

SOUTH CAROLINA NATIVE PLANT SOCIETY APPEAL  
Decision Notice and Finding of No Significant Impact, Rocky Timber Sale  
File Code 1950  
August 9, 2004

South Carolina Native Plant Society herein appeals the finding of no significant impact for proposed Rocky Timber Sale issued by District Ranger Elizabeth LeMaster on August 9 2004. The basis for our appeal is that responses to our previous comments indicate a deliberate failure to meet the provisions of the 1976 National Forest Management Act, specifically subsection B. This subsection states that US Forest Service must “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan”.

Responding to our comment that “effects of pertinent treatments on plant and animal biological communities should have been considered as one of the pertinent issues”, Ranger LeMaster replied “this was not identified as a significant issue during the scoping process.” We are then referred to sections of the EA dealing with responses of vegetation in general terms and PETS species specifically. These sections do not address our basic concern, and Ranger LeMaster’s response indicates that, contrary to the direction of NFMA, this issue was never even raised in the scoping process. As part of our appeal we once again ask that the issue of proposed treatments on biological diversity be addressed specifically as part of this planning process. To do so would entail the following steps:

- (1) Review and discussion of pertinent literature dealing with effects of proposed herbicide and chopping treatments on plant and animal biological communities, including species richness and abundance.
- (2) If specific data are not available for piedmont communities all proposed actions should be halted until such data are made available either via USFS research or outside research.
- (3) Following 1 and 2 above, an informed determination made of potential significant impacts of proposed treatments made on composition and diversity of biological communities in the project area. Such a determination would provide a detailed and specific rationale for the finding of impact one way or the other.

Other responses by Ranger LeMaster similarly indicate an acknowledged failure to consider and respond to the issue of biological diversity at the community level. For example “The EA only made general reference to some of the species occurring in the RAA and was not intended to be all inclusive” this, in response to our concerns that the treatments might negatively impact some of the characteristic piedmont forbs.

Most of Ranger LeMaster’s other comments failed to address our specific concerns related to community level impacts and potential negative impacts on specific groups of plants.

In all cases she either states that our concerns are “outside the scope of the proposed action” or makes reference to the fact that some vague generalities concerning vegetation responses were alluded to in the EA. The one case in which she does respond specifically, the response is ill-informed. Replying to our point that chopping may select against perennials particularly dominant bunchgrasses and favor disturbance specialists, she states without documentation that prescribed fires will control those species. In fact, the two effects are independent. If applied with sufficient frequency prescribed fires have been shown to reduce abundance of woody plants (Glitzenstein et al. 2003). However, impacts on ruderals (i.e. weeds) vary with fire frequency. Fires occurring at longer intervals tend in fact to increase ruderals because consumption of heavy fuels generate intense fires that create localized disturbances in the perennial ground layer. Frequent fires on the other hand do not create localized soil disturbances and therefore select neither for or against weeds (Glitzenstein et al. 2003). On the other hand, chopping has been shown to significantly decrease “conservative bunchgrasses” typical of pristine woodlands and increase weedier forbs and sedges (Swindell et al. 1982, Abrahamson and Hartnett 1990). Chopping also “dramatically reduced” shrub cover (Swindell et al. 1982). Desirability of chopping and herbicide treatments therefore depends on the community context. In low diversity, fire suppressed stands effects of these treatments may be positive, overall. However, in rich undisturbed systems, either fire maintained or mesic hardwoods, these treatments should not be implemented. Information provided in the Rocky EA and decision notice was inadequate for us to determine an informed position to take on the appropriateness of the proposed treatments on these particular sites and consequently we have chosen to appeal the decision.

#### LITERATURE CITED

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