

Decision Memo
Sumter Forest Plan Amendment #4
for the
Management of Woodland Habitat

USDA Forest Service
Sumter National Forest
Long Cane Ranger District, Edgefield County, SC

Background

Amendment #4 modifies the geographic extent for Management Prescriptions *8.B.2 Woodland and Grassland/Savanna Habitats* (8B2); *7.E.2 Dispersed Recreation Areas with Vegetation Management* (7E2), and *10.B High Quality Forest Products (Piedmont only)* (10B) on the Long Cane Ranger District of the Sumter National Forest.

The forest plan amendment addresses the need to provide fire-maintained woodland habitat, which improves hunting opportunities and scenery along a hiking trail on the Long Cane Ranger District of the Sumter National Forest. Fire maintained woodland habitat is very limited across the landscape and is nearly absent on private lands. Woodland habitat provides for a suite of wildlife, including quail, rabbits, deer, and turkey, and it provides high quality hunting opportunities.

Specifically this forest plan amendment addresses **Objective 8.02**: *Provide 8,000 - 11,000 acres of woodlands in the piedmont and 4,000 – 5,000 acres of woodlands in the mountains on dry-xeric sites in woodland, savanna, open grassland or shrubland conditions with fire-associated rare communities preferred over the 10-year planning period.* In meeting the requirements for amending a forest plan, the preliminary identification of the need to change a plan can be based on a new assessment; a monitoring report; or other documentation of new information, changed conditions, or changed circumstances (36 CFR 219.13(b)(1)). For this amendment, the need for change is based on new information that is available in the Sumter Biennial Monitoring Report. The Sumter Biennial Monitoring Report is posted on-line at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd780859.pdf. Progress toward accomplishing **Objective 8.02** is reported in monitoring question 2 on pages 6 to 14. Relevant findings in this report are:

- “*Objective 8.02. In the 2015 report, woodlands were calculated at 3,800 acres on the Sumter National Forest. This acreage is significant, but it is much less than the plan objective.*” (page 7).
- “*Objective 8.02 is unlikely to be fully achieved during the planning period at current funding and staffing levels given the number of woodland, grassland, savanna, and shrubland projects being planned.*” (page 11).

With this forest plan amendment, the two piedmont districts of the Sumter National Forest eventually may come close to accomplishing this objective.

Decision

This amendment converts approximately 4,349 acres of Management Prescriptions 10B and 1,327 acres of 7E2 to Management Prescription 8B2. These changes to the boundaries of these three management prescriptions are located in Compartments 309 to 311 and 320 to 324 in the southern portion of the Long Cane Ranger District in Edgefield County, SC. Refer to the enclosed map for a depiction of the location of these new boundaries.

Compartments 309 to 311 and 320 to 324 would become subject to the desired conditions and standards of Management Prescription 8B2 and be managed for large-scale, high-quality, fire-maintained woodland habitats. Notably, these areas would remain suitable for timber production. See the table below for a breakdown of the proposed changes to management prescriptions by compartments:

Proposed Management Prescriptions Changes	Current Acres in 8B2	Proposed Acres in 8B2	Comments
Compartments 309 (part), 310, 311 (part) and 321-324 10.B High Quality Forest Products (Piedmont only)	0	4,349	Compartments 309 (part), 310, 311 (part) and 321-324 would be managed for woodland habitat. All or part of these seven compartments currently falls in management prescription 10B, and they would be moved to management prescription 8B2.
Compartment 320 7.E.2 Dispersed Recreation Areas with Vegetation Management	0	1,327	Compartment 320 can be burned on a two-year burn rotation, which would complement a complex of wildlife opening. Compartment 320 currently falls in management prescription 7E2, and it would be moved to management prescription 8B2.

To reflect the boundary changes in the geographic extent of these three management prescriptions, updates to the Forest Plan will be made in Chapter 4, *Management Area 4 -Piedmont, Enoree and Long Cane Districts, outside of the Turkey Creek and Upper Stevens Creek Watershed*. Table 4-5 on page 4-12 is updated as follows (new text is highlighted in yellow and text to be removed has been struck out):

Table 4-5. Management Prescription Allocations, Management Area 4

Management Prescriptions	Descriptions	Current Acres
7E2	Dispersed Recreation Area	49,428 48,101
8B2	Woodlands/Grasslands/Savannas	7,958 13,634
10B	High Quality Forest Products	92,509 88,160

Rationale for Categorically Excluding the Action

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency regulations (36 CFR 220.6(e)(16)) as "*Land management plans, plan amendments, and plan revisions developed in accordance with 36 CFR 219 et seq. that provide broad guidance and information for project and activity decision-making in a National Forest System administrative unit.*" This amendment addresses the need for increased fire-maintained, large-scale woodland habitat on the Long Cane Ranger District and extends the boundaries of Management Prescription 8B2.

