



MARK WILLIAMS
COMMISSIONER

RUSTY GARRISON
DIRECTOR

December 21, 2017

Ms. Betty Jewett
Forest Supervisor
United States Forest Service
1755 Cleveland Highway
Gainesville, Georgia 30501

Dear Ms. Jewett:

Thank you and your staff for keeping an open dialogue with my staff and continuing discussions concerning the process for the Foothills project. I know this effort is time-consuming and challenging with diverse stakeholder participation. We appreciate your patience and willingness to hear concerns from all stakeholders. The purpose of this letter is to share the Georgia Wildlife Resources Division's (WRD) comments specific to the Chattahoochee-Oconee National Forest's (FS) strategy for the Foothills Landscape Project Proposed Action (Project).

The Project utilizes an "adaptive management" (AM) strategy in lieu of the traditional FS approach to identifying specific treatments, in specific areas with specific methods, which fails to consider environmental stochasticity. The AM strategy is appropriate, and allows the FS to contemplate and, in some cases, take advantage of changes (especially unpredictable changes) in the project area over time (short and long-term). We concur with and support this strategy.

Given the size and expanded scope of the Foothills Project, the need for rapid response and flexibility to unpredictable dynamic events is requisite to ensure efficient, effective, and successful Project implementation. We believe an AM approach addresses this need by providing a suite of tools to be applied as determined by real-time, specific conditions or a combination of conditions (e.g., stand composition, structure, age, slope, site index, soil conditions) and ensures that the landscape progresses toward desired conditions while accounting for incomplete information and adaptation to environmental stochasticity.

An AM strategy improves the Project's probability of success as real-time, on-the-ground information is acquired to identify the appropriate treatments immediately prior to implementation rather than relying on information that may be a few years or more old; thus, resulting in needless delays and applying tools that are less likely to be successful. For example, the difference between oak-pine stand maintenance and restoration is the presence of oak seedlings. This component could be present during early surveys but be lost with a few years due

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to lack of sunlight, wildfire activity or another stochastic event. If implementation was held to the prescription determined by outdated surveys the restoration objective would not be met.

We believe the flexibility provided by an AM strategy allows the FS to leverage changes in forest conditions, politics and regulations to achieve the maximum benefit to forest health and resiliency. For example, under AM the FS can take advantage of an area affected by a wildfire, but outside of a prescribed burn, by implementing treatments that promote oak regeneration. The FS can take advantage of natural canopy gaps created by storm damage, areas affected by insect damage or kills, landslides, or even changes to adjacent land use (e.g. conservation easement). Finally, changes to treatment locations based on the revision of part or all of the Forest Plan can easily be accounted for without an extensive re-evaluation thereby saving precious resources.

In closing, an AM strategy is essential to efficiently and effectively implement a project with this much complexity, at this scale and within a meaningful timeframe. It also facilitates avoiding the destructive stasis that occurs with analysis-paralysis. We support the FS adaptive management strategy as incorporated into the Project.

As always, my staff remains willing and available to assist you when we can.

Sincerely,



Rusty Garrison

cc: Jon Ambrose
John Bowers
Matt Thomas