

AT RISK SPECIES, EFFECTS ANALYSIS AND LISTED PLANTS

OBJECTION ISSUE SUMMARY

Page 41 - 42

Part of desired condition DC-T&E-3 is that American chaff seed be maintained along roadsides but it is not clear which forest plan components speak to this. **(See Remedy 1)**

The pondberry recovery plan emphasizes that, “first priority be given to management and enhancement of populations at known and historic sites for the species, where possible” (p. 205). In order for the revised plan to contribute to recovery, it must incorporate this prioritization. **(See Remedy 2)**

The BA refers to “additional management actions” that would benefit the listed plant species (see p. 194). Many of these appear to be assumptions that are not based on plan components. Consultation must occur only on the plan components in the proposed action, not on additional management action. Examples include:

“Population enhancement and propagation” of listed plants and “management of habitats adjacent to roadsides.” These assumptions are derived from the “management strategy” for OBJ-T&E-3. Management strategies are not plan components and cannot be given equal weight in the effects analysis. **(See Remedy 3)**

“Attempts are made to survey and flag individuals prior to the onset of activities. **(See Remedy 4)**

“Reduction of shrubs” is expected to lead to expansions of populations of pondberry (p. 207). **(See Remedy 5)**

In addition, we noticed that standard S41 in the revised plan is not the same as that included in the BA (p. 194). **(See Remedy 6)**

WHAT’S REQUIRED BY LAW, REGULATION AND/OR POLICY

N/A

REMEDY(S) PROPOSED BY OBJECTOR

Remedy 1: There should be other plan components that make this likely to happen, such as a standard prohibiting certain roadside treatments, or required surveys. The FEIS refers to plan components that are “protection measures aligned with the species’ recovery plan” (p. 147). It should make clear what those are.

Remedy 2: The BA indicates that adverse effects on pondberry could result from “timber harvest at pond ecotones” (p. 205). Why is timber harvest necessary in pond ecotones? This should be justified for ecological reasons and it needs to be clear that the standards listed as mitigating measures apply to pond ecotones; none of them currently mention this. These areas should not be considered suitable for timber management.

Remedy 3: These need to be included as plan components.

Remedy 4: This cannot be assumed unless there is a standard that requires it.

Remedy 5: Shrub reduction is not included in the objective for pondberry and therefore should be added.

Remedy 6: There needs to be an accounting of these differences and their effects.

FOREST SERVICE RESPONSE

The Forest Plan describes ecological conditions for federally listed plant species and incorporated recovery plans to continue management for these species. In the Forest Plan, Appendix D (Table D-4) shows the crosswalk to plan components that will provide direction for sustainable populations of American chaffseed (p. 182) and pondberry (p. 179 – should be DC-SCC-6 not DC-SCC-8). The Forest Plan lists specific standards and guidelines for at-risk species and ecological sustainability on pp. 124-125 and p. 131

Remedy 1: G35 (p. 131) states that the guideline and recovery objectives in the current recovery plan for American chaffseed should be considered. (See additional comments 20161027_RCW_DeferringPCsProject). DC-T&E-3 American chaffseed is maintained along roadsides in coordination with South Carolina Department of Transportation. The FEIS (p. 147) recognized that threatened and endangered species would be addressed and conserved through site-specific analysis and align with the species’ recovery plan.

Remedy 2: DOW commented that the pondberry recovery plan emphasizes that, “first priority be given to management and enhancement of populations at known and historic sites for the species, where possible.” The Plan addresses the need to maintain and restore stable to increasing populations of pondberry (OBJ-T&E-3, p. 108) in known existing and historic locations (DC-T&E-4, p. 43). OBJ-SCC-3 (p. 108) prioritize habitat restoration for declining species. Federally-listed species are given highest priority. Monitoring will assess population status and trends and the relationship to habitat/ecological conditions every 2 years for federally-listed plant species (MQ 13, p. 143) to develop adaptive management strategies (OBJ-SCC-3, p. 109).

The BA adequately analyzes the impact for timber harvest or vegetation management at pond ecotones. The Plan identifies standard and guidelines for management in T & E plant habitat while recognizing the need for timber harvest to achieve desired ecological conditions and objectives.

Remedy 3: OBJ-T&E-3 (p. 108) and OJB-SCC-3 (pp. 108-109) lists management strategies that will be used to maintain and restore listed species and their associated habitats. The effect analysis in the BA does reference those management strategies. However, the determination of “may affect, and are likely to adversely affect individual for American chaffseed” (Appendix G: p. 194) is based on active management required to maintain high-quality habitat conditions. “This determination is a result, primarily, of management activities within Management Area 1 which maintain and restore associated upland longleaf woodland ecosystems and habitats with open mid-story, shrub, and tree canopies and desired 1-3 year fire regimes, including a growing season burn every third burn, where activities could include mastication, selective herbicide application, timber harvest, and fireline and road reconstruction.” The rationale in the determination demonstrated that primary weight was given to plan components and impacts for implementing the revised Forest Plan, not additional management actions. Similar rationale is found for Canby’s dropwort (Appendix G: p. 200) and pondberry (Appendix G: p. 207)

Remedy 4: In the effects analysis in the FEIS and BA for TE plants, each analysis says that attempts will be made to survey and flag individuals prior to the onset of activities (FEIS, p. 147, Appendix G, p. 194, 198-199). The management strategy for at-risk species (OBJ-SCC-3, p. 109) includes collecting inventory and monitoring information. The effect analysis in the BA concluded that individuals may be impacted even with attempts to survey and flag individuals for American chaffseed and Canby’s dropwort. Objector is correct in that there is no standard requiring that plants be surveyed and flagged prior to activities.

Remedy 5: DC-ECO-4 (pp. 27-28) and DC-T&E-4 (p. 43) describes the desired ecological conditions for habitats that would support pondberry with open canopy and abundant herbaceous groundcover. High shrub cover is listed as a threat to pondberry (FEIS, p. 151).

Remedy 6: The Forest Plan (p. 125) and BA (Appendix G: pp. 190, 194, 199, 207) initially differed in the additional specific measures to reduce impacts to federally listed plant species. On Aug. 23, 2016, an email was sent to USFWS informing them of the correction to S41 in the BA. The effects analysis in the FEIS (p. 139 - 153) analyzes the effects from the standards listed in the Forest Plan, not the BA.