

26 April 2004

Mr. Richard L. Rosemier, District Ranger
Ms. Elizabeth LeMaster, District Ranger
Enoree and Long Cane Ranger Districts, Sumter National Forest
20 Work Center Road

Dear Rangers Rosemier and LeMaster,

Concerning your proposal to maintain and expand Mourning dove fields in Sumter National Forest, Enoree and Long Cane Ranger districts (project proposal 1950/2620):

The South Carolina Native Plant Society opposes expansion of food plot type habitats in the National Forests, particularly where native vegetation is negatively impacted as a consequence. In deference to tradition and hunter interests we do not oppose maintenance of existing food plots. The current proposal is especially egregious because it involves destruction of wetlands, i.e. bottomland hardwood forest, at a time when both federal and state governments are newly pledged to prevent further wetland destruction. Furthermore, the proposal clearly fails to meet the standards and requirements highlighted in the project proposal:

(1) Forest-wide direction in Ch. 2 of Sumter LRMP: *“The Sumter NF is charged with creating and maintaining habitat conditions suitable to maintain viable viable population of all species native to the planning area and where appropriate support desirable levels of selected species.”*

There is no indication that population viability of Mourning doves are under threat so that clause is not relevant. Indeed, the project would destroy some 52 acres of native habitat (50 acres at Abbeville, 1.5 acres at Worthy’s Bottom, not counting the off-site white pine) thereby directly contradicting the direction to maintain habitat conditions for native species. Concerning the second clause, “where appropriate support desirable levels of selected species” no standard is provided for a desirable level of Mourning doves and consequently we are unable to determine whether additional actions are required to raise the population to that standard. An *ad hoc* decision to lift dove populations simply to please hunters violates the letter and spirit of the above directive.

(2) CH 4, Sumter LRMP: *“There are a variety of high quality, well maintained developed and dispersed recreation opportunities including hunting”.*

It is SCNPS position that this requirement can be met without destruction of native habitat and expansion of food plots. We are strongly on record as supporting increases in prescribed fire where appropriate, including in piedmont-oak hickory woodlands. Increased burning will enhance the grassy under-story utilized by doves and other open habitat specialists without the need for chemicals, soil disturbing treatments and conversion of additional natural habitat to what is essentially agricultural land. Increasingly the main hunters groups (Ducks Unlimited, Wild Turkey Federation, Quail Unlimited) are taking a similar position.

In conclusion, we strongly oppose expansion of the two dove fields as proposed. We may alter our position with respect to Abbeville Field depending on the type and quality of the native habitat impacted, as this was not clear from the project description. There is no possibility that we will accept destruction of bottomland hardwoods habitat under any circumstances and it is distinctly possible that such habitat conversion will violate clean water act provisions and Army Corps regulations.

Sincerely,

Jeff Glitzenstein, Ph.D., Issues Chair, SCNPS
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