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RE: White Pine Management Project, Scoping Notice

The Chattooga Conservancy respectfully submits these comments regarding the Andrew Pickens Ranger District's (APD) White Pine Management Project scoping notice dated April 8, 2019, concerning the proposal to implement silviculture treatments on approximately 2, 148 acres of Eastern white pine stands in 66 different locations in Oconee County, SC.

The Chattooga Conservancy is a non-profit conservation organization working to protect, promote, and restore the natural ecological integrity of the Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands. The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattooga River watershed, including the Sumter, Nantahala and Chattahoochee National Forests. Members, staff, and board members participate in a wide range of activities on these national forest lands, including those areas that would be impacted by the proposal set forth in the subject scoping notice. We represent approximately 600 total members that support our work. Our members seek solitude, forested scenery, old growth stands, clean water, and opportunities for hiking, fishing, hunting, mountain-biking, horseback riding, paddling, rafting and photographing experiences within the Andrew Pickens Ranger District, including portions of the project area that would be affected by the White Pine Management Project. Our collective membership also includes citizens whose private lands would be directly impacted by the White Pine Management Project.

Landscape Ecology & Climate Change One of our main concerns with the White Pine Management Project as it's currently articulated is that the project does not include a contemporary landscape ecology perspective for options addressing recent science, which suggests one of the best ways to address climate change is to restore a connected network of forests across the landscape, that would include all native old growth stands joined by certain forest stands managed for old-growth restoration, to create buffers and connecting corridors for native flora and fauna. One of the best opportunities to mitigate the ongoing effects of climate change is to manage our national forests in this manner, to provide migratory pathways for plants and animals to shift northward and to higher elevations as temperatures rise as a result of climate change. Preserving and restoring a network of native old-growth forests will also help mitigate climate change, because these forests store large amounts of

carbon that otherwise would be released as CO₂ emissions if harvested, which is a prime cause of global warming.

The International Panel of Scientists urges all nations to address climate change as a matter of top priority. The vast majority of climate scientists tell us that we must act fast to address climate change, in order to avoid catastrophic results. The White Pine Management Project as currently proposed by the APD does not address this serious issue. In fact, the heavy-handed “crop tree management” agenda in the proposal, which features clear-cutting, herbicides, burning and intensive forest management practices, would destroy many of the areas that need to be managed for old growth restoration and connectivity across the landscape to combat climate change. Clear-cutting is the wrong choice as a silvicultural treatment as proposed by the Forest Service for the White Pine Management Project, if the aim is to restore a functioning network of native forests connected across the landscape, to facilitate mitigation and adaptation to the effects of climate change.

Old Growth The Carlson Old Growth Study (*An Assessment of the Old Growth Forest Resource on National Forest Service Lands in the Chattooga River Watershed*, by Paul Carlson, produced by the USDA Forest Service in 1995) found very little old growth in the project area—except at Swafford Creek, Sandy Ford Road, Mongold Gap, Big and Little Stakey Mountains near Orr Mill Road, and Ira Branch near the Chattooga Wild & Scenic Corridor. Please note that all of these old growth areas are contiguous with or near the proposed white pine timber harvests. Clear-cutting tracts adjacent to old growth stands would continue to fragment the forest and disrupt natural wildlife corridors. Heavy-handed crop tree management removes most of the forest and potentially leaves many of the remaining trees damaged and “cat-faced,” and subject to wind-throw. These specific, rare old growth stands should be surrounded by a connected network of intact native forests—not by a clear-cut, burned and herbicide-laced landscape.

Note also that these last remaining old growth stands should be used as a blueprint for native forest restoration, rather than relying on CISC data, or field data collected in previously disturbed sites. CISC data is notoriously rife with errors, and in some cases misses actual stand age or underestimates stand age by as much as 50 years or more, and also determines forest type by existing conditions after significant disturbance, rather than the site’s true potential natural vegetation.

Silvicultural Treatments—Recent studies conducted by scientists at the Forest Service’s Pacific Northwest Research Station suggest that the best way to manage pine plantations to facilitate the development of habitat diversity, and forests that will exhibit old-growth characteristics, is to use thinning harvests. This type of old-growth restoration and creation of habitat diversity using thinning is also appropriate in our Southern Appalachian forests.

