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March 7, 2007

USDA Forest Service
Attn: Ms. Elizabeth T. LeMaster, District Ranger
Enoree Ranger District
3557 Whitmire Highway
Union, SC 29379
comments-southern-francismarion-sumter-enoree@fs.fed.us

Re: Epps Spillway Restoration, File Code: 1950/2400
Date: September 7, 2006

Dear Ms. LeMaster:

On behalf of the South Carolina Native Plant Society (SCNPS), I offer the following comments on the proposed repair and maintenance of the Epps pond spillway, File Code: 1950, February 7, 2007, Enoree District, Sumter National Forest.

I surveyed this site and adjacent public Forest Service lands March 1, 2007. My inspection does not support the statement of **Purpose and Need** that:

the proposed action is (needed) to stabilize an actively eroding stream channel that impacts both private and national forest land. If the spillway is not stabilized, damage to private land could cause the dam to fail and may cause extensive resource damage...

I did not find any erosion in the stream channel. While there is very minor silting on the eastern stream bank, erosion is confined to the private property. No erosion or threat of erosion was noted on national forest land. I did not find a spillway associated with this small stock pond, nor did I see evidence that the earthen dam on the north end of the shallow body of water was likely to fail. Judging from the vascular flora in and around the stream that flows north of the pond, this man-made impoundment compromises what was once a rich oak-hickory-beech ravine. If the earthen dike in question were to fail altogether, the substantial forest service dam less than 100 yards downstream on the forest service road there would hold that small amount of water as it drained through the culvert at the base of the forest service dam. Any impact to forest land would be brief, with no reason to anticipate anything other than full ecological recovery.

I disagree that this proposal meets the **Management Direction**. This action does not satisfy **Goal 3**, *Riparian ecosystems, wetlands, and aquatic systems are managed (and where necessary restored) to protect and maintain their physical, chemical, and biological integrity*. The pond in question is an artificial impoundment, best characterized as a stock pond, of what was likely an ephemeral stream, a rich riparian corridor, through an oak-hickory-beech forest. Those understory and canopy species persist around the pond and

adjacent to the ephemeral stream that persists north of the dam. Removal of this dam would actually result in restoration of the riparian corridor, not degradation. It is the pond that compromises the physical, chemical, and biological integrity of this ecosystem.

Regarding Management Direction Goal 6, *Cooperate with landowners and other partners to address watershed needs and participate in efforts to identify stream problems,* ...this proposal seeks to commit public resources to substantial improvements on private property with no benefit to the public or the forest service. The only problems here appear to be some erosion, relatively minor by comparison to what occurs throughout the area, which has occurred on private property as a consequence of the property owners' management practices. Little if any of that erosion is associated with the pond, but rather run-off from clear cutting timber harvest. That erosion appears to have stabilized, or be close to stabilization. It is my opinion that the property owner could restore the remaining washes along the north end of his property line, the source of the run-off that this proposal would seek to abate, with relatively little effort or expense. Regardless, the majority of the impact to the banks of the ephemeral stream has already occurred. That condition may pose some hardship to the owner, but it is little if any threat to the watershed or adjacent forest service property.

The oak-hickory-beech ravine between the Epps and forest service dams is rich in native grasses and forbs. Invasive exotics, notably Japanese Honeysuckle, *Lonicera japonica*, do occur there, but invasive ground cover is relatively low. Native species dominate the site. In marked contrast the forest service dam and associated road is completely dominated by Japanese Honeysuckle and other exotic invasives, most notably Lespedezas. There is little doubt that the **Proposed Action** would alter conditions so that the entire ravine becomes consumed by those harmful exotics in the same way the forest service dam brought those undesirable species to dominate that site.

Little if any erosion originates in Epps pond, and there is an extremely low probability that even a catastrophic dam failure would harm forest land. **The Proposed Action** appears to be aimed at making a substantial dam/service road improvement and enlargement of a private stock pond. Enlarging the impoundment, widening the spillway, and seeding and mulching will degrade the site rather than improve it. The proposed work may serve the interest of the private property owner. Certainly he has the right to do with this land as he chooses. But there is no ecological merit to the **Proposed Action**. I respectfully request this proposal be withdrawn, and funds assigned to it be allocated to dealing with severe erosion that is actually on public property on the Enoree District of the Sumter National Forest.

Thank you for taking the time to consider my comments.

Sincerely,

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