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23 February 2005

Public Utility Commission of Texas
P.O. Box 13326
Austin, Texas 78711-3326

Attn: PUC Docket No. 29705
SOAH Docket No. 473-04-8361

Dear Comissioners,

I am writing in opposition to the proposed SHECO right of way that would result in a 2.7 mile long, 50 ft wide swath of destruction on the Russell properties and preserves. There appears to be no reason why this right of way cannot be located on adjacent properties of distinctively lower ecological value. Communities impacted on the Russell lands would include at least four globally rare habitats (NatureServe 2002):

(1) Much of the proposed ROW would pass through dry sandy longleaf pine woodlands dominated by mature trees in the 80 to 100 year age class. Longleaf habitats have declined tremendously throughout the southeast with most estimates placing remnants at no more than 3% of historic levels (Frost 1993). If anything, the losses are more acute in the western Gulf Coast (Bridges and Orzell 1989, Harcombe et al. 1993). This is especially problematic inasmuch as west Gulf Coast longleaf forests are characterized by unique species assemblages not found east of the Mississippi River (Bridges and Orzell 1989). The mature longleaf pine trees on Mr Russell's property are a valuable resource for tree-ring investigations of fire and climate history. Currently I am collaborating on such a study with Dr. Henry Grissino-Mayer and Mr. Joe Henderson of University of Tennessee. Texas Forest Service is using the longleaf trees for collections of distinctive West Gulf Coast genotypes. As an expert on longleaf ground layer vegetation and management (see attached CV) I can tell you that diverse distinctive ground layer assemblages are persisting in Mr. Russell's longleaf stands, in part due to his efforts at hand clearing of small hardwoods. Furthermore, Mr. Russell and I intend to work together to begin reintroducing a more historic fire regime, albeit in a careful manner so as not to damage the mature longleaf trees and rare understory shrubs that may be present. In so doing we also hope to gradually improve stand structure for Red-Cockaded Woodpecker utilization while preserving the distinctive characteristics of west Gulf Coast pinelands, including, apparently, a somewhat higher representation of larger hardwoods. Rampant destruction will preclude all these possibilities.

(2) Another rare community along the proposed ROW corridor is globally endangered post-oak, loblolly pine flatwoods depression forest with understory dominated by *Chasmanthium sessiliflorum.* This community receives a global rarity ranking of G2 by NatureServe (G1 is the rarest possible designation).

(3) There are also remnants of Blackland Prairie on the property, some of which may be impacted by the proposed ROW. Blackland Prairie is perhaps even more endangered than longleaf. Currently it is estimated that less than 1% of the historic acreage survives, most in small isolated and degraded remnants (Eidson and Smeins 1999). We cannot afford to lose any more.

(4) Finally, there is a Catahoula Sandstone outcrop, a geological feature associated with the very highly endangered (G1-G2) Catahoula Sandstone glade community (NatureServe 2002). Again, I

intend to work with Mr. Russell to reintroduce fire into this system to see if the rare herbaceous elements can be recovered while maintaining the mature hardwood trees.

Mr. Russell's efforts to assemble, conserve and restore his lands are to be applauded. One would hope the public agencies could work with him to protect these rare habitats.

Sincerely,

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Literature Cited

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