

Appendix D

Public Comments and Response

The notice for the Draft Environmental Assessment for the Tuskegee Forest Health and Longleaf Restoration project was published in The Tuskegee News on January 20, 2005. During the comment period, three responses were received. This appendix displays the public comments received and provides the Forest Service's response to those comments. Following direction in 40 CFR Section 1503.4, the ID team has analyzed and carefully considered all public comments received during the review period. All letters, emails, faxes, and comment forms received as public comment on the Draft Environmental Assessment were compiled, organized, read, and analyzed by resource specialists located on the Tuskegee National Forest – Tuskegee District and the Supervisor's Office for the National Forests in Alabama.

These specialists used a process known as "content analysis" which allows a systematic review of public comment through the development and use of a database tracking the commenter, and comment topic. The specialist have read all public responses in their entirety and identified discrete comments within these responses. They have related each discrete comment to a particular concern, resource consideration, or proposed management action. Every effort was made to keep each comment within sufficient context that it is a stand-alone statement. The specialists looked for not only each action or change requested by the public, but also the reason(s) behind each request in order to capture the full argument of each comment. Therefore, paragraphs within a response letter may be divided into several comments because multiple arguments are presented, or alternatively, several paragraphs that form one coherent statement may be coded into one comment. While simple statements of opinion without rationale are captured in the process and entered into the database, it is the strength of each rationale as a complete argument that provides the specialist with basis to develop their response.

The Tuskegee National Forest uses six broad-based categories with sub-categories to classify comments and to determine if comments are substantive. These categories are:

- 1. Soil Productivity**
 - a. Erosion
 - b. Compaction
- 2. Water Quality**
 - a. Sedimentation
 - b. Herbicides
 - c. Wetlands, Floodplains, and Riparian Areas
 - d. Cumulative impacts
- 3. Air Quality**
- 4. Vegetation**
 - a. Restoration of Off-site species
 - b. Age-class distribution
 - c. Understory diversity
 - d. Southern Pine Beetle
 - e. Non-native Invasive species
- 5. Wildlife**

- a. MIS Habitat
 - b. Threatened, Endangered and Sensitive Species
 - i. TES animals
 - ii. TES plants
- 6. Social and Economic**
- a. Economics
 - b. Recreation
 - i. Recreation Settings
 - ii. Scenic integrity
 - c. Heritage Resources
 - d. Public Health and Safety
 - e. Civil Rights and Environmental Justice

Some comments may not fall within these categories and are classified as “other” or “out of the scope of the project.” Generally “other” comments are those that may have some relation to the project but are administrative-, financial-, or process-related and, consequently, do not have a cause-and-effect relationship to the project’s environmental impacts. Comments “out of the scope” may or may not have a cause-and-effect relationship, but decisions related to them are: Outside the agency’s authority; addressed at the national or forest planning levels and, therefore, not appropriate for examination in a project-level analysis; or below the measurement threshold when compared to larger-scale relationships.

Substantive comments, as defined in, 36 CFR 215.2 are comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider. The ID team determined that there was one substantive comment. Most of the comments were supportive in nature and generally supportive comments are document below as well; and none of the comments resulted in a change to the preferred alternative. The Content Analysis file is located at the Tuskegee National Forest Office.

Any page references in the response to comments refer to the EA that was submitted for Notice and Comment, unless other wise noted.

A. Substantive Comments

1. Comment: A stated concern that the EA did not have adequate surveys for MIS as required by NFMA (36 CFR 219.19), necessary to make an informed decision. (5.a. – MIS Habitat)

Response: The respondent states the project level MIS surveys are required by NFMA and that this project is not in compliance with that requirement. Concerning the collection of population or inventory data for MIS, the National Forest Management Act (NFMA) regulations under which the Revised Forest Plan for the National Forests in Alabama was completed require that “[p]opulation trends of the management indicator species will be monitored and relationships to habitat changes determined” (36 CFR 219.19(a)(6)). The purpose of this regulation is to require monitoring of the

programmatic effects of implementing Forest Plans. Therefore, for most MIS, population monitoring and evaluation is accomplished through forest-wide efforts rather than on a project-by-project basis. In addition, from both practical and scientific standpoints, monitoring of populations that are distributed across a national forest is best approached at that broader scale. There is no requirement for site-specific population data for every project.

Although MIS are not monitored at the project level, the changes to MIS habitat may occur as a result of project level activities and collection of data at this level will provide input for monitoring at the forest-wide level (Forest Plan Appendix F). For this reason changes in habitat relationships are analyzed and documented in individual projects.