In meeting the requirements for amending a forest plan, the identification of the need to change the plan can be based on new information, changed conditions, or changed circumstances (36 CFR 219.13(b)(1)). As was identified in the Background section of this Decision Memo, the lack of high-quality, large-scale, fire-maintained woodland habitat across the state is a concern and this amendment provides important habitat for species that use woodlands.

I find that my decision does not have extraordinary adverse effects that would warrant further analysis and documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS). I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I do not believe that increasing the amount of woodland habitat on the Long Cane Ranger District and modifying the boundaries of the management prescriptions would have extraordinary circumstances defined by 36 CFR 220. I took into account the resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist:

Federally listed threatened or endangered species or designated critical habitat, species proposed for federal listing or proposed critical habitat, or Forest Service sensitive species

The Endangered Species Act provides broad protection for species of fish and wildlife and plants that are listed as threatened or endangered in the U.S. or elsewhere. Provisions are made for listing species, as well as for recovery plans and the designation of critical habitat for listed species. The Act outlines procedures for federal agencies to follow when taking actions that may jeopardize listed species and contains exceptions and exemptions. A Biological Evaluation/Biological Assessment for this forest plan amendment was completed in October 2020. Findings include the following:

- A “no effect” determination was made for Threatened and Endangered Species. Pursuant to section 7 of the Endangered Species Act, as amended, consultation with U.S. Fish and Wildlife Service is not needed.
- There are no species on the Sumter National Forest that fall under the responsibility of the National Marine Fisheries Service.
- Findings in the biological evaluation for this forest plan amendment include: no impact on sensitive species.

- There are no impacts on other federally listed threatened or endangered species or designated critical habitat species proposed for Federal listing or proposed critical habitat or on any Region 8 Forest Service designated sensitive species because the project area is outside of their known range, they are not known to occur in the project area, or suitable habitat does not exist within or adjacent to the project area.

Accordingly, I find this decision is fully compliant with the Endangered Species Act. Applicable procedures were followed with respect to threatened and/or endangered species. The forest plan amendment is a programmatic level planning effort that will not directly authorize any specific activities or projects. Site-specific projects that are undertaken as a result of the direction in the amended plan will fully comply with laws and regulations that ensure protection of threatened and endangered species on the Sumter National Forest.

Flood plains, wetlands, or municipal watersheds

This amendment would not pose new risks to flood plains, wetlands, or municipal watersheds. Standards for the protection of these areas would remain in place. There are no changes in the management direction for Management Prescription 11 Riparian Areas or in standards that protect soil and water quality.

Congressionally designated areas such as roadless areas, wilderness, wilderness study areas, or national recreation areas

This amendment would not pose any risk to roadless areas, wilderness, wilderness study areas, or national recreation areas. There are no changes to forest plan direction for these designated areas.

Research Natural Areas

This amendment would not pose any risks to research natural areas. There are no changes to forest plan direction for these designated areas.

American Indians and Alaska Native religious or cultural sites

This amendment would not have any effect on these sites because it does not authorize ground disturbing activities. Consultation with American Indian tribes would continue to occur for site-specific activities with the potential to impact these resources to ensure protection of religious and cultural sites.

Archaeological sites, or historic properties or areas

Section 106 of the National Historic Preservation Act requires each Federal agency to take into account the effects of its actions on historic properties prior to approving expenditure of Federal funds on an undertaking or prior to issuing any license. However, according to the Advisory Council's regulations 36 CFR Part 800.1 (c): *This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties.* Accordingly, I find this decision is fully compliant with the National Historic Preservation Act. The land management plan amendment is a programmatic level planning effort that will not directly authorize any specific activities or projects. Site-specific

projects that are undertaken as a result of the direction in the amended plan will fully comply with laws and regulations that ensure protection of heritage resources.

