

GEORGIA
DEPARTMENT OF NATURAL RESOURCES

WILDLIFE RESOURCES DIVISION

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December 8, 2020

Mr. Ryan Foote
District Ranger
Chattooga River Ranger District
Chattahoochee-Oconee National Forest
9975 Highway 441 South
Lakemont, Georgia 30552

RE: FY21 Prescribed Fire Project, Chattooga River Ranger District

Dear Mr. Foote,

The Georgia Department of Natural Resources, Wildlife Resources Division (WRD) herein provides comments on the Fiscal Year (FY21) Prescribed Fire Project, Chattahoochee National Forest (CNF), Chattooga River Ranger District (hereinafter, Project). We greatly appreciate the opportunity to review and comment on the Project.

The Project has the stated goal of maintaining and enhancing habitat for rare and endangered plant species found within the Upper Piedmont region of the Chattooga Ranger District. Specifically, this includes the federally endangered smooth purple coneflower (*Echinacea laevigata*) and the rare Smith's sunflower (*Helianthus smithii*). Additionally, the Project advances existing conditions in the Project area towards the desired conditions within the framework of goals and objectives in the Forest Plan. These include Forest Plan goals 2, 3, 8, 15, and 58.

WRD staff have reviewed the Project scoping material and Environmental Assessment (EA). We support the Project as presented to achieve application of prescribed fire on a total of 976 acres across the 5 identified areas. We offer the following comments in support of Project:

The Project, especially the possibility of growing-season fire, will favorably impact two State Wildlife Action Plan (SWAP) High Priority Piedmont Habitats: 1) Oak-Hickory-Pine Forest & Woodland (large matrix habitat); and 2) Oak Woodland & Savanna (small patchy habitat). Both are frequently associated with, or contain, mafic glades and barrens or other sub-xeric habitats with mafic geology-influenced soils.

The proposed burning is consistent with and supports at least three (3) SWAP High-Priority Conservation Actions with the goal of improving public-land management:

SWAP HP Cons Action #	Conservation Action
117	Continue to implement rare plant restoration, enhancement, and safeguarding program. Identify needs, develop horticultural guidelines, and initiate rare plant propagation efforts; continue to develop/improve and implement Safeguarding protocols; continue monitoring populations.
119	Develop an adaptive management approach for high priority plants and natural communities on public lands
121	Implement integrated resource management of state lands and waters (fresh, brackish, and salt), emphasizing restoration and maintenance of natural communities and rare species populations (i.e., ecosystem management). Work with other conservation organizations to address regional conservation needs.

Additionally, six (6) plant species of conservation concern are found within the project area in the SWAP High-Priority habitats listed above. Of these, four (4) are SWAP High-Priority Species, three (3) are state-protected, and one (1) is federally endangered. These are: Carolina Thistle (*Cirsium carolinianum*); Curly-heads (*Clematis ochroleuca*); Fraser's loosestrife (*Lysimachia fraseri*; SWAP High-Priority, state-listed as Rare); Georgia Aster (*Symphyotrichum georgianum*; SWAP High-Priority, state-listed as Threatened); Smith's Sunflower (SWAP High-Priority); and Smooth coneflower (SWAP High-Priority, state- and Federally-listed as Endangered).

Further, the restoration of mafic glade woodland sites and conservation of Smooth Coneflower and its rare floral associates are and remain a signature project of the Georgia Plant Conservation Alliance (GPCA) for more than 25 years. (The GPCA is a collaborative effort of 59 organizations, including WRD and the United States Forest Service, committed to conserving Georgia's endangered flora). This is the longest running GPCA project outside of the Mountain Bog project. The GPCA maintains six (6) sites in the Lake Russell WMA/Currahee Mtn, Lee/Yellowback Mountain, and Anderson Road/Quarry areas. All are within the Chattooga River RD of the CONF. The successful implementation of the Project will build upon and enhance these successes.

WRD realizes there are a variety of challenges involved in implementing active management on the CNF. We recognize and appreciate the hard work of your team to continue to propose active forest management projects that improve wildlife and plant habitat, enhance forest health and resiliency, and reduce hazardous fuels on the CNF. We believe the Project is an exemplary example of the type of active management needed on the CNF and we encourage the Forest Service to not reduce the acreages identified to receive proposed prescriptive activities in the Project area.

December 8, 2020

Page 3

If we can be of further assistance or to discuss details of these recommendations, feel free to contact Wildlife Conservation Section biologist Lisa Kruse (706-557-3219). We look forward to continuing our partnership with the Forest Service to conserve and enhance the National Forests of Georgia through active forest management.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Will", written in a cursive style.

Ted Will

TW/jwb

cc: Ted Will
John Bowers
Jon Ambrose
Alan Isler
Don McGowan
Lisa Kruse