machinery should be used in a way that minimized damage. Controlled burns can and should be limited in intensity within the corridor to prevent killing area near the trail."
86	39	"...language needs to be added to the Plan which states that conditions within all trail corridors have priority over management of the surrounding areas. Removal of trees, controlled burns, etc. would be acceptable only if the planned action would not be harmful to the health, maintenance patterns, and scenic values of the trail."

Response

Two standards have been added to address this concern:

VM003 Whenever proposed projects may affect a recreation trail, consult with the Forest Landscape Architect (or his/her designated representative) to determine how best to minimize impacts on the trail, minimize future vegetation encroachment on the trail and meet the assigned Scenic Integrity Objective. Retain sufficient overstory vegetation above and immediately adjacent to the trail to reduce opportunities for blackberry vines and other vegetation that impede non-motorized travel to flourish.

TH011 Timber harvests located near recreation trails will be conducted with mitigation measures appropriate for the trail Concern Level and the Scenic Integrity Objective of the area. Where skid trails or skidders must cross the recreation trail, the number of crossings should be minimized and crossings should be made at right angles unless doing so would result in greater damage to the trail than crossing at another angle. The affected trail tread will be restored when the timber harvest is completed. The Ouachita National Recreation Trail was added to the management area map to underscore this trail's importance in relationship to any nearby management activity.

Management Area 3, Developed Recreation Areas, and Management Area 18 in the 1990 Forest Plan have different resource management objectives. MA 3 provides a desired condition for developed recreation areas to meet requirements of places that are

considered destinations by the visiting public. Trails provide a linear, changing recreational experience while the participant travels through an area. Trails differ from recreation areas in that the environment of the trail changes from place to place as it passes through different MAs with differing landscapes and management emphases. Forest-wide standards for trails accommodate this difference and mitigate the potential impacts of management activities routinely undertaken in the vicinity of trails but which would not be allowed near recreation areas. The Forest-wide standards are designed to respond to a trail's varied and changing linear environment by not confining management for the trail to a set corridor width.

While the Forest strives to maintain the integrity of the trail system, it would not be possible to give highest priority to maintaining a given recreation trail above all else. For example, trails near Threatened, Endangered, or Sensitive species habitat are secondary in importance to the needs of the species at risk. Similarly, trails in areas with special designations, such as wilderness, are secondary in importance to the original purpose of the area.

Public Concern: Use of the Ouachita National Recreation Trail

Doc#	Cmt#	Comment
73	31	"...the [Ouachita] trail should be allowed to be used by any non-motorized method as long as it is in a way that does not permanently damage the trail."

Response

The Ouachita National Recreation Trail was originally a hiking trail. In 2001, a proposal to allow mountain-type bicycles to utilize a portion of the trail was considered. This proposal, preceded by favorable findings of a 3-year trail impacts study and public input on a 50-mile segment of the trail, was approved, and two sections of trail totaling 137 miles were opened to bicycle use. Because the Ouachita Trail was originally designed and constructed for hiking, and design criteria and construction methods and materials were applied with that use in mind, no other uses with the exception of bicycles have been considered. The trail remains closed to other types of non-motorized travel such as horses and pack animals because the design of the trail would not support such use.

Public Concern: Trail Impacts – All Uses

Doc#	Cmt#	Comment
20	5	"Same rules should apply to horse back riding and non motorized bikes as they, too, will cause as much if not more damage than OHV's are accused of."

Response

The Forest agrees that horseback riding and bicycle riding can create similar impacts to the forest floor if repeated use is sustained over time in areas not intended or designed and constructed for such uses. The major differences between such uses and OHV use are that significantly larger numbers of OHV users are riding on the forest floor compared to horse and bicycle riders and that there are significantly more user-defined routes and trails attributed to OHV use than to horse and bicycle use. It is the large numbers of OHVs using the forest floor that have created the need to manage this activity.

Public Concern: Cumulative Impact of Off-Highway Vehicles (OHVs)

Doc#	Cmt#	Comment
11	2	"ATV policy...all of them are going to pile in on a few roads and trails"
34	7	"[OHV policy] ... will put all use on a limited number of places and cause a higher incidence of erosion on these areas."
111	54	"...public should be allowed to ride their ATV's on as many roads and trails as possible to have the least impact on the national forest area...crowding ATV riders in a few certain areas is not a good idea and should have more analysis and public comments before any decision is made."
145	57	"decreasing impact by ATVs, which seem to do much more damage than almost any other kind of use"
378	265	"In MA. 17, we simply ask that no increased use of ORV be permitted as the noise impacts negatively on all other forest users."

Response

The desired effect of making the Forest floor unsuitable for OHV use and the eventual anticipated effect of redirecting some of that use to designated routes and trails would be to reduce existing and potential future environmental impacts. The EIS discussion of effects from OHV use has been supplemented. The Forest anticipates eventually making more well designed, constructed and properly maintained routes available to the public, with the necessary related facilities such as parking areas, signage and sanitation facilities, so that the recreational experience of using an OHV on the Ouachita NF would not be degraded and no individual route or trail is impacted beyond its carrying capacity. The Forest retains its ability to temporarily or permanently close overused routes and undertake other means to ensure unacceptable resource damage does not occur.

Nationally, the Forest Service has made clear, through many means, including statements by the Chief of the Forest Service, that OHV use of the national forests is a legitimate recreational activity but one that needs to be better managed. The proposed change in management direction making cross-country OHV use unsuitable is a measured response to the current and reasonably anticipated impacts resulting from increased OHV use. The move from considering uncontrolled forest floor use of motor vehicles a suitable use to an unsuitable one (where the use of motor vehicles of all types is allowed on a system of designated routes and trails but not elsewhere on the Ouachita NF) should significantly reduce environmental impacts associated with OHV use. The Forest will closely monitor the use of any new system of designated routes and trails for OHVs and will make adjustments and modifications where necessary to protect environmental values.

Public Concern: OHVs for Game Retrieval

Doc#	Cmt#	Comment
20	4	"Cross country OHV use be limited to game retrieval only."
357	204	"We support this policy [OHV] because it should reduce disturbance to wildlife resources, vegetation and soil. However, we are sensitive to the needs of non-ambulatory sportsmen and would like to see sufficient flexibility in the OHV restrictions to allow their use of OHVs off designated trails during hunting seasons. We believe this could be done with minimal natural resource impact because of the limited number of vehicles that would be involved. Further, non-ambulatory sportsmen use of OHVs would occur during the fall, outside of the typical nesting period for ground-nesting birds and mammals, and relatively level areas could be designated for this purpose to minimize potential erosion concerns."

Response

Between the draft and final EIS, the Forest analyzed the option of allowing game retrieval as part of Alternative D; however, it was determined that it was not feasible or reasonable to allow one cross-country use of motorized vehicles and declare all other such public uses unsuitable. The effects of making cross-country travel by motorized vehicle unsuitable are discussed in the FEIS.

Public Concern: Designated Routes for OHVs

Doc#	Cmt#	Comment
91	40	"We don't need any trails made just let our citizens ride the old logging roads which have a solid soil base."

Response

The Revised Forest Plan establishes management direction that cross-country motorized travel is unsuitable. Subsequent to Plan approval, a separate process will be used to designate routes. The move to designated trails and roads will occur after appropriate public involvement and will probably incorporate many existing roads already constructed in the Forest. Some roads, however, are not suitable for sustained and repeated use by motorized vehicles or safe for users. Some trails may need to be constructed to link existing travel routes together or to aid in creating loop routes or to enhance the OHV riding experience by participants. Designation of routes is expected to be completed within the next four years.

Wilderness Recommendations and Other Special Land Allocations; Wilderness Management

Public Concern: Wilderness

Doc#	Cmt#	Comment
111	53	"[no more] wilderness designations because these areas cannot be properly managed."
375	250	"Designate as wilderness study the following areas; Blue Mountain, Brush Heap, Cedar Mountain, Flood Mountain, Fourche Mountain, Irons Fork Mountain, Leader Mountain Little Missouri, Middle Mountain, Statehouse Mountain, Gap Creek, Boar Mountain and Little Blakely."
356	199b	"We also recommend that more areas be set aside and preserved – these areas to be excluded from extractive uses."
378	262	"... <u>heartily endorses your new recommendations for wilderness under Alternative D</u> that would include: Brush Heap, 8,353 acres in Arkansas; Blue Mountain, 11,678 acres in Arkansas; Irons Fork, 8,303 acres in Arkansas; Flatside additions, 620 acres in Arkansas; Upper Kiamichi additions, 1,096 acres in Oklahoma"
378	261	"The Ozark Society finds much to be happy about in Alternative E and supports it with one significant exception. <u>Land Allocation in Alternative D should replace and be incorporated into the Land Allocation in Alternative E.</u> " [emphasis in original]

Response

The Revised Forest Plan proposes no new wilderness areas but does recommend adding 1,793 acres to existing wilderness areas (Flatside—620 acres, Upper Kiamichi—1,096 acres and an addition to Poteau Mountain [East Unit]—77 acres). Blue Mountain, Brush Heap, and Irons Fork Mountain remain in Management Area 17, where their semi-primitive character will be conserved.

The wilderness needs assessment indicated significant unused wilderness capacity exists within the six designated wilderness areas on the Forest. As a result of the analysis conducted for this plan revision, no compelling need to add additional areas to the Ouachita NF's inventory was identified.

Public or Agency Concern: Fire in Wilderness and Other Special Areas

Doc#	Cmt#	Comment
374	240	"...strongly supports the appropriate use of prescribed burning, in keeping with the Smoke Management guidelines developed by the state. This would include those portions of designated wilderness areas that are economically feasible in conjunction with adjacent burns."
378	269	"We simply ask and urge the FS, specifically, to NOT use prescribed fire in designated Wilderness, Proposed Wilderness Areas, National Wild and Scenic River Corridors <u>and their respective watersheds</u> , Special Interest Areas and Research Natural Areas."

Response

Prescribed natural fire ignited by lightning or authorized employees for the purpose of reducing dangerous fuels or restoring natural processes in wilderness areas may be used if it is required to meet wilderness management objectives (see Management Area Design Criterion 1a.14). Prescribed fire also may be used to maintain, restore, and enhance native forest communities in special interest areas (Management Area Design Criterion 2.02) and in wild and scenic river corridors where care is taken to minimize visual impacts (Management Area Design Criterion 20.04). Prescribed fire will not be used on any research natural area on the Forest.

Public Concern: Allocation of Semi-Primitive Areas

Doc#	Cmt#	Comment
54	12	"...the Lynn, Kiamichi, Blue Bouncer, Walnut Mtn. area of SE LeFlore County... is being allocated to MA-14 "

Response

In the Revised Forest Plan, these areas are allocated to MA 17, Semi-Primitive Areas.

Public Concern: Wild and Scenic Rivers and Large Conservation Areas

Doc#	Cmt#	Comment
356	200	"The preferred alternative doesn't meet the public need and desire for protected areas, with only 18% of the forest acreage protected. It preserves only narrow corridors of Wild and Scenic Streams and provides no large conservation areas. Research Natural areas are inadequate."
358	215	"...preferred alternative should vastly increase the amount of the Ouachita NF that should be protected as wild and scenic streams and large conservation areas."
378	266	"The Ozark Society fully supports the inclusion of the other eligible rivers for consideration as worthy additions to National Wild and Scenic Rivers. We would ask that the Ouachita National Forest pursue Wild and Scenic River status for the segments of these rivers within the forest."

Response

The Forest Plan includes two large conservation areas (Habitat Management Areas HMAs) specifically for Red-cockaded Woodpeckers and associated species; one covers more than 84,000 acres in western Arkansas; the other, nearly 51,000 acres in Oklahoma. The effective size of these conservation areas is actually much larger, because much of the land surrounding these HMAs is managed similarly. The 2005 Revised Forest Plan is designed to sustain not only the rare species such as the Red-cockaded Woodpecker but all native plants and animals that live in or complete an important part of their life cycle within the Forest.

We have carried forward a previous recommendation that the Glover River be considered for designation as a Wild and Scenic River and noted the eligibility of many others for further consideration by the states. The Forest does not control or manage the majority of lands adjacent to these streams and, therefore, must defer to the appropriate state agency for the respective suitability studies. For this planning cycle, the Forest will continue to manage public lands adjacent to each eligible river segment allocated to Management Area 20 in a manner that maintains their identified “outstandingly remarkable features.” A new research natural area—R.R. Reynolds RNA on the Crossett Experimental Forest—has been designated.

The Revised Forest Plan places approximately 136,000 acres in Management Area 17 (semi-primitive areas) and will defer major timber harvest and road construction for the planning period in some of these areas.

Agency Concern: Special Features of South Fourche Special Interest Area

Doc#	Cmt#	Comment
110	51	“...addition to the South Fourche Special Interest Areas is warranted.”

Response

The boundary of the South Fourche Scenic Area has been adjusted to encompass the additional special communities and habitats there, and the area has been re-designated the South Fourche Botanical Area in the Revised Forest Plan.

Public Concern: Map of Special Area Allocations

Doc#	Cmt#	Comment
337	139	“No readable maps were provided showing; wilderness areas, roadless areas that were rejected in the analysis process, special areas, natural areas, wild and scenic river corridors, roadless areas that were rejected from wilderness addition, et cetera.”

Response

The management area map accompanying the draft and final documents clearly depicts wilderness areas, wild and scenic river corridors, and most special interest areas; research natural areas are not mapped to reduce opportunities for deliberate or inadvertent interference with research studies. Areas meeting roadless criteria are not automatically allocated to particular management areas and do not represent a management area allocation or designation in and of themselves; therefore, they do not belong on the same map with management areas. Maps of inventoried roadless areas were presented at several public meetings and were available for inspection in the Forest Supervisor’s Office during plan revision. Additional explanation regarding the roadless area inventory and wilderness evaluation has been included in the FEIS.

Public Concern: Designation of Blowout Mountain as Scenic Area

Doc#	Cmt#	Comment
111	52	"[reconsider] designation of 526 acres on Blowout Mountain as a Scenic Area because the timber cannot be managed properly if the area receives this designation. If the areas has wind damage or insect damage, that affected area needs to be salvaged to keep the area healthy."

Response

Blowout Mountain is managed as a scenic area under the 1990 Amended Plan. Additional safeguards that allow treatments for pests have been proposed in the Revised Forest Plan. The Revised Forest Plan allows salvage of trees in scenic areas following natural catastrophic events.

Inventoried Roadless Areas

Public Concern: Areas Managed as Roadless

Doc#	Cmt#	Comment
165	67	"Roadless Areas: We support the continued management of the 6 inventoried roadless areas (Bear Mountain, Blue Mountain, Brush Heap, Little Blakely, Rich Mountain, Beech Creek) as if the 2001 Rule were in effect...should not be subject to logging, road building or other intensive managements, whatever the outcome of the court proceedings."

Response

As a result of the roadless analysis and wilderness evaluation conducted for this revision and the alternative selected by the Responsible Official, Beech Creek will remain in Management Area 19 as Beech Creek Botanical Area and Beech Creek National Scenic Area and will be managed to protect and further the scenic and botanical values identified in the legislation that designated these areas. Rich Mountain moves from Management Area 19 to Management Area 2, Special Interest Areas, where it will continue to be managed for natural, botanical, and recreational values. The Bear Mountain area will be managed as part of Management Area 16, Lands Surrounding Lake Ouachita and Broken Bow Lake, where its recreational, aesthetic, wildlife and water quality values will continue to be conserved. The Little Blakely area will be in Management Area 17, Semi-Primitive Areas and will continue to be managed to preserve its semi-primitive character. Blue Mountain and Brush Heap will remain in Management Area 17, Semi-Primitive Areas, and will continue to be managed to preserve their semi-primitive character.

Public Concern: Adequacy of Roadless Analysis

Doc#	Cmt#	Comment
337	99	"...no substantive information was provided for the roadless area analysis polygons (ONF term) unlike some other national forests. This fails to meet NEPA for open public involvement and is arbitrary and capricious."
337	101	"We do not believe that the Forest has the statutory authority to make such [1/2 mile buffer and core solitude requirement] additional restrictions to the roadless inventory and ask that the roadless inventory be redone using the FSH 1909.12 Chapter 7.1 criteria...The Forest used more restrictive criteria based on the Recreation Opportunities Spectrum that essentially combined the roadless inventory and wilderness evaluation steps."
337	102	"To exclude lands from evaluation as wilderness because of a perceived lack of solitude is not supported by law or by congressional practice..."
337	103	"There is not even a flow chart showing how numerous roadless areas were eliminated from public review."
337	104	"Forest Service needs to prepare a SEIS that has maps for each area analyzed in the roadless inventory."
337	105	"...no explanation for most of the conclusions...not consider if any additional areas should be identified as inventoried roadless areas to be covered under the Roadless Area Conservation rule. Almost every area the Forest Service looked at was determined to be not eligible for a Wilderness evaluation. This was because the Forest Service did not follow the proper procedures."
337	106	"Some roadless areas were possibly excluded due to the Forest Service not holding mineral rights for part of the lands. This was not disclosed in the DEIS and the agency should have included an alternative to acquire these mineral rights. The DEIS did not disclose how much of an area did not have mineral rights to the Forest Service that cause its elimination as roadless."
375	252	"Reanalyze roadless areas in accordance with the true intent of laws and guidance and publish maps that allow the public to provide input in this very important process."

Response

We have added information to and clarified the Roadless and Wilderness Section of the FEIS and included a new Appendix G. The plan revision roadless inventory was conducted using guidance from Forest Service Region 8 headquarters (May 19, 1995). This guidance is consistent with both the Wilderness Act and FSH 1901.12. A "1/2-mile buffer" was not used to select the roadless areas as each was identified, initially, based solely upon meeting the test of no more than 1/2 mile of road for each 1,000-acres included in each identified area.

It is important to note that FSH 1909.12, Chapter 7, Section 1, sets out the primary criteria for roadless area identification, namely that roadless areas are roadless, undeveloped areas that satisfy the definition of wilderness found in Section 2(c) of the 1964 Wilderness Act (Act). In our process to identify roadless areas we first completed the task outlined above and only then did we proceed to apply the criteria found in the Act and in Regional guidance for roadless area identification.

Lands may be excluded from wilderness qualification based upon a lack of solitude and primitive-type recreation opportunity, a practice that is well founded in law and regulation. Forest Service guidance, the Wilderness Act of 1964 (Act) and FSH 1909.12, Chapter 7 all clearly reference solitude or the conditions that are conducive to solitude as being necessary for wilderness. Solitude, a primitive recreation experience and a respite from the works of man, is the essence of wilderness. These attributes, among others, are factors to be considered in the qualification of wilderness areas [see: the Act, Sect 2 (c) (2)]; FSH 1909.12, Chapter 7.1 (ties back to the Act), 7.11 (initial roadless criteria) and 7.11(b)(4) for roadless areas east of the 100th Meridian. All of these references link directly to, as is the case of the Act, or describe components of solitude.

Wilderness requirements east of the 100th Meridian, however, have been relaxed to account for the nature of settlement patterns, larger populations, more dense settlement conditions, prior ownership and treatment of the lands that are now under roadless review as well as other pertinent factors (see FSH 1909.12, Chapter 7.11(b). Chapter 7.11(b) makes clear that all the criteria listed in that section are required for a roadless area to be qualified as wilderness. This includes 7.11(b) (4), requiring the consideration of the relationship of the area to sources of noise, air and water pollution, as well as unsightly conditions that would have an effect on the wilderness experience. Additional guidance and clarification provided by our Regional Office states that potential wilderness areas below the 2,500 acre minimum size is not absolute; however, smaller (and some larger) areas should be reviewed carefully for topography, proximity to type and use of roads, population centers and other sights and sounds of human activity to determine if solitude and primitive and unconfined recreation could be experienced (emphasis added). Should we have applied the solitude and primitive-type recreation experience rigidly, there would likely have been no areas that could have qualified due to the developed nature of the Forest and its surroundings.

Poteau Mountain West roadless area was the only area excluded from wilderness analysis consideration due to non-Federal ownership of the mineral estate. The mineral estate of this area has never been under Federal ownership, as it was retained by the seller when the Forest Service originally purchased the land. This area, located west of Poteau Mountain Wilderness is currently the site of commercially producing methane gas wells. Significant surface occupancy has already taken place. Additional investigation and drilling for methane gas is on-going and includes road and pad construction and associated disturbance to the surface. Forest specialists do not believe this area is suitable for wilderness as a result of the alterations to the existing character of the surface and in light of the potential for additional impacts due to exploration and, possibly, additional gas well installations in the future. FSH 1909.12, Chapter 7.11(a) (4) and 7.11(b) (2), (3) and (4) clearly disqualify this area due to the extent of the existing surface occupancy resulting from the previous and on-going development and occupancy that has taken place and in view of the additional work likely to take place in the future.

Minerals, Natural Gas

Public Concern: Minerals

Doc#	Cmt#	Comment
290	76	"...since the completion during 2004 of the updated reasonably foreseeable development review, there has been a continuing increase in the demand for tracts in the Arkansas portion of the Ouachita National Forest in competitive oil and gas lease sales by BLM's Eastern States Office...increased leasing activity is likely to lead to increased drilling and, potentially, increased production of natural gas from lands in the Ouachita National Forest."
290	77	"...Plan that is finally adopted should accommodate and support the increased interest that now exists in the Forest's natural gas resources."
365	220	"SEECO fully supports the development of the LRMP under Alternative 'B' or any approved alternative which includes: the concepts of multiple-use; continues to identify land available for oil and gas leasing; insures and respects the exercise of private mineral rights to explore and develop mineral resources."
365	221	"SEECO regards this estimate [BLM] of drilling and production activity for the RFDS as low...The recent leasing activity by both SEECO and other lessees is indicative of increased activity in many of these areas during the upcoming planning period that the drafters are not fully recognizing. The LRMP must recognize the total active oil and gas leases in the ONF, taking into consideration the results of competitive sales during 2004 and 2005, in order to insure an effective planning document."
365	222	"...drafters have under stated the potential of ONF lands for natural gas...This potential for increased activity needs to be considered for revision of the 'Medium' and 'High' cases for the RFDS and the cumulative impacts fully incorporated into the planning document."
365	223	"If there is a multi-fold increase in anticipated drilling activity, the need and potential impacts of additional roads is under estimated in the RFDS...This extension [previously unexplored areas] will necessitate new road construction where only limited access and unimproved logging access roads may currently exist."
365	224	"Similarly, the RFDS under estimates pipeline activity that would follow from unanticipated drilling activity...The RFDS also fails to anticipate production facilities – principally compression and treatment facilities – that will accompany the pipelines. Such facilities may require siting separate from drilling and production pads and will include compression facilities requiring continuous functioning equipment."
365	225	"The drilling scenario should include the likely utilization of horizontal drilling technology, multiple-well drilling pads and increased well densities for both conventional and unconventional reservoirs...size of the drilling pads could increase from the 2 acres projected in the RFDS to 4 or more acres."

365 226 “It is important that the LRMP correctly reflect anticipated exploration and production activity. If the draft plan under estimates the level of mineral activity, the result will be less funding for the necessary personnel to conduct the required processing of APD’s and development plans associated with such activity.”

Response

The Revised Forest Plan includes the concepts of multiple uses; identifies land available for oil and gas leasing; and allows for exploration and development of mineral resources. The plan does not preclude increased natural gas exploration and extraction. The Forest Service relies upon the expertise of the Bureau of Land Management (BLM) for preparation of the Reasonably Foreseeable Development Scenario (RFDS). We have notified BLM of these concerns and concur with them that no adjustments to the RFDS are necessary at this time.

Interest in leasing may or may not be the result of real evidence for minerals. The Ouachita NF has experienced higher rates of leasing in the past and no discoveries were made. Leasing activity, by itself, does not affect the nature of planning decisions. There simply are too many reasons other than the presence of minerals that causes public interest in securing interest in the mineral estate for a period of time using the leasing process. Based on input from the BLM, The Forest has accessed the best available scientific data for this planning period, and if major changes occur at a future time, required re-evaluations will be addressed as amendments to the Plan. Funding to process APDs is not based on “what if” projections. The agency will appropriately respond if and when conditions change.

The Forest Service primarily is concerned with surface impacts. Drilling technology is expected to actually decrease the potential for surface impact in those cases where multiple wells can be drilled from one pad site location.

Public Concern: Importance of Natural Gas Potential

Doc#	Cmt#	Comment
290	75	“...in the summary of Forest roles and contributions in Part 1 of the proposed Revised Plan, natural gas potential is not even mentioned.”

Response

The natural gas potential of the Ouachita NF is modest and did not merit mention in terms of national, regional, or local significance.

Forest Composition and Structure, General Wildlife Habitat, Biodiversity

Public and Agency Concern: Hardwood Management and Forest Type Conversion

Doc#	Cmt#	Comment
92	44	"The revised plan does not go far enough in detailing plans for oak dominated forest management. Management prescriptions which include commercial and non-commercial thinning of over stocked oak dominated forest types must be discussed...."
292	84	"In addressing oak decline, we believe that the first principle should be recognition that the absence of fire and the resulting excessive density has contributed to the current unhealthy forest condition."
337	141	"The FS also claims that much of the Ouachitas was a pine-bluestem ecosystem. This falsification of forest health and ecosystem composition results in alternatives heavily biased to logging and burning. ...heavy conversion to pine and pine-bluestem...The Forest Service does not have any credible information to support its heavy conversion to pine and pine-bluestem...Statistics show the Ouachita to be hardwood dominated."
337	146	"The Forest Service claims that it has north slope hardwood areas not suitable for logging so it claims that hardwood types and hardwood needs are met. However, this mentality restricts the habitat of species dependent upon hardwoods, den trees, and hard mast."
374	241	"The Commission strongly recommends more detailed, silvicultural strategies to provide historic oak woodland conditions throughout the range. The revised plan does not go far enough in detailing plans for oak-dominated forests."

