

Andrew Pickens White Pine Management Project

Comment Responses

Background

A 60-day public notice regarding the intent to exceed the 40-acre opening size limit was commenced by sending a letter dated September 14, 2020 to interested parties. A 30-day comment period was conducted concurrently with the 60-day public notice and was commenced with publication of a legal notice in the newspaper of record (*The Journal*) on October 14, 2020. A preliminary EA was also provided at this time for public review. A total of 47 comment letters or emails were received during these concurrent notice and comment periods.

The comment letters were reviewed to identify comments for consideration. Over 150 different comments were identified. The comments were then sorted and grouped by issue. Concern statements were developed to encompass the comments received. A total of 37 concern statements were developed. The concern statements and their contributing comments were then reviewed and considered. Responses to the comments are provided in the following section of this document sorted by resource area. Some modifications to the proposed action were made in response to the comments.

Comment Responses

NEPA/Process

The 2012 Planning Rule can't be used for an exemption to the Sumter National Forest Plan's 40-acre clear cut limit and an exemption does not meet the intent of the Plan.

Response:

Although the 2012 Planning Rule was cited relative to the process for exceeding the 40-acre opening limit, the authority to do so does not extend from the 2012 Planning Rule. The 2012 Planning Rule was cited for simplicity of citing the most recent direction. However, it would have been more appropriate to cite the forest plan directly where the 40-acre opening limit is outlined for the Sumter National Forest, as well as a procedure for exceeding this limit. Forest-wide standard 54 of the Sumter National Forest Plan clearly states that “exceptions to these acreage limitations may be permitted following review by the Regional Forester.” Although prepared under a prior planning rule, the Sumter National Forest Plan remains in effect until replaced with a new plan.

Accordingly, we have sought and received Regional Forester approval to exceed the 40-acre opening limit for this project because of the restoration benefits of the proposed project. Exceeding the 40-acre opening limit is in line with the standards of the forest plan. It was clearly anticipated that there would be occasions where it would be appropriate to exceed the acreage limitation, such as restoration projects to move toward desired conditions as we propose for this project. Exceeding the acreage limit would best facilitate moving the project area toward desired conditions for a number of reasons as described in our letter notifying of the intent to exceed the 40-acre opening limit dated September 14, 2020.

Comments:

<p>The 2012 Planning Rule does not appear to apply to the old, 2004 Sumter Forest Plan.</p>
<p>40-Acre Exemption: Additionally, I am directly opposed to the notion that you all believe you should be exempt from the 40-acre clear-cut limit that was clearly established in the 2004 Sumter Forest Plan. Your use of the 2012 Planning Rule (which in no way applies to the 2004 Forest Plan) to justify this backdoor procedural maneuver is characteristic of corporate greed and entitlement, not a public agency tasked with protecting and preserving our lands.</p>
<p>On 9/14/20, the Andrew Pickens Ranger District (APD) released a proposal to exempt the district from the Sumter National Forest’s limit on timber harvesting “openings” exceeding 40 acres. The APD justifies exceedance of the 40-acre threshold by citing 36 C.F.R. § 219.11(2)(d)(4). This is a citation of the 2012 Planning Rule. On its face, 36 C.F.R. § 219.11 (2012) applies to “a plan developed or revised under this part.” The Sumter Plan wasn’t developed “under that part” because it was developed under the 1982 Planning Rule. The 2012 Rule states that “None of the requirements of this part apply to projects or activities on units with plans developed or revised under a prior planning rule until the plan is revised under this part.” Therefore, 36 C.F.R. § 219.11(2)(d)(4) is not applicable to the 2004 Sumter Forest Plan. This suggests that the Sumter National Forest needs to rely on the 1982 Planning Rule to exceed the 40-acre threshold, but the 2012 Rule explicitly “supersedes any prior planning regulation,” that is to say, the 1982 Planning Rule has been replaced and is now defunct. Therefore, there appears to be a serious flaw in the APD’s intention to use the 2012 Planning Rule to allow openings/clear-cuts exceeding 40 acres.</p>
<p>...the forest service has blatantly used vague wording to bi-pass the (2004) Sumter Forest Plan direct stipulation that a limit of 40 acres be put onto clear cuts. The FS has chosen to not only bypass this limit by quoting the (2012) Planning Rule (which in no way applies to the (2004) Sumter Forest Plan) but they have done so by a multiple of thirty times the specified amount.</p>
<p>There should be no exemption if you want to remove trees then you should follow the rules set forth in the forest service plan.</p>
<p>The 2012 Planning Rule does not appear to apply to the old, 2004 Sumter Forest Plan!</p>
<p>Regarding the Andrew Pickens White Pine Management Project #55429 proposal for a 40 acre exemption on clear cuts, the 2012 Planning Rule does not appear to apply to the old 2004 Sumter Forest Plan.</p>
<p>I would like to take a moment to respectfully express that I don’t believe the APD has grounds to exempt clear-cuts from the 40-acre limit laid out in the 2004 Sumter Forest Plan. In short, the APD cites the 2012 Planning Rule to justify this proposed exemption, but the current forest plan (2004) was developed under the defunct 1982 Planning Rule. Therefore, I believe the Forest Service’s application of the 2012 Planning Rule to the 2004 Forest Plan presents a significant procedural glitch in this decision-making process.</p>
<p>In regards to your request for an exemption to the 40 acre white pine limit, it just doesn't seem logical that the 2012 Planning Rule loophole would apply to the 2004 Sumter Forest Plan, and the argument put forth by the Forest Service doesn't withstand closer scrutiny.</p>
<p>The proposed exemption to exceed the 40-acre standard is logical, consistent with planning rules, and necessary. It is not clear why a proposal for exemption from the 40-acre standard is required since policy allows the Regional Forester to approve larger openings that support restoration objectives. Searches yield little information on the origin or scientific basis for this arbitrary standard. In any case, USFS presents compelling rationale for larger regenerative clearings and should take the necessary steps to expediently restore the ecological integrity and natural forest conditions of APD.</p>
<p>However the forty acre rule was put into place, to ensure that no area was logged too heavily. I Feel that an exemption to that rule would result in irresponsible harvest of our forests. If it is unprofitable to harvest trees in portions less than forty acres then maybe the trees should not be harvested at all.</p>
<p>I request that the proposal to exempt the 40 acre limit on timber cutting openings in the White pine management project be rejected. I would like to see this project follow the Sumter National Forests limit on timber cutting.</p>
<p>This exemption does not seem to be the intention of keeping the old 2004 Sumter Forest Plan.</p>

The EA needs to address cumulative impacts of other activities.

Response:

Effects analyses were completed for all resources identified in the comment; these effects are disclosed in the EA and the analysis documents are available on the project website. The effects analysis included consideration of cumulative effects. Maps depicting rare communities and possible old growth stands have been prepared and are available on the project website. A biological assessment was completed; the USFWS was consulted and concurred with the conclusions of the effects analysis.

The Forest Service responds to any concerns about localized negative impacts. Claims have been made in the past about the loblolly project causing negative impacts to soil/water resources. Field observations revealed no such impacts. The Forest Service will continue to respond to any concerns that are brought to our attention as part of our monitoring efforts. No significant adverse natural resource effects are anticipated from harvesting the white pine stands along Turkey Ridge road. However, to reduce visual impacts, a design criterion was included in the original proposed action (and is still included) to defer harvest of these stands by at least 3 years to allow more time for the newly regenerated mixed pine/hardwood to grow. These stands were harvested in 2016/2017 as part of the loblolly pine removal project.

Comments:

<p>Cumulative Impacts/Effects</p> <p>While the EA discounts any significant cumulative impacts of concurrent timber harvesting projects on the APD, we disagree with this blanket and vague evaluation. Plainly apparent to the casual observer, for example, are localized negative impacts to migratory corridors for flora and fauna, scenery, soil and aquatic resources from the ongoing Loblolly Removal Project. The EA fails to take a hard look, as required by NEPA, at the potential cumulative impacts of concurrent Loblolly, White Pine, NNIS and prescribed burning projects that could be simultaneously ongoing across thousands of acres in the APD.</p>
<p>The EA should thoroughly assess the potential, combined effects of concurrent and adjacent timber harvests on PETS, the approximately 12 acres of rare communities, and old growth stands located within the project area, and disclose their location and baseline conditions. We request this specific information.</p>
<p>4. Cumulative Impacts. While the EA discounts any significant cumulative impacts of concurrent projects on the APD, we disagree with this broad evaluation. Plainly apparent to the casual observer, for example, are localized negative impacts to soil resources from the ongoing Loblolly Project, where multiple instances of excessive erosion and sedimentation have occurred in Turkey Ridge Road area, Charlie Cobb Rd. area, etc. Another example concerning wildlife corridors could be the significant cumulative impacts of concurrent Loblolly, White Pine and prescribed burning projects, which clearly would disrupt and/or essentially destroy migratory corridors for wildlife across thousands of acres in the APD.</p>
<p>I am concerned about the stands on Turkey ridge road that are adjacent to and or border the Loblolly Removal stands. It is too much loss over a short period of time.</p>

The current Forest Plan is outdated and does not reflect the desires of the public.

Response:

The Forest Plan remains in effect until it is replaced with a new plan, and we believe the direction in the plan is still relevant. Monitoring of progress toward desired condition is reported biennially (available online at: <https://www.fs.usda.gov/detail/scnfs/landmanagement/planning/?cid=STELPRDB5261459>). Based on the results of monitoring, the Sumter Forest Plan is amended to reflect changed conditions or new information. The plan has been amended a number of times to adapt to changing conditions.

The Forest Plan provides for achieving a broad array of management objectives, including a myriad of recreation uses. Vegetation management activities such as those proposed for this project do not preclude recreational opportunities, and the proposed project has been designed to minimize adverse impacts to recreational uses. The desired conditions in the plan do not necessarily require clear cuts and logging. There are multiple desired conditions provided in the proposed action, and multiple treatment methods proposed to establish and maintain those conditions. The proposed action is not based on wood production, it is based on the most practical, effective means to achieve the desired condition, based on research and practice, and will ultimately provide benefits to wildlife and recreation by restoring more natural conditions. Refer to the Purpose and Need section of the EA for additional information.

Public involvement is encouraged at all stages in planning and implementation for forest management activities. Project scoping letters and other public involvement events specifically solicit feedback from the public.

Comments:

#9: Input from citizens opposed to current Forest Service proposals should be evidence enough the current LMP is no longer applicable to public thinking.
#25: another example of the outdated LMP. What was once viewed by the public as acceptable for the environment has evolved as evidenced by the public response to these proposed actions. The Forest Service has no way of knowing about changes in public desires since it has not revised the outdated LMP.
13a/b: when forest users have found uses for recreation within the forest, the Forest Service should manage those forest for recreation and not timber management. Destroying the forest under the guise of best scientific practices is a fallacy, a vestige of past beliefs that no longer apply to changing values; this is further evidence of an outdated LMP.
#15: Change the desired future condition. The Forest Service has created a desired future condition and time line that only leads to the conclusion that clear cuts and logging are needed. It's time to recognize the science the Forest Service relies on is biased towards the predictable and predetermined outcome of forest product production. This is further evidence of an outdated the LMP. There should be other alternatives available to the public.

The concerns and comments of interested parties should be considered.

Response:

The Forest Service has been involving stakeholders and the public at large in the development of this project since the fall of 2018. We believe adequate time and public involvement has been given for the planning phase of this project. An objection period will follow issuance of a draft decision notice for this project for those who have standing (who have commented in earlier phases of the planning effort). We also encourage the public to remain involved during the implementation and monitoring of the project once a decision has been issued.

We have considered the input and feedback which has been provided. Several changes have been made to the project based on comments received throughout the planning process. We were not able to accommodate every request made by the public, but we did listen and made changes where we believed the project objectives could still be met and concerns could be alleviated.

Comments:

Cease and desist from this action and seek more input from conservation groups and area users.
--

I am simply asking for this project to be put on hold, to be further looked into, and for those involved to listen more closely to those who inhabit this land.