For example, *An Assessment of the Old-Growth Forest Resources on National Forest System Lands in the Chattooga River Watershed* addresses thinning, and states: “White and Chestnut oak both release well from canopy suppression and go on to live a long time. As neither of these species is of high commercial value on upland sites in the Chattooga and both are of high wildlife and scenic value, they are good candidate trees to leave in any partial overstory harvest. National forest silviculturalists have recognized this in recent years and are beginning to leave these species in harvest units.” Therefore, thinning may be appropriate to accelerate native forest restoration, where roads are already present and where view sheds, recreation areas, water quality and critical habitats and private property are not harmed. Conversely in areas where tree-harvesting would result in significant negative effects, due to roadbuilding; skid trails; stream crossings; wetlands; erosion and sedimentation on both public and

private land; forest fragmentation in critical old-growth restoration areas; and, harm to view sheds and heavily used recreation areas, the best management would be benign neglect, i.e., leave the trees alone and let nature heal itself.

Our initial field surveys in many stands where clear-cutting is proposed has shown that they consist of 40-50 year old even-age stands of white pine, interspersed with native hardwoods such as oak, hickory, tulip poplar and other native vegetation that has developed in the understory, and that is naturally moving the stand back to a native, uneven-aged forest. Clear-cutting would destroy 40-50 years of natural restoration, whereas thinning could significantly speed up native forest restoration. We cannot afford to lose that much time in restoring a landscape-based solution to help address climate change. Collateral damage to many sensitive areas as a result of intensive timber management, that includes excessive use of burning, herbicides and even-age management to create unnatural forest stands dominated by southern yellow pine, is another great concern.

Thus, we also take issue with the APD favoring commercially valuable pine species, in defining potential natural vegetation for restoration purposes. Bailey's Ecological Land Classification (M 122) places the APD in the Central Appalachian Broadleaf Forest. However, the APD's White Pine Management Project would push the restoration of a predominantly pine tree crop, whereas we support restoring a native, mixed broadleaf forest.

In fact, official USDA Forest Service records of inventory and acquisition (Ayres and Ashe) during the time when our national forests were created document that ridge sites were the only sites where fire-tolerant communities, including yellow pine-dominated communities, existed. These early ecological studies determined that these pine-dominated communities were naturally driven by lightning strike caused fires on dry sites. The studies also showed that these pine-dominated forests made up just a small percentage of the landscape, with pitch pine constituting only 1.34% and shortleaf constituting .43% of the total forest canopy in the Southern Appalachians.

In addition, these early documents state that Southern Appalachian forest canopy types regenerated naturally by the process of gap phase reproduction, where wind shear, ice damage and low intensity fires occurred, with a return cycle of 10-15 years on a particular site. The regeneration gaps caused by these natural processes resulted in openings of about ¼ acre. The White Pine Management Project abandons this knowledge of native forest types and natural processes of regeneration in favor of proposing to use excessive prescribed burning to expand the range of commercially valuable pine-dominated forest stands to mid and lower slopes, and by the use of clear-cutting to create unnatural, even-age pine-dominated forest stands with little vertical or horizontal diversity. Furthermore, these early studies suggest that Southern Appalachian Physiographic Province ecosystems are determined by site conditions, and not by excessive disturbance regimes that are associated with management practices such as clear-cutting, prescribed burning beyond natural fire cycles and events, and the heavy use of herbicides as prescribed in the White Pine Management Project scoping notice.

We are also concerned that the areas where the harvest prescription calls for thinning and group selection—a form of uneven-age management—includes creating canopy gaps using group selections where group size is up to 1 acre in size, which far exceeds natural canopy gap dynamics. One acre groups are at least 4 times larger than what occurs naturally, in a gap-phase reproduction cycle. Also, we disagree that the rest of the stand should be thinned from a basal area of 150 down to 70-80 square feet of basal area, which would collectively result in harvesting of most of the trees. Our recommendations are to use a more natural type of forest regeneration, which would include light

thinning, with canopy gaps not to exceed one-quarter of an acre. Or, in the case of areas that would be subject to excessive collateral damage due to the presence of streams, wetlands and other prized resources, we would prescribe benign neglect.

