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April 16, 2021

**RE: Objection, White Pine Management Project**

Pursuant to 36 C.F.R. § 218, the Chattooga Conservancy objects to the Draft Decision Notice (DN), Finding of No Significant Impact (FONSI), and the “proposed action,” as modified, in the final Environmental Assessment (EA) for the White Pine Management Project in the Andrew Pickens Ranger District (APD) of the Sumter National Forest (the Project). The Chattooga Conservancy respectfully submits these comments regarding this objection.

**Standing** The Chattooga Conservancy is a 501(c)(3) conservation organization whose mission is “to protect, promote, and restore the natural ecological integrity of the Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands.” The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattooga River watershed, including in this instance the Andrew Pickens Ranger District of the Sumter National Forest. Our members, staff and board members participate in a wide variety of activities on these national forest lands, including those areas that would be negatively impacted by the Project, as well as the cumulative negative impact of this Project in combination with the ongoing Loblolly Pine Removal & Restoration Project. We represent approximately 600 members who support the Chattooga Conservancy’s work. Our members seek solitude, forested scenery, old growth stands, clean water, and opportunities for hiking, fishing, hunting,

mountain biking, horseback riding, paddling, rafting, photography and nature study within the Andrew Pickens Ranger District, including portions of the project area that would be affected by the White Pine Management Project. Our collective membership also includes citizens whose private lands would be directly impacted by the Project.

The Chattooga Conservancy has participated—in good faith—from the very beginning, pre-scoping stages of the proposed Project, all the way through this point in the NEPA process. We shared our input with the Forest Service at the Project’s pre-scoping public meeting a couple years ago at the ranger station; hosted a field trip into the project area with the Forest Service and other stakeholders; participated in a meeting at Clemson University with the Forest Service and other stakeholders; hosted a large public meeting at the Long Creek Community Center; participated in a public meeting at Chattooga Belle Farm; maintained regular dialog with the APD; submitted comprehensive comments on the project’s scoping notice; submitted detailed comments on the project’s environmental assessments; and now, regretfully, am submitting this objection.

**Objection** We have read in detail the Project’s recent DN, EA and associated documents. We acknowledge that the APD made some modifications to the proposed action including, for example: timber harvest acreage has been reduced by 20 acres to a total of 1,952 acres; a few stands were changed from clearcuts to thinning/group selection, and/or had boundary modifications; maps and project documents were updated to more clearly indicate stand access routes; and, a design criterion was added for a buffer—if possible—around a large patch of pink lady slippers in C34/S17.

But regarding the larger scope and fundamental tenets of the Project, and in spite of much public commentary opposing many aspects of it, not a whole lot has changed since the Project’s initial scoping (April 2019) and the subsequent draft EA (Oct. 2020) and final EA (March 2021). The overarching issues about the majority of the Project, as stated in our NEPA comments to date, remain largely the same. The APD, and the district’s partners at The Nature Conservancy and specific academia at Clemson U., clearly had their “minds made up” about the Project, since its inception a couple years ago.

We hereby incorporate by reference the Chattooga Conservancy’s previous scoping and EA comments, and attached reference materials (for example, USDA Pacific Northwest Research Station publication, recommendations by Dr. Robert Zahner, Clemson Professor Emeritus of Forestry, etc.) as unresolved issues ripe for advancing in the context of this objection.

**DN, EA, Associated Documents:** We have carefully reviewed the EA and associated documents as stated previously, and aside from some relatively minor modifications to the Project, have concluded that most of the issues and concerns we raised have been discounted, sidestepped or ignored. To call out several, these contentions include:

- ▶ Silvicultural practices geared towards suppressing native forest composition and biological diversity in favor of cultivating crop trees;
- ▶ Predominant use of clearcutting, that in many instances will destroy 50+ years-worth of naturally regenerating native trees;

- ▶ Eliminating connectivity across the landscape between remnant old growth patches, and corridors for flora and fauna, while in some areas creating negative edge effects and impacts to old growth ecosystems;
- ▶ Disruption and negative impacts to prized recreation resources;
- ▶ Negative impacts to visual quality objectives and expectations, and to adjacent private property;
- ▶ Road construction and logging activities that will exacerbate erosion and sedimentation into streams and aquatic resources;
- ▶ Road construction, logging activities and burning that will damage soils from compaction, heat and erosion; and,
- ▶ Cumulative negative impacts to public lands from clear-cutting across the landscape from the Project alone, and in combination with the ongoing Loblolly Project.

In consideration of incorporating by reference our previous commenting submissions at this NEPA juncture, it is not our intention to re-state the detailed narrative in these prior documents, but rather to briefly address several topics.

*Landscape Ecology & Climate Change* The Project eschews a contemporary landscape ecology perspective that would acknowledge and prioritize acting upon the compelling need to address climate change. Instead, as just one example, the EA discloses that the project “might temporarily contribute an extremely small quantity of greenhouse gas emissions *relative to national and global emissions.*” This statement rests on a completely disingenuous scale of comparing around 2,000 acres to the entire country or world, as a tactic to dismiss this critical issue. Further, this flawed equation is then proffered as one justification for proceeding with the Project’s intensive crop tree management practices of clear-cutting, herbicides and burning across the landscape.