It is evident to me... that our comments during the initial proposal phase went largely ignored. My voice and the voices of countless others have been callously overlooked. I am also grimly assured that the policies and procedures being pursued by the APD are just one of many failures to “sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.”

The new administration should be given time to review this project.

Response:

A decision for this project would not be issued until after the new administration has started. Nevertheless, this project implements the Forest Plan, seeks to implement restoration objectives, and is relatively routine, such that we would not anticipate a change in administration to affect this project.

Comments:

Finally, please allow the new administration time to review your proposals. The citizens of this country have made their voices heard for change and as an arm of our government, the Forest Service should listen.

The EA should state in which management prescriptions the proposed action would occur.

Response:

A table will be provided on the project website that shows in which Forest Plan management prescriptions the proposed actions are located. The primary prescriptions are 8A1 and 7E2.

Comments:

The EA does not disclose what Forest Plan prescriptions the proposed White Pine Project’s work would be in. Please provide this information.

Recreation

The project would result in adverse impacts to Recreation.

Response:

It is our belief that by implementing this project the diversity, health, and resilience of these forests would be increased, benefitting recreation and the tourism industry for generations to come. Several changes were made to the original proposed action to accommodate concerns expressed by the public. We believe these changes lessen visual and other impacts to recreation. There are no project areas that overlap with hiking trails or authorized mountain biking trails.

The John Mountain area was considered in the recreation analysis, along with all other areas in the proposal. The John Mountain area is not a specially designated management area. Part of the reason John Mountain gets heavy recreation use is due to the unauthorized construction and use of trails. Such activities are not only illegal, they are counterproductive to coordinated, interdisciplinary management of the National Forest. Unauthorized trail construction and continued use circumvents public involvement with project planning and the survey and clearance work required by the National Historic Preservation Act and Endangered Species Act. These protocols are crucial to ensure protection of cultural and protected, endangered, sensitive, or threatened flora and fauna, and these protocols

ensure involvement by Native American tribes, the State Historic Preservation Office, and the US Fish and Wildlife Service.

Comments:

Visitors to our area have increased significantly, and certainly we don't want to destroy what so many locals love and visitors can't get enough of. Especially being mindful of the increased tourism that ultimately supports the economic development and survival of all residents in Oconee County.
Recreation is not only related to the Chattooga river. There are many trails used for hiking, mountain biking, and horseback riding affected by logging in the proposed project. When many people recreate in the outdoors, they are attempting to immerse themselves in the beauty and majesty of the local backcountry. Even aged logging is not pretty (seen along Damascus church road) which would take away from many people's experiences as they chose to recreate in the area.
Many of the areas proposed for clear-cuts and other forms of timber harvesting in the White Pine Project occur in the midst of areas where recreation use is primary and heavy. Curiously, the well-known dispersed recreation use in the vicinity of FR 722, John Mountain, and around Swafford Creek and Hub Branch was not considered, discussed or evaluated in the EA. It's just a fact that the public is very aware of and have expressed alarm and their concerns about the proposed clear-cutting treatments in the John Mountain area, so the EA's omission of this issue is odd. Why was this absent from the EA?

The project would result in adverse impacts to scenery.

Response:

Scenery Integrity Objectives (SIOs) incorporate varying amounts, duration, and scales of disturbance from forest management activities. The specific thresholds are defined for each Forest Plan management prescription. The effects of the proposed action related to SIOs, and also cumulative effects, are assessed in the effects analysis documentation and summarized in the EA; these documents are available on the project website. As noted above, we anticipate that restoring these areas would ultimately benefit recreation and tourism by improving the diversity, resilience, and health of the project area.

Comments:

The EA (p. 22) states that "Implementation of this project would not cause a change in scenic integrity objectives (SIOs) because the project area comprises a very small area relative to the large scale of project spatial bounds, and because the impacts are temporary." But in some senses everything that happens on a forest is "temporary" because trees grow back. SIOs can still be violated with "temporary" impacts, and scenery impacts can't be masked by pointing out the large portions of the rest of the forest that are not impacted. In addition, the EA should disclose and assess the cumulative impact on SIOs in combination with the Loblolly Project.
Another concern is the viewshed and recreational opportunities. As outdoor recreation plays an increasing part in the count's tourism economy, we must not destroy that resource.

The project would have an adverse impact on the Rocky Gap Horse Trail.

Response:

Several changes were made to the original proposed action to accommodate concerns expressed by horseback riders (refer to the Original Proposed Action subsection of the Alternatives section of the EA). We believe these changes lessen the visual impact considerably. Based on the proposed buffers and change to thinning instead of regeneration harvest, there would be shade retained on the trails and the undergrowth should be kept in check. The trail would be monitored and maintained as needed to keep it clear. Portions of the trail impacted by logging would be rehabilitated.

Comments:

Please reconsider clear cutting the Whetstone/Willis Knob areas. There are so many people who enjoy the equestrian trails up there. It seems that we keep losing land to ride. The other issue is that trees are important to our survival and also the animals that live there.

This email is in reference to the 40 acre clearing project for Whetstone. Please do not destroy our trails, alot of our shade and other areas have already been destroyed. We need these trails to enjoy horseback riding and nature.

My comments to that are to implore you to please do whatever possible to preserve the integrity of the horse trails and the access to those trails. The Rocky Gap trail system is one of the most beautiful areas in the country! Recreational users of many types travel to your forest to enjoy its peace and beauty and bring prosperity to local economies. Please take that into consideration as you move forward with this management plan.

I would also like to ask Mr. Wyatt what the plan is for restoration of the clear cut area. Will there be planting of more natural trees and management of undergrowth to prevent a messy tangle of weeds, vines and briars? Will there be erosion management to keep soil where it belongs and not wash across adjacent forest? Will access roads and trails that are damaged by the skids and logging equipment be restored such that recreational users of the areas can resume use of the area safely? I implore your agency to consider these mitigations as absolutely essential.

It has been called to my attention the forest service plans to clear cut the area around Rocky Gap horse trails. We have so few horse trails as it is now and then to have no shade and possible destruction of existing horse trails is very disconcerting. Even if you replant the area with some other type of tree, it will be at least twenty years before that area will be shaded and desirable to ride once more. I know I speak for other trail riders in our utmost desire to see some kind of shade and maintained trails in that area in order to continue to enjoy using the forest lands owned by we the people. If there is any reasonable way to clear cut this area but leave a border for the enjoyment of the trails, we would all certainly appreciate it.

It is certainly too hot to ride open land during the warm months and the esthetic aspect will certainly be lost with a clear cut along the trails. The wet bulb conditions in the SE are only predicted to get more difficult to tolerate during the warm months which keeps many of us from riding and camping. Having no shade is going to make it even worse and probably cause most to discontinue riding and camping in that area. I hope you will strive to maintain a balance between management of the tress and forest along with the recreational aspects of this area.

1. Leave a 25 foot buffer on either side of the horse trails.
2. Do not use the existing horse trails for skidding logs. Make a separate logging road.
3. When a clear cut contains a trail with no buffer, provide resources to re-route the trail around the clear cut. The work should be done by professional trail builders for long term sustainability and minimal resource damage.

I adamantly object to any expansion to the already planned clear cutting. You are already going to devastate the recreational use of the Rocky Gap Horse trails with this project. Every trail going out of the Whetstone Horse Camp and the Rocky Gap Day Use parking lot will require riding through a clear cut and there are no plans to re-route the trails around these clear cuts. I believe this will have an economic impact on the community as most of the equestrians that come to the Whetstone horse camp spend several days spending money in the area. There will likely be a great reduction in use as this will destroy much of the beauty they come here to enjoy.

The project would have an adverse impact on the recreational experience of wildflower viewers by destroying a population of lady's slipper orchids.

Response:

Although this species is not protected and appears to be secure in the southeast (NatureServe), a design criterion has been added to the EA for protection of the lady's slipper orchid site in Compartment 34, Stand 17, based on public interest in viewing this site. Information from NatureServe notes that Pink Lady's slipper "seems capable of surviving landscapes heavily impacted by forestry and of colonizing fairly early successional forest." NatureServe website references are from the following website (accessed July 31, 2019):

<http://explorer.natureserve.org/servlet/NatureServe?searchName=Cypripedium+acaule>

Comments:

#7: The lady slipper density on the site near John's Mountain/Harts branch is unusually large. Forest users have made pilgrimages to this particular site every spring to enjoy their beauty. The Forest Service proposed action will destroy them. This site is where users want to visit and is irreplaceable. When users find attributes they value within the National Forest, the Forest Service should be responsive to those user desires and wishes. Protect this site so the citizens can enjoy their forest as it exists.

Lastly, though Pink Lady Slippers are not PETS, there is an abnormally large population of these beautiful flowers in the understory of C34/17, as well as several species of native trilliums and other native understory species, and we request that this unique area be preserved, undisturbed. The native hardwood forest and herbaceous understory in C34/17 is well on its way to recovering, and clear cutting this area would be a travesty.

Soils and Hydrology

The project would result in adverse impacts through erosion and sedimentation.

Response:

Based on comments received on the draft EA, a site visit was held in December 2020, with key stakeholders in the Orr Mill Road area (Compartment 19, Stands 21, 23, 25, and 30) to address concerns. The issue was primarily with stand delineations not mapped correctly to the actual boundary of the white pine plantations. The map has been updated in the final EA.

Without additional information, it is difficult to assess how the study from the University of Oregon might apply to this project, as the study likely looked at study areas in the Pacific Northwest. However, slide potential, sedimentation, and the effects of temporary roads were included in the soils, hydrology, and aquatic effects analysis, which is summarized in the EA and available on the project website. No significant effects are anticipated.

The 303(d) designation for Whetstone Creek and consideration of that designation is now included in the aquatic effects analysis.

Additional effects related to erosion and sedimentation, and aspects of the project design for mitigating such effects, are contained in the EA and accompanying effects documents that are included on the project website

Comments:

We are surrounded on all sides by the areas you plan to clear cut: Tracts 21, 23, 25, and 30. The ecosystem of the forest surrounding my family's farm: The University of Oregon led a study on the dangers of intensive logging, and found that the logging, paired with the roads necessarily created in order to access the inner-forest, "have increased slide activity . . . by about 5 times relative to forested areas over a period of about 20 years." Increased slides in the area, wherein many streams, ponds, and lakes exist, could create a dangerous amount of sediment transport to, and through, the waterways of the Appalachian Mountains. This is not mentioning the possible increased sediment within privately owned wells (such as the one that provides clean water to my family) that many would have difficulty recovering.

I do not believe that the APD has sufficiently planned how to mediate the detrimental impacts of this plan to the region, particularly the impacts to sensitive riparian areas and the high quality water sources flowing through the proposed management area, not to mention the wildlife that relies on these ecosystems. Furthermore, the proposed clear cutting plans will contribute significantly to erosion and soil degradation in the area. The impacts this plan will have on wildlife, soil health, recreational use, and the private landowners within and around the management area are too great to move forward as is - this plan needs significant reworking with local landowners stewards of the Chattooga River watershed.

A Forest Service study by Dr. Van Lear at Clemson University concluded that the greatest source of erosion and sedimentation in the Chattooga River watershed is from Forest Service roads and associated activities. The White Pine Management Project involves building 10 miles (or more?) of new, "temporary roads," and a large amount of ground-disturbing activity, which could cause much erosion and sediment. The Chattooga River watershed normally receives very high amounts of rainfall, and regular, intense weather events that increase both the threat and probability of significant erosion and sedimentation from ground disturbing activities. We note that the EA's section on aquatic resources is absent discussion of baseline stream conditions, beyond disclosing that "no streams are 303(d) listed." This information is mentioned only once, in relation to nutrients including Phosphorous, Chlorophyll A, and Nitrogen. However, the EA neglects to acknowledge and disclose that Whetstone Creek is 303(d) listed for biological (sediment) impairment. Further, this is extremely relevant to issues raised previously concerning the proposed logging activities and the unknown access to C34/S17, C34/S18, C31/S4 and C34/S21 in the Swafford Creek and Harts Branch area. Considering that erosion and sedimentation is a key concern with the White Pine project's proposed activities, and Swafford Creek drains into the 303(d) listed Whetstone Creek, this is a glaring and important issue that the EA fails to acknowledge and address.

