

The South Carolina Native Plant Society

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USDA Forest Service
Ms. Anne Kiser, District Ranger
Long Cane Ranger District, Sumter National Forest
810 Buncombe Street
Edgefield, SC 29824-1021
comments-southern-francismarion-sumter-longcane@fs.fed.us

Re: File Code: 1950-1

Dear Ms. Kiser:

On behalf of the South Carolina Native Plant Society (SCNPS), the following comments to the September 18, 2006, environmental assessment (EA) for the Restoration and Enhancement of Native Ecosystems for Wildlife (RENEW) project proposal, Long Cane Ranger District, Sumter National Forest, File Code: 1950-1, in accordance with 36 CFR 215.6(A)(3) are submitted.

We agree with the **Purpose and Need for Action** statement, the restoration of Piedmont ecosystems, offered in the proposal, but do not agree that the stated goal to create a “mosaic of pine native grass ecosystems, pine-hardwood habitats and open savannas” will be best achieved through the implementation of any of the **Proposed Actions**. That condition by and large already prevails within the project area. Hence the project is to a large extent unnecessary. A plant list for the upland pine and oak-hickory sections of the project area is attached in an EXCEL FILE. This list is by no means comprehensive, but it does indicate the prevalence of perennial grass and forb species characteristic of fire maintained woodlands. This reinforces the point that the project area is already fire maintained woodland, which is the target of the project. Note in particular the high representation of perennial legumes, a favorite food plant of Bobwhite quail and other wildlife.

We do not agree that

...this proposal is consistent with the Revised Sumter Land and Resource Management Plan (Forest Plan) and Record of Decision (12/15/2004), Forest Plan Goal 8, “Maintain and restore natural communities and habitats in amounts, arrangements and conditions capable of supporting

viable populations of existing native, and desired non-native plants, aquatic, and wildlife species within the planning area.

Fire ecologist and vegetation historian Cecil Frost was contracted by USFS to analyze and make recommendations concerning fire management and vegetation restoration in the project area. Dr. Frost's results are summarized by a map of reconstructed historic vegetation on file in the district office. It would seem evident that this work would form the basis for any restoration activities, but it is not mentioned in the EA and it seems to have been overlooked in project planning. In particular, Dr. Frost did not specify longleaf pine as an appropriate restoration target for the project area, presumably because of the loamy soils. We suggest that Dr. Frost's map serve as a template for the management of the area of the Long Cane that it encompasses. That document certainly indicates that **Alternative 5**, which excludes longleaf, would be a more appropriate treatment here. We concur that **Alternative 5** is preferable to **Alternative 2**.

The project aims to increase populations of wildlife species of open savannas and woodlands. It is assumed that these populations are in decline. No data are presented to support this assumption. Given the generally high quality of the habitat it may well be that the target species are increasing and further manipulation may be unwarranted and potentially harmful. Before any changes are implemented we would like to see data on population trajectories of bobwhite quail, Bachman's Sparrow, Prairie warbler and other species of open habitats.

Red-cockaded woodpecker is conspicuously absent from the list of threatened and endangered species discussed in the Biological Evaluation. Given the obvious suitability of the project area for this species we do not understand this omission. The mature loblolly and shortleaf pines distributed in an open fire maintained habitat would appear to be ideal for nesting and foraging of this federally endangered species.

If the project goes forward we would like to see a much finer grained approach to planned manipulations. Areas with widely spaced large pine, oak and hickory trees, herbaceous dominated ground layer, and natural regeneration of shortleaf pines and/or upland hardwoods should be left undisturbed, i.e. not logged. Those communities should be identified and flagged prior to timbering. No equipment should be permitted to enter those areas, and no material, not even loblolly pine, should be removed from them. Patches of overly dense loblolly pine or gums should be removed. We approve of hand spraying of sweetgum, but only in dense sprout clumps where herbaceous flora is suppressed. We see no need for removal of occasional sweetgum where sprouts of that species are embedded in a matrix of otherwise desirable vegetation. We are strongly opposed to the application of herbicide by any method; boom spraying, etc., that would allow a broader application of chemicals than backpack spraying.

The first paragraph under **Alternative 3** is of concern. It reads "Because of the lack of herbicides, there would be an increase in drum Chopping,..." Drum chopping does not appear as a treatment in any of the other **Alternatives**. We strongly oppose drum chopping here, and trust that the error is in the wording of this sentence in **Alternative 3**.

We appreciate your taking the time to consider our recommendations and concerns. We will be pleased to provide additional information, answer questions, or help any way possible at your request. A signed, hard, copy will follow this e-mail via US Postal Service.

Sincerely,

John A. Brubaker, Chairman
Issues Committee

Jeff Glitzenstein, PhD., Chairman
Lowcountry Chapter Issues Committee