Significant cultural resources will be identified, protected, and monitored in compliance with the National Historic Preservation Act. Tribal consultation will occur, and proposed activities will be coordinated with the State Historic Preservation Office (SHPO) of South Carolina.

Rationale for My Decision

I have decided to expand the management for high-quality, fire-maintained, large scale woodland management on the Long Cane Ranger District. This forest plan amendment addresses Forest Plan Objective 8.02 and helps move the Sumter National Forest closer to accomplishing the objective. Amendment #4 will provide uncommon wildlife habitat as well as contribute to social and economic sustainability.

- Large scale, fire-maintained woodland habitat is uncommon across South Carolina. This forest plan amendment provides high quality habitat for species, such as quail and turkey, that depend on this habitat. Existing direction in the Sumter Forest Plan provides protection for the natural resources, such as riparian corridors.
- Wood products are still provided. These areas remain suitable for timber production and continue to provide wood products. National Forest lands managed under Management Prescription 8B2 remain in the suitable timber landbase where the regeneration of stands could occur. Thinning activities will also be needed to maintain woodland habitat.
- This forest plan amendment improves recreation opportunities on the Long Cane Ranger District. The woodland management varies the scenery along the recreation trails in Compartment 320, improving the Scenic Integrity Objectives. The woodland management will improve hunting opportunities for species, such as quail and turkey.

Public Involvement

This action was originally listed as a proposal on the Francis Marion and Sumter National Forests Schedule of Proposed Actions (July 2020) and updated periodically during the analysis. A public scoping letter was sent to the mailing list on July 10, 2020. The legal ad was published on July 17, 2020, with *The State*. A total of eight responses from seven individuals were received in response to the public scoping letter. Three emails were received outside of the scoping period. Most of the comments were supportive of the proposed forest plan amendment, but concerns about the impacts of prescribed fire on wildlife, timber production, hardwoods with unnatural fire regimes, and soil were identified. These comments were grouped into four concern statements. These concern statements and the Forest Service responses are included in Appendix A attached to this decision memo.

Findings Required By Other Laws and Regulations

This forest plan amendment was developed in full compliance with National Forest Management Act. This forest plan amendment updates direction in the 2004 Forest Plan to address woodland management on the Sumter National Forest, specifically Objective 8.02.

The forest plan amendment is in compliance with the Endangered Species Act and the National Historic Preservation Act. See the section titled **Rationale for Categorically Excluding the Action** for more information.

Meeting Substantive Requirements of the Rule

In conducting a plan amendment, the specific substantive planning rule requirements within 36 CFR 219.8 through 219.11 that are “directly related” to the plan direction being amended need to be identified and applied. Conversely, any substantive rule requirements that are not directly related do not need to be applied to the amendment (see 36 CFR 219.13(b)(5)).

This forest plan amendment meets the planning rule requirements in 36 CFR 219.8(a), 219.8(a), and 219.10(a) as follows:

36 CFR 219.8(a) – Ecological sustainability

This forest plan amendment addresses the need to maintain and restore the structure, composition, function, and connectivity of fire-maintain pine ecosystems. This forest plan amendment considers the lack of woodland habitat not only on National Forest lands, but also across the state. Frequent, low-intensity fire was a common disturbance, and this forest plan amendment addresses the need to return frequent, low-intensity fire to the landscape while considering the impacts to plant and wildlife habitats and soil, air, and water quality.

36 CFR 219.9(a) – Ecosystem plan components

This amendment provides forest plan components to address ecosystem integrity and ecosystem diversity. This forest plan amendment not only considers the composition, structure, and function of pine woodland habitat, but also the role it plays in the broader landscape. Existing forest plan components, such as standards, provide additional protection for plants, wildlife, soil, air, and water across the Sumter National Forest.

36 CFR 219.10(a) – Integrated resource management for multiple uses

As noted in the Rationale for Decision of this document, this amendment recognizes that the woodland habitat would improve scenery along trails in Compartment 320 as well as improve hunting opportunities for species that use woodland habitats. National Forest land would be managed for timber production and continue to provide wood products as appropriate. In Compartment 320, the large complex of wildlife openings is managed cooperatively with the South Carolina Department of Natural Resources. This woodland management provides an opportunity to work closely with state personnel to provide an uncommon habitat. This management increases opportunities for hunting.

