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RE: White Pine Management Project, Environmental Assessment
RE: 40-acre Exemption Proposal

The Chattooga Conservancy respectfully submits these comments concerning the Andrew Pickens Ranger District's White Pine Management Project Environmental Assessment, and the district's 40-acre Exemption Proposal.

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. Our 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 proposals set forth in the subject documents. We represent approximately 600 total members that support the Chattooga Conservancy's 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.

- **40-acre Exemption Proposal**

On 9/14/20, the Andrew Pickens Ranger District (APD) released a proposal to exempt the district from the Sumter National Forest's limit on timber harvesting "openings" exceeding 40 acres. The APD justifies exceedance of the 40-acre threshold by citing 36 C.F.R. § 219.11(2)(d)(4). This is a citation of the 2012 Planning Rule. On its face, 36 C.F.R. § 219.11 (2012) applies to "a plan developed or revised under this part." The Sumter Plan wasn't developed "under that part" because it was developed under the 1982 Planning Rule. The 2012 Rule states that "None of the requirements of this part apply to projects or activities on units with plans developed or revised under a prior planning rule until the plan is revised under this part." Therefore, 36 C.F.R. § 219.11(2)(d)(4) is not applicable to the 2004 Sumter Forest Plan. This suggests that the Sumter National Forest needs to rely on the 1982 Planning Rule to exceed the 40-acre threshold, but the 2012 Rule explicitly "supersedes any prior planning regulation," that is to say, the 1982 Planning Rule has been replaced and is now defunct. Therefore, there appears to be a serious flaw in the APD's intention to use the 2012 Planning Rule to allow openings/clear-cuts exceeding 40 acres.

- **White Pine Management Project Environmental Assessment**

On 10/14/20, the APD released the environmental assessment (EA) for their White Pine Management Project. The EA addresses a proposed project for harvesting predominately white pine stands through clear-cutting on 1,261 acres, group selection on 711 acres, and constructing 10 miles of temporary roads.

The Chattooga Conservancy has participated in good faith from the very beginning stages of the proposed White Pine Management Project to this point, including: a pre-scoping public meeting at the Andrew Pickens Ranger District (APD); hosting a field trip into the project area with the Forest Service and stakeholders; participating in a meeting at Clemson University with the Forest Service and stakeholders; hosting a public meeting at the Long Creek Community Center; participating in a public meeting at Chattooga Belle Farm; maintaining regular dialog with the APD; submitting comprehensive comments on the project's scoping notice; and, submitting these comments on the project's environmental assessment and 40-acre exemption proposal.

We recognize that the APD made slight changes to their original proposal. We have carefully reviewed the EA and all associated documents. Unfortunately, we conclude that many of our concerns have been discounted, ignored or sidestepped, including but not exclusive to native forest composition; negative impacts to old growth ecosystems, recreation resources and soils; erosion and sedimentation into streams; and, cumulative impacts of clear-cutting across the landscape. Rather than reiterate our scoping comments, we hereby incorporate them now by reference. The narrative below primarily addresses the content of the White Pine Management Project EA.

Landscape Ecology & Climate Change

The White Pine EA falls short of employing a contemporary landscape ecology perspective to acknowledge and act upon the compelling need to address climate change. Rather, the EA discloses that the project "might temporarily contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions," and features intensive crop tree management practices (clear-cutting, herbicides and burning) in prime areas surrounding the isolated old growth stands in the project area, that instead should be managed for old growth connectivity and restoration across the landscape to combat climate change. Clear-cutting tracts adjacent to, surrounding and/or in close proximity to old growth stands would continue to fragment the forest, disrupt natural wildlife corridors, and significantly delay the restoration of connecting corridors between old growth stands. Although the EA states that "mixed species forests adapted to the site would be more resilient than monoculture plantations," we argue that mixed species forests are already naturally regenerating in many stands in the project area, and by the time the mixed species forests might be established after the proposed treatments, it will be too late.

