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Comments:
November 19, 2015

Mary Morrison
Francis Marion and Sumter National Forests 4931 Broad River Rd.
Columbia, SC, 29212-3530

Re: Francis Marion Forest Plan Revision #40695

Dear Ms. Morrison:

I am writing today on behalf of the South Carolina Division of the Appalachian Society of American Foresters to comment on the draft revised land management plan for the Francis Marion National Forest.

The Francis Marion National Forest is a treasure for South Carolina. The Division commends the efforts of the US Forest Service and specifically the team that crafted this revised draft managed plan. The team has done a skillful job in drafting a management plan to address the various ecosystems present on the forest within the obvious financial constraints that had to be considered.

The Division agrees the restoration of the longleaf pine fire climax community where possible is a worthy goal. Longleaf pine was once a dominant feature in our coastal forest and many important species thrive in the associated fire climax community. These fire climax stands can provide great ecological diversity and beauty, while producing forest products that benefit our economy and communities.

While we agree with the goal to restore the longleaf pine fire climax community on the forest where possible, we contend that loblolly pine is and will continue to be a major component of the forest. Like longleaf pine, loblolly pine is a native species to the coast of South Carolina and has always been present on the forest. Since loblolly pine will continue to be a major component of the forest, we encourage the US. Forest Service to actively manage and regenerate loblolly pine where appropriate to meet management objectives.

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The Division agrees with and supports the aggressive goal for the use of prescribed fire on the forest. Prescribed fire is a critical tool in the management of our southern pines. The goal to utilize prescribed fire on a one to three year rotation will reduce hazardous fuel loading and benefit many unique species.

However prescribed fire becomes more difficult to implement each year, due to the increased urbanization in and around the Francis Marion. While the draft management plan does make mention of alternative methods for fuel reduction and understory control where fire is not practicable or possible, the plan does not clearly spell out all alternatives being considered. In public meetings the use of herbicides, mechanical treatments and conventional harvesting were discussed, however the plan does not set goals for the use of these methods

beyond commercial harvests. The Division encourages specific goals for the use of alternative methods for fuel reduction and understory control.

The Division agrees that nonnative invasive species represent a threat to the forest. The draft plan calls for the treatment of up to 2,000 acres each year (OBJ-F-3(c)) using various means to control nonnative invasive species. Since the forest contains 260,000 acres, a goal to treat 2,000 acres each year seems inadequate at best. The US Forest Service should substantially increase the acres treated and implement an aggressive plan to identify new nonnative invasive species as they occur. The Division encourages the use of all accepted methods available to control nonnative invasive species.

The South Carolina Division of the Appalachian Society of American Foresters represents a diverse membership of forestry professionals throughout the state. Comments provided by the Division were approved by the Executive Committee of the South Carolina Division, but may not represent the views of every member of the Society. The leadership of the South Carolina Division has encouraged our members to carefully review the draft revised land management plan and provide comments directly to the US Forest Service.

Thanks you for your diligent work to conserve our natural resources and the Francis Marion National Forest.

Sincerely,

George K. Chastain Chair, SC Division