Specific areas that should be left alone (benign neglect) include:

- a) John Mountain at Swafford Creek, due to its proximity to old growth; the new roads and riparian area crossings that would be needed for access; its proximity to a wetland; and, its existing values as a high use recreation area.
- b) Sandy Ford, because of its proximity to old growth; steep slopes; and, connectivity to the Chattooga Wild & Scenic River Corridor.
- c) Round Mountain, due to the extreme use of road building; size of treatment area that would require use of “temporary roads” for many, many years; visual impacts; and, proposed tree-cutting that would destroy one of the most important wildlife corridors between the Chattooga and Chauga River watersheds.
- d) The Orr Mill Road harvest area, due to its proximity to existing old-growth, that would fragment old-growth restoration possibilities; and, because of collateral damage to private property.
 - Note that there are certainly other areas—for example, forests along Fall Creek that border popular, major waterfalls—that need to be allowed to regenerate naturally, and which should be reanalyzed and reconsidered for, at best, a very light thinning treatment.

In addition, of great concern is the fact that the White Pine Management Project could violate Sumter Forest Plan guidelines (Sumter Plan, 2-17, goal 18, FW-54), which state: “The maximum size of an opening created by even-aged or two-aged regeneration treatments is 80 acres for southern yellow pine and 40 acres for all other tree species.” One area on Round Mountain prescribes a harvest of over 200 acres. As an inextricably related issue, we are also very concerned about the cumulative effects of the ongoing loblolly project, where many of the loblolly treatment areas are adjacent to or in close proximity to the proposed white pine treatment areas.

Herbicides Regarding the use of herbicides, we are opposed to the use of glyphosate, because the World Health Organization has concluded that it causes cancer and Non-Hodgkin’s Lymphoma. Today, hundreds of lawsuits have been filed by those who have used glyphosate. We strongly believe that natural forest regeneration can be accomplished without the use of herbicides, by employing more benign forest management techniques such as mechanical controls and promoting natural regeneration.

Erosion & Sedimentation-A Forest Service study by Dr. Van Lear at Clemson University concluded that the greatest source of erosion and sedimentation in the Chattooga River watershed is from Forest Service roads and associated activities. The White Pine Management Project involves building 10 miles of new, “temporary roads” and a large amount of ground-disturbing activity, which would undoubtedly cause much erosion and sediment. The Chattooga River watershed normally receives high amounts of rainfall and regular, intense weather events that increase the probability of erosion and sedimentation from ground disturbing activities.

Recreation Areas Many of the areas proposed for harvest in the White Pine Management Project occur where recreation use is primary and heavy. These areas, including John Mountain around Swafford Creek and Hub Branch, Rocky Gap horse trail and Whetstone Horse Camp, should emphasize natural regeneration without destruction/disruption of popular recreational activities including hiking, horseback and mountain biking.

Private Property Damage to private property caused by crop tree management contiguous with these properties is another of our concerns. Clearcutting, excessive prescribed burning and the use of herbicides as proposed in the White Pine Management Project would destroy viewsheds, cause erosion, sedimentation and herbicide pollution in streams and lakes on private property adjacent to these activities.

Biological Evaluations Need to Be Completed First The White Pine Management Project does not provide the public with a “biological evaluation” that identifies important information about what is in each stand. This puts the cart before the horse. Many forest stands proposed for harvest in the White Pine Management Project may contain rare, threatened or endangered plants, animals and critical habitat. The public should not be asked to comment or check off on proposed timber projects without knowing important details about what is in each stand.

We appreciate this opportunity to comment on the APD’s White Pine Management Project scoping notice. In addition, we appreciate the APD’s presence at our recent public meeting at the Long Creek Community Center, to hear comments from other concerned citizens. We encourage the APD to reanalyze and revise the need and methodologies for this project, and we look forward to continued dialog in this regard.

Sincerely,



Nicole Hayler, Director
Chattooga Conservancy