Response

With the exception of some prescribed burning and occasional wildlife stand improvement actions, the oak dominated forests and woodlands of the Ouachita NF have been treated for decades with what amounts to hands-off management. Rather than project that the Ouachita NF will suddenly shift to an aggressive program of thinning and regeneration harvests in oak stands, The Forest has chosen an adaptive management approach, one that allows forest managers and research partners to begin testing the application of more management tools in hardwoods but does not mandate their widespread use. Plan standards (see thinning guides, for example) provide sufficient flexibility to increase active management in oak systems. The desired conditions for oak-dominated communities (Part 1 of the Plan) include the restoration and maintenance of appropriate fire regimes.

No claim that “much of the Ouachitas was a pine-bluestem ecosystem” was made in the EIS or Plan. The EIS provides evidence (Chapter 3, Terrestrial Communities section) that the pine-bluestem ecosystem provides conditions needed for the conservation of habitat for many species, including at least one federally listed species and several Sensitive ones. Of the nearly 1.8 million acres that make up the Ouachita NF, approximately 350,000 acres (19.4% of the national forest, and including old growth pine-bluestem woodland) will be managed toward pine-bluestem ecosystem conditions. By working toward a desired condition of 350,000 acres of pine-bluestem woodland, the Forest Service will reduce the need for additional listings of threatened or endangered species.

Forest-wide (and some management area specific) standards for retention of den trees and mast-producing trees at the landscape and stand scales were included in the proposed and final versions of the revised forest plan. Standards for retention and regeneration of hardwoods in pine and pine-hardwood stands are also presented in both versions.

Finally, restoration of oak woodlands is an explicit part of the ecosystem restoration strategy within Management Areas 21 and 22.

Public Concern: Inclusions of Hardwood Stands in Pine Old Growth Areas

Doc#	Cmt#	Comment
54	13	“north slope of Kiamichi Mtn., which currently supports Mesic Hardwood and Mesic-Dry Oak forest cover is being proposed to be allocated to MA-21 (Old Growth Pine-Bluestem), an MA that emphasizes an ecosystem type that did not historically occur on north facing slopes and for which the management prescription for is totally inconsistent with maintaining the current (and historical) forest cover for this area”

Response

As noted in the description of MA 21 in Part 2 of the Plan, “Hardwood stands and inclusions will be unsuitable for timber production and will be managed to restore upland hardwood and oak-pine old growth. Fire will not be excluded from these areas, although burns will generally be less intense [due to their higher moisture content, in part] and less frequent.” No existing hardwood stands in MA 21 will be converted to pine-dominated stands. Standard 6.01 was clarified to read: “Where mesic hardwood stands are included in large burning blocks or anywhere within Management Area 21, use techniques that either avoid or result in low-intensity fires within these communities. Direct firing techniques are not encouraged in these communities, unless needed to secure wildfire control lines.”

Public Concern: Development of Old Growth

Doc#	Cmt#	Comment
145	58	“allowing a substantial portion of forest to develop as old growth, to encourage species diversity.”
337	172	“All old growth opportunities should be evaluated independently of potential timber stands. Opportunities must be based on both landscape and structural characteristics...Riparian areas deserve priority for inclusion in old growth designations for watershed protection and wildlife benefits.”

Response

A substantial portion of the forest will be allowed to develop old growth character and other portions will be actively managed to restore old growth characteristics under the 2005 Revised Forest Plan. Management direction for old growth is clarified throughout the Revised Plan, including a “priority statement” in Part 2, an objective concerning old growth inventory (also in Part 2), a new appendix that provides data concerning potential future old growth by management area and ecosystem type, and refinement of some of the standards for MA 21 (Pine Old Growth Restoration).

Public Concern: Early Successional Habitat

Doc#	Cmt#	Comment
337	142	“The Forest Service should only seek to restore early successional habitat on lands cleared in the recent (0-15 years) past, and abstain completely from logging mature forests to re-create early successional habitat...The DEIS should propose an alternative to keep logging and openings on the well distributed even age plantations of the last forty (40) years.”
337	173	“The Forest Service always claims that early successional species require the ...timber sales... [no] proof nor evidence of this claimed need or addresses the impacts to the species currently living in the area.”

Response

The Species Viability Evaluation considered the habitat needs of *all* native species, and the Forest Plan is designed to sustain habitat for those species. It is not possible for every acre or every forest stand to sustain all needed habitats. What the Forest Plan presents is a landscape level approach to sustaining viable habitat for all native plants and animals that regularly inhabit or use the Forest. Early seral habitat is important to the viability of the following species: Bachman's Sparrow, American Kestrel, Northern Bobwhite, Red-headed Woodpecker, Orchard Oriole, Painted Bunting, Bewick's Wren, Prairie Warbler, White-eyed Vireo, Diana Fritillary, A Twistflower, Western Diamondback Rattlesnake, Timber Rattlesnake, Great Plains Skink and Southern Prairie Skink. This habitat is found where herbaceous elements dominate previously disturbed areas such as recently-harvested forests, old fields, and wildfire/wind/ice-damaged areas. Timber sales represent one tool that can be used very effectively to generate early seral habitat. This condition may persist for up to 10 years or indefinitely if stand conditions remain relatively open.

Under the 1982 NFMA planning regulations, the Forest Service is required to “assure that all even-aged stands scheduled to be harvested during the planning period will generally have reached the culmination of mean annual increment [CMAI] of growth.” For shortleaf pine in the Ouachitas, CMAI is not achieved until 60-70 years of age. Therefore, the suggestion that the Forest Service should restore early successional habitat only on lands “cleared in the recent (0-15 years),” virtually all of which have been reforested, is not only impractical but would be counter to the 36 CFR 219 regulations under which this forest plan revision was completed; as such, the Forest Service cannot implement shelterwood, seedtree, or clearcut harvests (the primary means used to obtain early successional habitat) in young stands.

Public Concern: Wildlife Openings

Doc#	Cmt#	Comment
85	36	“We believe that four well distributed 1-5 acre opening per square mile should be the goal of the forests regardless of glades, sufficient woodland condition, or non-fescue openings on private land.”
367	227	“...four well distributed 1-5 acre openings per square mile should be the goal of the forests regardless of glades, sufficient woodland condition, or non-fescue opening on private land.”
374	243a	“The Commission strongly supports the continued emphasis on providing supplemental wildlife planting for game management throughout the forest. Although the planned vegetative management will result in increases in native herbaceous plants and early successional habitat, the requirement of late winter foraging resources these wildlife openings provide game species is crucial in maintaining population levels of several species of wildlife having important social and economical value in local communities.”

Response

The Forest will continue cooperative efforts with state wildlife management agencies to enhance winter foraging opportunities. The Planning Team determined that standard WF008 (“Where open area habitats are not provided by other conditions, develop one permanent wildlife opening, one to five acres per 160 acres of habitat”) was sufficient to address needs for supplemental wildlife openings.

Agency Concern: Wildlife Habitat and Roads

Doc#	Cmt#	Comment
374	243b	“We...recommend additional roadless areas be provided during hunting seasons through the use of seasonal closures of selected roads. These areas will enhance the quality of recreational opportunities while reducing the concentration of hunters.”
367	229	“we would like to see the forests consider reducing the open road density where it exceeds one mile/section and continue to provide for reasonable access for hunting, fishing and other forms of recreation.”

Response

Eliminating unneeded roads is a priority (see Transportation System in Part 2 of the Plan, which also includes three related objectives). Opportunities to reduce road density will be analyzed at the project level using Transportation Design Criteria TR005 and TR006. Wildlife agency recommendations for seasonal road closures in specific areas will be considered on a case by case basis.

Public Concern: The Importance of Dead and Decaying Woody Material

Doc#	Cmt#	Comment
337	122	"The DEIS also fails to cite monitoring results showing the FS has been able to correctly implement coarse woody debris guidelines on the ONF...An environmental impact statement must present a 'reasonable complete discussion of possible mitigation measures.' ..The Ouachita fails to meet this test."
337	181	"Forest Service research indicates dead and decaying wood accounts for about 25% of a forest's biodiversity. The impacts of removing trees on this component of the forest ecosystem need to be considered."

Response

The availability of coarse woody debris on the forest floor and in streams was not an issue during this forest plan revision and therefore was not examined in detail in the EIS. Management direction for dead and decaying woody material includes the following Design Criteria:

WF005 Where timber is harvested, retain or create at least two snags per acre, minimum 12-inch diameter at breast height (dbh) with an objective of 16-inch dbh or larger. Where naturally occurring snags of this size are unavailable or cannot be created, retain or create snags near the required size. Standing snags will not be felled, unless necessary for insect or disease control or to provide for safety.

WF007 Where available, retain 50 linear feet of pine logs (12-inch diameter or greater) and 50 linear feet of hardwood logs (12-inch or diameter greater) per acre as wood debris on the forest floor within harvest areas. Felled logs will be oriented along contours.

Agency Concern: Restoration of Stands of Native River Cane

92	42	"Restoration of native cane stands on appropriate sites also should be planned and emphasized where ecologically appropriate."
292	82a	"Restoration of stands of native cane on appropriate sites also should be planned and emphasized where ecologically appropriate."

Response

Riparian-dependant native cane stands may be restored within streamside management areas (MA 9) where ecologically appropriate. Site-specific project-level analyses are the best tools for assessing cane restoration opportunities.

Public Concern: Herbaceous Understory

337	168	"...impacts to herbaceous understory needs to be addressed. Research indicates herbaceous-understories never recover from logging."
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Response

This concern was not raised as an issue during scoping and was not treated as a significant issue. There is a substantial body of evidence cited in the FEIS that demonstrates that, in the Ouachita Mountains, the response of herbaceous understories to logging and burning is generally an increase in diversity and a profusion of growth. The research alluded to (but not documented) in comment 168 may have been in mesic hardwood forests, where the response of herbaceous understories is quite different.

Public Concern: Inventory and Protection of Rare ("Unique") Plant Communities

Public Concern: Rare Upland Communities

Doc#	Cmt#	Comment
54	11	"Only 34, 430 acres have been identified and allotted to MA 6 (Rare Upland Communities)."
54	14	"...accurate inventory of rare upland communities...is necessary in order to allocate the appropriate acreage."
337	185	"The analysis needs to identify and the Forest Service needs to protect all unique plant communities."

Response

Areas known to contain rare upland plant communities are assigned to Management Area 6. Any additional rare upland plant communities located during subsequent inventories will be allocated to Management Area 6. To clarify this intent, Objective 12 was added to Part 2 of the Plan. Management Area 6 (Rare Upland Communities, including Mesic Hardwood Forest, Montane Oak Forest, Dry Oak Woodlands, Novaculite Glade and Woodland, Acidic Cliff and Talus, Dry Acidic Glade and Barrens, Calcareous Prairie) is specifically designed to conserve rare upland communities.

Public Concern: Biodiversity and Species Viability Evaluation

Doc#	Cmt#	Comment
57	22	"a diversity index is used to analyze economic issues, while no such index is applied to forest biodiversity."
57	25	"...an analysis of burning on biodiversity should be included."
165	65	"Scientific References:...conclusions on the impacts of their management activities on PETS species, historic ecosystem composition, historic fire return intervals, or the probably results of the prescribed burning program are not sufficiently supported by proven science to be utilized in the DEIS."

- 337 144 “The Forest Service absolutely must include strong species viability standards and mandatory monitoring requirements for population counts...In conjunction with this should be a comprehensive analysis of what size of forest patches will remain after implementation of the plan, and what species are currently occupying these areas.”
- 337 183 “The analysis needs to address the status of native fisheries and mussels and stream habitat quality compared with historic conditions in areas to be logged, Forest and region-wide. The analysis needs to disclose the population trends of exotic or introduces species relative to native fisheries and mussels in areas to be logged. The impacts logging will have on these populations needs to be addressed.”
- 337 167 ”...protect neotropical migrants and biodiversity in general. The longer the Forest Service waits, the worse the problem becomes. Biodiversity and forest fragmentation must be addressed in regard to all species, not just birds. The degree to which this area provides a biological corridor and its value should be considered.”
- 337 169 “Analysis needs to be conducted and presented to show the range of potential impacts for the following variables: total amount and distribution of late-successional and mature forest habitat; total amount and distribution of important wildlife habitats now uncommon due to past human activity (e.g., riparian forests, native grasslands, etc.); total amount and percentage of forest habitat compromised by edge effects; size distribution and habitat patches by seral stage and forest type; forest patch perimeter to edge rations; amount and distribution of roadless area within and adjacent to the planning area; degree of connectivity between both individual forest stands and larger habitat blocks; degree of structural contrast between habitat patches; population viability analysis for species or feeding guilds most prone to fragmentation effects (e.g., area sensitive mammals, forest-dwelling songbirds)...The analysis must consider the functional, structural, and compositional attributes of biodiversity. The analysis needs to evaluate the existing condition of biodiversity, and compare it with the natural range of variability.”
- 337 170 “To adequately consider the impacts of the project on biodiversity at the landscape scale, the following analysis must be conducted for all of the alternatives: size distribution of habitat patches for all community types and forest seral stages; patch size diversity index; degree of connectivity maintained between habitat patches at various scales, particularly between those patches that are now uncommon in the landscape (e.g., late successional forest, roadless areas); vegetation mosaic patterns; cumulative effects at scale of watershed and regional ecosystem; comparison of landscape patterns created by development to those created by natural disturbance regimes for all the above variables; maintenance of uncommon or unique landscape elements (e.g. rare plant communities, natural ecotones, undistributed vegetation along environmental gradients, et.)”
- 337 171 “The analysis needs to consider the cumulative and site specific effects of logging on biodiversity. The analysis must consider impacts on the following levels of diversity: 1) regional landscape, 2) community-ecosystem, 3) population-species, and 4) genetic. The analysis area must be large enough to consider biodiversity on all these levels.”

375 257 "The Forest Service absolutely must include strong species viability standards and mandatory monitoring requirements for population counts in this Forest Plan. Only by maintaining viability can the agency avoid having to consider the impacts of having species become listed as threatened or endangered. In conjunction with this should be a comprehensive analysis of what size of forest patches will remain after implementation of the plan, and what species are currently occupying these areas. Also, the list of monitored species needs to include frogs, bats, snakes, salamanders, and perhaps other groups of species that occur on the forest."

Response

The FEIS documents that the planning team thoroughly analyzed all ecological systems identified by NatureServe for the Ouachita Mountains and West Gulf Coastal Plain associated with the Ouachita NF. The team analyzed the ecological consequences of the various alternatives for these terrestrial and aquatic systems by comparing existing conditions (including key factors such as ratios of early, mid and late successional habitat, remoteness/road density, fire frequency and season) to desired conditions according to needs of the associated 145 terrestrial and aquatic plant and animal "species of viability concern" as determined by the most current science and the expert opinions of knowledgeable biologists and ecologists. The team drew upon data and expertise from the natural heritage inventory programs in Arkansas and Oklahoma, The Nature Conservancy, the Arkansas Game and Fish Commission, the Oklahoma Dept. of Wildlife Conservation, and other experienced biologists and ecologists and reviewed nearly 800 publications. The Species Viability Evaluation (SVE) conducted for this planning effort identified and considered each species of viability concern rangewide, within the Interior Highlands, and at the National Forest level. The habitat needs of all other native plants and animals were considered to be satisfied by achievement of the desired conditions identified in the Plan and FEIS for ecological systems and habitat elements. All alternatives were designed to conserve viable populations of all native species that live within or complete an important part of their life cycle on the Forest.

Public Concern: Interior Forest Habitat

Doc#	Cmt#	Comment
337	143	"There needs to be clear criteria in the plan for identifying areas that would be available for interior forest habitat restoration, and clear and enforceable standards and guidelines for implementing such restoration."
375	253	"Include at least one alternative that includes blocks of 300,000 acres minimum as interior forest habitat restoration."
375	254	" The forest is already fragmented severely, which is having a serious impact on the ecology of the forest. Openings should be limited to large openlands and to those lands that have natural openland communities and are not being significantly encroached by forest succession."

Response

Although “interior forest habitat” was not identified as a significant issue, the SVE addressed the needs of species associated with interior forest habitat such as the Cerulean Warbler. “Interior forest habitat” was not a significant issue because normal forest management practices have not been shown to be important fragmenting influences (the major documented fragmenting influences on forests and woodlands are conversion to farms, pastures, industrial sites, and suburbs and construction of new highways), and therefore, there was no need to develop special criteria or alternatives to address interior habitat. Nonetheless, the EIS discusses the current and desired conditions and the associated biodiversity of all ecological systems of the Ouachita Mountains and West Gulf Coastal Plain identified by NatureServe that occur within the Ouachita NF.

Public Concern: Tree Species Diversity

Doc#	Cmt#	Comment
337	151	“Tree species diversity needs to be tracked on a stand-by-stand basis, not solely on a forest-wide basis. It is foolish to think that you can address tree species diversity ONLY on a forest-wide scale-without site-specific data.”

Response

The Ouachita NF uses standardized stand sampling procedures to collect data for entry into the vegetation database. Trees within sampled plots are identified by species and various other attributes. The collected data provide sufficient information to depict species composition and forest structure on a stand-by-stand basis.

Agency Concern: Desired Condition of Pine-Bluestem Community

Doc#	Cmt#	Comment
357	205	“...we believe that many of the details specified for MA 21 (pg 42) could and should apply to MA 22 (pg 44) also. The desired condition stated for stands within MA 22 is 60 to 120 square feet of basal area per acre. At the upper end of this range, these stands would be too dense for optimum Red-cockaded Woodpecker habitat and for significant pine reproduction. We feel the range, indicated for MA 21 (30 to 80 square feet basal area per acre) would produce better Red-cockaded Woodpecker habitat and more effectively secure pine regeneration.”

Response

The Forest agrees that 120 sq. ft. of basal area is too dense for optimum RCW habitat. However, the only stands in this MA that will have basal areas as low as 30 sq. ft. will be those in a shelterwood regeneration condition. Compared to the conditions that will prevail in this MA, shelterwood stands will be a relatively uncommon landscape feature. The desired conditions in terms of tree basal area over most of MA 22 range from 60 sq. ft. to 80 sq. ft. The Revised Forest Plan text has been changed to reflect these desired conditions.

Doc#	Cmt#	Comment
357	206	"...disturbance regime for MA 21 is provided in the Management Plan: 'These forests will be maintained by frequent, moderately intense ground fires, some of which will occur in the summer and fall (July- November). Fire return intervals will range from one to more than four years, but will occur on an irregular basis at varying times, seasons, and intensities. Fires will be frequent enough, and hot enough to suppress the woody understory, and to occasionally kill individual overstory trees or small groups of trees.' We believe that this description is applicable also to MA 22, for which there are very few details provided regarding how fire will be applied."
357	207	"The <u>Regeneration</u> section for MA 21 specifies that 'The periodic use of prescribed fire under open canopies may promote natural regeneration at irregular intervals, resulting in "banked" advanced reproduction in many core and replacement stands...' At least part of this description should be adapted and applied to the regeneration strategy for MA 22."

Response

We agree and have added similar language to the description for MA 22

Protection of Watersheds and Riparian Areas

Public and Agency Concern: Protection of Watersheds and Drinking Water Quality

Doc#	Cmt#	Comment
60	27	"...sediment and nutrient load in Lake Ouachita. Volume data is not included in the DEIS or revised Plan."
60	28	"...data needs to be gathered...1: How many acres of logging and by what cutting methods will it occur annually? 2) What will be annual volume of road construction of all types? 3) How many acres of burning will occur annually?"
143	56	"...implementation of BMPs designed specifically for the protection of drinking water quality; increased buffer management zones; zones of exclusion; working with stake holders to best determine the appropriate protection measures; additional and/or increased monitoring activities."
145	60	"Watershed setbacks must be substantial to preserve the health of the watershed, to prevent erosion, and to preserve recreational uses."
259	72	"Design criteria that state the maximum percentage of a particular watershed that can undergo harvest at any particular time should be considered."

- 337 127 “The failure of the FS to monitor watershed conditions and fish population trends (over time) and required by the Forest Plan and by NFMA means the assumptions built into the DEIS cannot be taken as valid or reliable. The DEIS fish survey data used in the risk determinations ignored the most important information. (The 1970’s ADEQ survey of aquatic species.)”
- 337 129 “There are thousands of acres of private timber lands in close proximity and their impacts will be cumulative on wildlife habitat, soils and streams and they must be considered together under NEPA...Analysis of specific timber sales located near each other and a comprehensive evaluation of the environmental effects of these sales when added together must be performed in an EIS...To protect and restore water resources, and to manage the public lands for the greatest good of the public, the Forest Plan should identify and following objectives: maintain fully forested conditions within its boundaries; stop building roads; dis-allow expansion of mining activities; discontinue herbicide use; management plans should reflect watershed preservation values.”
- 337 130 “It did not diffuse ‘ongoing urbanization’ that is impacting the Ouachita, with a variety of private and public entities creating the cumulative impact. Rather, a series of timber sale projects (all of them planned and carried out by the Forest Service) are being implemented, creating biological impacts to Ouachita watersheds.”
- 337 136 “The Forest Service has not regularly conducted such monitoring or evaluation, and has not obtained accurate scientific monitoring data or written evaluations, specifically, with regard to the assessment of impact in the DEIS. The DEIS analysis is based on Forest Service opinions conjecture, and very limited aquatic survey data.”

Response

The amount of detail requested in comments 27 and 28 for a specific part of the Forest is outside the scope of this Forest-wide analysis. Estimates for Forest-wide activities are provided in the EIS for items 1 and 3 in comment 28. Item 2 cannot be accurately determined until site-specific analysis is conducted during Forest Plan implementation. An annual program of work is produced that shows scheduled timber sales, road construction, and planned areas of prescribed burning.

At the project (Forest Plan implementation) level, all watershed disturbing actions are designed, and mitigation measures specified, so as not to exceed the maximum allowable soil loss for that harvest unit. This ensures that soil productivity will be maintained on each harvest unit. To ensure that the watershed remains in good condition a cumulative watershed impacts analysis is performed. Rather than using a model based on some arbitrary percentage of a watershed area impacted, the Ouachita Forest uses the IMPACTS model, which assesses cumulative watershed impacts of proposed management activities and activities on private, state, and other federal lands.

The watershed cumulative effects analysis for water quality and associated beneficial uses included activities and/or land uses on the private lands within each watershed assessment—see the Water Quality section in the FEIS. Sediment values were listed for 5th level watershed around Lake Ouachita and Forest-wide. The Revised Forest Plan adds clarification concerning best management practices for protection of public source areas and watersheds. Annual Monitoring and Evaluation Reports, available at <http://www.fs.fed.us/r8/ouachita/projects/>, summarize the results of periodic watershed and fish population monitoring

The most recent publication by ADEQ concerning aquatic species (Arkansas Department of Pollution Control and Ecology. 1987. Physical, Chemical, and Biological Characteristics of Least-Disturbed Reference Streams in Arkansas’ Ecoregions, ADPCE, Little Rock, AR) was reviewed and used in the risk determinations for aquatic species as part of the analysis for the EIS.

Public Concern: Watershed Preservation as an Issue or Sub-issue

Doc#	Cmt#	Comment
60	29	"...watershed preservation, should be added as a category to the Ecosystem Health and Sustainability Category."

Response

The Forest agrees that watershed health is vitally important and that it is part of Ecosystem Health and Sustainability. However, significant issues were defined during scoping, and initial conclusions about what constituted significant issues for plan revision were shared through the Notice of Intent to prepare an EIS, through newsletters, and in several series of public meetings; this suggestion never came up. Although Watershed Health is not listed specifically as a sub-issue, it nonetheless was a high priority that the interdisciplinary team addressed. Rather than add Watershed Health as a sub-issue, the focus was on refining standards designed to protect soil and water quality (watershed health). See Forest-wide design criteria for soil and water, vegetation management, and transportation and Management Area 9.

Agency Concern: SMZ Width and Layout

Doc#	Cmt#	Comment
374	239	"...Commission offers ... SMZ recommendations."
378	264	"...protective "zone" of variable distances but at least 100 feet from both edges of perennial streams and the shores of lakes or ponds greater than 0.5 acre and 30 feet from both edges of other streams with defined channels. We urge you to stand by the same decision for land surrounding public water supplies as pressure for future development in their watersheds can and will threaten water supplies."

Response

SMA recommendations by slope are shown in the Plan and are the same or greater than those recommended. The proposed Revised Plan includes protective standards for public water supplies.

Public or Agency Concern: Concept of "Limited Cutting" in SMAs

Doc#	Cmt#	Comment
357	212	"The plan states that streamside management areas are, depending on their location, between 100 and 30-feet in width. Limited cutting will be allowed in these areas; however, the concept of limited cutting is vague and should be defined more explicitly such that conservative land management practices in these sensitive areas are maintained."

