



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

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F/SER47:JD/pw

(Sent via Electronic Mail)

Rick Lint, Forest Supervisor
Francis Marion and Sumter National Forests
4931 Broad River Road
Columbia, South Carolina 29212

Attn: Francis Marion Forest Plan Revision

Dear Mr. Lint:

NOAA's National Marine Fisheries Service (NMFS) reviewed the *Francis Marion National Forest Draft Environmental Impact Statement for the Revised Land Management Plan (EIS)*, dated August 2015, prepared by the U.S. Department of Agriculture (USDA) Forest Service. The Draft EIS describes and analyzes three alternatives for managing the 258,942 acres of land and associated resources within the Francis Marion National Forest in Charleston and Berkeley Counties. The Final Forest Plan resulting from the Final EIS analysis will guide all natural resource management activities, such as prescribed burning, habitat restoration, and public recreational use, in Francis Marion National Forest. While the Francis Marion Forest includes over six thousand acres of essential fish habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), the Draft EIS does not include a determination by the USDA Forest Service on whether the proposed management plan would adversely affect EFH [50 CFR 600.920(e)(3)]. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Act.

The Santee River, the Intracoastal Waterway, Lake Moultrie, and the Cooper River bound the Francis Marion National Forest. Because land use surrounding the forest is rapidly changing from a forested, rural landscape to an urban environment, the USDA Forest Service is revising the 1996 Land Management Plan, which focuses primarily on recovery from Hurricane Hugo. The Draft EIS presents three alternatives, each focused on achieving ecosystem restoration through vegetation management, prescribed burning, and enhancing wetland connectivity:

- Alternative 1 represents no change from the current forest plan enacted in 1996.
- Alternative 2 (Preferred Alternative) includes converting select loblolly pine stands to longleaf pine forests, improving hydrologic function of wetlands, and restoring rare communities and old growth forests.
- Alternative 3 is a variation of Alternative 2 and considers less prescribed burning near communities and major roads.



Essential Fish Habitat in the Project Area

Portions of the Francis Marion national Forest include tidal freshwater palustrine forests, tidal freshwater wetlands, estuarine emergent wetlands (salt marsh), tidal creeks, intertidal and subtidal flats, and unconsolidated bottom. The South Atlantic Fishery Management Council (SAFMC) identifies these habitats as EFH for penaeid shrimp, including white shrimp (*Litopenaeus setiferus*) and brown shrimp (*Farfantepenaeus aztecus*), and/or estuarine-dependent species of the snapper-grouper complex. Salt marshes are EFH because larvae and juveniles concentrate and feed extensively and shelter within these habitats. As a consequence, growth rates are high and predation rates are low, which make these habitats effective nursery areas. The SAFMC provides additional information on EFH and its support of federally managed species in Volume IV of the *Fishery Ecosystem Plan of the South Atlantic Region*¹.

Freshwater Wetlands

In addition to habitats designated as EFH, the Francis Marion National Forest is rich with freshwater wetlands providing nutrients and organic material to downstream estuaries and affecting the water quality of those estuaries. Past modifications, such as ditching and road construction, have altered water flows in and out of forested wetlands, riparian areas, and streams. To address these issues, the USDA Forest Service is proposing to restore hydrology in wetlands, which should benefit downstream EFH. Alternative 2 and 3 include restoration of wetlands, floodplains or riparian areas to benefit at-risk species within three target watersheds, Guerrin Creek, Turkey Creek, and the headwaters of Wambaw Creek. Specific activities include plugging ditches and adding culverts under dikes to restore water flows. However, existing dikes may be used to limit saltwater influx where hydrologic modifications are causing saltwater entry beyond recent historic conditions, such as those within the lower Santee River. Hydrologic restoration would improve habitats for freshwater aquatic species and at-risk amphibians.

Comments on Alternatives

Alternative 2 and 3 include measures to restore hydrology within freshwater wetlands, and the NMFS recommends this management strategy be carried over to tidally influenced wetlands. The Draft EIS states there are approximately 6,546 acres of tidal waters on the Francis Marion and 179 miles of intermittent and perennial streams receiving tidal influence. The designation of these habitats as EFH is not discussed within the Draft EIS and the actual amount of EFH within the Francis Marion is likely greater because these numbers are based on using SC Highway 17 as the saltwater/freshwater boundary and do not consider tidal freshwater wetlands designated EFH.

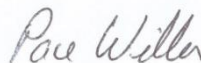
It is unclear if the use of existing dikes to control saltwater influx, as described above, would further impair EFH. The Magnuson-Stevens Act requires the USDA Forest Service to consult the NMFS should any of these projects adversely affect EFH. In addition, some projects could enhance EFH. For example, the Draft EIS discusses bridging portions of the Tuxbury Horse Trail (an old rail bed) to restore breeding habitat for salamanders; however, portions of the trail restrict flow within EFH. Restoring flow to EFH by bridging or culverting old rail and timber roads, such as the Tuxbury Trail, should also be a management strategy. In addition, restoring impounded salt marsh (e.g., old rice culture fields) would convert these impaired habitats back to free-flowing marsh habitat.

¹ Available at <http://safmc.net/EcosystemLibrary/FEPVolumeIV>

In summary, the NMFS believes the Final EIS should include information regarding the designation and importance of EFH within the Francis Marion National Forest, the need to consult with the NMFS when any action may adversely affect EFH, and strategies for eliminating restrictions and impairments to EFH. With the exception of using dikes to limit saltwater flow, the restoration of freshwater wetlands within the Francis Marion National Forest would likely have indirect beneficial impacts to EFH by improving the flow of nutrients and organic matter; however, there are opportunities to directly restore and enhance EFH within and adjacent to the Francis Marion. The USDA Forest Service should include these goals in Alternative 2 and 3. The NMFS is available to assist the USDA Forest Service in identifying and designing EFH conservation and restoration projects.

NMFS appreciates the opportunity to provide these comments. Please direct related correspondence to the attention of Ms. Jaclyn Daly-Fuchs at our Charleston Area Office. She may be reached at (843) 762-8610 or by e-mail at Jaclyn.Daly@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

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