The EA frequently refers to BMPs as mitigating or preventing environmental impacts. For example, multiple statements in the Aquatic Resources section state that studies have shown that "utilization of BMPs, especially buffer strips... would keep turbidity/temperatures/etc. below these thresholds," and "provided that Forest Plan Standards...and South Carolina Forestry Best Management Practices are followed, the proposed action would have no adverse impacts on aquatic communities." However, for a real world example to the contrary, we note that in the ongoing Loblolly Removal Project, we've seen problematic erosion and sedimentation areas in the vicinity of Turkey Ridge Road area, and have also received multiple complaints about excessive erosion and sediment due to either alleged or obvious BMP failures. We request substantiation of BMP performance on the APD. Please provide any relevant, site-specific BMP monitoring data.

While the proposed enlarged, 40-acre exemption, harvesting area is across Chattooga Ridge Rd, it has the clear potential to create additional, excess, muddy runoff, as a result of clearcutting all this acreage. I have hundreds of thousands of dollars invested in my pond and this runoff can enter and pollute my pond by way of at least 2 runoff streams.....What will be done to prevent this muddy runoff from entering my pond?

The project would result in adverse impacts to streams.

Response:

The potential effects, including cumulative effects, were analyzed for water and aquatic resources. The normal width of streamside management zones in South Carolina’s Best Management Practices for Forestry is 40 feet either side of the stream. For trout waters it is 80 feet either side of the stream. For this project, we would exceed those buffers with a minimum buffer of 100 feet either side of the stream to be consistent with riparian management direction in the Forest Plan. Outstanding Resource Waters and trout streams were considered for the analysis. The research documented in the effects analysis and monitoring of timber harvest activity with implementation of BMPs on the Andrew Pickens to date has shown them to be effective at protecting streams and the biota in them, by minimizing any impacts to water quality. These activities are routine forest management practices in the area and across the region and there is abundant peer-reviewed research literature that documents the effects of such activities on streams and wildlife populations. Application of the BMPs would prevent significant buildup of sediment in streams, would protect streambanks, and would not result in an increase in the water temperatures of streams, as the riparian areas would not be altered, except thinning (which retains shade trees) in 3 riparian areas to promote growth of hardwoods. Accordingly, we would also not expect impacts to specific watersheds such as Fall Creek, Long Creek, and Whetstone Creek that would preclude meeting the desired condition for improving water quality in these watersheds..

Comments:

Even with use of appropriate BMPs, the cumulative impacts of the White Pine Project and the ongoing Loblolly Pine Removal Project could degrade high quality streams in the project area. The majority of the streams in the project area are classified Outstanding Resource Waters (ORWs) or TN streams, and both classifications carry higher water quality standards to protect aquatic habitat and maintain existing stream uses. Timber harvests associated with the two projects would be occurring on the district at the same time, and in some cases on adjacent stands. While the Forest Service states both projects will follow appropriate design criteria, standards, and BMPs to protect water quality, we do not agree that these issues have been given sufficient attention. The EA should thoroughly assess the potential, combined effects of concurrent and adjacent timber harvests in relation to nearby high quality streams.
This practice also includes the deterioration of water quality with increased disturbance of sediment and erosion.
I am very concerned about the effects that your actions will have on streams and water quality, not only in Mountain Rest, but in all the dependent communities downstream to which the hopefully un-silted water of Mountain Rest flows, all the way along the Savannah River Basin to the Atlantic Ocean. What we do to the water here will affect all downstream. Millions of people depend on the clean water which originates in our forests in a time where global need for clean drinking water is increasing at an alarming rate. In the proposed tracts for logging are many designated Outstanding Resource Waters. I expect that if this project does unfortunately proceed, the APRD will legally and actively adhere to the already published and established higher water quality standards to protect not only Outstanding Resource Waters, but also riparian areas, terrestrial and aquatic habitat, and to maintain existing stream conditions in the all areas of the proposed cuts. The type of clear-cutting proposed by the APRD for many tracts in the White Pine Management Project have historically been shown to destabilize streambanks, reduce shading that will cause water temperature increases in stream beds, and increase flooding water run-off and subsequent sediment build up in waterways. This must all be prevented.
3. The Sumter National Forest Land Management plan lists water quality as a special concern for suspended sediments in the Chattooga river watershed. Fall Creek, Long Creek, and Whetstone Creek watersheds are included in the overall areas of harvest and are designated as having had diminished water quality in the LMP. The proposed action would undo the progress made in improving their water quality, running counter to the desired condition listed in the Land Management Plan for those streams. Thus, the agency is taking actions which will ultimately degrade the resource it's charged with protecting under the Wild and Scenic Rivers Act. How is this

acceptable? The Forest Service needs to understand that protecting the river means protecting the water that flows into it.

Secondly, the unknown damages this project could have on streams and the animal populations in the area could have a profound effect on the delicate ecosystem of our area.

The project would result in adverse impacts to well water and water used for agricultural uses.

Response:

We looked at these areas along Orr Mill road with the stakeholders in December 2020. In actuality, a wider buffer zone than was depicted on project maps would occur, because white pine plantation stand boundaries were incorrectly mapped too close to private land. This will be updated in the final EA / map. Based on this updated information, the stakeholders' concerns about the drinking water wells appeared to be alleviated.

Additionally, herbicide risk assessments were completed for this project and are available to the public. The method of application is directed foliar spray or stem injection. No broadcast herbicide application is proposed. This, in combination with multiple forest plan standards related to pesticide use, greatly reduces the risk of drift or contamination of water supplies, ponds on adjacent private land, etc.

Comments:

...Your proposed cuts in said zones will disrupt the farms water source which in turn will harm their community farming goals and their own drinking water which I can testify too being the cleanest I have ever drank !...A wider buffer zone around the farm would and could be an option you could look at , yes ?

Watershed Safety for Family & Farm : We drink from well water tapped from the watershed directly downstream from targeted areas (tract 25 and especially tract 30). We have serious concerns over the health and viability of our only water source. While I recognize the Safe Drinking Water Act doesn't apply to private wells that service under 25 people, I still don't want my loved ones, gardens, or livestock ingesting even trace amounts of glyphosate and other herbicides that will undoubtedly be applied liberally. Please, at least reconsider herbicide use in those specific tracts.

We have a 2-acre stream-fed pond that is the staple of our farm. We eat fish from it, and use it to irrigate our crops and livestock (not to mention the innumerable recreational benefits it poses). Potential watershed damages upstream, as well as excessive sediment deposition from road building, would have drastic effects on our viability as a small farm and our health/well-being. Additionally, increased windthrow from the development of tract 21 could have an extremely detrimental impact on the integrity of our dam, and the trees bordering the pond. It's an infringement in the utmost sense, and we will be regularly monitoring water levels & quality to pursue future litigation if detrimental effects occur.

Our home, our familys' homes and our summer camp runs off of well water, and not only that, but several lakes and ponds that are dear to us and quite solidly part of the ecosystem here are filled by springs that are located in the clear cut area. Clear cutting more than 40 acres at a time is not only going to have a major effect on erosion and sedimentation, which can clearly be seen in other areas where the loblolly project has already taken place, but...

The threats of sedimentation and glyphosate to our only source of clean drinking water, as well as water for crop/livestock irrigation, and recreation. We exclusively rely on well water for all of our personal and agricultural needs - please do not jeopardize the integrity of that source.

Pesticides should not be used because of impacts to the environment, especially potential contamination of water sources.

Response:

As stated above, herbicide effects are documented in the risk assessments. Herbicides would only be used as needed to meet project objectives with targeted foliar spray and stem injection methods of application. Broadcast spraying is not proposed, and herbicides would not be used in riparian areas. Based on the types of treatment proposed and the numerous forest plan standards related to pesticide application, it is not anticipated that herbicide use would have a significant adverse impact or have notable runoff into waterways.

Comments:

<p>... specifically Tracts 1,2, 25, 12, and 30. My time in that part of the world, ... make the clear-cutting of those stands, and further long-term degradation of the land through the use of herbicides, particularly intolerable. Please reconsider the inclusion of those stands with the knowledge that that land is well-loved as it is now. The complete destruction of that land through clear-cutting will cause significant harm not just to the ecosystem, but to the hearts and livelihoods of those nearby. This project may be intended for the long-term benefit of the forest and for humans, but the short term affects, especially for those of us who will not live to see the forest returned to a healthy state, will be incredibly detrimental.</p>
<p>And then you propose to spray herbicides on the cut areas! I am opposed to the use of herbicides on federal lands, especially near my property and watershed which is downhill from Track #21, which you intend to clear-cut and subsequently spray.</p>
<p>I am similarly concerned about the use of herbicides as methods to reduce cost for killing trees that are not economically viable. While I realize that this reduces the cost of the project overall, and reduces the likelihood that the White Pine will grow back, it still seems irresponsible to use herbicides in ways that create runoff, and it seems almost impossible to use herbicide in a way that will not to some degree leech into water sources or simply into flora that was not intended to be harmed. I would prefer that herbicides not be used at all, despite the economic disadvantages of not doing so. However, those involved with this project have obviously attempted to create a plan that overall is helpful and healthy for this ecosystem. With that in mind, it seems like you could understand why herbicides would be harmful to the ecosystems affected by this cutting, even if refusing herbicides does increase economic cost.</p>
<p>Though I understand the importance of forest diversity and ecological restoration, the proposed project does not account for the lasting impacts that my family will witness over the next 20 years or more, including herbicide runoff into the streams and lake on our land, the disruption of migratory corridors, increased erosion and soil pollution, and inevitable issues involving road construction through delicate ecosystems and invaluable old growth stands.</p>
<p>it will also have a harmful effect on the ecology and ecosystem. The "purpose", you say, is to restore native tree populations, which we appreciate, but there is a clear disparity between the methodology and the "desired outcome". Clear cutting massive swaths of land, spraying glyphosate indiscriminately, ignoring old growth stands, and building temporary roads are all at odds with what it actually means to restore a forest. Please reconsider your methodology and take into consideration all the folks up here who steward the land that they live on and who will be negatively affected by the current policy of this project for years to come.</p>
<p>#3: Herbicide use: all directions for herbicide caution against use near streams due to the negative impact on life in those streams. No other analysis is needed.</p>
<p>My home since birth is surrounded by sections 21, 23, 25, and 30 of the proposed project area. My home's main water source is fed from these areas. My family has both a well and a 2-acre pond on our property that are in the watershed from the proposed areas. These water sources could be contaminated by the herbicides which are cleared to be used in this project to a marginally excessive degree. My family along with all animals we care for on the farm use water pumped from the well for both consumption and use in such ways as hygiene and cooking. We use the lake as a source of fish to eat, to water plants, and it is used in recreational activities. Due to this I am highly against the actions taken so close to my family's home.</p>

The project would result in adverse impacts to soils.

Response:

Both the White Pine EA and the Loblolly EIS recognize impacts to soils. The White Pine EA is not indicating that there would be no impacts, rather that the impacts would not be significant. Meanwhile, the Loblolly EIS simply states what the impacts on soils are without a statement of significance of those impacts. Ultimately, there is not a contradiction in the analysis between the loblolly EIS and the White Pine EA, as the analysis approach for each document is different. An EA is prepared to document if significant impacts may exist that warrant preparation of an EIS which would further analyze those impacts.

Impacts to soils and other resources were considered in the effects analysis and the results are summarized in the EA. Although younger forests would likely have less dead wood, so possibly lower populations of detritivores, we would not expect a significant decrease in soil nutrient availability. Nutrient inputs would be expected to increase from the decomposition of logging slash left onsite as well as an increase in vegetation resulting from exposure of the ground to full sunlight. Water retention would be expected to decline initially, but as compacted soil is ripped/plowed and re-vegetated with increased understory vegetation, water retention would be expected to recover.