Response

The proposed and final revised plans clearly indicate that 100 feet either side of a perennial stream and 30 feet either side of other defined channels (non-perennial streams) are the *minimum* widths for streamside management areas (SMAs). Clarification concerning valid rationales for tree cutting in SMAs has been added to the final revised plan (see Management Area 9 direction).

Public Concern: Groundwater and Springs

Doc#	Cmt#	Comment
337	179	"The DEIS did not assess the impacts of planned activities upon groundwater and springs."

Response

Springs are protected as part of Management Area 9. Groundwater effects were not identified as a significant issue but were discussed in Report 3 of the Ozark-Ouachita Highlands Assessment (1999), which informed this plan revision.

Agency Concern: Stream Crossings

Doc#	Cmt#	Comment
357	211	"Greater priority should be placed on reducing the impact of road crossings on stream morphology and fish passage."

Response

The Ouachita NF is at the forefront of research on the impacts of fish passage at road crossings in warmwater stream environments and continues to adjust crossing designs and test them for improving fish passage. We also work closely with partners studied stream morphology changes. The proposed Revised Forest Plan includes an objective to improve aquatic organism passage on an average of no fewer than six stream crossings per year and a Forest-wide standard requiring that all new stream crossings be constructed so that aquatic organism passage is not impeded.

Public Concern: Firelines in SMAs

Doc#	Cmt#	Comment
259	68	"An alternative for bladed firelines that cross streams in streamside management areas should be considered...We suggest no blading within 30 feet of any stream channel."

Response

This alternative approach was considered but was not included in any plan alternative. However, the 2005 Revised Forest Plan includes the option to use firelines constructed with hand tools where feasible.

Public and Agency Concern: Extra SMA Protection for Aquatic T&E Species

Doc#	Cmt#	Comment
42	8	"...rare endemic crayfish, <i>Orconectes saxatilis</i> , is known only from the headwater of the Kiamichi River and its upstream tributaries...such non-permanent reaches would be afforded inadequate protection."
42	9	"...although the species [<i>Orconectes saxatilis</i>] is found in a low risk watershed, the actual risk under any of the management plans is higher than "low"."

259 69 "T& E species (i.e., several mussel species and the leopard darters)]...non-perennial portions of these stream be afforded the same protection as the perennial portions...minimum buffer zone of 100 feet...recommend buffers of 100 feet, 125 feet, and 150 feet on all channels (perennial and otherwise) with slopes of 0-15%, 15-35%, and >35%, respectively, for streams that harbor T&E species or other species of concern."

Response

Management Area 9 (Water and Riparian Communities) includes stringent standards for protection of the riparian zones and streams in which these species occur. Additional protection is provided for most leopard darter habitat by virtue of its inclusion in MA 20 (Wild and Scenic River Corridors). We have called attention to the potential need for additional conservation measures for aquatic species by adding the following standard to the 2005 Revised Forest Plan:

TE003 As part of project planning within sixth level watersheds where aquatic Proposed, Endangered, Threatened, Sensitive (PETS) species occur or are anticipated to occur downstream from proposed ground-disturbing management activities, consider additional measures (e.g., wider Streamside Management Areas) to conserve habitat for these species.

Agency Concern: Decommissioning Roads to Protect Riparian Areas

Doc#	Cmt#	Comment
374	237	"...high priority [should] be placed upon decommissioning un-needed roads and trails, especially within riparian ecosystems...The manner by which roads are decommissioned is unclear and requires more details to what methods, (rehabilitate, obliterated) will be employed."
292	82b	"We recommend that the Forest place a high priority on identifying unneeded roads within riparian areas. Decommissioning and closure of unneeded roads adjacent to streams will address multiple aquatic and riparian health issues."

Response

Decommissioning unneeded roads is a priority under the proposed Revised Forest Plan. Under Watershed Function, there is a priority to, "Identify roads and trails that should be reconstructed or decommissioned to reduce sediment and improve watershed condition." An additional priority was added to Part 2 of the Plan that states, "When conducting roads analyses, place special emphasis on reducing the impacts of roads in Streamside Management Areas (by proposing roads closures, road reconstruction, or other means)." Through project level roads analyses, unneeded roads or those contributing excess sediment to streams and/or SMAs are identified and recommended for improved maintenance, reconstruction or decommissioning to correct erosion problems. Two objectives in the Plan also address road decommissioning: OBJ37–By 2015, identify all system roads that should be obliterated. Performance Indicator: miles of system roads decommissioned. OBJ38–Obliterate 25 percent of roads identified under the previous objective by 2015 (many such needs to obliterate roads will be identified well before 2015). Performance Indicator: miles of road obliterated by 2015.

Cumulative Effects

Public Concern: Adequacy of Cumulative Effects Analysis

Doc#	Cmt#	Comment
337	116	"The DEIS fails to link the current and cumulative soil disturbance across thousands of acres in the cumulative effects area watersheds to the impact on water quantity, Quality and downstream erosion."
337	128	"The DEIS fails to adequately address the cumulative impacts 'which result from the incremental impact of the action (timber sales, burning and road construction of the Draft LRM) when added to the already heavily impacted condition of the Ouachita watershed."
337	131	"The Forest Service has made the same error here, by failing to disclose cumulative impacts of the Draft Plan activities on the environment."
337	132	"The Ouachita uses the arbitrary 115% sediment increase as its threshold on site specific projects! The National Marine Fisheries Service (NFMS) criticizes the use of Best Management Practices (BMPs) and mitigation as poor surrogates for addressing cumulative watershed effects because BMPs are addressed to individual actions and fail to do limit the totality of individual actions within a watershed."
337	133	"The DEIS utterly fails to adopt these scientific [Besechta et al. (1995)] recommendations regarding cumulative effects analysis."
337	134	"The DEIS under cumulative impacts on water quality refers to a process ...for predicting sediment yields for analyzing cumulative effects of proposed management action on water quality specifically for the Plan level...not been peer reviewed...just describe[s] the process for predicting Plan level sediment increases but uses values from the Ozark highlands. It displays examples of sediment increases in table form...'sediment values are expressed as a percent increase over the baseline'...This table [3.8] does not include predicted sediment increases for plan activities by Draft Plan alternative."
337	135	"...supposed risk levels for watersheds is based on very limited data and did not use historical survey data that covers a longer period...more appropriate for cumulative impacts analysis...risk levels in Table 3.8 are based only on current sediment levels. Thus the DEIS fails to analyze impacts of Draft Plan actions."

337	176	“The issue of the impacts to soil and water quality needs to be addressed. The effects of soil compaction and vegetation/nutrient removal must be considered. The analysis needs to address the impacts of decreased water quality due to increasing rates of soil erosion and mass wasting events. The effects of sedimentation, nutrient removal, and increased temperatures resulting from logging must be considered. The analysis needs to address the <i>cumulative impacts on aquatic communities, including fisheries...cumulative threats to water quality</i> , including logging, illegal dumping, oil and gas leasing, wildlife openings upstream of areas to be cut down must be addressed. The analysis needs to identify all these threats. The analysis needs to identify and protect all riparian areas, wetlands, and floodplains.”
356	191	“The preferred alternative also completely lacks cumulative air and water quality assessments, especially concerning effects of large-scale fires on human health...effects of smoke and particulate matter harming the many thousands of persons in Arkansas and surrounding states who suffer from asthma, emphysema, chronic bronchitis and COPD medical health conditions. We strongly request that total program impact to human health by prescribed fires under this alternative be assessed, including coordination with other agencies conducting prescribed fires in the region.”
356	197	“Increased logging would result in more road construction and erosion, which has and continues to be a concern.”
356	198	“...we’re also concerned about the lack of assessment of cumulative water quality effects resulting from combined timber harvest and other management activities.”

Response

The FEIS species viability evaluation and cumulative watershed analysis address all of these concerns. The ongoing Basin Area Steam Surveys have not detected changes in aquatic populations over time in response to different intensities of vegetation treatment/logging. Moreover, MA 9 standards were developed to minimize potentially detrimental effects from watershed activities to aquatic systems, with monitoring protocols designed to detect changes in water quality and aquatic community health. These impacts are evaluated as projected sediment increases, and a risk rating is determined for aquatic biota.

The cumulative effects model has been peer reviewed. The effects/consequences chapter of the FEIS provides the analysis of each watershed for each alternative for the first 10-year period.

The cumulative effects analysis did not use the 115% threshold; instead, the Forest calculated a risk level for each watershed, as reported in the FEIS and further described in a process paper within the administrative record.

Public Concern: Effectiveness Monitoring Data

Doc#	Cmt#	Comment
337	114	“Without a detailed analysis of soil and watershed impacts informed by past effectiveness monitoring data, the Forest Service simply cannot insure that soil and watershed conditions in the forest will not be significantly and permanently impaired.”

Response

The Forest continually analyzes soil and watershed impacts through effectiveness monitoring to ensure that long-term soil productivity and watershed conditions are not impaired. Effectiveness monitoring includes on-site project activity, monitoring by watershed specialists, timber sale administrators and other Forest Service representatives, and through Implementation Monitoring Reviews. The results of these actions are documented and actions taken where problems or improvements are needed to correct deficiencies. Examples of analyses used at the project level to ensure soil and watershed conditions will not be impaired include the use of the Modified Universal Soil Loss Equation and IMPACTS models in all watersheds. Results of these monitoring efforts were fully incorporated in the FEIS analysis.

Public Concern: Peak Stream Flows

Doc#	Cmt#	Comment
337	123	“The water quality analysis ignores the occurrence of high peak flows. (See Clingenpeel and Leftwich, 2005, Process Paper)...Historical Forest Service aerial photographs reveal this damage [from high intensity storms]...The DEIS dismisses the importance of water quantity caused sediment increases and does not analyze this very important impact...The DEIS did not predict sediment yield from peak flow events, which cause increased stream channel bank erosion and downstream sediment deliver, a modeling and data deficiency not disclosed in the DEIS. The DEIS fails to disclose that increased peak flows may well cause increased disturbance of toxic, carcinogenic, and otherwise harmful contaminating sediments.”
337	124	“The DEIS doesn’t disclose that estimates of water yield increases, such as by WATSED do not model instantaneous events or other storm events.”
337	125	“The DEIS also doesn’t disclose or analyze that high peak flow events, due to storm events or simply because of land altering cumulative activities, cause instream sediment erosion that affects aquatic habitats.”
337	137	“The present DEIS did not even provide that analysis [water yield increases].”
337	138	“The DEIS fails to disclose the Draft Plans potential for causing increased stream flows and flooding resulting from heavy storms common in the Ouachitas constitutes a violation of NEPA regulations Sections 1502.1(b) and 1502.24, requiring that the agency gather high quality information, provide accurate scientific analysis, and insure professional and scientific integrity.”

Response

The calculation of sediment levels is actually based on stormflows. Both models used (WEPP and USLE) have rainfall factors. These storm flows, while not specifically displayed, are included in sediment calculations.

Changes in Peak Flows were not addressed. Local research (Miller, Beasley and Lawson, 1986, Stormflow, sedimentation and water quality responses following silvicultural treatments in the Ouachita Mountains) has demonstrated that stormflow volumes and peaks in larger storms were not influenced by such treatments.

Types and Levels of Timber Harvesting

Public Concern: Use of Uneven-age Management Practices

Doc#	Cmt#	Comment
337	186	"The Forest Service needs to consider true uneven-aged management (selection management). The Forest Service must not attempt to use 'patch-clear-cutting' in place of 'group selection.' Group selection does not use area regulation, it uses diameter distribution regulation."
356	199a	"We recommend that timber harvest activities focus on single tree selection & canopy maintenance, with a maximum of 10% canopy reduction resulting."

Response

The Forest Plan projects that uneven-aged management, including single tree selection and group selection, will be employed to meet desired conditions. National policy establishes that a group opening should be no more than 2 acres in size.

Public Concern: Level of Logging Permitted

Doc#	Cmt#	Comment
356	196	"We are very concerned that the preferred alternative would allow logging of 1.1 million board feet/year – almost double that of the 1986 forest plan."
358	214	"Second, the extent of logging allowed under the preferred alternative is excessive—double the level prevalent 20 years ago. A certain level of logging is acceptable in a managed multiple-use forest, but the preferred alternative has gone considerably beyond that level."

Response

The allowable sale quantity (ASQ) increased from 26.2 MMCF to 27.0 MMCF, representing only a slight increase from the 1990 Forest Plan. This amount is less than the ASQ of 32.4 MMCF in the 1986 Forest Plan.

Public Concern: Size Limits for Harvesting

Doc#	Cmt#	Comment
259	71	"Regulations or design criteria on the size of stands (in terms of acres) that can undergo harvest at any particular time should be considered."

Response

The 2005 Revised Forest Plan provides size limits by (suitable) Management Area for even-aged regeneration harvests.

Public Concern: Inadequate Forest Management

Doc#	Cmt#	Comment
379	272	“Of the approximate 1.8MM total acres only 27% (486M) of the acres would be managed by the proposed alternatives in the proposed plan. The preferred alternative...would manage less than 50% (495M) of these 990M acres as and this calculated into 27% of the total 1.9MM acres and this is totally unacceptable for an environmentally healthy forest plan. ”
379	278	“The plan should manage all of the 990 M acres in the next fifteen years, which calculates into 66M acres per year.”

Response

To enter all acres identified as suitable for timber every 10-15 years would exceed allowable watershed impact levels. Suitable acres are where sustained timber activities are permitted. Project analysis determines where specific activities occur during the plan cycle. Ecosystem health is one factor considered when determining where to apply treatments.

Technical Corrections

Public Concern: Editorial Corrections

Doc#	Cmt#	Comment
52	10	“the total acres in the ONF is consistently noted as 1,780,101” Pages 11-17 ... the total comes to 2,037,879”
373	234	“...DEIS refers to an existing Forest Plan when it should refer to a Proposed Revised Forest Plan.

Response

Corrections have been made in the final documents.

Public Concern: Southern Pine Beetle Risk Rating of Preferred Alternative

Doc#	Cmt#	Comment
345	188	“Alternative E had the most acres at risk (838,000) from the Southern Pine Beetle (SPB).”

Response

The error in calculation of this measure has been corrected in the FEIS.

Public Concern: Clarification of Term “Revised”

Doc#	Cmt#	Comment
292	87	“ <i>Revised</i> should be defined for this table [Table S.1].”

Response

Table S.1 compares the preferred alternative as the Proposed Revised Forest Plan Management Areas to the Management Areas in use in the 1990 Amended Forest Plan.

Legal Requirements

Public Concern: Legal Requirements for Forest Plans

Doc#	Cmt#	Comment
379	274	“The law requires a 10 year management plan to be written. Also required is that the proposed plan offer an alternative for maximum positive environmental health, air, water, soil, wildlife, trails, roads healthy industries, positive economic and recreation purposes without constraints. This proposed plan does not have that alternative.”
57	24	“Plans do not adhere to ...Statute Section 219.15, Vegetation Management Practices” The vegetation management practices chosen for each vegetation type and circumstance shall be defined in the forest plan with applicable standards and guidelines and the reasons for the choices. Where more than one vegetation management practice will be used in a vegetation type, the conditions under which each will be used shall be based upon thorough reviews of technical and scientific literature and practical experience, with appropriate evaluation of this knowledge for relevance to the specific vegetation and site conditions.”

Response

The Revised Forest Plan is the 10-15 year management plan required by law. Within the scope of the reasonable range of alternatives, Alternative C maximizes ecosystem health.

Vegetation management practices for vegetation types are described in detail in the Revised Plan. See Forest-wide and management area-specific standards concerning even-aged management, group selection, single-tree selection, and thinning, including the tables that specifically address these forms of management. In addition, many management areas include specific direction regarding when and where particular practices may be used, and the Plan sets out desired condition statements for each of the community types that are based on best science.

Public Concern: Availability of Appendices for DEIS

Doc#	Cmt#	Comment
337	100	“Appendix B of the DEIS as well as other Appendixes are not listed in the table on contents in the printed copy. This violates the public review opportunity...This denies the public an opportunity for reasonable and meaningful review and lets the agency hide its very biased process as discussed herein. Areas were excluded by the Ouachita without allowing the public an opportunity to have any look into this matter in the published documents. This violates NEPA and the Public Trust responsibility of the agency.”

Response

The DEIS appendices were not printed and distributed with the DEIS, but they were published on the Forest website, and the availability of appendices upon request was noted on page iii of the DEIS and on page 19 of the Summary. 40 CFR 1502.18 states that appendices must be circulated with the environmental impact statement *or be readily available on request*.

Public Concern: Incorporation of Forest Plan Amendments

Doc#	Cmt#	Comment
337	111	“The DEIS did not disclose the significant amendments to the 1990 Plan and how, or if, they were incorporated into the draft plan.”

Response

The starting point for this plan revision was the 1990 Amended Forest Plan, *as subsequently amended*. An electronic version of the Forest Plan that incorporated all amendment language remaining in effect at the time the Notice of Intent was issued was provided on the Ouachita NF website and hard copies of this version were also made available upon request. Notice of the availability of the electronic version of the amended Forest Plan was included in newsletters.

Public Concern: Failure to Meet Intent of Applicable Laws

Doc#	Cmt#	Comment
337	113	"The ONF has failed to meet the intent of the APA, NEPA, and NFMA with its heavy logging and burning alternatives which are all aimed at producing pine to the detriment of many other resources."

Response

Alternatives were formulated to address the significant issues, which strongly featured ecosystem health, not "producing pine"; specific guidance is included in the proposed Revised Forest Plan related to conservation of hardwood stands and hardwoods in pine-dominated stands.

Public Concern: Range of Alternatives

Doc#	Cmt#	Comment
57	23	"...Plan is also deficient in that it does not contain a range of alternatives as required."
263	219	"Please provide an alternative that deemphasizes commercial logging and instead works to restore watersheds."
373	235	"The DEIS is very bloated with irrelevant data from extraneous sources and lacking in on-the-ground analysis. The DEIS has failed totally in the primary purpose of taking a hard look at issues and giving a reasonable range of alternatives. All four of the so called alternatives to the current direction are identical."
373	236	"For example, see table 2.1 DEIS, management areas 18: Trails, has been eliminated from ALL alternatives."
375	248	"We request that a reasonable range of alternatives be included which address the issues and concerns presented herein. The Forest Service must go back and better define the issues. It should reexamine the hundreds of detailed comments provided on the 1989 draft plan, which were largely ignored in the final 1990 plan. Nothing has changed on the forest to address this past input."
337	107	"The Draft LRMP, purpose and need is so restrictive that a reasonable range of alternatives is not presented to the public."
337	108	"...courts have reprimanded the Forest Service for formulating a purpose and need so as to exclude other alternatives."
337	109	"The highly restricted range of alternative evaluated and considered violates the very purpose of NEPA's alternative analysis requirement: to foster informed decision making and full public involvement."
337	165	"Alternatives, which are not connected to logging, must be developed and considered to respond to the majority of Americans who do not want their national forests cut down...Court ruled that while the Forest Service is allowed to log national forests, the Forest Service is not required to cut down the public's forests...Claiming that what the majority of American want is 'beyond the scope of the analysis' is ignoring the public and subverting democracy."

356	189	“...the plan, with its emphasis on resource extraction instead of wildlife habitat, watershed protection and recreation, doesn’t address public desires and needs.”
375	249	“Include an alternative that manages the forest without commercial logging, off road vehicles, oil and gas development and mining.”
337	110	“The DEIS failed to consider reasonable alternative that would have allowed alternative cutting methods and ecosystem preservation that would not be so pine biased as all the Draft LRMP alternative.”
165	61	“Please explain why the alternatives under consideration have been limited...What is missing is a significant variation in the alternative offered for consideration...request that an additional alternative be developed that responds to our original scoping letter request...as presented by the Arkansas Sierra Club.”

Response

The Forest Service appropriately followed NEPA regulations at Sec. 1502.1 “It [EIS] shall provide full and fair discussion of significant environmental impacts and shall inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data.”

Five alternatives were analyzed in detail and several others were considered but not analyzed in detail either because they did not sufficiently differ from the five identified alternatives or they failed to represent reasonable alternatives. Four alternatives (plus the present Forest Plan as the No Action Alternative) were sufficient to address the significant issues and provide a sufficiently broad range of alternatives for consideration. For this revision of the Forest Plan, the scope of the undertaking was limited to changes needed in current management (as represented by the 1990 Amended Forest Plan). Within this scope, the needed changes to the Forest Plan proved modest, and the complexity of the analysis and the number of alternatives required for this FEIS were correspondingly less than those accompanying the 1986 Forest Plan and the 1990 Amended Forest Plan. The range of alternatives considered in detail in this FEIS appropriately reflects the relatively modest need for change and the nature of the significant issues identified. Nonetheless, substantial variation exists among alternatives in terms of projected management activities (e.g., prescribed burning, application of uneven-aged management, thinning acres), acres in the high SPB risk category, acres recommended for wilderness designation, acres in Fire Regime Condition Class 1 or 2, projected annual net revenue for the planning period, population response by terrestrial management indicator species, species viability scores, and OHV use direction.

A no logging alternative was outside the scope that was determined during the early stages of the analysis and public involvement process. Logging in and of itself was not identified as a significant issue, internally or externally. Within the scope of the reasonable range of alternatives, Alternative D has the lowest emphasis on commercial logging. However, the use of timber sales is often the most reasonable and prudent means to meet minimum management requirements for wildlife habitat on this national forest, including habitat for the endangered red-cockaded woodpecker.

Portions of the Sierra Club alternative were adopted in one or more alternatives; others were not, as explained in Chapter 2 of the EIS.

Under this iteration of forest planning, the Forest opted to maintain a consistent number, type, and placement of management areas (in the action alternatives) and to vary the degree and/or type of management that takes place within each management area. MA 18 remained a part of Alternative A. The MA 18 was specifically removed from other alternatives because the new Forest-wide Scenery Management System should serve as a more effective means to maintain or enhance scenic quality than a linear management area that addresses only those areas near the most traveled roads and trails. As identified in our response to Doc 82, Cmt 33, above, we have included improved protections for trails in the final proposed revised plan.

Public Concern: Formulation of Alternatives/Unconstrained Alternative

Doc#	Cmt#	Comment
379	271	“No alternatives were used to consider the positive environmental health on air, water, soil, wildlife, trails, roads, healthy industries, positive economics and recreation purposes without any constraints placed on budgets, manpower or supervisors direction.”
379	275	“...factual data from the forest be entered into the computer with no constraints on budget, manpower or supervisors direction.”
379	276	“All other proposed alternatives should show the negative environmental impact and cost to the forest compared to an alternative without constraints.”
379	277	“The intent of this plan should reflect the goals and objectives not only for the next ten year but also for the next 150 to 200 plus years.”

Response

Alternatives unconstrained by budgets or manpower would be inherently “unreasonable,” particularly in an environment where budgets and manpower are steadily declining. In addition to eliminating budget and manpower constraints, the suggested approach to designing an alternative contains too many parameters to incorporate into a reasonable alternative. However, these parameters were certainly taken into consideration when the Responsible Official for this Revised Forest Plan selected the alternative determined to provide the greatest net public benefits.

The legally mandated scope of analysis (36 CFR 219) requires that certain environmental constraints be applied. At the beginning of the analysis process, a range of alternatives was also established, narrowing the latter to a reasonable range. The Desired Condition statements in the 2005 Revised Forest Plan (Part 1) are expressions of the Forest’s long-term vision as are the stated priorities and objectives (Part 2). For the analysis, the Forest projected 200 years into the future. Most data published in the FEIS reflect 50-year projections.

Public Concern: No Action Alternative

Doc#	Cmt#	Comment
337	166	“The no-action alternative of the Draft LRMP is not a true no action alternative. It continues the damaging activities of the present plan. Not having a true no action alternative is a violation of NEPA.”

Response

The Council of Environmental Quality (CEQ) specifically addressed this concern in its “Forty Most Asked Questions [concerning NEPA]” <http://ceq.eh.doe.gov/nepa/regs/40/40p3.htm>. In response to this very question, CEQ has this to say: “Section 502.14(d) requires the alternatives analysis in the EIS to ‘include the alternative of no action.’ There are two distinct interpretations of ‘no action’ that must be considered, depending on the nature of the proposal being evaluated. The first situation might involve an action such as updating a land management plan where ongoing programs initiated under existing legislation and regulations will continue, even as new plans are developed. In these cases “no action” is “no change” from current management direction or level of management intensity. To construct an alternative that is based on no management at all would be a useless academic exercise.”

Public Concern: “Negative Impacts” of Alternatives

Doc#	Cmt#	Comment
379	273	“None of the proposed alternatives explain ...in laymen terms...the negative impact that these proposed alternatives are costing our forests.”

Response

The EIS discusses the full range of environmental impacts. Some clarification has been added to more clearly express the effects of alternatives on forest/ecosystem health in “laymen’s terms.”

Public Concern: “Paucity of Citations” for Published Research

Doc#	Cmt#	Comment
54	17	“There is a paucity of citations for research published in peer reviewed journals.”

Response

Research used in the preparation of the species viability evaluation was largely cited within the Species Viability Evaluation database; however, in the FEIS all of the citations have been added to the references section. In the FEIS, a citation for the SVE (available on the Forest website or upon request) has been added that will lead the reader to nearly 800 references. Appendix E includes short citations (author, year) for these references for each species included in the SVE.