B. Other or Out of Scope Comments

1. Comment: General support for the project and proposed action (Alternative 2).

Response: No response required.

2. Comment: A general concern for the protection of the environment in the implementation of the project including protection of:

- a. hardwood stands, hardwood producers during harvest activities and prescribed burning**
- b. protection of nesting species during prescribed burning.**
- c. protection of soils and ground cover during mechanical site preparation**
- d. protection of non-target vegetation during herbicide treatments**

Response: This project is designed in compliance with the Revised Forest Land and Resource Management Plan (Forest Plan) and includes forest plan standards for protection of the environment. Chapter two of the forest plan lists standards by resource area and chapter three of the plan has additional standards by management prescription. These standards are incorporated by reference in the EA for this project and specific standards that apply to this project area are in the project file. The EA (section 3) references the mitigation that applies to all alternatives including the proposed action. Mitigation to reduce or eliminate impacts to the environment is included in this project in the project design.

a. Protection of hardwood stands, and hardwood producers – *The actions proposed in this EA are specific to upland pine sites, i.e., stands that have been identified as upland longleaf sites. Most important upland hardwood mast producing tree species (oaks and hickories) have significant adaptations to frequent fires, such as thick bark and protective growth forms. While wildfire intensities may sometimes lead to fire scarring; both wildfires and prescribed fires rarely cause mortality of mature mast bearing trees. Fire merely restricts regeneration of young hardwoods to more moist areas where fire severities are markedly decreased. Additionally as this project is designed and would be implemented under the guidance of the Revised Plan, the*

forest wide goals of retaining hard and soft mast species applies and is part of project design.

A significant portion of the stands classified as hardwood on the Tuskegee National Forest are located in riparian areas. The Revised Forest Plan direction provides for the protection of riparian areas, and riparian areas are generally excluded from activities except to enhance riparian values. Standards were developed during the Forest Plan Revision process to protect riparian hardwoods and hardwood inclusions (Forest Wide Standard 122, Page 2-54.)

b. Protection of ground nesting wildlife - *The protection of ground nesting wildlife during prescribed burning was considered during the Forest Plan revision. Ground nesting wildlife evolved in habitats perpetuated by fire. Various adaptations to fire disturbance; from nesting season, to re-nesting ability, to nesting site fidelity, have developed among the myriad bird species which select these fire-maintained ecosystems for nesting.*

Growing season fires do sometimes burn bird nests and kill eggs and young birds. However, future nesting and brood-rearing habitat improvements from growing season burns, offset the loss of one season's nests in an area.

Growing season fires reduce ground-nesting bird predator's habitat. Studies in Mississippi revealed that 92% of turkey hen deaths occurred during nesting and brood-rearing seasons, due to predation. In a 6-year study conducted by Auburn University, over 50% of turkey nests and 70% of poults were lost as a direct result of predation. By removing woody understory plants and encouraging thick herbaceous ground-covers, growing season burns reduce predator habitats, which may reduce turkey hen and poult losses to predation.

Growing season fires create brood-rearing habitat. The availability of quality brood-rearing habitat often limits ground-nesting bird populations on large, unbroken expanses of mature forest habitats, such as National Forests. Prime bugging and insect-foraging conditions are created for young chicks and poults by growing season fires. Growing season fires reduce woody understory plants and favor grasses and forbs. Grasses and forbs produce larger insect "crops" for poults to consume, while providing adequate cover for poults and females-brooding-young to escape predators.

Managers strive to limit the impacts of prescribed fires on turkey hunters, and ground-nesting birds. Managers design growing season prescribed fire average sizes to be smaller than average dormant season fires to minimize impacts to turkey hunters and nesting birds. Growing season fires burn less completely than dormant season fires, leaving many unburned microhabitats within burn blocks for quail, turkeys, non-game birds and other wildlife.

c. Protection of soils during site preparation – Detailed discussions of the types of site preparation appropriate for use on National Forest in Alabama and the expected effects of their use was analyzed during the Forest Planning process (FEIS Chapter 3). Project design includes mitigation, from the Forest Plan for the protection of soils. The effects of the activities on soils are discussed in the environmental consequences section of the EA (EA p. 27-39).

d. Protection of non-target vegetation during herbicide treatments – During the revision process of the Forest Plan the effects of the use of herbicides was analyzed (FEIS Chapter3). The Revised Forest Plan direction provides for the mitigation of the effects of herbicide use including the effects on non-target vegetation (Plan Chapter 2). Project design includes mitigation from the Forest Plan for the protection of non-target vegetation. The effects of the activities on vegetation including non-target species are discussed in the environmental consequences section of the EA (EA p. 51-52).