The proportion of the project area impacted by detrimental soil disturbance is determined by estimating the “footprint” of this type of disturbance from implementation activities. The primary sources of this disturbance for the white pine project would be from logging skid trails, log landings, and temporary roads. The extent of disturbance estimate is compared with overall project acreage to arrive at a percent. More detail is provided in the EA and supporting effects analysis documents contained on the project website.

Comments:

Comparing the White Pine and Loblolly NEPA docs is also relevant for assessing impacts to soils. The White Pine EA (p. 18) states that “the proposed project would not result in significant impacts to soil resources, because of application of project specific design criteria and adherence to Forest Plan standards and best management practices for forestry. The proposed action would also not result in a significant cumulative impact, as other ongoing activities and projects, especially loblolly harvests would also comply with applicable standards and best management practices to minimize adverse impacts to soil resources.” However, the Loblolly EIS (p. 277) states that “soil disturbance would be evident from logging activities. The action alternatives would have long and short-term direct negative effects on forest soils. Effects to soils include: compaction, rutting and displacement, disturbed litter layer and soil organic matter.” If the Loblolly Project would have long and short-term effects on soils, we expect that the White Pine project would as well. In addition, the APD indicates (EA, p. 17) that it expects detrimental soil disturbance to be limited to 2% of the project area. How was this determined?

Additionally, because younger, managed forests consistently display smaller populations and diversity of detritivores, fungivores, and xylophages, we can expect to see a decline in nutrient availability, water retention, and nitrogen in the soil in surrounding land which will directly threaten the health of our own soil and, therefore, my family’s land and home (Mcdowell et al., 2020).

I would like to urge that the scale of the White Pine Management Plan be reduced. As it now stands, it will negatively impact soil, water quality and wildlife corridors.

Streams as well as old growth forests need to be considered. I do not think the pros are worth the cons here: soil degradation, disrupting migratory corridors, endangering old growths.

The Chattooga River watershed should be protected.

Response:

Protection in the context of the Wild and Scenic Rivers Act does not preclude forest management. Based on our effects analysis and practical experience with similar forest management activities, we believe the proposed action, subject to the Forest Plan standards, project specific design criteria, and BMPs, will protect the outstandingly remarkable values of the Chattooga River and its environs, and will restore more natural, diverse, and resilient forest communities.

Lake Tugaloo sediment accumulation is not proof of mismanagement. Because of the nature of the soils, topography, and hydrography for the watersheds connected with Lake Tugaloo, a naturally occurring amount of sedimentation is a normal dynamic even in the absence of forest management. This lake is roughly 100 years old, so it would be expected that considerable sedimentation would have occurred over the past century, especially given the type of soils in the watershed.

The proposed action is subject to riparian management restrictions in the Forest Plan and BMPs as described above in other comment responses relative to sedimentation and erosion, streams, and soils. As streams and water quality are anticipated to be protected as previously described, tributaries to the Chattooga River and the Chattooga River itself are not anticipated to experience significant adverse impacts such as those described in the comments.

Comments:

the wild and scenic rivers act states: "...and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." Section 12 of the act states: "...to manage any lands which include, border upon, or are adjacent to any river included in the act as necessary to protect them in accordance with the purposes of the act." The clear cutting on Swafford Creek/ Harts Branch, Whetstone Creek, and Longcreek tributaries are not protecting these lands as described in section 12. The forest on all tributaries to the Chattooga should be left alone to allow time for the landscape to revert back to its natural state and protect them in accordance with the language of the Act. To protect the river, the water that flows into it must receive equal protection called for in the Wild and Scenic Rivers Act.

The long term effects of Forest Service management of the lands within the Chattooga watershed has resulted in sedimentation of the upper reaches Lake Tugaloo. This reach is isolated to direct input from only the Chattooga. The first mile of the lake from the river outlet is often only inches deep, filled with sand and sediments directly from the Chattooga and its watershed which flows primarily from USFS lands. The lake is often inaccessible to all but the most shallow draft vessel, denying recreation access to the public and decreasing storage capacity of the Ga. Power hydroelectric facility, a non carbon producing power plant that is vital in helping combat carbon pollution of our atmosphere. Lake Tugaloo sediment is physical proof that Forest Service management practices have not been in accordance with the purposes of the Act.

#18, 19, 20: These areas should be left alone as they impact creeks directly feeding the waters of the Chattooga. The streams flowing from these lands will be negatively impacted by the proposed actions, a likely violation of the Clean Water Act. Also, destroying the forests will negatively impact those who use them for recreation. The current LMP lists many of the creeks within the scope of this action in need of improvement. These proposed actions will undo years of water quality improvement and is contrary to the desired future condition put forth in the LMP.

In addition, many of the stands your district plans to log are very close to the Chattooga river watershed. The even aged logging of up to 40 acres of forest could increase erosion to the river and nearby tributaries, leading to a change in water chemistry and a worse habitat for the local wildlife. Creatures that dwell in the river and creatures that use the river and surrounding tributaries for drinking water would be directly impacted. Beyond the wildlife that use the river, increased sediments could lead to an increase in blue green algae, which produce toxins that are harmful to the many humans that recreate in the river. During the summers, the rafting outposts that operate on the Chattooga send upwards of 300 people rafting nearly every day. Added to that 300, many locals and visitors to the area privately raft, kayak, and play on the numerous beaches down the river all year long. The increased erosion from even aged logging affects every single one of those creatures and humans who just want to spend a wonderful day in one of the most beautiful places on Earth.

I wanted to register my strong objections to any form of clearcutting rather than selective forest management in the Chattooga watershed. The forestry directives in this National Wild and Scenic River watershed should be as clear as the water that runs through it:

1. You can't protect the river as directed by the wild and scenic rivers act if you don't protect the water that flows into it.
2. Leave the entire Chattooga watershed alone and manage it for recreation and water quality should be the change we seek.

I'm equally concerned about the herbicide treatments applied to this area because of its close proximity to the Chattooga River. The riparian zone is not long or wide enough to absorb the amount of herbicides that will be applied to this area without having them leak into the Chattooga River.

I am also concerned about the stands that border Reedy Creek. The erosion from the removal process will increase the sediment load flowing directly into the Chattooga River.

Vegetation

The project would contribute to establishment and spread of Non-native Invasive Plants.

Response:

The statement of no effect was a mistake in the write-up as evidenced by the remainder of the analysis in the Invasive Plant Species section of the EA which did acknowledge the potential for impacts from the project. The effects analysis for NNIS has been updated to reflect that. Ultimately, although the project may increase the risk of invasive species establishment and spread, that effect would not be significant because of project design criteria, forest plan standards, and an active NNIS treatment program on the district which would minimize potential effects. The ongoing NNIS treatment program includes identification and treatment of kudzu locations.

Comments:

Page 16 of the EA states that "no direct or indirect effects related to the threat of establishment or spread of invasive plants are anticipated. No cumulative effects are anticipated, because other projects that could contribute impacts are also subject to the same Forest Plan standards, SC BMPs, and similar project-specific design criteria." This is not true, and exemplifies that the EA's "hard look" at this issue has not occurred. According to the Loblolly Environmental Impact Statement (EIS, p. 277), that project would "increase sunlight and soil disturbance to the forest floor, which has the potential to spread or increase already existing populations of non-native invasive species (NNIS) in the project area. Mechanical equipment can inadvertently bring in seeds of invasive plants as can material and seed used for soil stabilization." If the Loblolly Project has the potential for proliferating NNIS, then surely the White Pine Project would too.

Additionally, we struggle with an incredibly endemic abundance of Kudzu around our farm and upon this mountain. Clearing land so brazenly would only aid this opportunistic species in claiming more land, choking out more biodiversity, and causing us stewardship headaches for decades to come. Maintaining a small family

farm is difficult enough as is, please do not add encroaching and totally encompassing Kudzu to our list of land management responsibilities.

The project would adversely impact sensitive vegetation.

Response:

Federally listed protected, endangered, sensitive, and threatened species are subject to protection and addressed in the effects analysis and project design criteria. Other species have populations that are large and stable enough to withstand disturbance from forest management activities at the scale presented in the proposed action. Some plants actually thrive on disturbance and an increase in available sunlight and growing space that results from timber harvest. Individual plants or groups of plants may be affected, but populations would remain stable.

Although the Oconee bell is a species of management concern, none were identified in botanical surveys of the project sites (stands). Occurrences outside the project stands, especially along creeks, would likely not be affected by the project, as riparian areas are not included except the 3 sites proposed for thinning. We welcome new information on Oconee bell occurrences to check that with our records and provide for their protection if they occur inside the project stands.

Comments:

Species of fungi and plants that exist in the area may be permanently damaged and endangered by the loss of their ecosystem, including: Polyporaceae, Morchellaceae, Monotropa Hypopitys. Thousands of plants that exist upon and between the roots of the trees

The stand of trees to be removed in the woodall shoals area is home to an amazing amount of mountain camellias and other sensitive flora specific to the Chattooga River watershed. Removal of these stands (although they are a monoculture) and temporary roads built to remove them will negatively affect the biodiversity of this area.

I am very concerned about the effects of the White Pine Management Project on rare or sensitive species. We have one confirmed Oconee Belle plant along our creek, in an area not far from your proposed logging activity. This is a sensitive species that deserves an extra level of protection.

The project would adversely impact old growth forests.

Response:

The Forest Plan acknowledges the importance of and need to manage for old growth forests. Proposed project treatments are confined to second or third growth white pine plantations that are less than 50 years old. Based on comments received to the draft EA, we have updated the effects documentation and the EA to clarify old growth inventory status, the Carson Old Growth study, potential effects to adjacent potential old growth, and the terms possible, future, and existing old growth.

Approximately 1/3rd of the acreage proposed for treatment is for uneven-aged management in acidic coves where white pine is ecologically suited. These sites could eventually develop into old growth forests. On the other sites covering the remaining 2/3rd of the project acreage, these are upland sites where white pine is not well-adapted. Even if left alone, it is unlikely that these white pine stands would develop the characteristics of old growth. Regenerating these plantations to mixed yellow pine/upland hardwood forests, which are better adapted to the sites, is the best chance for eventually having old growth forest conditions on these sites.

During a field trip in December 2020 with key stakeholders who live in the Orr Mill road area, we confirmed that a number of stands identified by commenters as potential old growth are not included in the proposed action. Proposed treatment stands located adjacent to possible old growth can be managed to restore better adapted forest types and more structural diversity without significant adverse impacts to the stands of concern.

The proposed action would not eliminate forested landscape corridors. Impacts from clearcutting would be short term. The project retains forested areas as forest for the long term; the timber harvest is to regenerate the forest, not eliminate it. It would increase the species diversity of those corridors by converting upland white pine plantations to mixed yellow pine/upland hardwood forests. It would increase the forest structure diversity in the corridors from a predominately closed canopy mature or mid-aged forest to corridors still dominated by those structures but with patches of young forest (upland sites) or uneven-aged forest (coves) scattered along the corridor, providing a more diverse array of habitats. At a landscape scale, distribution of young forests, such as those that would be established by the proposed action, is disproportionately low, similar to old growth. The proposed project would not modify allocations and desired conditions for old growth.

Comments:

#10: The purpose and need can be met by leaving the forest alone to heal itself. Proposed Forest Service actions mean there will never be an old growth forest on the lands affected by current plans. This is an example of the outdated LMP: there are no options to leave the forest within the watershed un-disturbed. The multiple use doctrine of the Forest Service should be expanded to take into account these desires of the public.