Public Concern: Adequate Involvement of Inholders

Doc#	Cmt#	Comment
373	232	"Inholders [were not integrated] in the planning. When you prepare the Final EIS please comply with 36 CFR Section 219.6 (k)...and include the results in the appropriate section of the EIS." Address West Nile Virus; spreading of Lyme Disease; Ungulant fever and Brucellosis; smoke emissions; use of herbicides."

Response

The revised forest plan does not include a section that addresses private inholders' concerns and interests separately. However, the revised forest plan contains substantial direction that is responsive to inholder concerns that have been expressed over the last 10-15 years, including smoke from prescribed burns, use of herbicides, motor vehicle (including OHV) access, rights-of-way, landownership patterns, military use, recreation access, and public water supplies. See, for example, the desired condition statements for Fire (Community Protection and Safety), Landscape (Scenery) Management, and Transportation System along with standards for use of prescribed fire and herbicides.

Forest inholders were included on the Forest Plan mailing list and received the Plan Revision newsletters as well as other announcements. The numerous public meetings held to discuss issues, present inventories and alternatives and later to explain the commenting process all presented excellent opportunities for discourse on topics related to plan revision. A brief discussion concerning public involvement opportunities for forest inholders has been included in Appendix A to the FEIS.

Public Concern: Response Measures

Doc#	Cmt#	Comment
165	62	"Evaluation Methodology...there is no explanation of the priorities placed by the FS on each of the seventeen Response Measures."
165	64	"Response Measures...revised(d) to incorporate measurements of forest restoration activities...include categories including miles of existing roads obliterated and restored to native forest and acres of non-native pine plantation restored to native forest, for example."

Response

The Forest did not attach priorities to the response measures; they were used to provide a basis for comparing the alternatives in relative terms. Objectives concerning restoration of native forests in loblolly pine plantations and obliteration of roads have been clarified in the 2005 Revised Forest Plan.

Public Concern: Adequacy of Suitability Analysis

Doc#	Cmt#	Comment
337	140	"...the suitability analysis does not meet the requirements of NFMA and the amount of allowable logging will be detrimental to the forest soil and water resources."

Response

The NFMA itself merely directs the Forest Service to "promulgate regulations, under the principles of the Multiple-Use, Sustained-Yield Act of 1960, that set out the process for the development and revision of the land management plans...The regulations shall include, but not be limited to—(2) specifying guidelines which-(A) require the identification of the suitability of lands for resource management." The 1982 regulations promulgated under NFMA specify that "During the forest planning process, lands which are not suited for timber production shall be identified in accordance with the criteria in paragraphs (a) through (d) of this section." (219.14) The summary of the results of this analysis was presented on page 49 of the Proposed Revised Plan and appears in the 2005 Revised Forest Plan as well. The assertion that "amount of logging will be detrimental to the forest soil and water resources" is not supported by the analytical evidence presented in the EIS.

Public Concern: Role and Nature of Design Criteria (Standards) in the Plan

Doc#	Cmt#	Comment
54	15	"Standards should be stated in defined, unambiguous language in order to inform both the public and Responsible Official what actions are and are not allowed. As an example,... not encouraged.."
165	63	"Design Criteria: These standards should be enforceable and clearly stated so that the public understand what management activity is allowed in each management area."
337	154	"...standards and guidelines for each management prescription for each management area...should be clear, appropriately detailed so that the public cannot have a good idea of what is being planned, and enforceable. Vague, broad statements which do not provide any kind of boundary on agency action do not comply with the requirements of the law."
375	260	"The National Forest Management Act requires each forest plan to contain standards and guidelines for each management prescription for each management area which provide important boundaries on the actions of the agency in implementing the plans. Each management prescription should contain its own standards and guidelines, and they should be clear, appropriately detailed so that the public can have a good idea of what is being planned, and enforceable. Vague, broad statements, which include terms, like "should" or "may" or "at the discretion of" are unenforceable. These kinds of standards and guidelines do not provide any boundary on agency action and do not comply with the requirements of the law."

Response

Standards are designed to guide project design toward achieving desired conditions. During this plan revision, a concerted effort was made to both streamline the number of standards and to write standards in the clearest form possible. Between proposed and final revised plans, we made a concerted effort to refine the language in standards even more, and we eliminated at least one use of “not encouraged” and other vague language.

Public Concern: Differences in Standards Between Draft and Final

Doc#	Cmt#	Comment
337	112	“The DEIS did not disclose the substantive difference in the Draft Plan and present plan standards and guidelines. For example, what streamside protection zone standards are now in place compared to those of the Draft Plan?”

Response

The Forest has clarified the streamside protection areas in the final Plan.

Public Concern: Availability of Forest Service Directives

Doc#	Cmt#	Comment
54	16	“...references to internal guidelines (Forest Service Manual, Forest Service Handbook) should be minimized. If it is necessary to reference these documents, which are not widely available to the public, the applicable text should be included in the Plan Design Criteria (Standards).”

Response

During this plan revision, a concerted effort was made to minimize duplication of guidance in the Plan that is already presented in regulations or Forest Service directives. References to these other sources of guidance are provided in Appendix F. Forest Service directives are readily available at <http://www.fs.fed.us/im/directives/>.

Agency Concern: Consultation Requirements

Doc#	Cmt#	Comment
292	93	“ ... adding text [concerning consultation with the US Fish and Wildlife Service] to the Threatened, Endangered, and Sensitive Species, and Their Habitats introduction.”

Response

Introductory text has been augmented with the following shown in italicized text: “*The Forest Service Manual (FSM 2600)* and standards for the following MAs supply additional guidance for managing habitats of federally listed and Sensitive species and protection of their populations: Wilderness (MA 1), Rare Upland Communities (MA 6), Water and Riparian Communities (MA 9), and Renewal of the Shortleaf Pine-Bluestem Grass Ecosystem and Red-cockaded Woodpecker Habitat (MA 22).” FSM 2600 covers consultation procedures concerning federally listed species and those proposed for federal listing.

Pesticides

Public Concern: Pesticide Use

Doc#	Cmt#	Comment
57	26	"...forest management should not include the use of herbicides."
375	255	"Chemical pesticides or genetically altered species should not be used on the forest."

Response

Herbicide use on the Ouachita NF is guided by a set of strict Forest-wide and Management Area design criteria. See, especially, Forest-wide Standards in the section titled Herbicide Use and the many provisions for limited use of herbicides or herbicides in riparian areas (Management Area 9, Water and Riparian Communities).

Public and Agency Concern: Herbicide Use – Broadcast Application

Doc#	Cmt#	Comment
92	48	"HU003. Please add the following text. "Broadcast application should be used only for noxious weed eradication/control programs, not for general forestry work."
292	95	"HU003 - Add the following text: 'Broadcast application should be used only for noxious weed eradication/control programs, not for general forestry work.'"
374	245	"...the Commission recommends the allowance of both stem and broadcast application of herbicides for the control of privet, kudzu and fescue...as a preventive measure of control, pre-treatment of <i>Sericea lespedeza</i> , especially along roadsides, in conjunction with prescribed burns.

Response Broadcast applications of herbicide to control non-native invasive species are not precluded by the Plan. The Forest Specialist will monitor the relationship of prescribed burning and the spread of *Sericea lespedeza*; pretreatment with herbicide presents several practical challenges, however, including being able to apply herbicide effectively at least one month prior to the prescribed burn and possible loss of erosion-controlling vegetation along roadsides for months at a time.

Standard HU003 was amended to partially address this concern: It now reads, "To minimize potential effects of herbicide use, whenever possible, use individual stem treatments, directed spraying, and crop tree release rather than broadcast or grid applications. Do not use broadcast or grid applications within Streamside Management Areas (see MA 9 for other restrictions)."

Invasive Species

Public and Agency Concerns: Annual Treatment Acres for Invasive Species

Doc#	Cmt#	Comment
92	46	"...invasive native and non-native species...not consider 200 acres as the maximum annual treatment acres. Rather than suggest a larger acreage, we ask an allowance for flexibility to treat acres identified within budget constraints."
292	91	"...increase the minimum annual acres treated for invasive species to 300 {OBJ02}..important for control of <i>Sericea lespedeza</i> ."
374	246	"...spread of invasive native and non-native species. The planned annual treatment is 200 acres forest wide. We believe there is a much greater need for such treatments and would ask that you no consider 200 acres as the maximum annual treatment acres."

Response

OBJ03 has been revised to "Treat at least 300 acres per year for non-native, invasive species."

Public Concern: Invasive Species Introduction and Management

Doc#	Cmt#	Comment
337	159	"The Forest Service should take an aggressive stand on exotic species introduction and proliferation in the ONF. Extensive monitoring should be routine covering intact forest and other ecosystems as well as, and most importantly over logged areas, right-of-ways, and other manufactured opening in the forest. ..Exotic species removal should be carried out manually wherever possible...Herbicide use should be discouraged."
337	178	"The analysis needs to address what impact the timber sale would have on the possible introduction and spread of invasive exotic species."

Response

The Forest Health section of the FEIS includes analysis of biological threats to forest health including outbreaks of insect pests and diseases, and intrusions by invasive, non-native species. The proposed 2005 Revised Forest Plan contains provisions to address non-native invasive species, including a Forest-wide objective to conduct control operations on at least 300 acres per year. Methods for control are always analyzed at the project level; often, mechanical/hand removal will result in fragmenting invasive plants, allowing them to multiply rapidly and make the situation worse. Herbicides may be the only feasible method to insure long-term success in controlling non-native, invasive species in some situations, but that conclusion can only be reached at through project level analysis and decision.

Public Concern: Fire Ant Control

Doc#	Cmt#	Comment
292	83	"...encourage you to develop planning direction for preemptive site-specific fire ant control, although this objective should receive a lower priority than management of invasive plant species."

Response

The Final Revised Plan includes a Priority to "Use an integrated pest management approach to prevent or reduce damage to forest resources from pest organisms, including non-native, invasive species." Given the state of available technology and knowledge, anything more specific about fire ant control would be premature. The Forest Service will continue to work with other federal and state agencies to identify integrated pest control strategies for fire ants and other non-native, invasive insects that pose threats to human health and wildlife and to deploy such strategies where most needed.

Public Concern: Special Forest Products

Doc#	Cmt#	Comment
337	152	"In the Draft Plan and DEIS the FS failed to consider non-timber forest product and their traditional and continuing use by local families for food, medicine, and income."

Response

"Special forest products" was not raised as a major concern internally (Forest Service) or externally (public, other agencies) and therefore was not treated as a significant issue in the EIS; however, standard SU003 in the Revised Forest Plan addresses this concern.

Public Concern: Cost of Timber Sale Program

Doc#	Cmt#	Comment
337	153	"The FS needs to give a clear analysis of how much taxpayer money is lost on the commercial timber sale program on the ONF, and fully disclose how the budget of the ONF is affected by this program...FS should work to find creative ways to redirect the money lost on the timber sale program to employ local individuals in non-commercial restoration activities."

Response

The EIS analyzes revenues that may be expected from certain activities, including timber sales, and compares estimated revenues to expected costs. Estimated net revenue from the projected timber program for the first decade under the Revised Forest Plan is \$6.8 million.

Transportation

Public Concern: Road Density

Doc#	Cmt#	Comment
337	161	"...backlog on road maintenance...Clearly, the Forest Plan for the ONF should move the policy on roads in a new direction...reduce road density, particularly in sensitive areas."
337	162	"It is of special importance to avoid road construction in both inventoried and uninventoried roadless areas."
374	238	"When planning road closures, we recommend the increased use of gates with information signs and reduced use of earthen mounds as road closure devices. Experience has shown that gates re more effective than earthen mounds for road closures."

Response

The Transportation System objectives address these concerns. Also see Forest-wide standards TR004 and TR005.

Agency Concern: Transportation – Definition of "Decommission"

Doc#	Cmt#	Comment
92	41	"...a more complete description of what is meant by road decommissioning is needed in the glossary..."

Response

An expanded definition of road decommissioning is in the glossary.

Livestock Grazing

Agency Concern: Livestock Grazing – Clarification of Restrictions

Doc#	Cmt#	Comment
292	88	"A list of restrictions should be provided to clarify the definition of 'Restricted' within Table S.2"
378	267	"Please see Table S.2, page 18, MA 20, Wild and Scenic River Corridors Column 3 related to Livestock grazing. We would prefer a change from Suitable, Restricted to Not Suitable and Restricted in those areas where streambank erosion might occur from cattle watering."

Response

Table S.2 was revised to better explain the livestock grazing restrictions and to direct the reader to Forest-side livestock grazing standards and Management Areas standards.

Grazing in MA 20, Wild and Scenic River Corridors, remains “suitable;” however, specific standards for additional protection of these corridors were added. See standards LG002 and LG004; Table 3.10 (Management Activities Permitted or Prohibited within Streamside Management Areas (SMAs)); and standard 20.03 (Wild and Scenic River Corridors): “Livestock grazing levels will not be increased. Measures will be taken to minimize livestock use of the rivers themselves, including construction of alternative water sources outside the corridors. No livestock distribution facilities or convenience structures (i.e. salting and dusting stations, corrals) will be constructed or placed in MA 20.”

Public Concern: Livestock Grazing - Woodlands

Doc#	Cmt#	Comment
356	203	“We are concerned about the potential for increased livestock grazing with creation of savannah/woodland areas, and request that no there be no increased livestock grazing allowed under the final forest plan.”
357	210	“...we believe that livestock grazing on MA 22 should be eliminated or severely restricted until research has been completed to define the impacts of cattle on pine/bluestem restoration.”
357	208	“The <u>Design Criteria</u> section for MA 21(pg 112) states that livestock grazing will be limited: “Restrict livestock, except where grazing is necessary based on site-specific analysis to mimic the ecological role formerly played by elk and bison. When livestock are in use on surrounding lands, consider their impacts on vegetation on a site-specific basis...” We believe this criterion should apply to MA 22 also.”

Response

Range allotments and the number of grazing animals (animal unit-months) are declining steadily on the Ouachita NF and are likely to continue to decline. Where grazing continues, safeguards are in place to protect resources. In the general Forest area, grazing of only up to 50% of available forage is allowed. Allotment management plans address potential overgrazing in the woodlands of MA 22. Within this Management Area, available forage is calculated on the basis of 25% utilization rather than the standard 50% utilization in the rest of the Forest. Effects of grazing are monitored, and the Forest has the ability to apply additional controls should adverse effects to woodland areas become evident.

Agency Concern: Livestock Grazing - Effects Analysis

Doc#	Cmt#	Comment
357	209	“On page 235 of the Draft Environmental Impact Statement (DEIS), the statement is made that, “There are few cumulative effects from the continuation of the grazing program.” Later in the same paragraph the author states: “Because grazing levels are below the estimated grazing capacity of the forest, the cumulative effect of the grazing program is considered insignificant.”

Response

This section has been reviewed and rewritten.

Agency and Public Concerns: Livestock Grazing - SMA and Riparian Protection

Doc#	Cmt#	Comment
374	242	“...continue to control livestock numbers and mitigate negative effects by restoring, enhancing, or maintaining the integrity of stream channels and banks. We also ask as interest in the use of existing woodland allotments diminishes, or if declining range conditions indicate, you place a priority on phasing out woodland grazing permits.”
92	49	“LG002. ...text...which would specify that allotment plans include forage improvements by way of thinning and prescribed burning along with development of small ponds as livestock water sources, and conversion of off site loblolly pine plantations.”
292	96	“Livestock Grazing, LG 002 – Add the following text: ‘Allotment plans will include forage improvement by way of thinning and prescribed burning along with development of small ponds as livestock water sources, and conversion of off –site loblolly pine plantations.’”
292	97b	“Add [suggested] standards [to Livestock Grazing]: Where grazing is currently allowed, control livestock numbers and mitigate negative effects to restore, enhance or maintain the integrity of stream channels and banks. Feeding troughs or water troughs will not be placed in riparian zones or defined channels. Salt blocks and mineral blocks will be placed in boxes or containers to control leaching into soils and will be placed in allotment uplands to encourage forage use away from riparian zones.”

Response

Provisions to protect resources from cattle grazing, including protection for Water and Riparian Areas (Management Area 9), are provided in Table 3.10 and in other MA 9 standards and in Forest-wide standards LG001 through LG004. LG005 now states that “Grazing allotment plans will be designed to minimize effects on water quality, recreation use and timber production. Grazing will be restricted if adverse impacts on water quality, recreation use, or timber production becomes evident.

Requirements specific to each allotment will be addressed at the project level. Actions such as prescribed burning, thinning, restoration of native species, and development of livestock water sources are allowed in the management areas where the grazing allotments exist, with exceptions and extra limitations for MA 9.

Public Concern: Livestock Grazing – Protection of MA 21 and 22

Doc#	Cmt#	Comment
92	45	“Because of the potential for selective grazing to interfere with the restoration of the bluestem component of the ecosystems, we recommend that impact of grazing in Management Areas 21 and 22 be closely monitored.”

Response

The Forest agrees, and it is the intent to do so. There is relatively little cattle grazing on national forest lands in or near the vicinity of Management Area 21. In fact, most of the remaining grazing allotments and by far the greatest number of cattle unit months are in the Broken Bow unit of the Oklahoma Ranger District, which was acquired in late 1996 and has a long history of grazing allotments. Nonetheless, in response to this comment, a new standard (21.03) was added: “Restrict livestock, except where grazing is necessary, based on site-specific analysis, to mimic the ecological role formerly played by elk and bison. When livestock are in use on surrounding lands, consider their impacts on vegetation on a site-specific basis; in general, fencing should not be necessary. Livestock will not be physically excluded from MA 21.” For MA 22 the following standard is in the 2005 Revised Forest Plan “22.08 Livestock grazing may utilize up to 25 percent of the annual forage growth, but will not exceed this amount.”

Public and Agency Concern: Livestock Grazing - Restoration of Native Species

Doc#	Cmt#	Comment
292	85	“We encourage the Forest to develop plans to convert any existing fescue and Bermuda pastures to native warm season forage species.”
92	47	“...support a higher priority plan on conversion to native species and would like to see more than 500 acres annually treated...place emphasis on initial allocation of these acres to Oklahoma portions of the national forest within existing range allotments.”
92	50	“No new non-native planting should be allowed. Feeding troughs or water troughs should not be placed in riparian areas. Salt block and mineral blocks should be placed in boxes or containers to control leaching into soils and should be placed in areas which will encourage grazing away from riparian zones. “

292	92	“...FWS would like to see more than 500 acres per year converted to native habitat types. If this is not possible, place emphasis on initial allocation of these acres to Oklahoma portions ... in range allotments...provide an increased forage base away from sensitive streams and riparian areas and reduce the streamside grazing pressure issues.”
374	247	“If you have improved pasture systems in non-native forage species such as fescue or Bermuda grass we ask that you add language or standards that would plan for conversion to native forage grasses. No new non-native planting should be allowed.”
292	97a	Add [suggested] standards [to Livestock Grazing]: “Pasture or field systems currently in non-native plant species, such as fescue or Bermuda grass, will be converted to native cool or warm season grasses as opportunities or budgets allow. When seeding to establish or maintain range forage in pastures and openings, use native species compatible with the ecological site.”
292	97c	“Existing permitted woodland allotments will be phased out as permits are terminated, or if range condition dictates. Provide structural and non-structural improvements that meet overall management goals and objectives to obtain desired livestock distribution and proper forage use throughout grazing allotments.”

Response

The following components of the Revised Forest Plan, most of which were adjusted between draft and final, respond to these concerns: Standards LG002 (discussed previously under Livestock Grazing - SMA and Riparian Protection) and LG004 [“No livestock distribution facilities or convenience structures (i.e. salting and dusting stations, corrals) will be constructed or placed in riparian areas, streamside management areas, or floodplains”]; Table 3.10 (Management Activities Permitted or Prohibited within Streamside Management Areas); and (within Wild and Scenic River Corridors), standard 20.03 [“Livestock grazing levels will not be increased. Measures will be taken to minimize livestock use of the rivers themselves, including construction of alternative water sources outside the corridors. No livestock distribution facilities or convenience structures (i.e. salting and dusting stations, corrals) will be constructed or placed in MA 20.”]

OBJ11 addresses conversion of offsite loblolly pine plantations to native species by establishing an objective to “treat at least 500 acres per year. “ The Revised Forest Plan does not preclude treating additional acreage for conversion to native species.

There are few fescue or Bermuda grass pastures within the Ouachita NF. The Forest is moving to restore those to native species. Few woodland allotments exist and, due to choices made by permittees, the number of such allotments is declining. Required structural and non-structural improvements that are necessary for livestock grazing are addressed in the site specific range allotment plans.

Soil Productivity, Soil Productivity Monitoring

Public Concern: Soil Productivity

Doc#	Cmt#	Comment
337	117	"The DEIS sorely misses the issue of maintaining soil productivity. The Forest Service does not have any reasonable amount of substantive, quantitative monitoring of soils in the Ouachita to support claims of protection of the soil resource as the DEIS claims...There is simply no watershed level analysis of soil impacts. The DEIS ignores the larger issue of soil productivity and watershed impacts."
337	118	"The meaning of soil productivity in the terminology of NFMA is largely ignored by the Forest Service...the FS still cannot assume that there has been no 'significant or permanent impairment of the productivity of the land' as NFMA requires."

Response

The EIS addressed soil productivity concerns. The allegation that the Ouachita NF has not conducted or supported substantive, quantitative monitoring of soils is incorrect. See subsequent section for a list of relevant studies and associated reports. Comment 118 is not well informed. The Forest has not ignored the meaning of soil productivity and assumes nothing when it comes to maintaining the productivity of the land. Maintaining or improving long term soil productivity is a common concern that is elaborated upon in the EIS and addressed in depth by design criteria specified in the Revised Forest Plan (See "Soil and Water Resources" in Part 3 of the 2005 Revised Forest Plan). The Forest has and will continue to pro-actively pursue monitoring and scientific studies (see, for example, those listed in the response area of the following section) that evaluate the relationships between management actions and maintenance of long term soil productivity.

Public Concern: Monitoring/Research to Validate the Effectiveness of Mitigation Measures for Soils

Doc#	Cmt#	Comment
337	115	"The Forest Service on the Ouachita relies upon mitigation for soils, but cites no monitoring or scientific studies to validate the effectiveness of the mitigation."
337	121	"...federal courts have evaluated the adequacy of mitigation measures the EISs and EAs rely upon. Relying upon inadequate mitigation measures to protect soils fails to meet this judicially specified test of compliance with NEPA regulations. The Forest Service must have scientifically sound monitoring upon which to base its DEIS analysis. This monitoring does not exist on a reasonable sampling of typical ONF timber sales. Thus, the DEIS has no data for its analysis."

Response

The Ouachita NF has worked with cooperators from universities and the Forest Service's Southern Research Station to complete a number of scientific studies relating to soil productivity and the possible need for added mitigation. Additionally, the Forest has been active with soil productivity monitoring. Our Forest monitoring results agree with the scientific studies performed in the Ouachita Mountains and scientific expert opinion that those management activities performed on the Ouachita NF are not resulting in loss of long term soil productivity. Some of the latest Ouachita National Forest specific research and monitoring studies are listed below and cited in the EIS:

Scientific studies:

Beasley, R.S., Miller, E. L. and Lawson, E. R.. 1987. Chemical Properties of Soils and Streams in Natural and Disturbed Forest Ecosystems in the Ouachita Mountains. Publication No. 132. Technical Completion Report Research Project G-1212-02. Arkansas Water Resources Research Center.

Ku, T.T. and Lawson, E.R. Jan. 1993. Soil Nutrient Study Data Analysis and Interpretation – Ouachita National Forest. Report submitted from Dept. of Forest Resources, U of A at Monticello. 16 p. unpublished.

Liechty, H.O., Luckow, K.R. and Guldin, J.M. 2005. Soil chemistry and nutrient regimes following 17-21 years of shortleaf pine-bluestem restoration in the Ouachita Mountains of Arkansas. *Forest Ecology and Management* 204 (2005): 345-357.

Liechty, H.O., Luckow, K.R., Seifert, J., Marion, D.A., Spetich, M., and Guldin, J.M.. 2004. Shortleaf Pine Ecosystem Restoration: Impacts on Soils and Woody Debris in the Ouachita Mountains of the Southern United States. 16th International Conference, Society for Ecological Restoration, August 24-26, 2004, Victoria, Canada. 5pp.

Leichty, H.O., Shelton, M.G., Luckow, K.R. and Turton, D.J. 2002. "Impacts of Shortleaf Pine-Hardwood Forest Management on Soils in the Ouachita Highlands: A Review." *Southern Journal of Applied Forestry*, Vol. 26, No. 1, pages 43-51.

Masters, R.E., Engle, D.M and Robinson, R.. 1993. Effects of timber harvest and periodic fire on soil chemical properties in the Ouachita Mountains. *SJAF* 17:139-145.

Scoles, S., Anderson, S., Turton, D., Miller, E. Undated. *Forestry and Water Quality: A Review of Watershed Research in the Ouachita Mountains*. Circular E-932, Oklahoma Cooperative Extension Service, Division of Agricultural Sciences and natural resources, Oklahoma State University. 30pp.