We have repeatedly discussed this landscape ecology perspective with ADP decision-makers, and will very briefly restate this concept here (and in the following old growth discussion). The vast majority of climate scientists recommend acting fast to address climate change in order to avoid catastrophic results. One of the best ways to address climate change is to restore a connected network of native old growth stands, joined by stands of mature forest managed for old-growth restoration, to create buffers and connecting corridors for native flora and fauna. Preserving and restoring a network of old-growth forests will help mitigate climate change, as old growth stands store large amounts of carbon. The time to act is now, and to swiftly incorporate old growth restoration and connectively in the White Pine Project area. These connecting corridors could be created and managed through benign neglect, or cut-and-leave and other appropriate silvicultural practices.

Old Growth

The EA should acknowledge the importance and act upon managing portions of the White Pine Project area to restore a functional old growth network. Of all the habitats in eastern North America, old growth forests are the scarcest—and this is especially true in the APD.

Meanwhile, the EA states (p. 14) that “During scoping, two stands adjacent to the project area, and identified in a 1995 study as old growth, were noted by the public (Carson [sic], 1995), and concern was expressed about potential impacts from the project to old growth forests.” The EA also states (p. 11) that additional old growth stands “considered by some commenters to be old growth” were identified. First, we must reiterate that this “1995 study” was not performed by a random dilettante, it was produced by the USDA Forest Service. Second, our scoping comments identified several old growth stands in the project area as per the 1995 USDA study, specifically in the vicinity of 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. Further, we determined that all of these old growth areas are contiguous with, or near, the proposed white pine timber harvests and/or the ongoing loblolly pine clear-cuts. The rare old growth stands in the project area should of course be preserved, and managed through establishing a connecting network of intact native forests, rather than surrounded by the disruptive silvicultural practices of clear-cuts, prescribed burns, and systematic herbicide treatments.

Dr. Robert Zahner, Clemson Professor Emeritus of Forestry, was one of the founders of the Chattooga Conservancy, and in his words:

“A review of the Forest Service's own definition of old growth will help us visualize its characteristics: "Old-growth forests are ecosystems distinguished by old trees and related structural attributes. Old growth encompasses the later stages of stand development that typically differ from earlier stages in a variety of characteristics which may include tree size, accumulations of large dead woody material, number of canopy layers, species composition, and ecosystem function.

“It is the last characteristic, ecosystem function, that is most important from the standpoint of biodiversity at the landscape level. Old growth communities are reservoirs of rare plants and animals. Some are already listed as Threatened or Endangered, and others are destined to join them unless we can prevent further loss of their endangered habitat. The food chains, reproductive processes and all the other strands in an ecosystem's web of life are coupled with those of adjacent communities, from habitat to habitat across the landscape.

“But healthy populations of many mature forest species cannot be sustained in isolated fragments. As is typical for the Southern Appalachian region, most of the old growth in the Chattooga watershed occurs in small isolated fragments. Conservation biologists agree that such a distribution of old growth does not provide for the long-term viability of native species dependent on old growth forest habitat. Viable populations require healthy genetic interchange between isolated groups (to avoid the consequences of interbreeding). We are not concerned here with highly mobile animals and wind-disseminated plants. We must provide for all of the less mobile biota that cannot migrate across disturbed forest land between fragments of old growth. These include most old growth herbaceous plants, especially perennials with limited pollination and seed dispersal, most spiders, non-flying insects, and snails and many amphibians and reptiles—all essential components in the functioning of these ecosystems.

“The necessary biological processes can be restored here by linking isolated habitat to isolated habitat with corridors of old growth forest across the watershed. Today, there are no old growth corridors between existing old growth fragments. We can restore them now by allowing relatively mature forest between old growth fragments to continue growing.

“To summarize: the scarcity of old growth throughout the region and the watershed, and the degree to which most native species in decline depending on it, make restoration of mature forest and preservation of existing old growth fragments the highest priority of ecosystem management. Mature forest communities adjacent to existing old growth must be preserved intact and permitted to restore themselves to additional old growth. Where there is potential to connect existing old growth communities with mature forest corridors, such corridors must

be protected from further disturbance and allowed to mature further toward additional old growth.”