*Old Growth* The Project fails to acknowledge the importance and need for managing specific areas of the forest to restore an old growth network. Of all the habitats in eastern North America, old growth forests are the scarcest, which is especially true in the APD. In the project area, relatively small and isolated old growth stands are located at Swafford Creek, Sandy Ford Road, Mongold Gap, Big and Little Stakey Mountains near Orr Mill Road, Long Creek, Callas Mountain, and Reed Mountain and Hickory Top in the Chattooga Wild & Scenic Corridor. Two of these old growth areas are contiguous with the proposed white pine timber harvests and/or the loblolly pine clear-cuts, and several others are within short distances. The rare old growth stands in the project area should be cared for through establishing a connected network of intact native forests, not surrounded by clear-cuts, prescribed burns, and systematic herbicide treatments.

*Silvicultural Treatments, & Preserving Scenery & Recreation Resources* The EA proposes that the overwhelming majority of silvicultural treatments will be clearcuts. This is a heavy-handed forestry practice often utilized to cultivate crop trees of new pine stands. As with the Loblolly Removal Project, we hold that the White Pine Project is largely geared to replace one pine plantation—white pine and/or loblolly—with another pine plantation—shortleaf, pitch and/or Table Mountain. The APD’s forestry practices should employ mostly single tree or small group selection forestry practices to restore a

predominantly hardwood forest, conserve a multitude of sensitive natural resources, and to preserve recreation resources and the visual quality attributes of our public lands.

*Recreation Resources, More* Much has been said about the expected impacts of the Project on the well-known and established recreation use in the John Mountain area, and in the vicinity of FR 722 and Swafford Creek. The Project's EA and associated documents admonish the established trail use in this area as "unauthorized" and "illegal." In fact, Chattooga Conservancy corresponded with Project planners about this specific issue, but the information was not acknowledged in project documents, as follows:

The recreation use in the vicinity of FR 722, John Mountain, and around Swafford Creek and Hub Branch, includes hiking, trail running, horseback riding, mountain biking, hunting, birding, and various aspects of nature study (visiting old growth stands, and the large grove of pink lady slippers and trilliums, and the boggy wetland area). This broad recreation use started during the tenure of previous APD Ranger Mike Crane, where the APD worked with Prof. Gene Wood of Clemson University to investigate creating a network of horse trails in the expansive area between the Fall Creek Road, over hill and dale in the John Mountain area, to connect to Custom Sawmill Road and the Earls Ford area. This tentative horse trail system was created and extensively flagged on the ground by Prof. Wood. People saw the flagging and followed it, and the recreation use took off from there. Meanwhile, the APD's collaboration with Prof. Wood was not disclosed to the public, and the whole project was ill-conceived and never happened. However, the recreation use in the area has continued to grow, and it largely originated and grew under the auspices of the APD Ranger Crane and Prof. Wood's failed horse trail project.

*Streams, Aquatic Resources, and Soils* Even with use of appropriate Best Management Practices (BMPs), the cumulative impacts of the White Pine Project and the ongoing Loblolly Pine Removal & Restoration Project will degrade soils, and could also 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. Whetstone Creek is an impaired (polluted) stream, and should not incur further impairment from ground-disturbing activities on public lands. It's a given that heavy rain events are normal in the Chattooga River watershed, and standard BMPs are regularly overwhelmed during these events.

Timber harvests associated with the White Pine and Loblolly Projects would be occurring on the district at the same time, and in some cases in adjacent stands. Even if all appropriate design criteria, Forest Plan standards, and BMPs are followed, soils and sensitive riparian areas and high quality streams in the project area could be seriously damaged by proposed road construction, harvesting and burning activities. However, the Forest Service states both projects will follow appropriate design criteria and BMPs to protect both water quality and soils; indeed, the APD states that "Claims have been made in the past about the Loblolly Project causing negative impacts to soil/water resources. Field observations revealed *no such impacts.*" This is a ludicrous and arrogant statement, and is simply not true. We have pictures and documentation of numerous instances of these negative impacts.

*Cumulative Impacts* The EA discounts any significant cumulative impacts of concurrent projects on the APD, and we disagree with this broad evaluation. For example, plainly apparent to the casual observer are localized negative impacts to soils from the ongoing Loblolly Project, where multiple instances of excessive erosion and sedimentation have occurred, for example, in the Turkey Ridge Road and Shoulder Bone Road area, and the Charlie Cobb Road area. In fact, and as referenced in our prior comments, we believe instances of significant cumulative impacts will affect many elements across the board of natural resources on our public lands in the APD, because it's potentially a lot of disturbance at one time in a relatively small district.

We regret utilizing this opportunity to object to the APD's White Pine Management Project's DN, EA and FONSI. We look forward to continued efforts and dialog regarding these specific objections and accompanying requests for relief.

Sincerely,

A handwritten signature in blue ink that reads "Nicole S. Hayler". The signature is written in a cursive, flowing style.

Nicole Hayler, Director  
Chattooga Conservancy