Administrative Review

As described above in the Public Involvement section of this document, this decision was subject to objection pursuant to 36 CFR 219 Subpart B. An objection period, in accordance with the requirements of 36 CFR 219 Subpart B, was initiated with the publication of a legal notice in *The State* on November 23, 2020. One objection was received, but it was set aside by the

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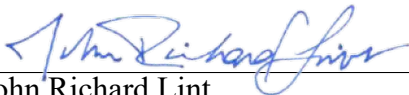
reviewing officer (Acting Deputy Regional Forester, Stephanie Neal Johnson) documented in a letter dated February 1, 2021. The objector brought up a concern about “the lack of natural late succession forest.” However, the objector did not submit substantive formal comments related to this issue during opportunities for public comment on the proposed decision. This decision is not subject to additional administrative review.

Implementation Date

The forest plan amendment is effective immediately following the signing of the decision and applies to all future actions and projects within the areas of the changed management prescription boundaries. The forest plan amendment does not alter or modify previously approved projects, activities, occupancy, or use.

Contact Person

For additional information concerning this decision and forest plan amendment, contact Mary Morrison, Forest Planner at mary.morrison@usda.gov.



John Richard Lint
Forest Supervisor
Francis Marion and Sumter National Forests

February 17, 2021

Date

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Appendix A Response to Concern Statements

This action was originally listed as a proposal on the Francis Marion and Sumter National Forests Schedule of Proposed Actions (July 2020) and updated periodically during the analysis. A public scoping letter was sent to the mailing list on July 10, 2020. The legal ad was published on July 17, 2020, with *The State*. A total of eight responses from seven individuals were received in response to the public scoping letter. Three emails were received outside of the scoping period. Most of the comments were supportive of the proposed forest plan amendment, but concerns about the impacts of prescribed fire on wildlife, timber production, hardwoods with unnatural fire regimes, and soil were identified. These comments were grouped into four concern statements. These concern statements and the Forest Service response are below.

Wildlife Concern

Some commenters supported the need to increase woodland management in order to provide habitat for wildlife species and common game species, such as rabbits, deer, turkey, and quail. Other commenters stated that these game species have declined on the Francis Marion National Forest, where the Forest Service uses frequent, low-intensity fire.

Forest Service Response: Prescribed fire is not anticipated to adversely impact the persistence of wild turkey populations. The National Wild Turkey Federation (NWTf)'s position statement on prescribed fire is posted at <http://www.nwtf.org/conservation/article/prescribedfire-letter>. An excerpt from NWTf's position statement includes: *Unfortunately, many blame poor reproduction and observed declines in hunter harvest on the use of prescribed fire, particularly burns conducted during the growing season, which coincides with the spring nesting season for wild turkeys. While the loss of wild turkey nests to prescribed fire is a legitimate concern, a majority of wild turkey research shows very few turkey nests are lost directly because of springtime burns. Research suggests that hens prefer nesting in areas that have been burned within the past two years and not in high numbers in unburned areas because the habitat is too thick. For the few nests that are lost due to habitat management activity, predation, or even weather-related events, it's important to note that hens may re-nest up to three times.*

South Carolina's State Wildlife Action is located on-line at <https://www.dnr.sc.gov/swap/index.html>. In Chapter 4: South Carolina's Landscape, there is a section on Region-wide Challenges (pages 4-34 to 4-35) *Low-density development contributes to habitat fragmentation which impacts many fish and wildlife species. In the Piedmont, development has been particularly rapid in association with the interstate highway system. Habitat fragmentation also hinders the use of prescribed fire. Therefore, most of the priority species associated with fire-dependent communities decline as development encroaches. While most birds can rapidly find and colonize early successional habitat patches, some bird species—grassland birds in particular—are area sensitive and will not use small patches of habitat surrounded by forest or developed areas. The Northern Bobwhite may require large areas of contiguous habitat (greater than 2,023 ha or 5,000 ac.) for long-term population viability (Guthery et al. 2000). The isolation of suitable early-successional habitats may be most problematic for mammals, reptiles, and amphibians that have limited dispersal ability and may suffer high mortality when traveling through unsuitable habitats.*

Concerns about liability, air quality, social acceptance, and smoke management, as well as the lack of landowners with experience and equipment to conduct prescribed burns, has limited the use of fire on private lands. Similar to the coastal regions, fire was once an important natural feature of the Piedmont (Frost 1998). Pre-settlement oak-hickory forests experienced surface fires that were frequent, of low intensity, and were sustained by fine grass, pine needles, and hardwood litter. An absence of fire leads to forest stands dominated by fire-intolerant species such as maple, beech, and sweet gum. The pre-settlement mean fire return interval was 4 to 6 years in many parts of the Piedmont, while in certain places, fires burned almost every year. Early European explorers described small, open prairies on the upper Piedmont maintained by annual fall burns conducted by Native Americans.