Stanturf, J.A., Marion, D.A., Spetich, M., Luckow, K.R., Guldin, J.M., Liechty, H.O., and Meier, C.E.. 2000. Soil quality and productivity responses to watershed restoration in the Ouachita Mountains of Arkansas, USA. In *Forest Ecosystem Restoration: Ecological and Economical Impacts of Restoration Processes in secondary Coniferous Forests*; Proceedings of the International Conference held in Vienna, Austria; ed. Hubert Hasenauer.

Wheeler, G. L. and Eichman, J.K., Feb. 1991. The Effects of Forest Management Practices on Soil Nutrient Status – A final report to the USFS, Ouachita NF. Cooperative Agreement #19-90-056 with the U of A. 56 p. unpublished.

Monitoring Studies:

Luckow, K.R. 2000. Effects of shortleaf pine-bluestem ecosystem restoration on long term soil productivity on the Ouachita National Forest. 21pp. Monitoring report (on file).

Luckow, K.R. 2000. Effects of shortleaf pine-bluestem ecosystem restoration on soil quality on the Ouachita National Forest – Implications for improved water and air quality and watershed condition. 14pp. Monitoring report (on file).

Luckow, K.R. 1999. Monitoring Results of Prescribed Fire on Soil Erosion, pH and nutrient levels from two prescribed burns on the Caddo Ranger District of the Ouachita National Forest. (Report on file).

Luckow, K.R. 1998. "Soil compaction monitoring of 20 timber harvest unit subplots on the Ouachita National Forest. In: Appendix D of the Environmental Assessment for Amendment No 27 to the Forest Plan for Changing Applicable Forest Plan Standards and Guidelines Related to Soil Compaction and Normal Operating Seasons." May, 1998. USDA-Forest Service, Ouachita National Forest, Hot Springs, Arkansas.

Public Concern: Soil Productivity Standards

Doc#	Cmt#	Comment
337	119	"Also, soil productivity can only be assumed to be maintained if it turns out that the soil Standards work. To determine if they work, the Forest Service would have to undertake objective, scientifically sound measurements of what the soil produces (grows) following management activities. But the FS has never done this on the ONF."

Response

The Southern Region and Ouachita NF soil quality standards were developed by scientists from both the academic and Forest Service communities as threshold indicators to determine if soil productivity is being maintained. These threshold indicators, which are designed to be measurable on the ground, include soil compaction, displacement, organic matter retention, erosion and deep tire rutting. The Ouachita NF has been monitoring these standards for a number of years, even prior to their becoming Regional soil quality standards. Two notable "scientifically sound" monitoring studies include the Forest soil compaction study and the pine-bluestem restoration soil quality monitoring study cited in the previous section. These were performed in cooperation with the Southern Research Station and University of Arkansas, School of Forestry at Monticello. The Forest also monitors soil quality standards in a more general way through timber sale administration, other soil disturbing projects using contracting officer representatives or Forest Service representatives, Implementation Management Reviews, and spot checking of project work by forest soil scientists. In addition, the Forest Service has established long term soil productivity monitoring plots across the nation, through Forest Service Research units, to test how well these standards work.

Doc#	Cmt#	Comment
337	120	"The DEIS must include estimates of damage to soils and must include all potential sources of detrimental soil disturbance for Draft Plan actions."

Response

The EIS discusses and analyzes the major sources of detrimental soil disturbance as it relates to the Forest's soil quality standards. In addition, a comparative estimate of erosion by alternative is given in Figures 3.5 and 3.6.

Prescribed Fire, Smoke, and Fuels

Public Concern: Data Concerning Prescribed Fire

Doc#	Cmt#	Comment
54	18	"DEIS is deficient in ... empirical data that ... Prescribed burning in the dormant season adequately mimics the ecological impacts of the historic fire regime in the Ouachita mountains (late-growing season) and is an acceptable practice for ecosystem restoration and maintenance."

Response

Use of dormant season prescribed burning on the Ouachita NF is not based on a premise that it "adequately mimics the ecological impacts of the historic fire regime in the Ouachita Mountains." While the Forest recognizes that fire has been an important ecological force in the Ouachita Mountains for thousands of years, the modern use of prescribed burning on the Ouachita NF is based more on its demonstrated efficacy as a tool for creating or maintaining desired vegetation structure and composition (and other desired ecosystem attributes) than an attempt to mimic the fire regime of any particular era. The roles and effects of prescribed burning in both the dormant and growing season have been extensively and intensively examined in research efforts in Ouachita Mountain ecosystems, as summarized in the FEIS. Literature references relevant to this question have been added to the FEIS. While the 2005 Revised Forest Plan calls for continued use of dormant season burns, it also calls for increased use of growing season burns. There is some debate among scientists about seasonality of burning in the pre-European forest. The best estimate is that about 20% of the pre-European burning occurred during the growing season (Rich Guyette, personal communication.)

Doc#	Cmt#	Comment
54	19	"DEIS is deficient in ... empirical data that ... Fire return intervals were as frequent as the USFS contend, particularly in late-successional habitats."

Response

The FEIS clarifies that desired fire return intervals for ecological systems are estimates and are based on a variety of sources, including General Land Office descriptions of 19th century forests (Foti and Glenn), dendrochronology studies (Guyette) and ecological (or biological) requirements of specific fire-adapted species and/or communities (Masters and others). The peer-reviewed results found in the ecological system descriptions represent a consensus opinion among leading experts.

Doc#	Cmt#	Comment
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54 20 “DEIS is deficient in ... empirical data that ...the fuel reduction activities that are mandated (not simply allowed, as you are designating “treatment “ targets to measure compliance with the Plan) by the proposed Plan Revision will actually reduce the risk of large scale fire events, and associated threats to life and property.”

Response

The FEIS clarifies that the expected effect of the projected program of prescribed burning is to lower and maintain fire regime condition class and restore some of the forest to woodland communities. Fuel loading (amount and kind of fuel) in woodlands is lower than in closed-canopy forests (e.g., fuel model 2 conditions versus fuel model 9). The expected outcome of vegetative changes from forest to woodland is to lower the risk of catastrophic (stand-replacing) fires in treated areas with less total fuel and no ladder fuels to carry fire into other canopy layers. The 2005 Revised Forest Plan places a priority to first treat critical wildland urban interface areas and lands adjacent to communities at risk.

Doc#	Cmt#	Comment
54	21	“DEIS is deficient in ... empirical data ...That the fuel reduction activities that are proposed will not increase the probability of large scale fire events (the proposed fuel reduction activities could very well lead to such an increase due to the results of the treatments which would lead to increased fine (1 hr) fuel loading (increased herbaceous growth), and more direct sunlight penetration to the forest floor, which would, logically, lead to lower fuel moisture values, the increased probability of ignition , a faster rate of spread, and a higher fireline intensity, conditions that would cause fires to be <u>more</u> difficult to control).”

Response

The FEIS clarifies that, while it is true that restoration of some fire-adapted ecological communities could result in a slightly more fire-prone landscape (dry, grassy fuels are easily ignited and have relatively high rates of spread), energy release of fires in grassy fuels is generally lower than in the case of densely forested sites. As a result, fire-caused scorch, damage, and mortality to woody vegetation are reduced. Fires in woodlands are generally easier to control with mechanized equipment than are fires in closed-canopy forested conditions. The light, grassy fuel components are usually quickly extinguished. Higher rates of control line construction are possible in woodlands both for hand crews and equipment.

The fireline handbook shows increases in line production rates for mechanized equipment for both Fuel Model 9 (FM9), hardwood and conifer, as opposed to Fuel Model 2 (FM 2). Therefore, line production with dozers should be helped by conversion to more grassy fuels. Manual production rates for conifers are marginally improved by converting to FM2. Production rates of engine crews (wetline) decrease when changing from FM9 hardwood to FM2. Woodlands are usually easier to access and are safer environments for firefighters (better visibility and movement, minimum mop-up and/or lower threats of re-ignition).

Doc#	Cmt#	Comment
337	158	“The Forest Service is heavily using fire as a management tool on the ONF and plans to almost double the annual amount...The DEIS as well as timber sale decisions on the ONF do not assess the impacts of burning upon soil, water, increased storm run off downstream channels and most importantly human health effects...There is wide discrepancy in the literature on the effects and necessity of fire in the Ouachita region. While some literature espouses the necessity of fires as a tool to maintain Ouachita forest, or to re-create pre-colonial conditions, there is a substantial body of literature arguing that the use of fire, over varying spatial and temporal scales, may be extremely damaging to our native forest and the soil and water resource. The Forest Service should make evident all studies and other information that it is using in the application of fire on the Forest.”

Response

The 2005 Revised Forest Plan has a lower projected average annual acres to be treated with fire—180,000 acres instead of 200,000 acres—than the draft plan. While the use of fire is still expected to increase over the current average of about 100,000 acres per year, the increase in the average annual acres of prescribed burning is likely to be gradual and may be adjusted if the results of monitoring show a need to decrease or increase the projection.

Based on research conducted on the Ouachita NF, prescribed burning is not expected to adversely affect soil, water, or biological resources, as documented in the FEIS. Water resources are protected by stringent soil and water protection measures, including those of Management Area 9. The Streamside Management Areas the Ouachita NF designated are far more restrictive than State Best Management Practices in terms of allowable silvicultural activities and are applied to all streams with defined channels, not just perennial and intermittent streams.

We know of no discrepancy between the environmental consequences disclosed in the DEIS/FEIS and any current research or “body” of scientific literature whose findings indicate that prescribed burning in the Ouachitas to be “extremely damaging.” and the author of this comment did not provide evidence of “a substantial body of literature arguing that the use of fire...may be extremely damaging to our native forest and the soil and water resource. Additional references have been cited in the FEIS to document the body of work that demonstrates the actual effects of prescribed burning on various biological and physical components of Ouachita Mountain ecosystems.

There is no contradictory relationship among fire management, timber harvesting and meeting public needs. The opposite is true, however. There is a direct link between goals in ecosystem management (e.g., restoring, maintaining and enhancing fire-adapted ecological communities) and reducing hazardous fuels and the threat of catastrophic fire. A variety of vegetation management methodologies in fire-adapted ecosystems may be necessary to lower condition class and restore ecological communities to the reference condition. In some areas, commercial thinning will be needed to reduce overstory densities to pre-settlement estimates. In other areas, midstory densities will need to be reduced. In some places, the control of non-native invasive vegetation could be needed. Treatment tools might include timber harvesting, chemical and non-chemical hand treatments of midstory vegetation, mechanical treatments and/or prescribed burning. Restoring and maintaining healthy ecosystems through a combination of treatments will change existing fuel types, loadings and profiles to conditions less hazardous to both to the public and firefighters when wildfires do occur. These goals are embodied in the National Fire Plan, Healthy Forest Initiative and Healthy Forest Restoration Act and are integral to the draft Plan goals and objectives.

Doc#	Cmt#	Comment
165	66	“Prescribed Fires:...there is insufficient documentation in the DEIS to evaluate this [level of activity]. Further, the DEIS estimated that 63% (1,140,267 acres) of the ONF is in the worst fire regime condition category...request that the DEIS be modified to reflect only the prescribed burning required at the WUI until such time that sufficient scientific analysis of past prescribed burning has been conducted and presented for public review.”

Response

The DEIS/FEIS references research and a recent species viability evaluation that support the revised Plan in relation to annual prescribed burning needed to meet resource needs. The finding in regard to condition class found in the DEIS/FEIS derives from a Regional mid-scale study based on existing conditions as compared to an estimated pre-European or “reference conditions.” The abundance of condition class 3 stands represents a severe departure from the reference condition across the Forest. We share a common desire to set a high priority for burning in the Wildland-Urban Interface (WUI). Ecological restoration of fire-adapted ecosystems addresses a wide variety of needs, including habitat restoration for federally endangered species, game and non-game habitat restoration, maintenance and enhancement and hazardous fuel reduction in non-WUI areas that will significantly reduce the risk of catastrophic fire.

Doc#	Cmt#	Comment
145	59	“...neither controlled burns nor logging are necessary to prevent out-of-control wildfires or to maintain a ‘healthy’ forest. The forest can take care of those things itself, even if individual trees die.”

Response

The desired ecological condition descriptions in the DEIS/FEIS and in the 2005 Revised Forest Plan are considered the best estimates of forest or woodland conditions that are ecologically sustainable, including habitat sustainability for native plants and animals. These descriptions are not a unique Forest Service perspective or opinion, but the result of research work specific to the Interior Highlands of Arkansas, Oklahoma and Missouri and strong collaborative work among ecologists, archeologists and others familiar with Highlands ecosystems, past and present. Relying solely on passive management is likely lead to more ecological imbalance and dysfunction (as illustrated by rampant oak decline and oak borer outbreaks), loss of key habitats, and further endangerment of sensitive species. The use of a suite of vegetation management practices to restore and maintain fire-adapted ecosystems is rooted in the desire to have resilient and diverse ecological communities.

Doc#	Cmt#	Comment
356	190	“The preferred alternative has several notable omissions as it addresses the use of fire as a forest management tool. It is based on an intensive management model of forest management assuming the desirability of a historic human-generated forest condition. This model is not part of the current forest management plan and public input was not considered in its development.”

Response

The use of fire in forest management includes some silvicultural burning to facilitate reforestation but is primarily focused on ecological restoration activities. The desired conditions described are considered the best estimates of forest or woodland conditions that are ecologically sustainable, including habitat sustainability for native plants and animals. Scientists generally agree that the aboriginal role in influencing these landscapes was, in the purist sense, natural.

Doc#	Cmt#	Comment
356	191	“The preferred alternative also completely lacks cumulative air and water quality assessments, especially concerning effects of large-scale fires on human health...effects of smoke and particulate matter harming the many thousands of persons in Arkansas and surrounding states who suffer from asthma, emphysema, chronic bronchitis and COPD medical health conditions. We strongly request that total program impact to human health by prescribed fires under this alternative be assessed, including coordination with other agencies conducting prescribed fires in the region.”

Response

The expected effects of prescribed burning and smoke are documented in the FEIS. Current project-level planning includes identification and avoidance of smoke-sensitive targets along with public notification for every burn. The Forest Service will meet state smoke management guidelines when conducting prescribed burns.

Doc#	Cmt#	Comment
356	193	“This program is based on dubious science and if it is to be continued at the current or recommended levels there is a great need for additional research to give the public confidence in the assumptions being used, such as studies of the historical pollen and charcoal record to tell us pre-settlement forest composition. Another element that is missing is fire scar studies of oak/hickory forests in later settled areas, such as the interior highlands.”

Response

While the Forest agrees that more research (particularly fossil pollen studies, where feasible) is desirable, the contention that the science used in the EIS is “dubious” is unsupported. Unfortunately, there are very few sites in the Ouachita Mountains where vegetation history data in the form of fossil pollen profiles may be studied; appropriate depositional environments such as bogs and fens are not available. The recommendation regarding the use of fire scar studies in the oak/hickory was the subject of cited works by Dr. Rich Guyette and others and was used in the analysis.

Doc#	Cmt#	Comment
356	195	“...concerned that the mostly low-intensity fires that are being conducted are actually preserving snags and creating charcoal that would otherwise harmlessly decompose in a short time...no site-specific documentation of fire-dependant areas that are supposedly being restored as a result of this program... how a program that isn’t reducing the danger of forest fires and isn’t performing site-specific restoration activities can be beneficial to forest health. We request that acreage using prescribed fires as a management tool be scaled back to approximately the 1986 level, with fires only used on a site-specific basis to maintain glades or wildlife openings. ”

Response

Contrary to these assertions, the Ouachita NF is successfully restoring fire-maintained ecosystems. There is a nationally recognized restoration area on the Ouachita NF. (MA 22 in Arkansas), and there are over 40,000 acres of condition class 1 acres (near reference condition) in the Red-cockaded Woodpecker habitat management area of the Poteau and Cold Springs Ranger Districts. All the condition class 1 areas are at a significantly lower risk of catastrophic fire than areas that are condition class 2 or 3 and are more ecologically resilient and sustainable. These areas have been recognized by various conservation groups as showcases for the efficacy of restoration efforts.

Doc#	Cmt#	Comment
361	218	"Smaller burns that bracket unburned areas should be encouraged. the whole forest should not be burned at one time."

Response

Prescribed burns are carefully planned with smoke-sensitive target identification and avoidance a part of every plan. Public notification is also an integral part on each burn. Compliance with all state and federal air quality guidelines is incorporated at both the project and programmatic planning levels.

Doc#	Cmt#	Comment
372	230	"...concerned about the current burning practices and use of tax dollars on an activity that is damaging to Arkansas hardwoods."
372	231	"...reconsider the expanded logging plans and help preserve water quality in all the forest stream systems. Greater extraction and burning will combine to negatively impact this vital resource."

Response

While it is true that not all hardwood is part of a fire-adapted ecosystem, oaks and some other hardwoods are fire-adapted. The role of fire in oak forests was covered at a 2002 Oak Ecology Symposium held in Fayetteville, AR and cited in the DEIS/FEIS. This publication along with other research indicates the role of fire in oak forests to be the single-most important natural disturbance agent needed to help perpetuate oak forests. Rather than damaging or negatively impacting oak forests, fire will lead to more resilient, functioning ecosystems.

378	268	"We understand the science of thinning, regeneration and some prescribed fire to reduce fuel loads. The massive amount of acreage scheduled for repeated burning seems excessive to virtually all Ozark Society members."
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Response

The reduction of fuel loads should be viewed as a secondary benefit in the context to restoring the role to fire-adapted ecosystems. The projected prescribed burning program responds primarily to the desire to improve the condition class of current stands and restore areas to desired conditions beneficial to the full suite of native plants and animals in the Ouachita Mountains. The amount of burning being proposed is modest in comparison to the amount that would actually be needed to fully restore all the fire-adapted ecological communities on the Forest.

Public Concern: Wildland Fire (Natural Ignitions)

Doc#	Cmt#	Comment
367	228	"We also support the use of wildland fire (natural ignitions) to accomplish set objectives when it is properly planned for and can be safely accomplished."

Response

National forest managers may respond to unplanned, natural ignitions by managing the fire under prescribed conditions, allowing it to burn to roads or natural barriers as long as it meets resource objectives and doesn't threaten private property or public resources.

Public Concern: Smoke from Prescribed Burning

Doc#	Cmt#	Comment
11	1	"Herbicides are much less damaging to the environment than the vast amount of smoke you are sending into the atmosphere."
291	78	"...irresponsible of the FS not to do an Environmental Assessment of the cumulative impact of all the fires proposed. Such an analysis should consider air pollution generated by other prescribed burns (Ozark-St. Francis NF, U.S. Park Service, Nature Conservancy, private land, etc) as well as all other sources."
361	216	"No regard is mentioned related to the harmful effects of burning on persons with asthma who experience attacks when immersed in excessive smoke situations."
361	217	"Plan should require that an annual list be made of asthma stricken person in each ranger district and require notification of the persons who have asthma on days when prescribed fire could cause deadly harm to asthma effected persons."
358	213	"If the burning schedule now employed by the USFS is any guide to future burning practices, there is likely to be a decrease in biodiversity, since many species' particular life cycles and habitats are not given any specific attention. Health effects of particulates sent by the burns over populated areas are inadequately considered."

Response

The effects of smoke on the environment are addressed in the DEIS and FEIS. The States' Department of Environmental Quality and Forestry Divisions have primary responsibility for monitoring compliance with the Clean Air Act as it applies to prescribed burning. The cumulative effects of smoke from prescribed burns are monitored and regulated by the States. The Ouachita NF will comply with the states' Smoke Management Plans and meet all state and federal laws related to air quality standards. Additional discussion has been added to the Air Quality section of the FEIS to describe the effects of smoke.

The identification of smoke-sensitive individuals that could be affected by prescribed burns is done at the project-level, i.e. by Ranger Districts. Smoke screening and avoidance of smoke sensitive targets is part of every burning plan. Public notification (including personally contacting smoke-sensitive individuals that may be affected) prior to burning is done through local media, to local law enforcement offices and through the internet at a special website designed specifically for this purpose.

Contrary to the concern that a "decrease in biodiversity" is likely due to increased burning, the Species Viability Evaluation, as summarized in the EIS, documented a positive relationship between burning and biodiversity.

Public and Agency Concerns: Monitoring the Results of Prescribed Fires

Doc#	Cmt#	Comment
92	43	"Increased monitoring of the expanded burn program should be emphasized to quantify efficacy of treatments against objectives."
292	81	"If through monitoring and the best science you learn that planned burn acres need to be adjusted up or down, you should incorporate into the final Plan the latitude to adjust without having to revise the Plan."
337	155	"The plan should provide adequate monitoring requirements to ensure that the plan will not result in damage to the forest....in-the-field monitoring of an adequate range of forest species..."
356	194	"Needed monitoring of the effects of repeated burning on animal and plant species is not in process or planned. We believe there is a strong possibility that non-native and fire-dependant invasive species could be established as a result of this program, for example, and without adequate monitoring this type of unforeseen problem could get out of control quickly."
375	259	"The plan should provide adequate monitoring requirements to ensure that the plan will not result in damage to the forest. This should include requirements for in-the-field monitoring of an adequate range of forest species, including species mentioned above. These requirements should be mandatory and frequent."
356	192	"We also request that watershed-specific assessments be conducted to gauge the total watershed impacts of the prescribed fire program as it is currently being conducted and also as it is being proposed."

Response

Although there is substantial evidence of the efficacy of prescribed burning in Ouachita Mountain ecosystems, the Forest concurs with the need to continue improving our monitoring of the effects of burning. A recent Southern Region supplement to the Forest Service Manual concerning fire use (FSM 5140) updates and considerably enhances the emphasis on monitoring the effects of prescribed burning. Monitoring the effects of prescribed burning has been added as a Priority in Part 2 of the 2005 Revised Forest Plan.

Intensive studies of the effects of prescribed burning on native plants, animals, and soils have been conducted on the Ouachita NF. As documented in the FEIS, these studies are sufficient to determine that, for the most part, the effects of prescribed fire on plant and animal habitats and other ecosystem components are well understood. Monitoring and research studies will continue to be conducted where needed to elucidate the relationships between fire and particular species (for example, studies of the relationship between fire and Ozark chinquapin or between fire and the spread of non-native, invasive species).

The Revised Forest Plan can be amended, as needed, to adjust objectives for prescribed burning. Under the 2005 planning rule, such amendments should be relatively simple exercises. (The Ouachita NF will fully transition to the 2005 planning rule no later than January 2008).

Doc#	Cmt#	Comment
375	251	“Due to water pollution, air pollution and health impacts cease prescribed burning. Until burning is ceased perform pre and post burn ecological surveys on all burn areas.”

Response
The roles and effects of prescribed burning in both the dormant and growing season have been extensively and intensively examined in research efforts in Ouachita Mountain ecosystems, as summarized in the FEIS. Literature references relevant to this question have been added to the FEIS. Based on research conducted on the Ouachita NF, prescribed burning is not expected to adversely affect soil, water, or biological resources, as documented in the FEIS. Water resources are protected by stringent soil and water protection measures, including those of Management Area 9. The Streamside Management Areas the Ouachita NF designated are far more restrictive than State Best Management Practices in terms of allowable silvicultural activities and are applied to all streams with defined channels, not just perennial and intermittent streams.

Public Concern: Fuels Management

Doc#	Cmt#	Comment
337	177	“The analysis need to address how the timber sale will increase the fire danger...how far a fire could spot and the danger to nearby structures.”

Response
The Forest Fire Managers do not agree that timber sales will increase fire danger. From a fire behavior perspective, changes in fuels resulting from timber harvesting are generally very short-term (no more than a single growing season in regard to fuel loading, arrangement and flammability and resultant fire danger). In the long-term, thinning in older stands as a part of an ecological restoration should significantly reduce the risk of catastrophic fires.

Miscellaneous

Agency Concern: Heritage Resource Management Plans

Doc#	Cmt#	Comment
12	3	“documentation and results form Sections 106 and 110 work must be fully integrated into Forest Heritage Resource Management Plans for effective planning”

Response
We agree; this concept has been integrated into the objectives (2005 Revised Forest Plan Part 2) for Heritage Resources.

Elected Official Concern: Sufficiency of Public Opinion Survey Data Presented

Doc#	Cmt#	Comment
34	6	"Give people more alternatives to choose from on the surveys. In present form it is very misleading. Such as strongly agree or somewhat agree."

Response

Additional columns were added in the FEIS to the referenced data tables in order to show more of the range of responses received. (Note: this comment refers to summary data presented in the DEIS concerning a public opinion survey.)

Public Concern: Goals/Messages for Conservation Education

Doc#	Cmt#	Comment
259	73	"The goals/messages stated for conservation education seemed vague and could be more specific."
259	74	"The partners sought by the Forest Service, with regard to helping deliver the conservation education message to consumers and taxpayers/voters, could be specified."

Response

The messages needed to be clarified; the desired condition statement for this item has been revised. The Forest Service welcomes all potential partners, and have an ongoing working relationship with the Cradle of Forestry Interpretive Association (headquartered in Asheville, NC). A sample of some of the other organizations that have helped or are helping "deliver the conservation education message" include the Audubon Society (identifying outstanding birding areas on the national forest); The Nature Conservancy (Fire Learning Network); Arkansas Forestry Association (forest practices); and Quail Unlimited, Wild Turkey Federation, Wildlife Society, Fisheries Society, and Wildlife Federation (fish and wildlife habitat). In addition, the Forest often partners with other federal and state agencies to deliver conservation education messages.