3. Comment: A concern that the residual thinning BA should be 40-50 sq. ft per acre rather than 50-60.

Response: The desired future condition of the thinned stands is an open woodland condition which supports a native grass and pyrophytic forb herbaceous layer over at least 40% of the ground area. Basal area is a highly variable metric and can vary widely when measured at several points in a stand. The stated target basal area of 50-60 square feet is merely the anticipated average basal area that will allow the characteristics of the desired future condition to develop in the stand. The desired character is one of an open woodland with a well-developed native groundcover.

4. Comment – A concern indicated that the EA does not adequately state a site specific project level DFC that include structure, species composition and necessary ecosystem function elements. A further concern indicating that the DFC should include all cultural and socio-political attributes and expectation as well a conservation forestry strategies.

Response: The respondent indicates a belief that the EA does not adequately state a site specific project level DFC. The site specific DFC for this project was included in the EA with the proposed action. The proposed action clearly states both project specific goals, including a description of the stands following the actions of this proposal, as well as long term DFC for the Tuskegee National Forest. Recognizing the long term nature of ecosystem restoration, the EA states, " This is the initial phase of a long-term project that is designed to improve the health of the Tuskegee National Forest." . Additionally the EA ties the DFC of this project to the DFC of the Revised Forest Plan by stating the specific goals and objectives that this project will help meet (EA p.5-13).

As stated in the EA, this proposed action is in compliance with the Revised Forest Plan and the cultural and socio-political impacts are expected to be negligible. Full details of

the social impact of implementing the Revised Forest Plan can be found in Chapter 3C of the FEIS for the Revised Plan.

For clarity, a separate section has been inserted in the EA summarizing the DFC for the Project. This DFC is specifically related to the expected outcomes of the actions within this project (EA p. 10).

5. Comment: A concern indicating that the EA may not clearly recognize the longleaf pine component in mixed stands as a seed source for natural regeneration or the value of the shortleaf pine component.

Response: The project design and implementation are consistent with the Revised Forest Plan which included the definitions and descriptions of silvicultural practices used on the NFsAL. These descriptions state that "... in loblolly stands being restored to longleaf pine, existing longleaf trees on the site would be retained indefinitely." (Forest Plan, Appendix E).

This project recognizes that the existing longleaf component of stands is a valuable resource and provides for the retention of these trees. The analysis section of the EA gives detailed information on the major forest community types on the Tuskegee National Forest (EA pp. 74-79). Additionally the proposed action lists each stand to be treated and its current condition including overstory forest type.

The EA (p.20) states that "Many stands receiving restoration cuts will have reserve trees (longleaf and shortleaf pines) left in the stand. Relic longleaf and shortleaf pines will be marked and retained. Mast producing trees of sufficient size will be left for wildlife purposes."

6. Comment: A concern indicated that the EA should clearly establish statements of intent regarding a restoration goal for the longleaf ecosystem. This concern included several comments and questions concerning "a comprehensive ecological restoration" plan and detailed components of such a plan as well as an "ecological time line much greater than 5-7 years". This concern further suggested the use of "phased" restoration harvest and other techniques with ongoing evaluation to accomplish restoration goals.

Response: The respondent discusses in detail the long term nature of ecosystem restoration with several suggestions of techniques and methods of initiating, evaluating and modifying ecosystem restoration efforts. The scope of this comment is essentially above the site-specific project level but rather at the Forest-wide planning level.

Long term management and restoration goals are appropriately discussed at the Forest Plan Level and that discussion can be found in the Revised Forest Plan. While the life of a forest plan is 15-20 years the planning horizon for the evaluation is 50 years, recognizing the long term nature of forest planning. Periodic monitoring of the Revised Forest Plan will indicate needs for modification or amendment. Additionally, as new

information becomes available and need methodologies become accepted the forest planning process and revision process allows for their incorporation into management strategies.

Individual projects at the site specific level are planned under the guidance of the Forest Plan and the forest-wide goals are achieved through site-specific projects. While, site-specific projects to implement the Revised Forest Plan may analyze the use of some of the techniques suggested, the methods utilized by this project are appropriate at this time.

This project is proposed to implement the goals and objectives of the Revised Forest Plan (EA p. 8). The EA for this project recognizes the long-term nature of forest planning in general and specifically ecosystem restoration. In purpose and need for this proposed action the EA clearly states that, " This is the initial phase of a long-term project that is designed to improve the health of the Tuskegee National Forest."