Early Successional Habitat (ESH)

The EA’s discussion of ESH is unclear, somewhat confusing, and appears to contradict Sumter Forest Plan standards for maintaining desired successional stage proportions. The EA (p. 20) suggests that the district’s ESH target is in the 4-10% range, and that the White Pine project, in combination with the Loblolly Removal Project, would exceed this 10% threshold. The 10% ESH threshold is exceeded because together, these two projects cumulatively result in 11.5% ESH—and this total is without adding the APD’s 368 acres of permanent wildlife openings and dove fields. Regardless, to take a “hard look” at this issue as required by the National Environmental Policy Act (NEPA), the EA should disclose where the cumulative total of ESH is or will be made on the landscape, including in what forest and ecosystem types. For instance, if the combined effect of the Loblolly and White Pine projects is to focus ESH in the one or two forest types, at the exclusion of others, the EA should disclose this and consider the resulting effects on wildlife.

Non-Native Invasive Species (NNIS)

Page 16 of the EA states that “no direct or indirect effects related to the threat of establishment or spread of invasive plants are anticipated. No cumulative effects are anticipated, because other projects that could contribute impacts are also subject to the same Forest Plan standards, SC BMPs, and similar project-specific design criteria.” This is not true, and exemplifies that the EA’s “hard look” at this issue has not occurred. According to the Loblolly Environmental Impact Statement (EIS, p. 277), that project would “increase sunlight and soil disturbance to the forest floor, which has the potential to spread or increase already existing populations of non-native invasive species (NNIS) in the project area. Mechanical equipment can inadvertently bring in seeds of invasive plants as can material and seed used for soil stabilization.” If the Loblolly Project has the potential for proliferating NNIS, then surely the White Pine Project would too.

Soils

Comparing the White Pine and Loblolly NEPA docs is also relevant for assessing impacts to soils. The White Pine EA (p. 18) states that “the proposed project would not result in significant impacts to soil resources, because of application of project specific design criteria and adherence to Forest Plan standards and best management practices for forestry. The proposed action would also not result in a significant cumulative impact, as other ongoing activities and projects, especially loblolly harvests would also comply with applicable standards and best management practices to minimize adverse impacts to soil resources.” However, the Loblolly EIS (p. 277) states that “soil disturbance would be evident from logging activities. The action alternatives would have long and short-term direct negative effects on forest soils. Effects to soils include: compaction, rutting and displacement, disturbed litter layer and soil organic matter.” If the Loblolly Project would have long and short-term effects on soils, we expect that the White Pine project would as well. In addition, the APD indicates (EA, p. 17) that it expects detrimental soil disturbance to be limited to 2% of the project area. How was this determined?

Road Construction

The White Pine EA does not fully disclose how all of the stands would be accessed by logging trucks or lengthy skid trails. The EA shows fixed locations for approximately 10 miles of temporary access roads into many of the stands, but not all, specifically in some cases where there is no apparent access from system roads. Therefore, the EA does not fully disclose and evaluate the potential impacts of access routes into those stands, and the mileage of temporary road construction is understated in the EA. For example, access to C34/S17, C34/S18, C31/S4, and C34/S21 in the sensitive Swafford Creek area from FR 722 (old Fall Creek Rd.) will require crossing Swafford Creek, a classified Trout Natural (TN) stream with relatively high water quality standards. Without advance consideration in the EA of how those stands will be accessed, the Forest Service cannot fully assess how the creek’s water quality would be affected by project implementation. In addition, the APD plainly has not disclosed this information for

public comment. Even if all appropriate design criteria, Forest Plan standards and SC BMPs are followed, some sensitive riparian areas and high quality streams in the project area could be seriously damaged by constructing access routes for proposed harvesting activities. The Forest Service should carefully consider, analyze and disclose the environmental impacts of access routes in all stands that would require stream crossings, operating in close proximity to streams, traversing rugged terrain, or extending far from maintained system roads.