Old-Growth Stand Damage : We are surrounded by some extremely rare old-growth stands on Orr Mill Road, and believe that protecting their integrity is vital to the health of our ecosystem. The language used in the old-growth section of your EA is weak, suggestive, and seemingly inconclusive: "The district has not inventoried nor monitored the identified stands for existing old growth."...."these two stands indicate they likely meet Region 8 old growth criteria".... Do they or do they not meet the criteria? That same Forest Service document you cite from 1997 states that "...future decisions made regarding old growth on national forests during forest plan revisions will be based on sound ecological principles and on consideration of the many social values throughout the region ." The decision to clearcut so closely to these stands after admitting to not properly inventorying or monitoring them seems flippant and in total disregard for "sound ecological principles" and the deeply personal social values our community has towards our old-growths. " Potential impacts to these stands from project activities would be the same as the indirect effects described in the preceding paragraph...The integrity of these adjacent stands, including their old growth characteristics, would not be impacted by the project because no treatments are proposed in them and because of their protected position on the landscape." What if the potential impact isn't low? Is there accountability anywhere if the impact to old-growth woods exceeds your current valuation (or lack thereof?)

<p>The EA should acknowledge the importance and act upon managing portions of the White Pine Project area to restore a functional old growth network. Of all the habitats in eastern North America, old growth forests are the scarcest—and this is especially true in the APD. Meanwhile, the EA states (p. 14) that “During scoping, two stands adjacent to the project area, and identified in a 1995 study as old growth, were noted by the public (Carson [sic], 1995), and concern was expressed about potential impacts from the project to old growth forests.” The EA also states (p. 11) that additional old growth stands “considered by some commenters to be old growth” were identified. First, we must reiterate that this “1995 study” was not performed by a random dilettante, it was produced by the USDA Forest Service. Second, our scoping comments identified several old growth stands in the project area as per the 1995 USDA study, specifically in the vicinity of Swafford Creek, Sandy Ford Road, Mongold Gap, Big and Little Stakey Mountains near Orr Mill Road, and Ira Branch near the Chattooga Wild & Scenic Corridor. Further, we determined that all of these old growth areas are contiguous with, or near, the proposed white pine timber harvests and/or the ongoing loblolly pine clear-cuts. The rare old growth stands in the project area should of course be preserved, and managed through establishing a connecting network of intact native forests, rather than surrounded by the disruptive silvicultural practices of clear-cuts, prescribed burns, and systematic herbicide treatments.</p>
<p>More specifically, I have concerns about how the overall project will affect pocket stands of old growth in Mountain Rest, many of which still exist in areas not easily logged in the 1930’s. I am concerned that, even if the APRD does not actively or intentionally cut any of these trees, that your logging project will ultimately affect the overall climate, temperature, and humidity level of our sub-tropical local forest and ultimately negatively impact those trees and the forest as a whole. Large tracts of uninterrupted forested areas, not traversed by roads, are widely accepted as being key to the overall health of fauna and flora in any forest, ours included. Research demonstrates conclusively that large, undeveloped, and connecting landscape corridors allow species to move through areas that are both ecologically rich and more resilient to climate change. Your proposed cutting actions will leave areas of the forest completely denuded, decrease its ability as a living organism to moderate temperature, and disturb wildlife that is dependent on wide expanses of uninhabited areas for survival.</p>
<p>According to the section on old growth in your Environmental Assessment, there is no inventory or detailed documentation of the old growth within and near the proposed 1,261 acres where the deforestation is planned to occur, meaning that lasting impacts of the clear-cut on the old growth in the area are certainly being overlooked, opening the door to many greater impacts than just the loss of these ancient trees. Lack of old growth (and/or harm to old growth stands) is a major contributor to a global lack of stability in our forests, as demonstrated by Mcdowell, et al. in Pervasive Shifts in Forest Dynamics in a Changing World. In a time when we are faced with rising carbon dioxide levels, heightened temperatures, and excessive global pollution, stable forests are one of our final hopes in repairing the damage we humans have already done to the earth and the remaining old growth we have can and should not be risked.</p>
<p>look further into the impact it would have on the old growth stands in the area, and follow the 40 acre limit as clearly outlined in the 2004 Sumter Forest Plan. Based on our current situation as a global community, we cannot underestimate the value of old growth stands and intact forests in regards to their impact combating the damages caused by pollution, carbon emissions, and major deforestation.</p>
<p>Concerns to me are the negative impacts to old growth, recreation resources, soils, erosion and sedimentation into streams, and the cumulative impacts of clear-cutting across the landscape.</p>
<p>Because the proposed acreage to be clear-cut is so vast and does not fall within the designated 40 acre limit as cited in the 2004 Sumter Forest Plan, it seems unavoidable that local old growth will be directly affected despite these trees’ “protected position on the landscape” and we locals fearfully expect to see these impacts take place on a very large scale.</p>
<p>Were the Forest Service truly practicing its self-described use of “sound ecological principles,” the vulnerability and importance of neighboring old-growth stands would be a priority subject, attended to with specific inventorying and documentation along with detailed projections of impact caused by neighboring deforestation.</p>
<p>Also, more care should be taken with the old growth forests. Please put more time into this project and don’t just clear cut it all.</p>
<p>Old growth forests need to be valued, particularly for their scarcity.</p>

<p>There are few old growth stands left in North America, and those that still exist should be protected and cared for at all costs. I believe that those old growth stands that exist within the Andrew Pickens Ranger District, including those on Swafford Creek, Sandy Ford Road, Mongold Gap, Big and Little Stakey Mountains near Orr Mill Road, and Ira Branch near the Chattooga Wild & Scenic Corridor, would be better served by being surrounded by healthy forests as opposed to clear-cuts, herbicides, and prescribed burns. Although I agree that it is important and beneficial to remove White Pine and replace it with more ecologically appropriate trees, I think we need to be sure that we do not inadvertently harm to the few old forests we still have in order to try to make things better.</p>
<p>While logging the planted white pines may increase the likelihood of the forests returning to a truly native state, there are many stands of old growth forests that are still in their native state in and around the areas the Andrew Pickens ranger district plans to log. As time goes on, old growth forests are getting smaller and rarer in the Southeast. This should mean we strive to protect them even harder. Keeping a buffer around those stands of old growth, and opting to let the old growth continue to stand untouched will preserve habitats for much of the local wildlife. Old growth forests are integral for the health of the local ecosystems.</p>
<p>As to the White Pine EA: The Forest Service needs to manage the forest to restore a functional and connected old growth network. That would mean not surrounding old growth areas with clear cuts, prescribed burns and herbicide treatments.</p>
<p>the proposed cut area contains rare old growth stands which are priceless and irreplaceable. It is imperative to care for these stands by creating a network of uncut, unburned areas, as well as areas that are not treated with pesticide.</p>
<p>I dream of the day we might have trees that resemble something closer to old growth trees. ... Instead with the proposed exemption, scarred and scraped acreage will be in its place.</p>
<p>#16: There will be no new old growth forests if this plan is implemented. Leave the landscape within the Chattooga watershed alone so future generations will be able to experience old growth forests.</p>
<p>The detrimental effect of cutting, burning, and spraying around old growth forest stands. These careless actions are an acceleration of climate change, and a detriment to old growth restoration, which is an erasure of this area's landscape, history, and ecosystem connectivity.</p>
<p>First of all, I feel as though this project has failed to take into account the value of the old growth stands within this area. Please do adequate research and protect this rare and vital forests.</p>
<p>Make no further addition of new old growth inventory allowances at the project level. Old growth areas are already emerging in areas restricted from active restoration management. Old growth should not be allowed to overtake the NRV in areas where regeneration management can occur.</p>

No clear cutting should be performed.

Response:

Sometimes, as in the case with the proposed action, clearcutting is the most logical course of action for conservation. We are proposing to convert artificially created, poorly adapted plantations to mixed species forests that would naturally occur on these sites. For stands where white pine fits the ecological classification (generally lower slopes and coves), thinning and small group openings are the proposed action. These treatments represent about 1/3rd of the acreage of the proposed action.

For upland sites, white pine plantations are outside the natural range of variability. These are poorer quality sites that have an historically frequent fire regime. Dense white pine stands are inconsistent with such sites. The objective is to replace the white pine with a mixed forest of better adapted species. The white pine cannot be replaced unless it is all removed. Economic efficiency is not the primary driver for creating openings larger than 40 acres. For stands proposed for conversion from white pine to mixed yellow pine/upland hardwoods, we don't want to leave patches of white pine simply because the existing plantation is larger than 40 acres. We are proposing to convert the whole stand, because white pine does not fit with the ecological classification for these sites.

Based on the research documented in the project record and on experience with the loblolly removal project with similar objectives for the new forest type to establish, new young forests are established approximately 5 years following harvest with full canopy closure 10 to 20 years following harvest. The natural resource-related impacts of clearcutting are temporary and not irreversible.

Comments:

<p>Please conserve these forests. Do not allow this area to be clear cut!</p>
<p>The possibility of more broadly thinning rather than clear-cutting, which would significantly setback the natural restoration of these old pine stands that has already been occurring for the last 40-50 years. Your plan to implement mass clear cutting serves a gross dramatization of your stated goal of “natural restoration”, which is already happening and could be aided by responsible and thorough management. We have yet to be given reason as to why this project has so strongly advocated for even-age “restoration” of these pine-dominated forest stands, as opposed to the less-invasive procedure of benign neglect or, at the bare minimum, light thinning of canopy gaps not exceeding a 1/4 acre. One is left to believe that the decision making process here is solely driven by economic ease and efficiency of the timber harvests.</p>
<p>The project will dramatically impact the intake canopy of this area as well as community value for those who have private parcels backing up into the allotment. In partnership with the Chattooga Conservancy, I am urging you to re-evaluate your clearcut proposal and proposing an extension of the group selection harvest. The damage of a clearcut is irreversible. The community type will not reach a secondary forest for generations to come.</p>
<p>2. The argument that it would be more efficient to expand clear cuts is specious since efficiency is not the primary goal of the Forest Service in managing our nation's natural resources. Applying that rationale would negate any existing limitations in Forest Service best management practices. History has shown clear cuts are the most efficient means of harvest timber. Fortunately, efficiency has not been the primary driver in Forest Service decision processes, nor should it be introduced in this case.</p>
<p>Why after decades of technical advances in forestry management is the USFS still doing clear cuts? A forty acre cut is a terrible idea but increasing it to hundreds is malpractice.</p>
<p>I am especially concerned about the use of clear-cuts for so much of this project, as well as invasive temporary roads and the likelihood that this cutting will negatively impact stream health in many areas. I understand that clearcutting and temporary roads reduce cost and increases profits, making projects with native and ecologically appropriate forest regeneration more tenable. However, I worry that the short-term negative impacts will outweigh the long-term benefits of all of these things. I do not think it is wise to critically degrade current ecosystems with the hope that in the future, they will grow back stronger. I think those involved should reconsider the reasoning behind the 40-acre limit laid out for clearcutting by the 2004 Sumpter Forest Plan. Even in the event that it is legal to exempt this project from this limit, it does not mean that it is morally right, or best for the human and non-human inhabitants of the Andrew Pickens Ranger District. I would argue that in fact it is not, due to the degradation and danger that it would cause to the flora, fauna, soils, riparian zones, and the humans that are affected.</p>

Project should reduce the amount of logging.

Response:

Breaking the sites up into small 10-acre portions could actually result in more environmental impacts than treating it all at once, because it would result in multiple entries over a short period of time, re-opening temporary roads, skid trails, etc. The extent of logging is focused on those areas which warrant treatment to move the project area toward desired conditions by replacing white pine plantations.

Comments:

There are other options for the Andrew Pickens ranger district's White Pine Management Project. My personal favorite is to not log at all. However, I try to be a realist. Perhaps instead of logging up to 40 acres at a time, and close to 2000 acres in total, do less than 10 at a time, totaling much less. When the forest has had time to recover from that logging, cut another 10 or so acres. That is still a large enough area for the ranger district to get the money you would like, and a small enough area to not devastate the local ecosystem for decades. While I understand that the ranger district must make money somehow, I urge to please rethink the White Pine Management Project. There are many implications of the project that affect the ecosystem and the community. Cutting down trees, on a smaller scale, can be beneficial to the woods and the forest. Large scale clearing of the woods does not help make the forest healthier, it removes many of the trees and land that make the forest healthy.