Public Comment: Ecologically Sound Land Acquisition

Doc#	Cmt#	Comment
337	160	"The Forest Service should incorporate an ecologically sound land acquisition and exchange policy in the Forest Plan...essential that external threats to public land be addressed...based on an analysis that emphasizes the protection and long-term viability of ecosystems. Consolidation for the sake of economic operation and maintenance is not sound public policy because it excludes numerous factors from the decision."

Response

Forest-wide standard LA002 presents ecologically sensitive criteria for landownership adjustments.

Public Concern: Carbon Sequestration and Global Warming

Doc#	Cmt#	Comment
337	163	“The Forest Plan should address the issue of how much carbon is being stored in the forest, and how the actions proposed in the draft plan will release stored carbon...Increases in CO ₂ in the atmosphere are contributing to global climate change, which could have a serious effect on our forests.”
337	164	“References which should be considered (and contradict the claims about climate change in the DEIS)...”
375	258	Doc 375 Cmt 258 “The forest plan should address the issue of how much carbon is being stored in the forest, and how the actions proposed in the draft plan will release stored carbon. For example, recent research in the Eastern U.S. have indicated that mature white oak trees store excess carbon in this carbon enriched atmosphere. Forest management activities such as logging, roadbuilding, and burning result in significant carbon release to the environment. Increases in CO ₂ in the atmosphere are contributing to global climate change, which could have a serious effect on our forests. This needs to be considered.”
373	233	“...how much that [prescribed burning] contributes to Global Warming and climate change... Global effects are [not] outside the scope of this analysis. “

Response

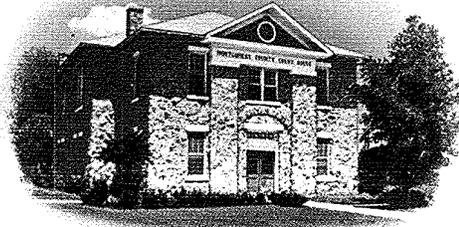
The global nature of this concern is beyond the scope of this EIS. We note, however, that carbon contained in vegetation will ultimately be cycled between atmospheric carbon (CO₂) and terrestrial carbon. One way to delay this process is to harvest the timber and convert it into lumber and other solid wood products and sequester it in constructed buildings, then foster the development of stands of younger trees that generally consume more CO₂ than mature trees. Thus, the Ouachita NF timber sale and reforestation programs support carbon sequestration. While the numerous references cited in Document 337 may be of general scientific interest, they are not specifically related to the Ouachita NF and thus are outside the scope of the information used to support the analysis. The FEIS (Chapter 3, Climate) briefly discusses the prospect that climate change may affect the health, diversity, and productivity of the Ouachita NF.

Comment Letters from Federal, State, and Local Agencies and Elected Officials

Copies of comment letters from Federal, State, and local agencies and elected officials concerning the proposed Revised Forest Plan and Draft Environmental Impact Statement are reproduced on the following pages of this appendix.

MONTGOMERY COUNTY

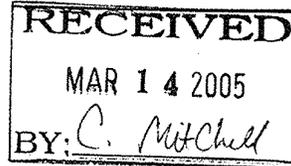
Ted Elder
County Judge



MOUNT IDA, ARKANSAS 71957

March 8, 2005

Forest Plan Team
US Forest Service
P.O. Box 1270
Hot Springs, Ar. 71902



RE: Comments on the Proposed Land and Resource Management Plan

1. Page 8 – D.E.I.S., Alternative E, Relationship to Communities

The forest service should follow through on statements about helping improve economic relationships with communities. In the past this just seemed to be written to simply satisfy our congressional delegation.

Overall the Plan looks good. I think the forest service needs to take the welfare of the communities into account before enacting any new regulations and also contact the County Judge and Quorum Courts of the counties affected.

2. Page 174 –175 – D.E.I.S.

Give people more alternatives to choose from on the surveys. In present form it is very misleading. Such as strongly agree or somewhat agree. This form seems to skew the answers in favor of subject.

3. O.H.V. Use

If plan to limit OHV use to designated trails and roads is adopted, this will do exactly what you are trying to prevent. It will put all use on a limited number of places and cause a higher incidence of erosion on these areas. Instead of having only two or three problem areas, there will be many more.

The way to eliminate the problem is to eliminate the source. Groups of pleasure riders coming in from out of state and county. Restrict these people to hard service roads and trails.

The sportsmen of our county do very little damage to the forest as you have indicated. Don't punish the whole population for what the few do.

MONTGOMERY COUNTY

*Ted Elder
County Judge*



MOUNT IDA, ARKANSAS 71957

At least open up the use during deer seasons, so that the disabled and abled hunters can retrieve their game or tree stands. If not, a higher incident of cardiac arrests could happen. Just with the exhausting effort it takes to drag a deer out.

The hunter would be forced to leave his \$4,000.00 - \$7,000.00 machine on the trail or road when he went into the woods to hunt, leaving it susceptible to vandalism or theft. To pull it off the trail or up in the woods to hide it would be in violation. The groups who ride for pleasure would have no problem staying on designated routes, because that is what they enjoy. They will still get to ride and enjoy their hobby, the hunter won't.

If none of the above is feasible, which I'm sure they won't be, ban OHV's from the forest completely. If going in to retrieve game is going to damage the forest floor, then I think the USFS should abide by the rule also. Manage the forest like you use too (by foot).

4. Increase Law Enforcement

I am strongly against increasing law enforcement in the national forest. Too many people have had very negative experiences when contacted by USFS personnel. Our county is doing the best we can to build our tourist trade. Don't spoil it with law officers with a bad attitude toward visitors.

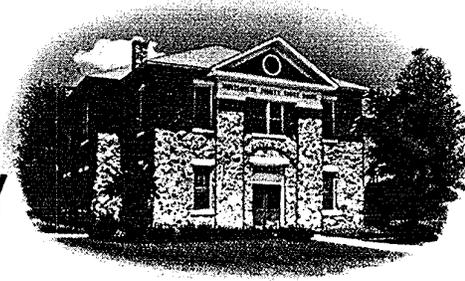
I don't think the forest service should be writing traffic tickets to citizens or visitors. We have our state and local officers for that. This not only gives our people a bad experience, it also takes money out of our county.

Thank You,

Ted Elder
Montgomery County Judge

MONTGOMERY COUNTY

*Fred Elder
County Judge*



MOUNT IDA, ARKANSAS 71957

AG
Bill *AD*
Alett

May 2, 2005

Alan Newman, ONF Supervisor
Alett Little, Team Leader Revision Plan
P. O. Box 1270
Hot Springs, AR 71902

Dear Mr. Newman & Ms. Little

Because 76% of Montgomery County is National Forest, decisions changing the management plan for the Ouachita National Forest could have a major affect on the citizens and economy of the county. Here are some specific comments the Montgomery County Quorum Court have to the proposed Land and Resource Management Plan.

Many families in Montgomery County earn their living by working in the timber industry. Logging has been a tradition handed down through generations of families and it is important to maintain those traditions for the future. We encourage the Forest Service to develop small sales in the timber harvest area. All loggers, large and small, have a right to bid on a tract of timber. When our logging families are working, they add greatly to the economy of the county. The Forest Service should try to work with the local communities and try to divide some of the timber tracts so that smaller logging operations can afford to place a bid on the timber. This is an important part of maintaining the economic stability of our local communities. We realize that administrative costs may be a little more but this action could double public relations with the citizens.

Prescribed burning is an important aspect of managing the national forest. Safety is of utmost importance for all the citizens and visitors in Montgomery County. We support the increase in prescribed burning to reduce the fuel buildup which could cause major wildfires as we have seen out west. The public needs to be able to enjoy the national forest without having to worry about being in a fire danger zone. Our homes and businesses can be much better protected when high fuels levels have been eliminated.

Thinning of timber gives the trees a better chance to grow and creates a healthier forest. We support an increase in the thinning process and we all need to be reminded that timber

is a renewable resource. A healthy forest gives people more jobs and provides more opportunity for recreation.

Open road access is a very important aspect of the management plan. Maintenance funds should be used as efficiently as possible to keep as many roads open as possible. Roads are a vital part of the economy of Montgomery County. Forest Service roads and county roads provide a network of access to most parts of the national forest within the county. Revisions to the management plan that close this access will stifle the economic growth and the opportunity for use by the citizens and visitors to the county as well. Many citizens work in the national forest and enjoy the recreational opportunities provided by the national forest and must have open roads to do these things. Emergency personnel must be able to get to an accident. Even forest service personnel must have access to survey timber stands for management purposes and checking timber health. The purpose of the national forest is for multiple use.

The use of ATV's has become part of the culture of many citizens of Montgomery County. Grouping four-wheelers together such as Wolf Pen Gap has created many problems. The Ouachita National Forest has many roads and trails which could be utilized by an ATV rider. The more roads and trails accessible to four-wheelers the less impact they would be on the environment. We support the continued use of ATV's within the county. We do not support regulations that violate individual rights.

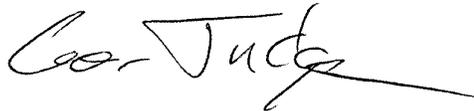
The citizens of Montgomery County and the general public all want a Healthy Forest. Education and communication are an important aspect in working together to solve problems and determine what is best for the local communities and their citizens. It does take a lot of planning and studying to determine what is the best management for a national forest. Montgomery County has a land use plan which describes our custom and culture and the National Environmental Policy Act mandates that our local customs and culture be considered when making proposals which may affect the livelihoods of the citizens and the economy of the county.

We want to keep the wonderful county where we live and a healthy forest, clean water, work and enjoy our national forest by supporting the Forest Service in doing what they were established to do--manage the national forest. We must work together and listen to one another to achieve these goals. We hope that our comments are helpful to the task of the revision plan.

Sincerely



Montgomery County Quorum Court





Oklahoma Biological Survey
111 E. Chesapeake Street
University of Oklahoma
Norman, Oklahoma 73019

Telephone (405) 325-4034
FAX (405) 325-7702

25 April 2005

To: Ouachita National Forest

From: Jeff Kelly, Oklahoma Natural Heritage Inventory Zoologist

Subject: Proposed Revised Land and Resource Management Plan

Date: 25 April 2005

I have reviewed the Proposed Revised Land and Resource Management Plan for the Ouachita National Forest. My interest in doing so was to determine which of the proposed management alternatives would provide the best protection and enhancement of the native fauna of Oklahoma. The Environmental Impact Statement presented the ongoing management (alternative A) and four other choices. As is typically true in such complex plans there was no one alternative that contained all of the options that I would support unequivocally. Of those presented, alternative D would appear to be the best compromise for Oklahoma's diverse fauna. This option appears to protect the largest land base in wilderness designations and emphasizes the role of natural processes (fire) in shaping the structure and composition of the forest. It is not clear why fire management is primarily limited to Units 21 and 22. While there is no doubt that this tool is appropriate in these units, it would also seem to be useful in reducing the risk of catastrophic fire, which is the number 1 national strategic goal of the Forest Service. In addition, the emphasis on scenery management, in this and other alternatives, would seem to be short sighted if it detracts from management directed at important ecological attributes of these forests.

Repeated allusions to the "healthy forests initiative" detracted from my ability to understand what activities would actually take place on the land. As a reviewer, I perceive that the options presented may be overridden substantially by this initiative (e.g., "including any adjustments needed to respond to the Healthy Forests Initiative"). If this is the case, it would seem to contradict the spirit of the planning exercise in which local feedback is used to shape forest management. This sort of politically driven rhetoric does not improve a stakeholder's confidence that their contribute to the planning process is taken seriously.

Constituent Programs:

*Bebb Herbarium * Oklahoma Fishery Research Laboratory * Oklahoma Natural Heritage Inventory *
Sutton Avian Research Center*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 20 2005

Robert T. Jacobs
Regional Forester
USDA Forest Service
Southern Region
1720 Peachtree Road, NW
Atlanta, GA 30367

Dear Mr. Jacobs:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) for the proposed Ouachita National Forest Revised Land and Resource Management Plan.

EPA classified your DEIS and proposed action as "LO," i.e., EPA has "Lack of Objections". The DEIS is consistent with the CEQ regulations for implementing NEPA. Alternative E is the preferred alternative. This alternative would be a greater emphasis on active management for ecological conditions to sustain diversity and forest health in the Pine-Oak Forest, Pine-Oak Woodland, Shoirtleaf Pine/Bluestem Grass Woodland, West Gulf Coastal Plain Pine-Hardwood Forest, and Ouachita Dry to Mesic Oak Forest.

Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on proposed Federal actions. If you have any questions, please contact Michael Jansky of my staff at 214-665-7451 or by e-mail at jansky.michael@epa.gov for assistance.

MAY 23 PM 2:50

Sincerely yours,

Rhonda M. Smith
Rhonda M. Smith
Acting Chief, Office of Planning
and Coordination

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)



The Department of Arkansas Heritage

Mike Huckabee, Governor
Cathie Matthews, Director

Arkansas Arts Council

▪

Arkansas Historic
Preservation Program

▪

Delta Cultural Center

▪

Historic Arkansas Museum

▪

Mosaic Templars
Cultural Center

▪

Old State House Museum



Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

(501) 324-9619

fax: (501) 324-9618

tdd: (501) 324-9811

e-mail: info@arkansasheritage.org

website:

<http://naturalheritage.com>

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Date: May 17, 2005
Subject: Proposed Revised Forest Plan
Draft Environmental Impact Statement
Ouachita National Forest
ANHC No.: F-USFS-05-015

Mr. Alan Newman, Forest Supervisor
Ouachita National Forest
P.O. Box 1270
Hot Springs, AR 71902

Dear Mr. Newman:

Staff members of the Arkansas Natural Heritage Commission have reviewed the Proposed Revised Forest Plan and Draft Environmental Impact Statement (DEIS). Overall we think the plan addresses Ouachita National Forest (ONF) management issues very thoroughly and in particular supports its emphasis on appropriate restoration and management of the full range of natural communities and species that occur on the national forest. We have the following specific comments on the plan:

- We believe the increase in number of acres treated with prescribed fire is well justified by the analyses and figures presented on pp. 10-18.
- As we discussed in our meeting with the ONF on March 3, 2005, we believe an addition to South Fourche Special Interest Area (SIA) is warranted. Between the two existing units of this SIA is an abandoned channel of South Fourche LaFave River, elevated considerably above the level of the existing channel. It is kept moist by local surface and groundwater seepage. Plant communities and species typical of the West Gulf Coastal Plain occur there, such as native (not planted) loblolly pine, and wax myrtle. Because of the plant species rare to the Ouachita Mountain Ecoregion that occur in this wetland and the adjacent shale and sandstone glades, the area might be designated as a botanical area. We would be happy to assist you in documenting and developing boundaries for this area.
- We support the designation of 11 Semi-Primitive Areas, Management Area 17 (p. 39). As stated on that page, "Management is dictated by recreational and wildlife objectives that provide for a semi-primitive experience and range of wildlife habitat. In a portion of this Management Area [56,773 acres], most timber harvesting and road construction are deferred for the planning period..." It appears to us that these areas are de facto natural areas, and we would like to participate in evaluation of their natural values and possible management strategies necessary to restore and maintain those values.
- We believe that the plan for old growth restoration (pine-grass emphasis), Management Area 21 (p. 44), will result in an outstanding system of areas representative of the late seral condition of this ecosystem. Likewise Management Area 22, Renewal of the Shortleaf Pine – Bluestem Ecosystem and Red-cockaded Woodpecker Habitat, will continue the stunning progress you have made in restoring the RCW population in the Ouachita Mountains. We note that this ecosystem restoration includes a substantial area over and above that originally proposed for RCW habitat management areas, with an eventual goal of 350,000 acres of shortleaf pine – bluestem habitat by 2021 and we applaud this addition.
- We would like to participate in identification of old growth patches and evaluation of efforts to conserve or enhance their old growth characteristics (p.76).
- We support the proactive and appropriate management of Rare Upland Communities (Management Areas 6, p. 34) and would like to participate in identification and development of management plans for these areas. However, we believe that, with appropriate restoration and management, two of these, Ouachita Dry Oak Woodland

and Ouachita Mesic Hardwood Forest, will become common on the ONF and will not need to be given special attention.

We believe the Land and Resource Management Plan as proposed here will provide excellent direction for management of the Ouachita National Forest for the future. We are looking forward to working with you as you continue to implement this plan.

Sincerely,

Jennifer Sheehan
for:
Thomas Foti
Chief of Research



STATE OF ARKANSAS
**Department of Finance
 and Administration**

OFFICE OF INTERGOVERNMENTAL SERVICES

1515 West Seventh Street, Suite 417
 Post Office Box 8031
 Little Rock, Arkansas 72203-8031
 Phone: (501) 682-1074
 Fax: (501) 682-5206
<http://www.state.ar.us/dfa>

BY: *al*
 MAY 27 2005
 RECEIVED

May 24, 2005

Mr. Alan G. Newman, Forest Supervisor
 U.S. Department of Agriculture
 Forest Service
 Ouachita National Forest
 P.O. Box 1270
 Hot Springs, AR 71902

RE: Summary Draft Environmental Impact Statement and Proposed Revised Land and
 Managment Plan - Ouachita National Forest, Arkansas and Oklahoma - Forest
 Services Southern Region

Dear Mr. Newman:

The State Clearinghouse has received the above document pursuant to the
 Arkansas Project Notification and Review System.

To carry out the review and comment process, this document was forwarded to
 members of the Arkansas Technical Review Committee. Resulting comments received
 from the Technical Review Committee which represents the position of the State of
 Arkansas are attached.

The State Clearinghouse wishes to thank you for your cooperation with the
 Arkansas Project Notification and Review System.

Sincerely,

Tracy L. Copeland
 Tracy L. Copeland, Manager
 State Clearinghouse

TLC/th
 Enclosure
 CC: Randy Young, AS&WCC



Arkansas Soil & Water Conservation Commission



J. Randy Young, PE
Executive Director

101 East Capitol, Suite 350
Little Rock, Arkansas 72201
<http://www.aswcc.arkansas.gov>

Phone: (501) 682-1611
Fax: (501) 682-3991
E-mail: aswcc@arkansas.gov

Mike Huckabee
Governor

MEMORANDUM

RECEIVED

MAY 24 2005

INTERGOVERNMENTAL
SERVICES
STATE CLEARINGHOUSE

TO: Mr. Tracy Copeland, Manager
State Clearinghouse

FROM: *[Signature]* Mr. J. Randy Young, P.E.
Executive Director

SUBJECT: Summary Draft Environmental Impact Statement and Proposed Revised
Land and Management Plan - Ouachita National Forest
Arkansas and Oklahoma - Forest Service Southern Region

DATE: May 23, 2005

Members of the Technical Review Committee have reviewed the above referenced project; the Forest Service proposes to revise the Land and Resource Management Plan (Forest Plan) for the Ouachita National Forest. The Forest Plan provides long-term, strategic direction for natural resource management of the Forest. Projects designed to implement the direction of the Forest Plan are undertaken only after additional, project-specific environmental consideration. The Forest Service published the Amended Forest Plan for the Ouachita National Forest in 1990, replacing the 1986 Forest Plan, and the Amended Forest Plan will be 15 years old in March 2005. Part of the need to revise the Forest Plan is that the National Forest Management Act calls for such plans to be revised every 10-15 years. The need to revise the Forest Plan is also driven by the changing conditions identified in the Ozark-Ouachita Highlands Assessment, the Southern Forest Resource Assessment, and ongoing monitoring and evaluation results specific to the Ouachita National Forest. In developing a Forest Plan, the Forest Service examines various alternatives to reach a final decision about the future management of the given National Forest. The Draft provides a detailed analysis of alternatives for management of the Ouachita National Forest. Five alternatives were analyzed. Under the preferred alternative, the revised Forest Plan would allocate land to 17 management areas and recommend increases to Flatside Wilderness and Upper Kiamichi Wilderness. The alternatives examined in detail include the current Forest Plan and four alternatives that present a range of projected vegetation management activities and wilderness recommendations. The Committee supports this project. Comments are attached for your review.

The opportunity to comment is appreciated.

JRY/ddavis

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Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.state.ar.us/dfa

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager State Clearinghouse
DATE: February 23, 2005
SUBJECT: SUMMARY DRAFT ENVIROMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

#1776

Please review the above stated document under provisions of Section 404 of the Clean Water Act, Section 102(2) of the National Environmental Policy Act of 1969 and the Arkansas Project Notification and Review System.

March 15, 2005

Your comments should be returned by _____ to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is Imperative that your response be in to the ASWCC office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ASWCC at (501) 682-1611 or the State Clearinghouse Office.

- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) Colbert Agency ASWCC Date 5/17/05
Telephone Number



STATE OF ARKANSAS

Department of Finance and Administration

B.S. Cur OFFICE OF INTERGOVERNMENTAL SERVICE

1515 West Seventh Street, Suite 41, Post Office Box 803, Little Rock, Arkansas 72203-803, Phone: (501) 682-107, Fax: (501) 682-520, http://www.state.ar.us/df

MEMORANDUM

Received RECEIVED

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager State Clearinghouse
DATE: February 17, 2005
SUBJECT: SUMMARY DRAFT ENVIROMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

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March 15, 2005

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- Support Do Not Support (Comments Attached)
Comments Attached Support with Following Conditions
No Comments Non-Degradation Certification Issues (Applies to ADEQ Only)

OUR comments will be provided at the Final level

Name(print) Agency Date
Telephone Number

RECEIVED
FEB 24 10 59 AM '05



Acw
Bill P. BP

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

February 25, 2005

Alan G. Newman
Forest Supervisor
Ouachita National Forest
P. O. Box 1270
Hot Springs, AR 71902

RECEIVED
MAR 07 2005
BY: C. Mitchell

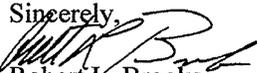
Re: Draft Environmental Impact Statement and Proposed Revised Land and Resource Management Plan, Ouachita National Forest, Arkansas and Oklahoma.

Dear Mr. Newman:

I have reviewed the above referenced document regarding treatment of cultural (heritage) resources. I have no objection to selection of Alternative E as the preferred alternative for revision of the Forest Plan. This alternative combines elements of the various alternative plans with some revisions. As all actions affecting heritage resources from the various alternatives would require treatment under Sections 106 and/or Section 110 of the National Historic Preservation Act, the selection of Alternative E is not anticipated to bring about greater threat to heritage resources.

I am in concurrence with statements made concerning heritage resources in the EIS and Revised Forest Plan. The one comment I have concerns actions taken by the Ouachita National Forest in respect to survey for heritage resources, evaluatory testing of resources for National Register eligibility, as well as data recovery efforts to mediate adverse affects to National Register eligible properties. Reports documenting the nature of this work and resultant findings should be an integral part of the heritage resource program. From my perspective, documentation and results from Sections 106 and 110 work must be fully integrated into Forest Heritage Resource Management Plans for effective planning. Such documentation should also be performed to meet requirements under the Archaeological Resource Protection Act and the Archeological Data Recovery Act.

This review was conducted in cooperation with the State Historic Preservation Office, Oklahoma Historical Society.

Sincerely,

Robert L. Brooks
State Archaeologist

Cc: SHPO
K. Schneider, USFS



Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5208
http://www.state.ar.us/dfa

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager, State Clearinghouse
DATE: February 23 2005
SUBJECT: SUMMARY DRAFT ENVIROMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

Please review the above stated document under provisions of Section 404 of the Clean Water Act, Section 102(2) of the National Environmental Policy Act of 1969 and the Arkansas Project Notification and Review System.

March 15 2005

Your comments should be returned by _____ to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is Imperative that your response be in to the ASWCC office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ASWCC at (501) 682-1611 or the State Clearinghouse Office.

- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

RECEIVED
05 MAR -1, AM 9:11
SOIL & WATER COMM

Name(print) Jerry Bradshaw Agency COSL Date 3/1/03
Telephone Number 683-3310



STATE OF ARKANSAS

Department of Finance and Administration

OFFICE OF INTERGOVERNMENTAL SERVICES

RECEIVED
MARCH 28 2005
DIVISION OF ENGINEERING

4515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
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Fax: (501) 682-5206
http://www.state.ar.us/dfa

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager ^{TC} State Clearinghouse
DATE: February ²³ 2005
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March ¹⁸ 2005

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- Support
- Do Not Support (Comments Attached)
- Comments Attached
- Support with Following Conditions
- No Comments
- Non-Degradation Certification Issues (Applies to ADEQ Only)

RECEIVED
05 MAR -9 AM 11:31
SOIL & WATER CONSERVATION

Name(print) Harold R. Siefert Agency Division of Engineering Date 03/04/05
Telephone Number 501-661-2623 Arkansas Department of Health
4815 West Markham
Little Rock, AR 72205-3867



Department of Finance and Administration

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Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.state.ar.us/dfa

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager, State Clearinghouse
DATE: February 23, 2005

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- Support Do Not Support (Comments Attached)
Comments Attached Support with Following Conditions
No Comments Non-Degradation Certification Issues (Applies to ADEQ Only)

SOIL & WATER CON. RECEIVED 05 JAN -2 AM 9:22

Name(print) BILL PRIOR Agency AGC Date 2-28-05
Telephone Number 663-0117



Arkansas GEOLOGICAL COMMISSION

VARDELLE PARHAM GEOLOGY CENTER • 3815 WEST ROOSEVELT ROAD • LITTLE ROCK, ARKANSAS 72204

Mike Huckabee
Governor
Bekki White
Director and State Geologist

February 25, 2005

Mr. Randy Young
Chairman, Technical Review Committee
101 E. Capitol, Suite 350
Little Rock, Arkansas 72203

Dear Mr. Young:

This letter is a response to your request for comments on the proposed Land Management Plan for the Ouachita National Forest in Arkansas and Oklahoma by the U.S. Forest Service. Most all of the plan's proposals deal with biological and social issues therefore I will have no comments to make on them.