BMPs

The EA frequently refers to BMPs as mitigating or preventing environmental impacts. For example, multiple statements in the Aquatic Resources section state that studies have shown that “utilization of BMPs, especially buffer strips... would keep turbidity/temperatures/etc. below these thresholds,” and “provided that Forest Plan Standards...and South Carolina Forestry Best Management Practices are followed, the proposed action would have no adverse impacts on aquatic communities.” However, for a real world example to the contrary, we note that in the ongoing Loblolly Removal Project, we’ve seen problematic erosion and sedimentation areas in the vicinity of Turkey Ridge Road area, and have also received multiple complaints about excessive erosion and sediment due to either alleged or obvious BMP failures. We request substantiation of BMP performance on the APD. Please provide any relevant, site-specific BMP monitoring data.

Erosion & Sedimentation & Water Quality

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 (or more?) of new, “temporary roads,” and a large amount of ground-disturbing activity, which could cause much erosion and sediment. The Chattooga River watershed normally receives very high amounts of rainfall, and regular, intense weather events that increase both the threat and probability of significant erosion and sedimentation from ground disturbing activities.

We note that the EA’s section on aquatic resources is absent discussion of baseline stream conditions, beyond disclosing that “no streams are 303(d) listed.” This information is mentioned only once, in relation to nutrients including Phosphorous, Chlorophyll A, and Nitrogen. However, the EA neglects to acknowledge and disclose that Whetstone Creek is 303(d) listed for biological (sediment) impairment. Further, this is extremely relevant to issues raised previously concerning the proposed logging activities and the unknown access to C34/S17, C34/S18, C31/S4 and C34/S21 in the Swafford Creek and Harts Branch area. Considering that erosion and sedimentation is a key concern with the White Pine project’s proposed activities, and Swafford Creek drains into the 303(d) listed Whetstone Creek, this is a glaring and important issue that the EA fails to acknowledge and address.

Streams

Even with use of appropriate BMPs, the cumulative impacts of the White Pine Project and the ongoing Loblolly Pine Removal Project could degrade high quality streams in the project area. The majority of the streams in the project area are classified Outstanding Resource Waters (ORWs) or TN streams, and both classifications carry higher water quality standards to protect aquatic habitat and maintain existing stream uses. Timber harvests associated with the two projects would be occurring on the district at the same time, and in some cases on adjacent stands. While the Forest Service states both projects will follow appropriate design criteria, standards, and BMPs to protect water quality, we do not agree that these issues have been given sufficient attention. The EA should thoroughly assess the potential, combined effects of concurrent and adjacent timber harvests in relation to nearby high quality streams.

Scenery

The EA (p. 22) states that “Implementation of this project would not cause a change in scenic integrity objectives (SIOs) because the project area comprises a very small area relative to the large scale of project spatial bounds, and because the impacts are temporary.” But in some senses everything that happens on a forest is “temporary”

because trees grow back. SIOs can still be violated with “temporary” impacts, and scenery impacts can’t be masked by pointing out the large portions of the rest of the forest that are not impacted. In addition, the EA should disclose and assess the cumulative impact on SIOs in combination with the Loblolly Project.

Silvicultural Treatments

The EA does not disclose what Forest Plan prescriptions the proposed White Pine Project’s work would be in. Please provide this information.

The Chattooga Conservancy’s scoping notice comments include an extensive discussion of the silvicultural treatments proposed by the White Pine EA, and our proposed alternative treatments. The EA’s modifications to some of the silvicultural treatments in the project area are appreciated; however, we remain opposed to the predominant, heavy-handed crop tree forestry practices designed to cultivate new pine stands. As with the Loblolly Removal Project, we believe the White Pine Project appears largely geared to replace one pine plantation (white pine and/or loblolly) with another pine plantation (shortleaf, pitch and/or Table Mountain). The APD is in the zone identified by Bailey’s Ecological Land Classification (M 122) as the Central Appalachian Broadleaf Forest, that is composed of predominately hardwood species. Historical data supports this, and the APD’s forestry practices should seek to restore a predominantly hardwood forest.

