

Robert Sitzlar, District Ranger
Andrew Pickens Ranger District
112 Andrew Pickens Circle
Mountain Rest, SC 29664
SM.FS.r8fmsapcom@usda.gov

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District Ranger Robert Sitzlar,

Chattooga Conservancy appreciates the opportunity to comment on the proposed AP White Pine Plantation Restoration Project ("White Pine Project"), as part of the collaborative process required when utilizing the categorical exclusion at 7CFR 1b.4(d)(47). On behalf of our nonprofit organization, I submit the following comments in response to the Public Letter of Engagement from September 3, 2026:

Chattooga Conservancy opposes the proposed White Pine Project actions on 518 acres in the Andrew Pickens Ranger District (APD).

The pressure to meet congressionally mandated timber targets has driven the USDA Forest Service to perpetuate heavy-handed forest management by incorporating prescriptions for even-age management—with silvicultural treatments emphasizing clearcutting as opposed to selective harvesting—in order to produce more timber at less cost. To compete in these high-volume markets, the wood products industry uses large equipment including feller-bunchers, harvesters, and skidders to more quickly handle large volumes of timber. Heavy-handed even-age management produces high visual impacts, causes soil erosion, damages native habitat, and causes the invasion of non-native species.

Recent science reflects a need for a new Forest Service mission to end heavy timber extraction practices and instead take into account the value of protecting and restoring native forest. USFS must meet the need for protecting biological diversity, as well as restoring and protecting mature and older forests, which would in turn help mitigate and adapt to climate change; and the agency must meet the needs of a public that increasingly utilizes public lands for recreation.

Consequently, we reject the perpetuation of extraction forestry and instead propose to manage our public forestlands, including those within the proposed project area, by a prescription for "benign neglect." This need is underscored by the recent, massive harvesting of existing pine plantations that have increased erosion, caused the spread of non-native species, increased wildfire risk, and eliminated the opportunity to take advantage of stands that are now naturally recovering to a native forest condition.

While the proposed action uses the name, "AP White Pine *Plantation Restoration* Project" [emphasis added], the prescribed treatments and statement of need are identical to those of the 2021 "AP White Pine *Management* Project" [emphasis added]. The current proposed action thus constitutes a supplement to the 2021 AP White Pine Management Project. Chattooga Conservancy continues to object to AP White Pine Management Project methods and impacts; these same objections apply to the proposed action. Of further concern:

- the proposed action appears to be a significant expansion of the original scope of the 2021 White Pine Management Project;
- the prescribed treatments fail to support stated project objectives; and
- opportunities for public participation to this point fall short of a genuine "collaborative process."

Unfortunately, we recognize that APD may proceed with the proposed action despite Chattooga Conservancy's strong objections. Accordingly, we

- request incorporation of a genuine collaborative process;
- enumerate stand-specific concerns;
- acknowledge and request further details about one beneficial design accommodation; and
- acknowledge and request confirmation of apparent changes made to proposed stand boundaries following a meeting on August 25, 2026.

To be clear, Chattooga Conservancy **does not endorse** any White Pine Project actions within the proposed stands. We support management through benign neglect of the 12 stands in this proposal. We reluctantly include the stand-specific and design-criteria comments as a backstop against the most blatant harms of the proposed action.

<u>Relevant objections to White Pine Project activities from 2021 DN</u>

Chattooga Conservancy participated in the planning and objection process for the White Pine Management Project during its initial development from 2019–2021. Given the identical goals, methods, and basis for this current proposal, most of our organization's

project-wide objections from the 2021 White Pine Management Project Decision Notice likewise apply to the new proposal and are incorporated herein by reference. Relevant objections include:

- Silvicultural practices are geared towards cultivating crop trees at the expense of native forest composition and biological diversity
- Predominant use of clearcutting, which would destroy naturally regenerating native trees and create unnatural even-aged conditions
- Eliminating connectivity and habitat corridors, especially adjacent to old growth
- Disruption to recreation resources
- Negative impacts to scenic qualities and viewsheds
- Erosion and sedimentation from logging activities and temporary road use
- Cumulative impacts, including climate impacts, in combination with other simultaneous APD projects

Separating the current proposed AP White Pine *Plantation Restoration* Project from the 2021 AP White Pine *Management* Project further hides the cumulative impacts of APD's timber program. This presents a misleading picture of discrete actions, while failing to examine or disclose the total combined impact. This is true of the AP White Pine actions alone, and of the entire suite of APD's timber harvest projects.

<u>The project size is significant</u>

The White Pine Management Project decision memo in 2021 authorized timber harvest activities on 1,952 acres. Given the identical basis, methods, and goals, the proposed actions on 518 acres would mean expanding the 2021 project by over 25% from its original proposed acreage. This is a significant change and deserves more careful consideration than a one-page Letter of Engagement. The proposed project warrants a supplement the 2021 White Pine Management Environmental Assessment, as per 7 CFR 1b.9(r)(2)(ii), relating to "updates [which] substantially change the major Federal action or substantially alter the disclosure of adverse effects."

<u>Prescribed treatments would not achieve desired future conditions</u>

The treatments prescribed in the proposed action are unlikely to achieve APD's desired future conditions—mixed shortleaf pine/hardwood forest—based on our on-the-ground observations and USFS monitoring reports from White Pine Project stands (approved 2021) where harvest has been completed. Monitoring reports indicate limited reserved/regenerating desired hardwood species compared to overall pine, plus significant survival of undesired pine species. Visual observations from a White Pine Project harvested area include erosion and bare soil, residual trees of poor-quality and falling far short of goals for reserved basal area, negative impacts to native vegetation from herbicide

applications, plus extensive growth of invasive *Lespedeza* spp. We advise APD not to increase the acreage of the White Pine Project unless and until monitoring reports show strong, consistent evidence of meeting ecologically appropriate native forest conditions.