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Piedmont prairies contain highly diverse and specialized plant and insect communities, and only small remnant tracts remain in South Carolina. Fire and/or other low-intensity soil disturbances, such as light disking at the proper time of year, are necessary for the maintenance of prairie communities. Current restoration efforts are focused on plant conservation and have been implemented on small acreages that have limited value for area-sensitive grassland species, such as the Grasshopper Sparrow and the Eastern Meadowlark.

Timber Production Concern

Some commenters feel that prescribed fire management on the Sumter National Forest has led to impacts on timber production due to mortality of merchantable trees.

Forest Service Response: Burn objectives are identified in the burn plans, and staff implementing prescribed burns attempt to meet burn objectives. The Forest Service Southern Region Office has not given a target to the forest for prescribed burn acres in several years. Rather, treatment acreage targets are based on desired conditions for forest types. We do our best to protect the urban interface from catastrophic fire while maintaining fire adapted ecosystems on the forest.

There has not been a substantial loss of marketable trees in areas that are planned to be sold. Some tree mortality is anticipated in any prescribed fire operation. Unfortunately, when improving and restoring both the fire regime condition class and the ecosystem condition class, at times and at localized scales, fire may occur at moderate or high intensity as a result of fuel loading, flammability, and fire exclusion which is considered when planning and implementing prescribed burns. However, the fires are typically of small scale and duration and not at the landscape or even stand scale. High intensity fires are a result of high fuel loading and fire exclusion combined with unfavorable weather conditions. Forest Plan desired conditions for low intensity burns are likely once stands have achieved the fire regime condition class 1 and maintenance ecosystem condition class.

It should be noted that the desired conditions for management prescription 8B2 includes: “A flow of wood products is provided to local economies.”

Hardwood production and “Unnatural” Fire Regimes

Some commenters feel that frequent, low-intensity fire did not occur historically in the South Carolina Piedmont and is an application of an unnatural fire regime. It was noted by some commenters, “*fire should not have a leading role in managing our forests, especially traditional hardwood forests.*”

Forest Service Response: Refer to the excerpts from the South Carolina State Wildlife Action Plan under Wildlife Concern that specifically addresses historic fire regimes in the South Carolina Piedmont. While it may seem reasonable that mast production in open pinelands may not be as great as stands with abundant oak and hickory in the mid-story, it would be hard to argue that a biennially burned pine land with an open midstory does not have enough mast, fruit, and browse in the understory to sustain game populations, especially when considering adjacent transition zones and hardwood communities, where fire penetrates less completely and mid-stories are more developed. While the desired condition for management prescription 8B2 does state that woodland conditions “collectively dominate the landscape,” it also describes woodland conditions “are common in small to large patches.” Not every acre within an 8B2 management prescription is managed with frequent, low-intensity fire. Detailed burn plans are prepared with information on objectives of the prescribed fire as well as protection of resources.

Soil Productivity

Some commenters noted that past farming practices damaged soils, and the use of frequent prescribed fire could damage mineral soils resulting in “full scarification of the fermentation layer.”

Forest Service Response: We have completed a general order 2 soil survey on the Long Cane Ranger District, which is used to identify soil characteristics and determine soil series. This area has been heavily farmed and has a thin organic layer that could be depleted depending on how fire is applied. Depending on the

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monitoring, the fire regime may be lengthened to address the impacts to the organic layer. Sumter Forest Plan standards FW-64: “ *Prescribed burns are done so they do not consume all litter and duff and/or alter structure and color of mineral soil on more than 15 percent of the area*” and FW-65: “*On severely eroded forest soils, any area with an average litter-duff depth of less than ½ inch or duff less than ¼ inch will only be burned at low intensity*” are designed to address this concern.