The only geological mention made is on page 13 under Area 5, Experimental Forests. This section is precluding all mineral exploration and development in these areas. Also does the term (lease able minerals) apply to fossil fuels? Other than this question I have no other comments.

Sincerely,

William Lee Prior
Geologist Supervisor

PHONE: (501) 296-1877; FAX: (501) 663-7360
agc@arkansas.gov
www.state.ar.us/agc/agu.htm
An equal opportunity employer



Department of Finance and Administration

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MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager, State Clearinghouse
DATE: February 23 2005
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- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) Steve Jones Agency ADEQ Date 2-24-05
Telephone Number 501-682-7311

5-37



STATE OF ARKANSAS

OFFICE OF INTERGOVERNMENTAL SERVICES

Department of Finance and Administration

RECEIVED

1315 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
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Fax: (501) 682-5206
http://www.state.ar.us/dfa

FEB 25 2005

FEB 24 2005

Outdoor Recreation Grants

Outdoor Recreation Grants

MEMORANDUM

RECEIVED

FEB 24 2005

EXECUTIVE DIRECTOR'S OFFICE

TO: All Technical Review Committee Members

FROM: Tracy L. Copeland, Manager ^{TLC} State Clearinghouse

DATE: February ²³ ~~27~~ 2005

SUBJECT: SUMMARY DRAFT ENVIRONMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

Please review the above stated document under provisions of Section 404 of the Clean Water Act, Section 102(2) of the National Environmental Policy Act of 1969 and the Arkansas Project Notification and Review System.

March ¹⁵ ~~10~~, 2005

Your comments should be returned by _____ to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is imperative that your response be in to the ASWCC office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ASWCC at (501) 682-1611 or the State Clearinghouse Office.

_____ Support

_____ Do Not Support (Comments Attached)

_____ Comments Attached

_____ Support with Following Conditions

No Comments

_____ Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) A. Chouinard Agency ADPT Date 3/7/05

Telephone Number 501-682-6946



Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
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Fax: (501) 682-5206
http://www.state.ar.us/dfa

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager State Clearinghouse
DATE: February 23, 2005
SUBJECT: SUMMARY DRAFT ENVIRONMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

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March 15, 2005

Your comments should be returned by _____ to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is Imperative that your response be in to the ASWCC office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ASWCC at (501) 682-1611 or the State Clearinghouse Office.

Support (checked), Do Not Support (Comments Attached), Comments Attached, Support with Following Conditions, No Comments, Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) George Rheinhardt Agency AFC Date 2-28-05
Telephone Number 296-1861



Department of Finance and Administration

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Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.state.ar.us/dfa

MEMORANDUM

RECEIVED
FEB 25 2005

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager State Clearinghouse
DATE: February 23, 2005
SUBJECT: SUMMARY DRAFT ENVIROMENTAL IMPACT STATEMENT & PROPOSED REVISED LAND AND MANAGEMENT PLAN-OUACHITA NATIONAL FOREST ARKANSAS AND OKLAHOMA-FOREST SERVICE SOUTHERN REGION

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March 10, 2005

Your comments should be returned by _____ to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is Imperative that your response be in to the ASWCC office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ASWCC at (501) 682-1611 or the State Clearinghouse Office.

- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

RECEIVED
05 MAR 21 11 58 AM
SOIL AND WATER CON...

Name(print) Kevin Dorman Agency ADEQ Date 2/28/05
Telephone Number 501-682-0645

May 24, 2005

Mr. Alan G. Newman
Forest Supervisor
Ouachita National Forest
P.O. Box 1270
Hot Springs, AR 71902

Dear Mr. Newman

We, as partners in the stewardship and management of natural resources in Arkansas and Oklahoma, wish to speak with one voice on a number of forest wide management issues along with specific items related to the revision of the Ouachita National Forest Land and Resource Management Plan (LRMP). After review of the draft LRMP and its supporting Environmental Impact Statement (EIS), it is clear that the documents are based on best available science, including a diverse land management perspective. The vision statement developed for these documents speaks directly to ecosystem health and sustainability, and this theme remains consistent throughout the documents. Your planning team is to be commended for developing plans in a spirit of cooperation and always showing willingness to consider diverse points of view. We will offer comments on these documents at two levels: forest wide management issues and specific items within the draft plan.

It is our understanding that although you are completing the plan revision under the 1982 planning regulations, you are incorporating the spirit of the new planning process. Monitoring, adaptive management, and collaboration with other agencies are guiding principles in the new process. We see these principles embraced in the documents and again thank you for the partnerships forged throughout development of the revised plan. We understand an Ecological Management System (EMS) for the Ouachita National Forest will be prepared within the next three years. This document will further transition the forest to the new planning process. We share a common interest in insuring ecological health and sustainability of the terrestrial, riparian, and aquatic ecosystems of the Ouachita highlands and wish to work with you in developing the Ouachita EMS.

We wish to express our thanks for the opportunity along with other conservation partners to be actively involved in developing the species viability evaluation (SVE) database for the Ouachita National Forest. This conservation planning tool will help insure diversity and sustainability of biological resources. We know you are completing development of the SVE, and we look forward to working with you in the immediate future specifically to finish tasks related to the fine filter strategy.

Forest Service Chief Dale Bosworth has identified four important threats to America's National Forests. He has stated that wildfire and fuels accumulations, invasive species, land conversion in the context of the urban interface, and

unmanaged recreational use are issues which must be addressed by the national forests during plan revision. We agree with the Chief's assessment and acknowledge that these issues have been addressed and carried through in development of the revised plan.

Forest Wide Comments

We appreciate your ecosystems based approach to plan revision. The detailed descriptions of current and desired ecological condition of terrestrial and aquatic ecosystems within the planning document serve as reference for the development of alternatives. This foundation speaks specifically to maintaining or improving health and sustainability of these ecosystems.

We collectively agree with and support you in identifying Alternative E as the preferred alternative. Alternative E addresses threats to the Ouachita National Forest and provides a balance of ensuring ecosystem health and sustainability along with the social and economic values related to multiple use. In doing so it recognizes human influences, needs, and uses.

With respect to recreation and public access, your revised plan demonstrates a recognition of our concern that these uses should comply first with overall resource conservation, health, and public safety with the realization that there are levels of use the forest cannot provide. It is our understanding that implementation of the new national off highway vehicle policy will eliminate all terrain vehicle (ATV) access to the general forest area and define permitted areas where ATV's may be used. We agree with and support this policy change. We also understand that this change will not be implemented until analysis and identification of roads and trails approved for ATV use has been accomplished. When identifying designated ATV use areas, we ask that you consider designation to the extent possible on existing roads and trails, avoiding riparian areas, and limit the amount of new road or trail construction. We will assist you with analysis, planning and sharing information on the need for these changes in traditional public access and use.

We think a more complete description of what is meant by road decommissioning is needed in the glossary, and we encourage you to place emphasis on decommissioning un-needed roads and trails within riparian ecosystems. Decommissioning and or closure of roads and trails identified as contributors to stream bank instability, sources of elevated sediment input, or as barriers to movement of important riparian and aquatic species will make significant contributions to aquatic and riparian ecosystem health

Recreational disturbance, potential for soil erosion and related water quality concerns, combined with insufficient maintenance budgets, all speak to the need to reduce existing open road densities on portions of the forest. We commend you for carrying forward the road density objective of one mile of open forest road per square mile of general forest area into the revised forest plan.

When planning road closures, we recommend the increased use of gates with information signs and reduced use of earthen mounds as road closure devices. Experience has shown that gates are more effective than earthen mounds for road closure. We also support the increased use of seasonal road closures to balance resource management objectives while providing access during high demand periods.

When considering new recreational developments, we ask you to place emphasis on low impact uses where no threats to sensitive flora, fauna, or archaeological resources are present. Some examples of low impact recreation include hiking, hunting, fishing, mountain bicycling, rock climbing, wildlife observation, and geocaching.

We are pleased with the overall direction developed for water and riparian communities (Management Area 9). It shows a high priority has been placed on riparian and aquatic health. You should retain all of the tools necessary to maintain or restore these ecosystems and not limit your options for invasive species control.

The ability to use selective thinning, and in specific instances conversion of single species plantations to more appropriate riparian forest assemblages, should be retained. Application of herbicides approved for aquatic use may be needed to control invasive species now threatening native vegetation adjacent to stream courses. Restoration of native cane stands on appropriate sites also should be planned and emphasized where ecologically appropriate.

Oak decline is a serious management challenge facing portions of the Ouachita National Forest. Healthy white oaks will live 250-300 years, and healthy red oaks will live 120-150 years. Droughts and native insects like the red oak borer have been part of Ouachita oak ecosystems for several millennia and these forces have historically thinned woodlands in synergy with fire. Some oak forests have become so dense that competition for water, light and nutrients is intense. Where previously forest densities ranged around 50 stems per acre, there may now be over 150 stems per acre, each depending upon the same levels of water, nutrients and light. Due to this increase in forest density, the current forest is under excessive stress and vulnerable to stochastic events at scales outside the historical range of variability.

Recent droughts have been within the historical range of variation. Records indicate that more severe droughts lasting up to ten years have occurred in recent history without extensive oak mortality. The current overstocked forest may appear healthy during non-drought years, but is nevertheless stressed. Current outbreaks of insects and pathogens are not a result of drought, but rather the symptoms of a stressed ecosystem incapable of sustaining itself under altered conditions. In addressing oak decline, it should be recognized that overly dense forest stands, caused to a large degree by the lack of fire, has contributed to the current unhealthy forest condition.

We believe the plans for oak-hickory ecosystem restoration developed and in use on demonstration sites of the South Central Fire Learning Network could be applied to

additional sites in the Ouachita National Forest. Information from participating sites appropriate for inclusion into the final revised plan can be found at <http://tnc-ecomangement.org/Fire/>. We will work with you to further refine your plans to address oak decline and restore oak-hickory ecosystems.

For several thousand years prior to European settlement, the Ouachita Highlands like other parts of central North America were influenced by natural processes and Native American lifestyles, including frequent burning done for a variety of purposes. Fire and cultural disturbances are essential ecological processes throughout the Ouachitas.

The average annual prescribed burning and the seasonal diversity of burns, dormant and growing season, planned in alternative E should be adequate to accomplish forest wide fuel reduction, ecological diversity and restoration, and wildlife habitat objectives. Increased monitoring of the expanded burn program should be emphasized to quantify efficacy of treatments against objectives.

Expanded prescribed fire objectives will result in challenges related to increased human-smoke conflicts. Adaptive management mechanisms should be incorporated into the prescribed burning program, with adjustments made based on the results of monitoring. If through monitoring and the best science you learn that planned burn acres need to be adjusted up or down, you should incorporate into the final plan the latitude to adjust without having to revise the plan. You also should plan for increased public education and information on the role of fire as a management tool for ensuring forest health and sustainability.

Fire alone will not remedy years of suppression and forest densification. The revised plan does not go far enough in detailing plans for oak dominated forest management. Management prescriptions which include commercial and non-commercial thinning of over stocked oak dominated forest types must be discussed within the framework of the plan in order to ensure sustainability of these ecosystems.

The Ouachita National Forest is a national center of excellence in restoring shortleaf pine-bluestem woodland and savanna ecosystems. We commend you for placing proper emphasis on this initiative and agree with the amount and distribution of shortleaf pine woodland and savanna shown in Management Areas 21 and 22. We also believe you have designed adequate flexibility within management area 14 to implement shortleaf woodland and savanna restoration, and as appropriate areas are identified we encourage you to further expand restoration of these productive and diverse ecosystems. Because of the potential for selective grazing to interfere with the restoration of the bluestem component of the ecosystems, we recommend that impact of grazing in Management Areas 21 and 22 be closely monitored.

Where grazing is currently allowed, we ask you to continue to control livestock numbers and mitigate negative effects to restore, enhance, or maintain the integrity of stream channels and banks. We also ask that as interest in the use of existing

woodland allotments diminishes or if range conditions indicate that you place priority on phasing out woodland grazing permits.

A number of introduced species are invasive and threaten the native ecosystems of the Ouachita National Forest. We agree with and support your planning direction for reducing invasive species impacts and avoiding additional introductions of exotics. It will be essential to retain the use of approved herbicides to effectively control unwanted species such as *Sericea lespedeza* and fescue. We agree with your description of adverse effects caused by the imported red fire ant and encourage you to place high priority on monitoring and treatment to detect further increases in the numbers of this insect pest. We also encourage you to develop planning direction for preemptive site specific fire ant control, although this objective should receive a lower priority than management of invasive plant species.

SPECIFIC COMMENTS, PROPOSED REVISED LAND AND RESOURCE MANAGEMENT PLAN

(Page 61, OBJ02) Aggressive and proactive preventative and control measures will reduce the long term costs associated with curtailing the spread of invasive native and non-native species. The planned annual treatment is 200 acres forest wide, but we believe there is a much greater need for such treatments and would ask that you not consider 200 acres as the maximum annual treatment acres. Rather than suggest a larger acreage, we ask an allowance for flexibility to treat acres identified within budget constraints. This will be especially important for control of *Sericea lespedeza* as the canopy is thinned and more prescribed fire is used throughout various management areas on the forest.

(Page 62, OBJ09) We strongly support a higher priority placed on conversion to native species and would like to see more than 500 acres annually treated. If this is not possible, we recommend you place emphasis on initial allocation of these acres to Oklahoma portions of the national forest within existing range allotments. This will provide an increased forage base away from sensitive streams and riparian areas and reduce the streamside grazing pressure identified on some of the Oklahoma range allotments.

(Page 84, HU003) Please add the following text. "Broadcast application should be used only for noxious weed eradication/control programs, not for general forestry work."

(Page 90, Livestock Grazing, LG002) We would like to see text added which would specify that allotment plans include forage improvements by way of thinning and prescribed burning along with development of small ponds as livestock water sources, and conversion of off site loblolly pine plantations. This will divert grazing away from wild and scenic river corridors and minimize access to all other stream areas.

(Page 90, Livestock Grazing) We recommend you add language and/or standards which will address the following concerns related to grazing:

If you have improved pasture systems in non-native forage species such as fescue or Bermuda grass we ask that you add language or standards that would plan for conversion to native forage grasses. No new non-native plantings should be allowed. Feeding troughs or water troughs should not be placed in riparian areas. Salt blocks and mineral blocks should be placed in boxes or containers to control leaching into soils and should be placed in areas which will encourage grazing away from riparian zones.

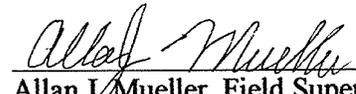
In closing we once again commend your staff for a job well done. The draft documents address the four imminent threats identified by Chief Bosworth and the planning team has done an excellent job of bringing these threats to the forefront throughout the draft documents. We are available to assist you with completing remaining tasks and remain united in our support of your ecologically responsible land management.



Scott Simon, State Director
Arkansas Field Office,
The Nature Conservancy



Karen Smith, Director
AR Natural Heritage Commission



Allan J. Mueller, Field Supervisor
Arkansas Field Office
U.S. Fish and Wildlife Service



Jerry Brabander, Field Supervisor
Oklahoma Field Office
U.S. Fish and Wildlife Service



Scott Henderson, Director
AR Game and Fish Commission



Greg Duffy, Director
OK Dept. of Wildlife Conservation





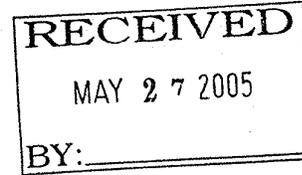
United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
P.O. Box 26567 (MC-9)
Albuquerque, New Mexico 87125-6567



IN REPLY REFER TO:

May 26, 2005



9043.1
ER 05/218

Alett Little
Plan Revision Team
Ouachita National Forest
100 Reserve Street
Hot Springs, Arkansas 71901

Dear Mr. Little:

The U.S. Department of the Interior (DOI) has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Revised Land and Resource Management Plan for the Ouachita National Forest (Forest). We offer comments on these documents at two levels, forest-wide management issues, and general and specific items within the draft plan. We appreciate the opportunity to be actively involved in the revision process. Through collaboration with agency partners in Arkansas and Oklahoma, your planning staff has developed revised plans including a diverse land management perspective. Your vision statement speaks directly to ecosystem health and sustainability. This theme is evident throughout the documents.

Forest-Wide Comments

We believe Alternative E provides the best balance of providing for ecosystem health and sustainability while recognizing human influences and incorporating human needs and uses.

Planning Regulations

We recognize that although you are completing the plan revision under the 1982 planning regulations, you are incorporating the spirit of the new planning process. This is evident in the format of the draft revised Plan. We understand you will complete an Ecological Management System (EMS) for the Forest within the next 3 years. As you develop the EMS, we hope you will continue to emphasize ecological health and sustainability of the terrestrial, riparian, and aquatic ecosystems identified for the Forest.

Species Standards

The DOI plans to continue working with you (in developing the species viability evaluation database for the Forest) until the final Plan is completed. This conservation planning tool

will help ensure diversity and sustainability of biological resources. As you finalize the revised land management plan, please include both U. S. Fish and Wildlife Service (FWS) field offices in Conway, Arkansas, and Tulsa, Oklahoma, in review and completion of fine filter strategies for all federally listed, candidate, and species of concern. Doing so will ensure that adequate standards for these species are developed and included in the final revised Plan.

We offer our staff experts for final collaborative development of standards for the following listed species known to occur on or adjacent to the Ouachita National Forest:

- Indiana bat
- American burying beetle
- Bald Eagle
- Red-cockaded Woodpecker
- Leopard darter
- Ouachita rock pocketbook
- Scaleshell
- Winged mapleleaf
- Harperella
- Pink mucket
- Arkansas fat mucket

We believe standards will not be needed for the following species, unless new information becomes available on species locations and/or habitat use relative to the forest:

- Piping Plover
- Interior Least Tern
- American alligator

Ecosystem Management

Forested ecosystems, such as the Ouachita Highlands and other parts of central North America, have evolved and are adapted to natural and historic anthropogenic disturbances, including frequent burning. Fire and cultural disturbances are essential ecological processes throughout the Ouachitas.

The average annual prescribed burning and the seasonal diversity of burns, dormant and growing season, planned in alternative E should be adequate to accomplish forest-wide fuel reduction, ecological diversity and restoration, and wildlife habitat objectives. Increased monitoring of the expanded burn program should be emphasized to quantify efficacy of treatments against objectives.

Expanded prescribed fire objectives will result in challenges related to increased human-smoke conflicts. Adaptive management mechanisms should be incorporated into the prescribed burning program, with adjustments made based on the results of monitoring. If through monitoring and the best science you learn that planned burn acres need to be

adjusted up or down, you should incorporate into the final Plan the latitude to adjust without having to revise the Plan. We also recommend that you plan for increased public education and information on the role of fire as a management tool for ensuring forest health and sustainability.

We are pleased with the overall direction developed for Management Area 9. It shows that the Forest has placed a high priority on riparian and aquatic health. We recommend that the Forest retain all of the tools necessary to maintain or restore these ecosystems, while not limiting options for invasive species control. The ability to use selective thinning, and in specific instances, conversion of single species plantations to more appropriate riparian forest assemblages should be retained. Application of herbicides approved for aquatic use may be needed to control invasive species now threatening native vegetation adjacent to stream courses. Restoration of stands of native cane on appropriate sites also should be planned and emphasized where ecologically appropriate. We recommend that the Forest place a high priority on identifying unneeded roads within riparian areas. Decommissioning and closure of unneeded roads adjacent to streams will address multiple aquatic and riparian health issues.

A number of introduced species are invasive and threaten the native ecosystems of the Forest. We agree with and support your planning direction for reducing invasive species impacts and avoiding additional introductions of exotics. It will be essential to retain the use of approved herbicides to control effectively unwanted species, such as *Sericea lespedeza* and fescue. We agree with your description of adverse effects caused by the red imported fire ant and encourage the Forest to place high priority on monitoring and treatment to detect further increases in numbers of this insect pest. We also encourage you to develop planning direction for preemptive site-specific fire ant control, although this objective should receive a lower priority than management of invasive plant species.

We support the amount and distribution of shortleaf pine woodland and savanna shown in Management Areas 21 and 22, and 14. We agree with the emphasis and desired condition for Management Area 14 and believe the Forest has designed adequate flexibility into the standards for this management area so that the entire suite of community types can be maintained.

Oak decline is a serious management challenge facing portions of the Forest. Healthy white oaks will live 250-300 years, and healthy red oaks will live 120-150 years. Droughts and native insects like the red oak borer have been part of Ouachita oak ecosystems for several millennia. These forces have historically thinned woodlands in synergy with fire. Some oak forests have become so dense that competition for water, light, and nutrients is intense. Where previously a single tree competed for necessary resources, there may now be a dozen or more trees, each needing as much water, nutrients, and light as the original plant. Because in modern woodlands many more trees are competing for the same amount of nutrients and water, the current dense forest system is under stress and vulnerable to stochastic events at scales outside the historical range of variability.

Recent droughts have been within the historical range of variation. Records indicate that more severe droughts lasting up to 10 years have occurred in recent history without extensive oak mortality. The current overstocked forest may appear healthy during non-drought years, but is stressed, nevertheless. During the slightest dry period, trees become vulnerable to insects and diseases, and as a result, large numbers of trees die. These outbreaks are not a result of drought, but rather the symptoms of a stressed ecosystem incapable of sustaining itself under altered conditions. In addressing oak decline, we believe that the first principle should be recognition that the absence of fire and the resulting excessive density has contributed to the current unhealthy forest condition.

We believe the plans for oak-hickory ecosystem restoration developed and in use on demonstration sites of the South Central Fire Learning Network should be applied on similar sites in the Forest. Participating sites with established plans for addressing oak decline include the Bayou and Pleasant Hill Ranger Districts of the Ozark National Forest. Information and plans for these participating sites can be found at <http://tnc-ecomangement.org/Fire/>.

We encourage the Forest to develop plans to convert any existing fescue and Bermuda pastures to native warm season forage species. Forage improvements by thinning and prescribed burning along with development of small ponds as livestock water sources, and the conversion of off-site loblolly pine plantations, in order to lessen impacts to streams and provide benefits to multiple wildlife species, should be continued.

Recreation

All recreational and access-related uses on the Forest should comply with overall resource protection, health, and public safety with the realization and clear statement within the Forest Plan that there are levels of use the Forest cannot provide. We understand there is new national direction that excludes all-terrain vehicles (ATVs) from the general Forest area. Consideration should be given to establishing all proposed new ATV trails, including designated trails systems, on existing Forest roads to the extent possible. Where new trails are developed, we encourage multi-use trails, as opposed to single-use trails. New trail development should limit the number of stream crossings and access through areas with fragile soils or sensitive resources. The emphasis and development of low impact recreational uses should be restricted to areas where they will not threaten sensitive flora, fauna, or archaeological resources.

Recreational disturbance, potential for soil erosion, and related water quality concerns, combined with insufficient maintenance budgets, all speak to the need to reduce existing open road densities on portions of the Forest. We agree with the Forest road density objective of 1 mile per square-mile of Forest area. We recommend increased use of gates with information signs and reduced use of earthen mounds as road closure devices. Experience has shown that earthen mounds are less effective as closure devices. We also support the increased use of seasonal road closures to balance resource management objectives while providing access during high demand periods.

woodland allotments diminishes or if range conditions indicate that you place priority on phasing out woodland grazing permits.

A number of introduced species are invasive and threaten the native ecosystems of the Ouachita National Forest. We agree with and support your planning direction for reducing invasive species impacts and avoiding additional introductions of exotics. It will be essential to retain the use of approved herbicides to effectively control unwanted species such as *Sericea lespedeza* and fescue. We agree with your description of adverse effects caused by the imported red fire ant and encourage you to place high priority on monitoring and treatment to detect further increases in the numbers of this insect pest. We also encourage you to develop planning direction for preemptive site specific fire ant control, although this objective should receive a lower priority than management of invasive plant species.

SPECIFIC COMMENTS, PROPOSED REVISED LAND AND RESOURCE MANAGEMENT PLAN

(Page 61, OBJ02) Aggressive and proactive preventative and control measures will reduce the long term costs associated with curtailing the spread of invasive native and non-native species. The planned annual treatment is 200 acres forest wide, but we believe there is a much greater need for such treatments and would ask that you not consider 200 acres as the maximum annual treatment acres. Rather than suggest a larger acreage, we ask an allowance for flexibility to treat acres identified within budget constraints. This will be especially important for control of *Sericea lespedeza* as the canopy is thinned and more prescribed fire is used throughout various management areas on the forest.