More opportunities for public collaboration and input needed

APD should expand options for public participation in this project design and decision-making. The "collaborative" process so far is insufficient and appears to be in name only, to qualify for the categorical exclusion at 7CFR 1b.4(d)(47). It has consisted of one informal meeting at the Andrew Pickens Ranger District office on August 25. The meeting format—one-on-one conversations with USFS personnel—did not allow meaningful discussion among stakeholder groups. The wait time to speak with USFS representatives was a deterrent, and there was no explicit commitment from USFS to follow through on verbal feedback received at the meeting in a collaborative fashion. Further, those invited to the event by email likely underrepresent the breadth of stakeholders who would be interested in the proposed action. This process fell far short of the group discussion opportunities, field visits, and extent of stakeholder participation Chattooga Conservancy knows from other collaborative group experiences—most recently, the development of an Implementation Area plan from the Foothills Landscape Project in Chattahoochee National Forest. We urge APD to conduct another open public meeting, with an opportunity for fielding questions in front of the entire attending audience to generate better-informed and more representative stakeholder input, and substantive collaborative processes. We likewise request field visits to identify site conditions and evaluate the need for action.

Stand-specific concerns

Despite boundary modifications since August 2025 (see below), several stands in the proposed action still overlap with sensitive areas or could have an outsize impact on common recreational uses. These include:

3) Portions of stand #1 on Grapevine Branch Rd and stand #5 on Persimmon Rd, totaling just over 6 acres (see attached maps) overlap with the Chauga Scenic Area (Sumter Forest management prescription 4.F). Sumter Forest Standard 4.F.-3 states that these lands are unsuitable for timber harvest. White Pine Project activities should exclude these areas.
3) Stand #8 along Long Creek is just upstream of the confluence with the Chattooga River, where BMP failure in extreme weather events could result in sediment transport to the Chattooga at a popular and primary-contact recreation site, Long Creek Falls. The severity of risk associated with BMP failure is too high to justify timber harvest in this stand.

3) Stand #7 along Sandy Ford Rd includes the road terminus at a hiking trailhead and recreational boater put-in for Section III of the Chattooga River. White Pine Project activities around the recreational trailhead would negatively impact the recreational user experience of hikers and both private and commercial whitewater users. Stand #7 also directly abuts Whetstone Creek, a 303(d) impaired Chattooga tributary. Whetstone Creek is also classified as SC "Natural" Trout Waters (TN), where turbidity should not exceed 10 Nephelometric Turbidity Units (NTUs). Timber harvest should be minimized, not increased, in the Whetstone Creek drainage, to avoid exacerbating nonpoint source pollution in an impaired waterway and to protect its downstream impacts on the Outstanding Resource Water (ORW) Chattooga River.

Accommodations for stands with mixed-species growth

We acknowledge and approve of the project design criteria which would exclude from harvest portions of the new proposed sites which have become mixed with other native tree (and understory) species naturally regenerating over time; this could be the case for much of the proposed action. We ask that Andrew Pickens Ranger District (APD) establish and publicly share the thresholds (using such metrics as species, basal area, "patch" size, or age class) which would qualify portions of a stand for exclusion from harvesting. We further request details on APD's plan to evaluate stand conditions prior to timber sale. Is the collaborative process going to be engaged in a walk-through to identify where mixed-species regeneration exists?

While, as stated above, we advise excluding from harvest any areas that demonstrate mixed-forest regeneration, APD has included "thinn[ing] to improve forest health" as an alternate prescription for stands with existing mixed species regeneration. We ask that APD define its procedures for "thinn[ing] to improve forest health," commit to no action (benign neglect) or single-tree selection practices when thinning in these circumstances, and identify which species would be targeted for thinning within portions of stands that meet the criteria (see above paragraph) for existing mixed species regeneration.

Boundary modifications since August 25, 2026, meeting

Chattooga Conservancy further acknowledges and approves of the apparent boundary modifications (as shown on the PDF map[1] distributed September 3, 2026) to stands #10 and #6 to avoid areas of identified old growth[2] and to avoid project activities in the Cedar Creek Botanical/Zoological Area, as per stated project design criteria. We ask that the narrative project design criteria explicitly confirm the boundary modification to stand #6 and include a commitment not to conduct timber harvest in areas of identified old growth.

Further, to comply with Sumter Forest standard FW-33 for rare communities, any stands encountered in the project area which meet the operational definitions for old growth in Region 8 should be exempted from timber harvest, roadbuilding/ “woods” road use, herbicide and/or mechanical site preparation, mastication, and tree planting.

For the reasons listed above, Chattooga Conservancy concludes that the proposed White Pine Project actions are unlikely to achieve desired future conditions; they risk damaging sensitive areas and interfering with public recreational use of the national forest; and they have been developed without a sufficient collaborative process thus far. We urge APD not to approve the proposed actions without further public input and site-specific evaluation. We look forward to participating in continued dialogue about this proposed action.

Sincerely,

Nicole Hayler
Executive Director, Chattooga Conservancy

[1] Public Engagement Letter Attachment 1, AP White Pine Plantation Restoration Project.

[2] Carlson, P. J. (March 1995). *An assessment of the old-growth forest resource on national forest system lands in the Chattooga River watershed.* Chattooga Ecosystem Demonstration Management Project, USDA Forest Service-Region 8, 114 p.