Project should not focus on restoration of shortleaf pine.

Response:

Shortleaf pine/upland hardwood forest types were historically prolific across the district landscape. In the past 2 decades, discoveries by the research community about fire dynamics in the southern Appalachians has improved the understanding of the ecological importance of these fire-adapted forest community types. While mature forests of shortleaf pine/upland hardwood are still common, regenerating young forests of this type are becoming increasingly rare on the district and across the southern Appalachian Mountains. More detailed information regarding this research is available from the Shortleaf Pine Initiative (<http://www.shortleafpine.net/>) and in Fire History of the Appalachian Region: A Review and Synthesis (USDA 2017; <https://www.appalachianfire.org/research/2017/2/15/fire-history-of-the-appalachian-region-a-review-and-synthesis?rq=Fire%20history>)

The proposed action is not to replace one pine plantation with another; it is to restore mixed shortleaf/Table mountain/pitch pine with upland hardwood dominated forests; mainly hardwood species that are frequent fire-adapted such as dry-site oaks and hickories. The proposed action may give the appearance of intending to establish pine plantations, given the tree planting parameters, but the hardwood sprouts come up with the planted pines for a mixed species stand. The pines are planted at a density that allows mortality such that a mixed pine/hardwood forest would result when the stand is fully established. Establishment of mixed pine/hardwood stands is consistent with recent research as well as other data such as Bailey's ecoregions.

Bailey's ecological land classification is a regional dataset, intended and useful for looking at much larger landscapes (e.g., the entire Southern Appalachian region). Bailey's was not designed to be used at the project level scale. It is much coarser in accuracy than the datasets used for this project, such as ecological zones by Simone et al, Landfire, Natureserve, etc. Before these newer ecological classification datasets were readily available, there were methods, such as combining Bailey's data with Forest Inventory Analysis (FIA) plots, that were used the data useful at a finer scale. However, the newer datasets (which built on the work by Bailey et al) are based on more rigorous modeling methods and

more accurate mapping data. The newer classification datasets are also consistent with the large body of learning gained in the past 20+ years about fire dynamics in the southern Appalachians. Additionally, our information regarding Bailey's ecoregions (<https://www.fs.fed.us/land/ecosysmgmt/index.html>), identifies the area as M221 Central Appalachian Broadleaf Forest--Coniferous Forest--Meadow Province. The description of this province notes that "the pattern of vegetation is complicated by topography and substrate" and notes the presence of "mixed oak-pine forest" and "open oak and southern pine stands."

The assumption that forest dynamics for shortleaf pine are the same on the Andrew Pickens as in the piedmont is flawed. Soil types are different, and topography and drainage are substantially different between the two zones. Little leaf disease is not believed to be native to the Andrew Pickens; to the best of our knowledge it occurs in isolated locations most likely brought in on contaminated bare root stock in the 1960s to 1980s. We now use containerized seedlings that use filtered water, greatly reducing the risk of introducing little leaf disease. To date, there has been no known occurrence of little leaf disease in any of the shortleaf plantings with the loblolly removal project.

Comments:

As with the Loblolly Removal Project, we believe the White Pine Project appears largely geared to replace one pine plantation (white pine and/or loblolly) with another pine plantation (shortleaf, pitch and/or Table Mountain). The APD is in the zone identified by Bailey's Ecological Land Classification (M 122) as the Central Appalachian Broadleaf Forest, that is composed of predominately hardwood species. Historical data supports this, and the APD's forestry practices should seek to restore a predominantly hardwood forest.

In addition, we question the efficacy of the ADP's work to propagate shortleaf pine stands across the district. The FY 2012 Monitoring Report for the Sumter National Forest states (p. 4) "The GIS database currently shows 3,077 acres of shortleaf pine on the piedmont districts, an increase of 20 acres from the 3,057 acres reported in FY 2011. However, because historic erosion from agricultural practices in the Piedmont Region has generally left few places where the soil is adequate to support shortleaf pine communities, the forest is unlikely to meet restoration objectives during the planning period. Shortleaf pine requires at least eight inches of well-drained to moderately well-drained soil in order to stay relatively free from little leaf disease. Thus far, the suitable areas found tend to be very small, isolated parts of ridges and flats." If this is true for the SC piedmont, it would certainly also be true for the APD, where soils in the mountainous terrain are still relatively shallow and damaged from the massive erosion and sedimentation that occurred during the turn of the century logging practices.

The extent of early successional habitat should be clarified and the district should increase creation of this habitat type.

Response:

We recognize there are several different biophysical settings/ecological zones within a given Forest Plan prescription, however, successional habitat proportions are managed by Forest Plan prescription and are analyzed accordingly in the effects documentation. The figures pertaining to early successional habitat and forest will be clarified in the final EA. Plan objectives are for the amount of early successional forest, and not for broader early successional habitat which includes other habitats such as wildlife openings. The effects of early successional habitat creation were considered in the analysis for impacts to wildlife.

When combined with the loblolly removal project, substantial gains would be made across the district with increasing the proportion of early successional habitat. We acknowledge the importance of these habitats for wildlife and these young forest habitat needs are documented in the biological assessment.

We welcome participation during Forest Plan revision, at which time we would consider the latest science in determining proportions of seral stages.

Comments:

<p>The EA's discussion of ESH is unclear, somewhat confusing, and appears to contradict Sumter Forest Plan standards for maintaining desired successional stage proportions. The EA (p. 20) suggests that the district's ESH target is in the 4-10% range, and that the White Pine project, in combination with the Loblolly Removal Project, would exceed this 10% threshold. The 10% ESH threshold is exceeded because together, these two projects cumulatively result in 11.5% ESH—and this total is without adding the APD's 368 acres of permanent wildlife openings and dove fields. Regardless, to take a "hard look" at this issue as required by the National Environmental Policy Act (NEPA), the EA should disclose where the cumulative total of ESH is or will be made on the landscape, including in what forest and ecosystem types. For instance, if the combined effect of the Loblolly and White Pine projects is to focus ESH in the one or two forest types, at the exclusion of others, the EA should disclose this and consider the resulting effects on wildlife.</p>
<p>It is discouraging that the scope of acreage was decreased by over 8% from 2,148 acres to 1,972 in reaction to comments. While these concessions resulting in less treatment may be reasonable, they nonetheless further reduce the proportion of young forest and diminish the ability to increase early succession forest in APD from less than 4% to the stated goal of 8%. Reduction in treatment acreage as a result of concessions needs to be offset with even-aged treatment of additional tracts.</p>
<p>For future planning, increase the APD young forest goal from 4-10% of total acreage to 12-14%. Such a goal is aligned with the consensus of science-based conservation direction including: State wildlife agency guidelines, The Nature Conservancy's Blue Ridge blueprint for a long-term conservation approach that promotes dynamic matrix forest, biodiversity, and natural disturbance regimes, and USDA 2012 Planning Rule to conserve species and manage forests to sustain ecological integrity and within the historic range of variation of natural disturbances and vegetation structure, as well as USFS Ecosystem Restoration Policy.</p>
<p>Acknowledge the necessity of young forest to species commonly associated with old growth forest including Cerulean Warbler, Woodland Thrush, and roosting bats [2-4]. Peer reviewed research concludes the necessity of adjacent regenerating clearings to these species.</p>

The EA should clarify where rare communities are located within the project area.

Response:

Old growth is not included with rare communities, because rare communities are a specific designation of the Sumter Forest Plan, which does not include old growth. Old growth is considered separately. Maps will be provided on the project website showing the location of rare communities and possible old growth stands.

Comments:

<p>The EA (p. 17) states "There are approximately 12 acres of rare communities located within the project area. These rare communities include springhead seepage swamp, herb bog, montane seep/alder seep, and cove forest." The EA does not disclose where these rare communities are located, or their baseline conditions. Old growth stands in the project area are noticeably absent from inclusion in the naming of known rare communities, and since they are indeed quite rare, we request that old growth stands be included. Also, specifically where are the 12 acres of rare communities located within the project area?</p>
--

Other Issues

The project would result in adverse impacts to Climate Change by eliminating the forests which act as carbon banks.

Response:

Information regarding potential climate change effects is provided in the EA and additional information is provided on the project website and the biennial Sumter monitoring report. The project would not remove or have a significant adverse impact on old growth. As such, the project would not have a significant impact on the benefits of old growth forests in combatting climate change.

Comments:

#21: What further study is needed to understand that destroying these forests which act a carbon banks will exacerbate climate change? This should be justification enough for halting this project.
3. Destroying the forests which act as carbon banks makes no sense given the climate emergency we face.
1. With global warming a real and present danger to our lives and livelihoods, the 40 acre exemption is foolish and counter productive towards combating global warming. Clear cutting our forests which act as carbon banks should be avoided in this climate emergency. The proposal to double their footprint will exacerbate this problem. It seems ludicrous for the Forest Service to stand behind scientific reasoning as justification for this project when science tells us the highest use for the forest is to leave it standing to combat global warming.
Landscape Ecology & Climate Change The White Pine EA falls short of employing a contemporary landscape ecology perspective to acknowledge and act upon the compelling need to address climate change. Rather, the EA discloses that the project “might temporarily contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions,” and features intensive crop tree management practices (clear-cutting, herbicides and burning) in prime areas surrounding the isolated old growth stands in the project area, that instead should be managed for old growth connectivity and restoration across the landscape to combat climate change. Clear-cutting tracts adjacent to, surrounding and/or in close proximity to old growth stands would continue to fragment the forest, disrupt natural wildlife corridors, and significantly delay the restoration of connecting corridors between old growth stands. Although the EA states that “mixed species forests adapted to the site would be more resilient than monoculture plantations,” we argue that mixed species forests are already naturally regenerating in many stands in the project area, and by the time the mixed species forests might be established after the proposed treatments, it will be too late. One of the best ways to address climate change is to restore a connected network of native old growth stands, joined by stands of mature forest managed for old-growth restoration, to create buffers and connecting corridors for native flora and fauna. Preserving and restoring a network of old-growth forests will help mitigate climate change, as old growth stands store large amounts of carbon. The time to act is now, and to swiftly incorporate old growth restoration and connectively in the White Pine Project area. These connecting corridors could be created and managed through benign neglect, or cut-and-leave and other appropriate silvicultural practices.
The old-growth sections you plan to remove with the white pine growths lend a hand to the natural, and incredible, biodiversity of the area. Another study done by Oregon State University found that: “The analysis of 519 different plot studies found that about 15 percent of the forest land in the Northern Hemisphere is unmanaged primary forests with large amounts of old growth, and that rather than being irrelevant to the Earth's carbon budget, they may account for as much as 10 percent of the global net uptake of carbon dioxide.” To destroy them, or even to cut around them, would be to begin dismantling the positive net carbon balance of the forests of North America. A network of native species of trees should be created in the place of the white pines removed, rather than a destructive cut being made and then abandoned for the next thirty years.

The project may impact cultural resources and surveys should be conducted to identify potential cultural resources.

Response:

Cultural resources have been surveyed in each stand in accordance with applicable standards and impacts to these resources would be mitigated by avoidance. If new sites are discovered during implementation, the Section 106 process of the National Historic Preservation Act would be followed to ensure appropriate protection measures are employed for eligible sites.

Comments:

I am very concerned about the potential anthropological and archeological impacts of the White Pine Management Project on Tract #21 particularly, but for all areas within the proposal, as well. Over the years, as we have gardened, we have found many "arrowheads" and some pieces of pottery as have most of the neighbors I know in my community. I live off Village Creek Road and it seems very clear the areas around my farm for miles were inhabited in the distant past, most likely by Cherokee, Iroquois, or Woodland peoples. I question, and would like to see evidence prior to the implementation of the White Pine Management Project, whether the same level of inspection and scrutiny has been applied to the culturally significant lands contained within the boundaries of Tract #21 and all tracts of land with in the proposed White Pine Management Project as a whole. I am not certain this has happened.