In addition, we question the efficacy of the ADP’s work to propagate shortleaf pine stands across the district. The FY 2012 Monitoring Report for the Sumter National Forest states (p. 4) “The GIS database currently shows 3,077 acres of shortleaf pine on the piedmont districts, an increase of 20 acres from the 3,057 acres reported in FY 2011. However, because historic erosion from agricultural practices in the Piedmont Region has generally left few places where the soil is adequate to support shortleaf pine communities, the forest is unlikely to meet restoration objectives during the planning period. Shortleaf pine requires at least eight inches of well-drained to moderately well-drained soil in order to stay relatively free from little leaf disease. Thus far, the suitable areas found tend to be very small, isolated parts of ridges and flats.” If this is true for the SC piedmont, it would certainly also be true for the APD, where soils in the mountainous terrain are still relatively shallow and damaged from the massive erosion and sedimentation that occurred during the turn of the century logging practices.

Recreation Areas

Many of the areas proposed for clear-cuts and other forms of timber harvesting in the White Pine Project occur in the midst of areas where recreation use is primary and heavy. Curiously, the well-known dispersed recreation use in the vicinity of FR 722, John Mountain, and around Swafford Creek and Hub Branch was not considered, discussed or evaluated in the EA. It’s just a fact that the public is very aware of and have expressed alarm and their concerns about the proposed clear-cutting treatments in the John Mountain area, so the EA’s omission of this issue is odd. Why was this absent from the EA?

Federally Threatened, Endangered, & Sensitive Plants, and Rare Plant Communities

The EA (p. 17) states “There are approximately 12 acres of rare communities located within the project area. These rare communities include springhead seepage swamp, herb bog, montane seep/alder seep, and cove forest.” The EA does not disclose where these rare communities are located, or their baseline conditions. Old growth stands in the project area are noticeably absent from inclusion in the naming of known rare communities, and since they are indeed quite rare, we request that old growth stands be included. Also, specifically where are the 12 acres of rare communities located within the project area?

The EA’s draft Biological Assessment/Evaluation addresses proposed, endangered, threatened and sensitive (PETS) species that are known to occur within or adjacent to proposed treatment units, or have potential habitat within the White Pine Management project area. On p. 3, the BE states “Surveys for fish, crayfish, and mollusks have been performed on the Andrew Pickens Ranger District (Adkins 1995; Alderman 2008, 2004; Eversole et al. 2002; Eversole and Welch 2001; Krause and Roghair 2013). With the exception of the discovery of Edmund’s snaketail on

the district (Hill 2009), very little survey work for the species has been done.” It is unclear which species is the subject of “very little survey work;” please clarify this statement. The EA should thoroughly assess the potential, combined effects of concurrent and adjacent timber harvests on PETS, the approximately 12 acres of rare communities, and old growth stands located within the project area, and disclose their location and baseline conditions. We request this specific information. Lastly, though Pink Lady Slippers are not PETS, there is an abnormally large population of these beautiful flowers in the understory of C34/17, as well as several species of native trilliums and other native understory species, and we request that this unique area be preserved, undisturbed. The native hardwood forest and herbaceous understory in C34/17 is well on its way to recovering, and clear cutting this area would be a travesty.

Private Property

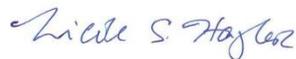
Damage to private property caused by crop tree management immediately adjacent to a number of these properties remains in our list of issues. Clear-cutting, excessive prescribed burning and the use of herbicides as proposed in the White Pine Management Project could destroy viewsheds, and cause erosion, sedimentation and herbicide pollution into springs, streams and lakes on private property adjacent to these activities on public lands. We encourage public land managers to use lighter touch forestry practices such as thinning, and employ generous buffer strips between adjacent private lands and the activities proposed in the EA.

Cumulative Impacts/Effects

While the EA discounts any significant cumulative impacts of concurrent timber harvesting projects on the APD, we disagree with this blanket and vague evaluation. Plainly apparent to the casual observer, for example, are localized negative impacts to migratory corridors for flora and fauna, scenery, soil and aquatic resources from the ongoing Loblolly Removal Project. The EA fails to take a hard look, as required by NEPA, at the potential cumulative impacts of concurrent Loblolly, White Pine, NNIS and prescribed burning projects that could be simultaneously ongoing across thousands of acres in the APD.

We appreciate this opportunity to comment on the APD’s White Pine Management Project EA and 40-acre Exemption Proposal. We look forward to answering any questions about the contents of our comments.

Sincerely,



Nicole Hayler, Director
Chattooga Conservancy