(Page 62, OBJ09) We strongly support a higher priority placed on conversion to native species and would like to see more than 500 acres annually treated. If this is not possible, we recommend you place emphasis on initial allocation of these acres to Oklahoma portions of the national forest within existing range allotments. This will provide an increased forage base away from sensitive streams and riparian areas and reduce the streamside grazing pressure identified on some of the Oklahoma range allotments.

(Page 84, HU003) Please add the following text. "Broadcast application should be used only for noxious weed eradication/control programs, not for general forestry work."

(Page 90, Livestock Grazing, LG002) We would like to see text added which would specify that allotment plans include forage improvements by way of thinning and prescribed burning along with development of small ponds as livestock water sources, and conversion of off site loblolly pine plantations. This will divert grazing away from wild and scenic river corridors and minimize access to all other stream areas.

long-term costs associated with preventing and controlling the spread of invasive native and non-native species. This is especially important for control of *Sericea lespedeza* as the canopy is thinned and more prescribed fire is used throughout various management areas on the forest.

Page 62, OBJ09. - The FWS would like to see more than 500 acres per year converted to native habitat types. If this is not possible, we recommend you place emphasis on initial allocation of these acres to Oklahoma portions of the national forest in existing range allotments. This conversion will provide an increased forage base away from sensitive streams and riparian areas and reduce the streamside grazing pressure issues identified on some of the Oklahoma range allotments.

Page 74, Paragraph 1. - Please consider adding the following text to the Threatened, Endangered, and Sensitive Species, and Their Habitats introduction:

“Carry out Forest Service responsibilities for the conservation of endangered and threatened species through interagency consultation with the U. S. Fish and Wildlife Service. Manage federally listed species in accordance with approved recovery plans and under direction from the most recent biological opinion. Issue permits for the collection of federally listed plant and animal species only if collector has a current U. S. Fish and Wildlife Service collecting permit. Threatened and endangered species will be monitored according to terms and conditions listed in the biological opinion for that species. Manage habitat to move species toward recovery and de-listing.

Manage habitats for sensitive species and other species of concern to prevent downward trends in populations or habitat capability, and to prevent federal listing. Sensitive species site records and databases that include the Arkansas Natural Heritage Commission and the Oklahoma Natural Heritage Inventory databases will be maintained and updated periodically. This information along with other information sources will be used to determine future management decisions.”

Page 75, TE002, Page 88, TR007, and Page 92, SU001. - Impacts to federally listed species are not “mitigated.” If road construction may affect or result in the possibility of “take,” endangered species consultation should be initiated.

Page 84, HU003. - Add the following text: “Broadcast application should be used only for noxious weed eradication/control programs, not for general forestry work.”

Page 90, Livestock Grazing, LG002. - Add the following text: “Allotment plans will include forage improvements by way of thinning and prescribed burning along with development of small ponds as livestock water sources, and conversion of off site loblolly pine plantations.” This will divert grazing away from Wild and Scenic River Act corridors and minimize access to all other stream areas.

Page 90, Livestock Grazing. - Add the following standards:

1. Pasture or field systems currently in non-native plant species, such as fescue or Bermuda grass, will be converted to native cool or warm season grasses as opportunities and budgets allow. When seeding to establish or maintain range forage in pastures and openings, use native species compatible with the ecological site.
2. Where grazing is currently allowed, control livestock numbers and mitigate negative effects to restore, enhance, or maintain the integrity of stream channels and banks.
3. Feeding troughs or water troughs will not be placed in riparian zones or defined channels. Salt blocks and mineral blocks will be placed in boxes or containers to control leaching into soils and will be placed in allotment uplands to encourage forage use away from riparian zones.
4. Existing permitted woodland allotments will be phased out as permits are terminated, or if range condition dictates.
5. Provide structural and non-structural improvements that meet overall management goals and objectives to obtain desired livestock distribution and proper forage use throughout grazing allotments.

Page 94, Paragraph 1. - Add the following text: "When catastrophic wildfire events occur on the Ouachita National Forest that threaten known federally listed species or other important forest resources, the local FWS Ecological Services Field Offices would gladly provide support when the incident commander deems it necessary for minimizing impacts and emergency consultation."

We agree that wildfire and fuels accumulations, invasive species, land conversion in the context of urban interface, and unmanaged recreational use are issues which must be addressed during plan revision. Your team has done an excellent job of bringing these threats to the forefront of plan revision and we wish to support you in completing the revision process. As you consider our comments, remember that we look forward to assisting you in completing species viability evaluation fine filter strategy and listed species standards development.

Thank you for the opportunity to review and comment on this DEIS. We hope these comments will be of use as you prepare the final documents.

Sincerely,



Stephen R. Spencer
Regional Environmental Officer

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Buc P. BT

Arkansas Game & Fish Commission

2 Natural Resources Drive Little Rock, Arkansas 72205



David Goad
Deputy Director

Loren Hitchcock
Deputy Director

Scott Henderson
Director

May 26, 2005

Mr. Alan G. Newman, Forest Supervisor
Ouachita National Forest
P.O. Box 1270
Hot Springs, AR 71902

Re: Comments on the Revised Forest Plan

Dear Mr. Newman:

It is indeed a pleasure to have witnessed the cooperative manner that our two agencies employed in developing this revision to the Ouachita National Forest plan. Your agency and more specifically, your planning team is to be commended in their efforts in their collaborations towards the goal we have reached. I personally offer my congratulations to both you and your staff for a job well done in designing an aggressive new approach in this revision towards meeting challenging multiple-use objectives that balance ecological health and sustainability while providing for diverse public uses for our citizens.

I have asked my staff, who have followed this long path with you, to review the proposed plan and submit the attached comments to your team that, in our opinion, will offer some improvements to the document as related to ecosystem health and sustainability, wildlife species viability and recreational use.

The Commission appreciates the opportunity to submit these comments in a spirit of cooperation between our agencies for the betterment of wildlife and the opportunities for generations of Arkansans to enjoy these treasured lands. We look forward to helping see this plan affect positive impacts to the resources in the years to come.

Sincerely,

Scott Henderson
Director

Phone: 501-223-6300 Fax: 501-223-6448 Website: www.agfc.com

The mission of the Arkansas Game and Fish Commission is to wisely manage all the fish and wildlife resources of Arkansas while providing maximum enjoyment for the people.

Comments on the Revised Forest Plan, Ouachita National Forest
from the
Arkansas Game and Fish Commission
May 26, 2005

Following are the Arkansas Game and Fish Commission's comments on the final draft of the Ouachita National Forest Land and Resource Management Plan (LRMP) as detailed in the Federal Register. The Commission offers this assistance as a long-standing conservation partner, co-managing the wildlife and aquatic resources of these lands, in order to both provide our support and our recommended improvements to the revised plan.

The Commission staff agrees that Preferred Alternative E best addresses a comprehensive management strategy balancing ecosystem management, wildlife and aquatic species viability and social and economical needs. It is clear that the revised plan is based on the best available science, including a diverse ecosystem management perspective. The vision statement stated within speaks directly to ecosystem health and sustainability while maintaining multiple-use principles.

It is our understanding that the plan incorporates the monitoring, adaptive management, and mandated collaborative guiding principles of the new planning process soon to be enacted. We support these principles embraced in the documents and again thank you for the partnerships forged throughout development of the revised plan. We understand an Ecological Management System (EMS) for the Ouachita National Forest will be prepared within the next three years. This document will further transition the forest into the new planning process. The Commission also is very supportive of the collaborative nature by which the Species Viability Assessment was developed. As the evaluation continues towards the fine filter goals, our agency pledges our assistance in collaboration with other conservation partners.

As mentioned in previous comments, the Commission agrees with Forest Service Chief Bosworth's assessment of the four major threats to National Forests. The Ouachita National Forest has done a great job of assessing and dealing with excessive fuel loads remaining from the recent ice storm, especially within the urban interface. Its' research and work on documenting OHV use and effects on the forest has also aided in moving toward control measures. The Commission agrees that the revised plan addresses all four threats adequately.

The manner by which management is driven at the vegetative community level is very appropriate. The identification of the various ecological communities and their representative seral stages on the landscape is, in our regard, the best method for ensuring that wildlife species are managed for at historic levels. We strongly support species populations to be maintained at the "good" to "very good" levels according to the viability assessment, unless the species is located on the edge of it's range or limited by

the extent of the habitat available. The detailed descriptions of the desired conditions of terrestrial and aquatic ecosystems within the planning document provide our agency with the assurance that this plan is truly taking our native species into consideration while improving the health and sustainability of these forested ecosystems.

Regarding recreation and public access, it is our understanding that implementation of the new national OHV policy will eliminate ATV access to the general forest floor and will define permitted areas where they may be used. We agree with and support this policy change, although we recommend an accelerated analysis to expedite the implementation of this policy. The Commission recommends the use of existing roads and trails for ATV use, avoiding riparian areas and stream crossings, and limiting the amount of any new road or trail construction. When considering new recreational developments, we ask you to place emphasis on low impact uses including hiking, mountain bicycling, rock climbing, wildlife observation, and geo-caching. All recreational activities require monitoring and should be at levels that the Forest can sustain without resource degradation. Additionally, with changes in recreational use policies, the Commission strongly recommends increased enforcement throughout the Forest to help ensure public awareness and compliance.

We strongly support the retention of the road density standard of one mile of open forest road per square mile of general forest area in the revised forest plan. We also support a high priority be placed upon decommissioning un-needed roads and trails, especially within riparian ecosystems. In recent years of limited maintenance budgets for existing roads, the Forest Service has ample justification for closing roads. It is our understanding that the Ouachita Forest averages the decommissioning of approximately 17 miles of roads each year. The manner by which roads are decommissioned is unclear and requires more details as to what methods (rehabilitated, obliterated) will be employed. Riparian health and aquatic viability within drains needs to be balanced with the overall benefits of restoring historic drainages along these selected roads.

When planning road closures, we recommend the increased use of gates with information signs and reduced use of earthen mounds as road closure devices. Experience has shown that gates are more effective than earthen mounds for road closures. We also support the increased use of seasonal road closures to balance resource management objectives while providing access during high demand periods.

The Commission supports the manner by which riparian communities are managed under this plan. Although the plan shows that a high priority has been placed on riparian and aquatic health, the Commission offers the following SMZ recommendations:

SLOPE	<u>0-5%</u>	<u>5-15%</u>	<u>15-35%</u>	<u>35+%</u>
Perennial	100'	100'	125'	150'
Other defined channels	30'	50'	75'	100'

The Ouachita National Forest should also retain all of the tools necessary to maintain or restore these riparian ecosystems and be sure not to limit options for invasive species control.

In regards to vegetative management under the Preferred Alternative, the Commission strongly supports the appropriate use of all silvicultural tools in maintaining the health and sustainability of forest conditions as outlined. Our wildlife species depend upon both a diversity of forest age class and structure at the landscape scale, as well as, a diversity that ecological conditions afford in species compositions. These forested systems are, for the most part, fire-dependent communities and the appropriate use of fire regimes per community is essential in maintaining ecological function and sustainability. The Commission strongly supports the appropriate use of prescribed burning, in keeping with the Smoke Management guidelines developed by the state. This would include those portions of designated wilderness areas that are economically feasible in conjunction with adjacent burns.

The Ouachita National Forest is a national center of excellence in restoring shortleaf pine-bluestem ecosystems. The Commission commends the Ouachita for placing proper emphasis on this initiative and we agree with the distribution of shortleaf pine woodlands shown in Management Areas 21 and 22. As appropriate additional sites are identified we encourage you to further expand restoration of these productive and diverse ecosystems.

Conversely, the oak-dominated communities within the Forest have been neglected from structured management strategies. Natural forces have in the recent past negatively impacted these forest types. New management alternatives and guidelines are required to attain specific objectives for sustainability of these communities. Fire alone will not resolve the years of forest densification and species composition changes within these systems. The Commission strongly recommends more detailed, silvicultural strategies to provide for historic oak woodland conditions throughout the range. The revised plan does not go far enough in detailing plans for oak-dominated forests. Management prescriptions which include commercial and non-commercial thinning of over stocked oak-dominated forest types must be discussed within the framework of the plan in order to ensure sustainability of these ecosystems. The Commission believes the plans for oak-hickory ecosystem restoration developed and in use on demonstration sites of the South Central Fire Learning Network should be applied on similar sites in the Ouachita National Forest.

Where grazing is currently allowed, we ask you to continue to control livestock numbers and mitigate negative effects by restoring, enhancing, or maintaining the integrity of stream channels and banks. We also ask that as interest in the use of existing woodland allotments diminishes, or if declining range conditions indicate, you place a priority on phasing out woodland grazing permits.

The Commission strongly supports the continued emphasis on providing supplemental wildlife plantings for game management throughout the forest. Although the planned vegetative management will result in increases in native herbaceous plants and early

successional habitat, the requirements of late winter foraging resources these wildlife openings provide game species is crucial in maintaining populations levels of several species of wildlife having important social and economical value in local communities. We also recommend additional roadless areas be provided during hunting seasons through the use of seasonal closures of selected roads. These areas will enhance the quality of recreational opportunities while reducing the concentration of hunters.

Under the guidelines of Management Indicator Species (MIS), the revised plan falls short in species indicative of the various aquatic systems within the National Forest boundary. The Commission proposes the following recommendations regarding assessing the health of the aquatic communities. For the Ouachita National Forest, the health of the aquatic community and especially the fish population, would be best monitored by conducting fish samples targeting the entire community, utilizing the Index of Biotic Integrity (IBI or a modification following Karr's work). One of your biologists (Lisa Hlass) has developed a modified IBI for Ouachita streams near Mt. Ida, which should be reviewed for applicability to more Forest streams. In addition, with assistance from Commission personnel, all sport fish should be measured (mm total length) for length frequency analysis. Emphasis should be given to following trends in a five (5) component, feeding guild including Smallmouth Bass (piscivore), Bigeye Shiner (omnivore) and Central Stoneroller (herbivore). We do not feel that this number of species will require intensive monitoring, but too many of some particular species within a stream may indicate a problem in that stream. We support a monitoring system that samples every stream within a three (3) to five (5) year rotation

Additionally, in aquatic management of the National Forest waters, the Commission strongly supports the use of rotenone as a lake sampling tool. This should be considered an allowance at the forest level under a category exclusion and not require an environmental impact statement. In addition, all Rainbow Trout stockings are to continue in the Albert Pike area of the Forest.

Regarding the management of invasive species, the Commission recommends the allowance of both stem and broadcast applications of herbicides for the control of privet, kudzu and fescue. Additionally, we recommend, as a preventive measure of control, pre-treatment of *Sericea lespedeza*, especially along roadsides, in conjunction with prescribed burns. We further agree with your description of adverse effects caused by the imported red fire ant and encourage you to place a high priority on monitoring and treatment to detect further increases in numbers of this insect pest

Aggressive and proactive preventative and control measures will reduce the long-term costs associated with preventing and controlling the spread of invasive native and non-native species. The planned annual treatment is 200 acres forest wide. We believe there is a much greater need for such treatments and would ask that you not consider 200 acres as the maximum annual treatment acres. Rather than suggest a larger acreage, we ask an allowance for flexibility to treat acres identified within budget constraints

If you have improved pasture systems in non-native forage species such as fescue or Bermuda grass we ask that you add language or standards that would plan for conversion to native forage grasses. No new non-native plantings should be allowed.

The Commission thanks you for the opportunity to submit these comments and we commend the Ouachita National Forest Planning Team on a job well done in drafting such a comprehensive forest plan.

AV
Bill P. ~~th~~

Arkansas

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May 27, 2005

Mr. Alan G. Newman, Forest Supervisor
Forest Plan Team
U.S.D.A. Forest Service
P. O. Box 1270
Hot Springs, AR 71902-1270

Re: Draft Environmental Impact Statement
for the Proposed Revised Land and Resource
Management Plan of the Ouachita National Forest
State of Arkansas
ORGP 5-48a

Dear Mr. Newman:

Thank you for this opportunity to review and comment on the proposed land and resource management plan of the Ouachita National Forest. Based on my own and staff review of the plan, I would like to offer the following comments and suggestions:

Pg. 15 Mgt. Bulletin R8-MB 122 B, Alternative E

The Department of Parks and Tourism prefers Alternative E because of its emphasis on managing a healthy and diverse sustainable forest.

Pg. 95 Mgt. Bulletin R8-MB 122 A, Trails

We commend you for your method of resolving user conflict in wilderness areas, along with designing and maintaining trails based on a wilderness experience.

In our meeting with Bill Pell, et. al., we spent considerable time on two specific subjects: OHV use and declining recreational budgets resulting in possible USFS recreation area closures. First, with 1.8 million acres in the Ouachita National Forest, your agency is the largest land managing agency in the state. We all agree that OHV use needs to be managed, but it is a viable outdoor recreation activity. There are few options on other public lands, and USFS strategies and planning should be cognizant of that fact. Secondly, we are concerned about the recreation budget situation and reductions for the Ouachita National Forest. Closing recreation areas will save M&O funds and, depending on "how many" and "where", can have a devastating long-term effect on outdoor recreation in Arkansas. We hope you will continue to pursue partnership opportunities with local governments and organizations for management options.

We appreciate all the work that went into the plan, and your staff's assistance in reviewing the details with us.

Sincerely,

A handwritten signature in black ink that reads "Greg Butts" followed by a stylized flourish.

Greg Butts, Director
Arkansas State Parks

cc: Richard W. Davies, Executive Director
Bryan Kellar, Director, Outdoor Recreation Grants Program
Stan Graves, Manager, Planning & Development
Rex Friedman, Chief Planning, Planning & Development
Randy Roberson, Resource Management Specialist
Anita Chouinard, SCORP Planner

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May 27, 2005

Mr. Alan G. Newman
Forest Supervisor
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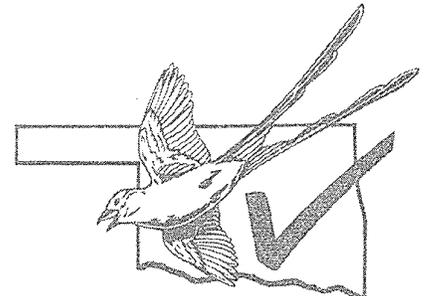
Subject: Review of the Ouachita National Forest Land and Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Newman,

We appreciate the opportunity to review and provide comments on the Proposed Land and Resource Management Plan for the Ouachita National Forest and the accompanying Draft Environmental Impact Statement. Overall, these documents are well written and thoughtfully prepared, and we support most aspects of them.

There are many components of the proposed management plans with which the Oklahoma Department of Wildlife Conservation agrees. Some of these statements, under the Desired Condition of the Ouachita National Forest section, which we particularly support are:

- pg. 8 "Fire, thinning, and other vegetation management practices are used to help sustain the balance of structural and compositional diversity needed to support healthy populations of native plants and animals."
- pg. 9 "Where native species have been displaced by non-native or off-site species, systems will be restored over time to native species composition."
- pg 22 "Desired Condition: Habitat conditions sustain healthy populations of native and desired non-native wildlife and fish species."
- pg 26 "over the planning period, the number of inventoried unclassified roads and trails is reduced, and the development and proliferation of new unclassified roads is minimized."
- Pg 36 "Movement of fish and other aquatic organisms in otherwise free-flowing perennial streams ...will not be obstructed by road crossings, culverts or other human-caused obstructions."



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In the Strategy section (pg 50) we strongly support restricting the use of OHVs on the Forest consistent with the proposed national policy: "If the rule is approved in its current form, National Forest Service lands will move to a system of designated routes for motorized vehicles, including OHVs, and toward excluding public use of motorized vehicles from the rest of the forest." We support this policy because it should reduce disturbance to wildlife resources, vegetation and soil. However, we are sensitive to the needs of non-ambulatory sportsmen and would like to see sufficient flexibility in the OHV restrictions to allow their use of OHVs off designated trails during hunting seasons. We believe this could be done with minimal natural resource impact because of the limited number of vehicles that would be involved. Further, non-ambulatory sportsmen use of OHVs would occur during the fall, outside of the typical nesting period for ground-nesting birds and mammals, and relatively level areas could be designated for this purpose to minimize potential erosion concerns.

In the Strategy section, we believe that many of the details specified for MA 21 (pg 42) could and should apply to MA 22 (pg 44) also. The desired condition stated for stands within MA 22 is 60 to 120 square feet of basal area per acre. At the upper end of this range, these stand would be too dense for optimum Red-cockaded Woodpecker habitat and for significant pine reproduction. We feel the range, indicated for MA 21 (30 to 80 square feet basal area per acre) would produce better Red-cockaded Woodpecker habitat and more effectively secure pine regeneration.

A detailed description of the disturbance regime for MA 21 is provided in the Management Plan: "These forests will be maintained by frequent, moderately intense ground fires, some of which will occur in the summer and fall (July- November). Fire return intervals will range from one to more than four years, but will occur on an irregular basis at varying times, seasons, and intensities. Fires will be frequent enough, and hot enough to suppress the woody understory, and to occasionally kill individual overstory trees or small groups of trees." We believe that this description is applicable also to MA 22, for which there are very few details provided regarding how fire will be applied.

The Regeneration section for MA 21 specifies that "The periodic use of prescribed fire under open canopies may promote natural regeneration at irregular intervals, resulting in "banked" advanced reproduction in many core and replacement stands..." At least part of this description should be adapted and applied to the regeneration strategy for MA 22.

The Design Criteria section for MA 21(pg 112) states that livestock grazing will be limited: "Restrict livestock, except where grazing is necessary based on site-specific analysis to mimic the ecological role formerly played by elk and bison. When livestock are in use on surrounding lands, consider their impacts on vegetation on a site-specific basis..." We believe this criterion should apply to MA 22 also.

On page 235 of the Draft Environmental Impact Statement (DEIS), the statement is made that " There are few cumulative effects from the continuation of the grazing program." Later in the same paragraph the author states: "Because grazing levels are below the estimated grazing capacity of the forest, the cumulative effect of the grazing program is considered insignificant."

Over large areas subjected to uniform management practices, these statements may be true. However, on small areas such as stands initially thinned and burned in MA 22, grazing may have a substantial detrimental effect. While the density of cattle on the forest may be light, the animals may be attracted to the newly thinned areas where there is a greater abundance of grasses and forbs and where they selectively graze bluestem and other highly palatable species. The result of such selective, concentrated grazing is that the bluestem and forb component of the understory is severely suppressed and less fuel exists at ground level to carry fires that are required to suppress hardwoods. We have observed the detrimental impact of trespass cattle grazing on the McCurtain County Wilderness Area (MCWA), which is managed to restore Red-cockaded Woodpecker habitat and the pine/bluestem woodland ecosystem. On thinned and burned areas within the MCWA's east side, the combined density of bluestem and native forbs is sparse in late summer compared to similarly treated areas on the area's west side where trespass grazing is not an issue. On the east side clumps of bluestem are scattered several feet apart, one or two feet tall, and virtually every one shows signs of grazing. On the west side, the density of grasses and forbs is much greater, nearly continuous, and often over head high. Given our current experience, we believe that livestock grazing on MA 22 should be eliminated or severely restricted until research has been completed to define the impacts of cattle on pine/bluestem restoration.

Tables 3.82 and 3.83 within the DEIS demonstrate that the public places substantial importance on the maintenance of stream quality, protection of water sources and provision of habitat for fish and wildlife populations. During the public opinion survey, 86 percent of the respondents ranked "maintaining stream quality" as an extremely important management objective. Similarly, 80 percent of the respondents ranked "protecting areas that are sources of water" as a very important management activity. These were the highest ranked items in each aspect of the survey. While the Management Plan adequately addresses most of the fisheries issues within the Ouachita National Forest, it does not appear that the management of aquatic resources and riparian corridors are given consideration in proportion to their ranking by the public. We request that greater consideration be given to the following management points.

1) Greater priority should be placed on reducing the impact of road crossings on stream morphology and fish passage. Across the Ouachita Uplift, there are thousands of these stream crossings that are now and have historically affected aquatic resources through the alteration of local hydrology, impairment of sediment transport, reduction in bed and bank stability and impairment of the movement of fish along the stream continuum. The ODWC is working to evaluate these issues in the Glover River watershed and develop a predictive tool to estimate stream impacts by crossing type. Tractable solutions to modifying existing crossings and designing replacements also will be addressed. Our goal is to use the results from this study to prioritize and restore the crossings in most need of enhancement and to design crossings that are more compatible with the maintenance of proper stream function.

2) The ODWC has collected a substantial amount of data regarding the status of stream-dwelling sport fish in the Ouachita uplift. These data include logistically demanding collections of the smallmouth bass which is designated as a management indicator species in the Plan. We would like to improve the sharing of data between our agencies and develop communication

protocols that will assist the ONF in incorporate these data into the Forest Plan and reduce potential duplication of sampling efforts.

3) The plan states that streamside management areas are, depending on their location, between 100 and 30-feet in width. Limited cutting will be allowed in these areas, however the concept of limited cutting is vague and should be defined more explicitly such that conservative land management practices in these sensitive areas are maintained.

In closing, we would like to again commend you and your staff on a well written Management Plan. If you have any questions or need additional clarification on the points raised in this letter, please contact Ron Suttles, Natural Resources Coordinator, at 405/521-4602.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Duffy". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Greg Duffy
Director