The project should not focus on economics.

Response:

Per the EA section on economics, the project would be economically viable, and as noted in the description of the purpose and need for the project the project is focused on restoration and not economic considerations. However, even if the project were not economically viable, the Forest Service considers use of a combination of timber receipts and appropriated funds for ecological restoration to be a good investment. However, we want to implement the project in the most cost-effective way possible in order to be good stewards of the timber revenue and taxpayer money.

If the primary driver of the project were economics, then the proposed action would be very different in order to maximize wood production. Regenerating the white pine plantations to mixed shortleaf pine/upland oak is less economical, however it is more beneficial from an ecological standpoint.

Shortleaf pine is declining across the southern Appalachian landscape. In the absence of fire and other natural disturbances to be allowed to occur unchecked across the landscape, neither shortleaf pine nor oaks are regenerating well in forests that are left unmanaged. Due to their lack of shade tolerance relative to other tree species on these sites, and conditions needed for regeneration, shortleaf pine (and other native yellow pines) and upland oaks/hickories cannot successfully regenerate underneath the white pine plantation canopy. If we leave the white pine plantations that are on upland sites unmanaged, we will eventually get stands dominated by shade-tolerant hardwoods, which are already overabundant on the district landscape and across the southern Appalachians according to ecological classification and historic reference data,.

Comments:

#22: how on earth can the Forest Service justify any project that is not economically viable in these times of huge deficit spending by our national government? Do your part to act financially responsible. This is our money you're losing.

Trees may make you money, but water is the key to life. Protect it, please. We don't need any more roads through the forest, we need less access by vehicles. Ancient and increasingly rare plants and animals deserve a wide-ranging contiguous habitat left to itself and we can help provide that by not doing this project. The small amount of profit you propose to make from this project will be lost in federal coffers quickly, road maintenance funds you need for the forest roads you already have that are in disrepair won't ever come back here, and you will actively prevent an already imminent and self-prescribed transition from happening for another 50 years. You purport to need to do this project to return our forests to their natural state, however, you then state that if you don't harvest the trees now that they will be non-viable as a forest product. It's contradictory, and if this project goes forward it will be the money that is driving this action more than a desire to do the Sumter National Forest right by employing common sense in the face of impending need. Leave it alone! Our forest is returning to its natural state, naturally, and it doesn't really need our help. Look it up, the definition of natural is, "existing in or caused by nature, not made or caused by humankind."

I am very concerned that the White Pine Management Project is being driven by economics and textbooks about how to manage and harvest forest products, not about what is best in the long term for Mountain Rest, Sumter National Forest, and all of us who live here. A more empirical and circumspect approach is needed in our times, a more global one dictated by the recognition that we live in a world where the long-lasting negative effects of deforestation and subsequent habitat destruction, even in smaller pockets, is clearly recognized. While I can appreciate your implied intention of returning the forest to its natural state, I strongly feel that leaving the local forest to regenerate naturally by allowing the pines in the proposed areas to die out and then promote the progression of an already well-developed understory of mixed broad leaf trees to continue to maturity is the best approach. Just because certain pine trees are "native" doesn't mean you should replant the cut areas predominantly with those pines, no matter how financially advantageous in the long run for the USFS or the APRD. Nothing eats pine cones. Your proposed actions would set this natural process, which is on the verge of happening through natural progression by your own admission, to be set back by decades. It seems the proposed cut, though mildly profitable, drastically hinders and delegitimizes the overall stated intention of "returning the forest to its natural state."

Prescribed fire application should be reduced.

Response:

Fire was historically a major driving force in shaping the types and arrangement of forest conditions, and maintaining these conditions on the Andrew Pickens, in particular on upland sites. Fire does not happen here as much as it once did, primarily because of suppression efforts to protect human life and property. Prescribed fire is used subject to fuel conditions and weather constraints such that the soil resources are protected. In the past 2 decades, discoveries by the research community about fire dynamics in the Southern Appalachians has improved the understanding of the ecological importance of fire on this landscape. More detailed information regarding this research is available in Fire History of the Appalachian Region: A Review and Synthesis (USDA 2017; <https://www.appalachianfire.org/research/2017/2/15/fire-history-of-the-appalachian-region-a-review-and-synthesis?rq=Fire%20history>)

Comments:

Fire does not happen here as naturally as you would like to apply it as an application for forest management. Please decrease the amount of fire applications to these sensitive areas that are undergoing significant changes in temperature due to coverage and soil chemistry for a number of reasons.

The project would result in adverse impacts to adjacent private landowners.

Response:

A December 2020 field trip with property owners revealed mapping errors with the actual white pine plantation boundary. The final EA map will update the delineation to show that most of the property is buffered by natural forest that will not be treated. In addition, riparian areas would not be treated. We recognize that forest management activities temporarily disturb adjacent residences. We also recognize that forests are dynamic, and that this area of the Andrew Pickens district is a working forest. We believe the ecosystem benefits of the proposed action justify the temporary inconvenience.

Thinning would not meet the purpose and need of the project to replace existing white pine plantations on upland sites with forest communities that are better adapted to such sites. Implementation of the proposed action would not damage adjacent property. We have considered potential impacts to adjacent landowners. The community has been provided several opportunities to comment and participate in project development, and a variety of modifications have been made to the proposed action in response to public comments. We welcome assistance with monitoring the implementation of the project to ensure BMPs are working and if adjustments need to be made.

Comments:

Increased Windthrow on our Property : Our entire farm is essentially surrounded by proposed sites for this project. While that poses severe and obvious effects on our quality of life (concerns that were voiced and promptly ignored in previous comments and meetings), how about the inevitable increased windthrow on trees all over our property? Can we not, at the very least, push back the zones a few hundred yards to increase the buffer zones? We rely on many of our trees for mast, silvopasture for pork and eventually sheep production, forest medicinals, sap, other NTFPs, etc. This, again, seems like an infringement on our economic viability as a small family farm.
Quality of Life: Lastly, You estimate that it takes 10-20 years until full canopy regrowth occurs. Unfortunately, that is close to the remaining lifetime of some family members on this farm. Robbing their final years of peace, silence, and undisturbed wilderness is undoubtedly cruel enough as is. While we recognize we have next-to-no way to combat the inevitability of this lucrative forest service project, we again implore that, at the absolute very least, tracts 21, 25, and 30 get re-examined and hopefully pushed further back from our property line.
Damage to private property caused by crop tree management immediately adjacent to a number of these properties remains in our list of issues. Clear-cutting, excessive prescribed burning and the use of herbicides as proposed in the White Pine Management Project could destroy viewsheds, and cause erosion, sedimentation and herbicide pollution into springs, streams and lakes on private property adjacent to these activities on public lands. We encourage public land managers to use lighter touch forestry practices such as thinning, and employ generous buffer strips between adjacent private lands and the activities proposed in the EA.
I feel that it is reasonable within these circumstances to request my rights as a property owner in Oconee County be respected, and that you amend the proposal for Tract #21 of the White Pine Management Project to include a minimum 300-foot buffer zone outside of my property line which abuts your proposed cutting area. This is increasingly accepted as the minimum distance prescribed for best practice forest management in this situation so near to a watershed. If what’s good for the goose is truly good for the gander, it seems logical that the same care and planning should be employed to similarly protect any creek or stream within the proposed cutting areas. Riparian areas are essential components of forest ecosystems and each one in the APRD deserves equal protection. In my case, the riparian area along side of my watershed, which clearly continues well into tract #21, is an essential component of the tributaries and streams that form Village Creek, the Chauga River, and ultimately, the Savannah River. Volumes of research point to the importance of such riparian areas to terrestrial and aquatic habitat through the protection of streambanks, the filtering of silt and potential pollutants, and the reduction of flow during times of flooding.

Furthermore, if a wide buffer between the riparian areas that encompass my property line and tract #21 is not maintained, research demonstrates the probability of that area becoming less windfirm due to an increase in the effects of winds on the trees that will be left along my streamside and pond bank is great. This would necessarily increase the probability of deadfall both in my pond and within my property boundary, would be a financial and safety burden to me, would complicate my land and water management plans, and would certainly negatively affect the watershed as a whole. I do not look forward to these possibilities.

The destruction of such an area is not only disgusting for the people who stay here who's land is being encroached upon but the severe damage to the eco system. The community around this area should be allowed a voice against this destruction. It seems like plans are going ahead without any forethought of the consequences for the eco system but equally important is the sheer disregard for the people who live in this area who have lived here for generations in the blissful mountain forests, now facing its utter destruction.

Selfishly, my greatest concern with your project is the fact that Tract #21 of the proposal abuts my property line, in some places only 50 to 60 feet from my farm, multiple spring heads, and the creek, Orr Mill Creek, that feeds it. Orr Mill Creek is a hidden gem in Mountain Rest and certainly qualifies as an Outstanding Resources Waterway. When the APRD cut the area in the 1970's, environmental assessments of the watershed of Orr Mill Creek were conducted that resulted in the wise protection of the areas around all of Orr Mill Creek's springheads. This was done by stopping cutting at ridgelines above the entire creek bed system. Your proposed actions threaten to casually undo a groundwork of conservation of a water system nearly fifty years in the making. Erosion, siltation, disturbance to the banks of the pond and creek, and negative effects on water quality are all very probable outcomes of your proposed actions near my land, especially if great care is not taken to preserve a filter strip around each of the waterways of the system. Silt fences should be installed in any gully, wash, or draw that leads away from your cut areas towards my land and watershed. Do you intend to install these? I fully intend to carefully monitor the effects of your cutting on my watershed, land, stream and pond, through documentation and the use of erosion pins. I will photo-document changes that I observe. If this project proceeds, I respectfully intend to observe your actions along and near to my property line to make sure that you have followed all established and published United States Forest Service protocols for the protection of Outstanding Resources Waters. I will make sure that you adhere to all laws of the State of South Carolina in regard to property owner's rights. Although I sincerely hope it never comes to it, I will legally defend my rights as a property owner if actions on your land adversely affect my property. Please, let us respect one another in this.

The project should be used as an opportunity for public education about restoration.

Response:

We agree that the project may be used as an example and opportunity for education regarding restoration. We would welcome partnerships and assistance from interested organizations and volunteers to help with such efforts.

Comments:

Include public education initiatives addressing wildlife habitat and active regeneration management. The White Pine Management is an opportunity to share the natural history of the area and the role of disturbance on the landscape including wildfire, and once abundant populations of incisor mammals (beavers, elk, and bison) that were eco-engineers along with Native Americans who utilized fire to maintain healthy and diverse habitat. [8-14]. Partner with conservation organizations to put up on-site signage describing project and intent. Develop a restoration forest management demonstration area for the public.

The EA does not adequately disclose the extent of temporary roads needed for the project and temporary roads would have an adverse impact on the environment.

Response:

The EA and effects analysis have been updated to show proposed temporary road locations more accurately. Exact locations of temporary roads would be by mutual agreement between the Forest Service and the logging contractor because each logger has different equipment configurations. As such, the actual locations of temporary roads may differ slightly from the proposed roads as mapped. However, the total mileage of temporary roads would not exceed what is disclosed in the EA, and the location and all activities related to construction and use of temporary roads is subject to Forest Plan standards and SC BMPs.

Private landowners would be notified before use of any existing easements (rights of way). Usually, landowners are aware if any easements already exist on their property. No new permanent roads are proposed. The proposed action would also not make any changes to legal public access. The Forest Plan and EA provide information on temporary road locations, construction, obliteration, etc. More detailed information is available in each timber sale contract. These contracts are public records and are available upon request.

Use of temporary roads for unauthorized purposes, whether while an active temporary road or after it has been closed, is illegal; we welcome information on such uses to help protect natural resources. The intent of temporary roads is to be used for logging and then to be rehabilitated and returned to more natural conditions. When the temporary roads are closed, the rehabilitation includes efforts to prevent future unauthorized use of the area.

