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March 8, 2007

USDA Forest Service  
Attn: Ms. Mary Morrison  
Enoree Ranger District  
3557 Whitmire Highway  
Union, SC 29379  
[comments-southern-francismarion-sumter-enoree@fs.fed.us](mailto:comments-southern-francismarion-sumter-enoree@fs.fed.us)

Re: Road Work on Newly Acquired Tracts, File Code: 1950  
Date: February 7, 2007

Dear Ms. Morrison:

On behalf of the South Carolina Native Plant Society (SCNPS), I offer the following comments on the proposed Road Work on Newly Acquired Tracts, File Code: 1950, February 7, 2007, Enoree District, Sumter National Forest.

I surveyed corridors and roads considered for treatment in this proposal on March 2, 2007. Some locations were difficult to determine, and available maps did not precisely correlate with text provided. Those difficulties and discrepancies can be largely attributed to the fact that many of the roads are on or proposed for land newly acquired by the forest service. I am indebted to you for your valiant effort to provide maps and other help in directing me to those sites. Even with that I don't have total confidence that my inspections were always precisely on the sites of interest.

While it is outside the scope of this proposal, I congratulate the Forest Service for successfully acquiring these new properties. I also thank the administration and other staff on the Enoree District for assuming the work load required to manage the additional land.

I support the **Proposed Action**, and agree with the **Purpose and Need** and **Management Direction** as stated in the proposal. Supporting documents, however, indicate objectives not clearly noted in the proposal. Specifically I refer to an inordinate number of treatments that the status sheets indicate are to be made in the interest of Wildlife. I assume that Wildlife here refers in the main to access to hunting two game species, deer and turkey; perhaps others to a lesser degree. The status sheets indicate a total of 56 treatments in this project. Of those 17, 30%, are road closures. For the remaining 39 roads that are to be maintained, improved, or newly constructed the sheets note 14, 36%, are to facilitate hunting. Other public recreational use is indicated for only 3, 8%, of these roads.

Hunting is a worthy pursuit. The Enoree District is blessed with an abundance of deer and turkey to the delight of many, including locals, who take pleasure and derive other benefits from hunting those game species. I, however, consider the amount of the road work noted in this proposal for that activity excessive. In addition to increasing the expenditure of limited forest service resources, money and manpower, road use over-and-above that required for administrative purposes contributes to the two principal degrading factors on the Enoree, erosion and the spread of invasive exotic plant species. Of concern throughout, those problems, especially erosion, was evident in the Compartment 319 road complex. Soils washed from roads and other disturbances there may wash directly into the Broad River. The forest service plan to address that problem here is well received, but I would like to see it expanded to include restricting those roads to administrative access. Concerning the proposed treatment for U119-D2 including decommissioning its terminus, I recommend closing that road just north of the “hump” that serves to divert water to either side rather than channeling down the existing roadway. My GPS coordinates for the spot are N34°26'47.5”, W-81°25'21.4.”

All four of the **Management Directions** noted are well received, but **FW-96** *Establish and maintain vegetation preferably native to the ecotype, on roadbeds, cut slopes, and fill slopes of intermittent service roads when they are closed. Annuals may be used to provide temporary soil cover until natives can take over* is especially appreciated. My survey revealed an abundance of native forbs and grasses throughout, with a notable diversity of *Andropogon spp.* in compartment 119. I recommend using a no till seeding of annuals on these roads and other openings. That will minimize the release of less attractive species with huge, persistent, seed banks, and offer the best opportunity for the more attractive native grasses growing close-by to establish on those corridors.

Thank you for taking the time to consider my comments.

Sincerely,

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