

**The South Carolina Native Plant Society**

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January 24, 2006

USDA Forest Service  
Attn: Ms. Mary W. Morrison, Acting District Ranger  
Enoree Ranger District  
3557 Whitmire Highway  
Union, SC 29379  
francismarion-sumter-enoree@fs.fed.us

Re: File Code: 1950/2720-1  
Date: December 21, 2005

Dear Ms. Morrison:

On behalf of The South Carolina Native Plant Society I offer the following comments on the Proposed Action: 2006 Greenville Endurance Riders Association special use permit, File Code: 1950/2720-1, December 21, 2005, Enoree District, Sumter National Forest. I request that you deny this proposal. I concur with Ms. Rachel Doughty's Wildlaw comments of May 23, 2005, and attach those to this comment for your consideration. In particular I want to echo Ms. Doughty's statement

...very little consideration has been given to a proposal to invite and encourage OHV use in the Sumter National Forest on an informally maintained 150 mile "race track." ...this is an inappropriate use of National Forest Land. It is contrary to the Forest's Land and Resource Management Plan, contrary to the Sumter Roads Analysis, and because of these and other problems, illegal under the National Environmental Policy Act.

In addition to Ms. Doughty's comments I add that I have made surveys in the general location described in paragraph 2 of this proposal. I found the area badly eroded by land use practices, generally prior to acquisition by the USDA Forest Service. That land is recovering, but is yet quite fragile and vulnerable to erosion and other set-backs. Even with the Mitigation Measures indicated significant damage would be wrought upon recovering soils and associated groundcover. While it is important to assure that no harm comes to Threatened, Endangered, and Sensitive species, it is not enough to limit the Biological Evaluation to the effects upon those species; the impact upon the ecosystems as a whole must be considered. It is unimaginable that temporary bridges could be constructed and subsequently removed without significant adverse impact upon those riparian areas. That is simply not acceptable.

I am further able to corroborate from personal observations Ms. Riddle's testimony that OHV traverse unauthorized areas in the vicinity of the proposed trail. Lacking a detailed map, I could not be certain those motorcycles were actually on this trail.

Detailed botanical surveys should be completed before this trail and race is considered along this or any other route on the Enoree. Certainly the highly regarded native flower garden in compartment 77 should not be disturbed by this or any other invasive activity. The recently described May White Azalea, *Rhododendron eastmanii*, occurs throughout the project area. All of those azaleas should be located in order to assure that none of these little understood shrubs are harmed. The State Threatened Columbo, *Frserra caroliniensis*, and Federally Threatened Relict Trillium, *Trillium reliquum*, are known to occur in the vicinity of the proposed trail. Verifying the occurrence of these two species, especially the Trillium, could require surveys over several seasons. I would be pleased to participate in any of those surveys.

Clearly, this endurance race should never have been permitted.

Thank you for taking the time to consider my comments.

Sincerely,

John A. Brubaker, Chairman  
Issues Committee  
South Carolina Native Plant Society