Comments:

Road Construction

The White Pine EA does not fully disclose how all of the stands would be accessed by logging trucks or lengthy skid trails. The EA shows fixed locations for approximately 10 miles of temporary access roads into many of the stands, but not all, specifically in some cases where there is no apparent access from system roads. Therefore, the EA does not fully disclose and evaluate the potential impacts of access routes into those stands, and the mileage of temporary road construction is understated in the EA. For example, access to C34/S17, C34/S18, C31/S4, and C34/S21 in the sensitive Swafford Creek area from FR 722 (old Fall Creek Rd.) will require crossing Swafford Creek, a classified Trout Natural (TN) stream with relatively high water quality standards. Without advance consideration in the EA of how those stands will be accessed, the Forest Service cannot fully assess how the creek's water quality would be affected by project implementation. In addition, the APD plainly has not disclosed this information for public comment. Even if all appropriate design criteria, Forest Plan standards and SC BMPs are followed, some sensitive riparian areas and high quality streams in the project area could be seriously damaged by constructing access routes for proposed harvesting activities. The Forest Service should carefully consider, analyze and disclose the environmental impacts of access routes in all stands that would require stream crossings, operating in close proximity to streams, traversing rugged terrain, or extending far from maintained system roads.

The Forest Service needs to consider and disclose environmental impacts of all access routes that would cross or be close to streams, cross rugged landscape, or extend out far from maintained system roads. The effects of timber harvest near high quality streams need to be thoroughly assessed. There should be no negative impacts from erosion and sediment entering streams, or to wildlife corridors in the area.

2. Road Construction. The White Pine Project EA does not fully disclose how all of the stands would be accessed by logging trucks and/or skidders. The EA shows fixed locations for temporary access roads into many of the stands, but not all. For example, access to C34/S17, C34/S18, C31/S4, and C34/S21 in the Swafford Creek area from FS 722 (old Fall Creek Rd) will require crossing Swafford Creek, a classified Trout Natural (TN) stream with relatively high water quality standards. Without advance consideration of how those stands will be accessed in the EA, the Forest Service cannot fully assess how the creek's water quality will be affected by project implementation. In addition, the APRD has not disclosed this information for public comment. Even if all appropriate design criteria, Forest Plan standards, and SC BMPs are followed, some sensitive riparian areas and high quality streams in the project area could be seriously damaged by proposed harvesting activities. The Forest Service should carefully consider and disclose the environmental impacts of access routes in all stands that would require stream crossings, operating in close proximity to streams, traversing rugged terrain, or extending far from maintained system roads.

There are currently no roads that provide access to the proposed cut area and potential new logging roads are likely to have an extremely negative impact on water quality, soil resources, streams and other water sources, plants and flowers, and surrounding trees and wildlife.

I am very concerned about the construction of new roads in the APRD. Road building, especially near or crossing waterways, can wreak severe damage on waterways and ecosystems if not done correctly. Opening up previously closed areas will certainly encourage already prevalent illegal use of federal lands by motorcycle and all-terrain vehicle riders who easily ride around insufficient gates and tank traps installed to prevent access. Currently I have not been able to locate any public disclosure from the APRD on how permanent or temporary roads used to access many isolated tracts are to be located, built, maintained or returned to natural state after use. No information seems to be available about proposed right of ways which may be used to cross private property in order to access isolated tracts in the proposal. It is distressing that APRD has not fully disclosed their full plans concerning new roads. I feel the general public ethically and legally deserves the further opportunity to comment on all proposed actions related to the construction of permanent or temporary roads associated with the White Pine Management Project.

Additionally, the Forest Service would account for and acknowledge the historically recurring impact of the "temporary" logging roads that are left behind once all viable trees have been taken following the clear-cut. In our lengthy experience, such roads provide easy access to delicate wilderness areas that border our property and quickly become heavily trafficked by off-season hunters and users of prohibited motor vehicles. These roads lead to unmonitored usage and desecration of precious forest areas and leave the forest floor polluted with gasoline, bullet shells, and glass bottles, causing us to fear for animals and children exploring the borders of our land. No part of how these temporary roads are left unattended and unaltered demonstrate that forest revisions by the Forest Service seem to value "sound ecological principles" or "social values throughout the region."

Having additional roads cut into these tracts provides people easy access to areas they otherwise wouldn't be able to reach. We have a population of people with addiction problems in this area who are always looking for places to go, out of the public eye. These roads will provide increased access to the most protected parts of our property. Additionally, I REALLY do not want access roads cut in near our property. They allow people with 4-wheelers access to all parts of our property. Many of whom, as stated in the opening, have addiction issues that often impair their judgement.

Make no further restrictions in access that in any way thwarts progress of project treatments or future project treatments.

The unavoidable impact your "temporary" roads have on erosion and sedimentation on public and private land. It is so utterly evident, whether when reading Dr. Van Lear's study on this issue in the Chattooga River watershed, or to the casual observer when visiting land where the Forest Service has performed these clear cuts: Forest Service roads and the damage they cause are not "temporary" to anyone but the rangers and loggers who walk away when the job is done, leaving those of us who actually steward the land to reap a bitter harvest.

The present generation is alarmed by the immanent destruction of their forests, streams, and wildlife, and fear that the benefits that may happen 10-30 years from now may be marred by the long-term damage of "temporary" roads, harm to old-growth, and other cumulative harms to humans and other parts of the ecosystem that are not currently considered under this plan.

The impacts of the project on traffic should be considered.

Response:

Forest Service timber contract sale provisions require for the purchaser to provide and execute a traffic safety plan approved by the Forest Service. This plan includes the type and placement of signage, and if necessary, the use of flagmen. Traffic safety is one of several items inspected by the Forest Service during administration of the timber sale contract.

The Forest Service agrees that mud on roads from logging operations can make traffic conditions more hazardous. Logging operations do not have to result in mud on roads. The Forest Service has no tolerance for mud on roads; the timber sale contract has provisions to prevent this from occurring, and timber purchasers are notified upfront that mud on roads is not allowed. Stain may occur, where the pavement is discolored with no buildup of mud. However, stain does not make road conditions more hazardous. In some cases, placing rock at the log landing/deck and along the temporary access road is sufficient to keep mud off of publicly used roads. If not, then hauling operations have to cease until conditions are drier.

Comments:

The impacts on traffic in and out of this area needs to be carefully weighed.
The logging road entrances & exits designated on Map C30/S30 are located on or near blind curves. This is very evident if you drive that stretch of road. Other than signs, what additional safety measures will be taken to stop traffic when a fully loaded logging truck is slowly leaving the site, likely pulling into both traffic lanes (or an empty truck slowly pulling into the logging site) and thereby creating a potentially dangerous situation to oncoming traffic coming around a blind curve? Given that this stretch of Chattooga Ridge Rd is hilly and winding, what precautionary/ safety steps will be taken during this extended period, to keep logging trucks from dragging mud on to Chattooga Ridge Rd when the logging road becomes wet and muddy - as it inevitably will? This was a big problem within the past year when logging was being done on private land across Chattooga Ridge Rd, northeast of your proposed location, near the entrance to Conley Rd....And that area of Chattooga Ridge Rd is flat, which is not true of Chattooga Ridge Rd fronting Map C30/S30 which is winding and hilly.

Wildlife

The project would adversely impact wildlife habitat and corridors.

Response:

Analysis for the project addressed potential impacts to native flora and fauna, including preparation of a biological assessment and biological evaluation, and this analysis is available to the public. The proposed action would shift some of the mid-aged closed canopy habitat (which is abundant on the district landscape) to young forest (early succession), which is in short supply across the landscape. All stands proposed for treatment are currently even-aged plantations. The proposed action would increase the amount of uneven-aged forests by implementing treatments in some of these plantations to begin moving them towards uneven-aged conditions. As such, the project would ultimately result in a greater diversity of available habitats.

Impacts to corridors have been considered in the analysis. We do not anticipate significant impacts to corridors for wildlife movement, as the project represents a small portion of the district and there is considerable availability of closed canopy forests. Ultimately, the project may benefit by providing a greater diversity of habitat within the project area.

Comments supporting the project were received from wildlife conservation-focused organizations such as the Rough Grouse Society, National Wild and Turkey Federation, the South Carolina DNR, and the Nature Conservancy, as well as natural resources (including wildlife biology) educational/research organizations such as Clemson University. This support lends credibility to the project for overall benefits to wildlife habitat.

Comments:

I would like to let the parties who are concerned know that the proposed plans in the area are extremely detrimental to the native flora and fauna.
The ethics of the Forest Service in this district are profoundly lacking when its principal aim is to disrupt and/or essentially destroy migratory corridors for wildlife across thousands of acres in the APD.
I oppose the 40 acre exemption request. Our wildlife needs corridors with which to travel. Decreasing uneven aged stands with the 40 acre exemption will significantly reduce coverage for wildlife and the root systems in place to decrease erosion and sedimentation.
#32: users of the national forest enjoy the abundance and variety of wildlife in the proposed impact areas. To destroy functioning habitat and the animals in residence is an outdated precept and should be changed.
The habitats of hundreds of creatures, including, but not limited to: red foxes, deer, black bears, opossum, northern long-eared bat, beavers, bobcats, coyotes, and more.
The project doesn't only affect the appearance of the land around my home but also would be detrimental to both ecosystems on and off of my families' farm, including natural habitats of deer, bears, and birds of many varieties as well as the domestic animals on our farm.
The destruction that comes with increased logging includes loss of habitat which is increasingly crucial in a world that loses habitat by the millions of acres a day.

The project would result in adverse impacts to black bears.

Response:

The project would not be anticipated to adversely impact black bears, as they benefit from a diversity of habitat types, which this project supports.

Comments:

According to Jay Butfiloski of the Department of Natural Resources, South Carolina has only around 1,000 Black Bears left, concentrated within two sustainable areas: The Pee Dee Region, mostly within Georgetown and Horry, and the Upstate Region, primarily within the Oconee and Pickens regions. Of the presumed 1,000 Black Bears, 900 of them live within the upstate region alone, and are at great risk of losing their habitat due to your plans.
--

The project would result in adverse impacts to the northern long-eared bat.

Response:

Refer to the biological assessment for analysis of potential effects on northern long-eared bat populations.

Comments:

The Northern Long-Eared Bat- This species has long been found in the forests of South Carolina, historically within the mountains of Oconee County. According to the South Carolina Department of Natural Resources, this species' habitat is commonly found in "mature mixed hardwood forest, mature Virginia pine stands, hemlock forest, and mixed pine-hardwood less than 15 years old." In 2015, it was found that the population had declined by 69% due to White Nose Syndrome. To destroy their habitat in these mountains would be to hurt their chances of ever fully recovering.

The project may result in an increase of herbivore populations.

Response:

The proposed action would not be anticipated to significantly affect predator populations.

Comments:

Furthermore, a lack of diversity in predator populations in new and managed forests lends itself to herbivore outbreaks, a concerning and disheartening subject for those of us who have witnessed the rapid decline of our beloved Eastern and Carolina Hemlocks due to infestations of the woolly adelgid (Mcdowell et al., 2020).

The BA/BE should clarify statement regarding survey work.

Response:

Edmund's snaketail is the species that has had little survey work done.

Comments:

The EA's draft Biological Assessment/Evaluation addresses proposed, endangered, threatened and sensitive (PETS) species that are known to occur within or adjacent to proposed treatment units, or have potential habitat within the White Pine Management project area. On p. 3, the BE states "Surveys for fish, crayfish, and mollusks have been performed on the Andrew Pickens Ranger District (Adkins 1995; Alderman 2008, 2004; Eversole et al. 2002; Eversole and Welch 2001; Krause and Roghair 2013). With the exception of the discovery of Edmund's snaketail on the district (Hill 2009), very little survey work for the species has been done." It is unclear which species is the subject of "very little survey work;" please clarify this statement.