GEORGIA
DEPARTMENT OF NATURAL RESOURCES
WILDLIFE RESOURCES DIVISION

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August 13, 2021

Mr. Ed Hunter
Forest Supervisor
United States Forest Service
1755 Cleveland Highway
Gainesville, Georgia 30501

RE: Foothills Landscape Project, Revised Programmatic EA

Dear Mr. Hunter,

The Georgia Department of Natural Resources, Wildlife Resources Division (WRD), appreciates the opportunity to provide comments on the Revised Draft Programmatic Environmental Assessment (EA) for the Foothills Landscape Project (Project). Our staff have reviewed the EA and its supporting documents.

An additional feature of the EA is Alternative 3 (p. 55). Alternative 3 restricts the application of commercial timber operations. WRD believes predefining the boundaries of timber harvest is not wise because it does not consider unforeseen events such as disease outbreaks and natural disasters that may necessitate timber salvage or other commercial-scale timber operations and seems to be a deviation from adaptive harvest management. As such, WRD does not support Alternative 3.

Many of the proposed actions in Alternative 2 are critical for the recovery of rare species and restoring active forest management across the foothills landscape in support of the Land and Resource Management Plan. WRD supports Alternative 2 and offers the following comments and suggestions.

WRD supports the revised goals of the Project, which are to create, restore, and maintain resilient ecosystems through active management and enhance human connectivity across this landscape with sustainable recreational opportunities for the purpose of producing ecosystems that are biologically connected and diverse, while maintaining soil productivity and protecting water quality within these landscapes.

The Project contains approximately 1,162 cool or coldwater streams. These waterways support a significant amount of Georgia's trout population. With at least 225 stream crossings and 81 miles of roads and trails within a 300-ft stream buffer, we concur that sedimentation caused by erosion and runoff from roads and trails impacts aquatic resources in the Project area that needs to be addressed.

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WRD continues to support management actions that enhance stream, riparian, and aquatic habitats through stream habitat improvement projects that maintain or add large woody debris (LWD) and instream structures. We offer the following remarks:

- On page B17 (last paragraph, last sentence), it should be mentioned that LWD needs to be repaired and upgraded on a regular basis along with instream structures.
- Recommend the addition of a proposed action in Table 17, *Stream, Riparian, and Aquatic Habitat* section (p.49) to "Restore Riparian Buffers." This proposed action addresses the need for stabilizing stream banks, preventing or minimizing erosion and sedimentation, and bringing disturbed riparian zones into compliance with Georgia's 50-ft stream buffer requirement. This action is mentioned on page B18 but is not listed in Table 17.
- Herbicide treatments are mentioned in Table 17 and pp. B44-B45. WRD recommends and supports using herbicides that are safe for aquatic organisms where the potential for runoff into streams, bogs, or lakes exists.

WRD supports the desired condition in Table 17 (p.49) of increasing aquatic connectivity by removing barriers to aquatic organism passage. It should be noted, however, that some barriers are beneficial in preventing encroachment of non-native species (i.e., rainbow trout, Alabama bass) on native species (i.e., brook trout, Chattahoochee bass). The potential for negative consequences of removing a barrier should be evaluated on a case-by-case basis.

In the EA, there are no recommendations addressing lake habitat improvements, downstream temperature impacts, or lake access improvements. WRD does not concur with decommissioning the angler access trails to Murray and Peeples lakes (Table 16, p.41). The rationale behind this recommendation in the EA is low use. If these trails receive low use, then impact and maintenance should be commensurately low. These trails provide the primary access to these waterbodies and absent further documentation the recommendation to close these trails seems arbitrary. Murray and Peeples lakes are impoundments located on designated trout waters. To meet state water quality standards for trout waters, a deepwater release should be installed over the outlet structures to provide cooler water temperatures downstream. The needs of boaters utilizing Forest Service boat ramps is not addressed. ADA-compliant floating courtesy docks should be included as a desired condition in Table 16 under the Recreation Areas section (p.42). The Forest Service has boat ramps on at least two lakes, Lake Rabun and Lake Russell, but there may be other non-compliant boating access facilities within the Project area that should be evaluated to accommodate boaters with physical limitations.

WRD's final comment pertains to public involvement as it relates specifically to the "citizen-led" working group. The role of this group is unclear in how it will guide the implementation process. WRD understands the process to develop this group and its operational framework is on-going. To this end, WRD offers the following suggestions for consideration:

- Group membership should reflect the diversity of interest in the Project (e.g., non-governmental conservation organizations, non-governmental preservation organizations, commercial timber interests, recreational user organizations, state natural resource agencies, local government representation,

federal agencies (i.e., United States Fish and Wildlife Service), citizens, adjacent landowners, and others.

- Organization membership on the group is limited to one official representative. The group serves in an advisory capacity to the Forest Service on proposed projects by helping identify and resolve critical or controversial issues, review and provide input, and provide recommendations for consideration.
- The Group may identify subcommittees from its membership to work on issues and develop recommendations to be considered by the group membership.
- The group and any subcommittees function on a consensus basis. Consensus means that all members can accept a recommendation or proposed action even if one, or more, representatives do not consider the recommendation ideal. This approach ensures working toward solutions where all interests are served and improved consistent with the Forest Plan and the betterment of forest health and the resources it supports. Voting should only be used as a last resort when consensus is unattainable as it divides the membership into winners and losers.
- The Forest Service retains a trained facilitator to assist the group and provides staff support to assist with and provide technical, legal, or similar guidance.
- Group meetings are open to the public; however, public interaction at group deliberations is limited so as not to interfere with the group fulfilling its role.

In closing, WRD supports the habitat restoration actions proposed in Alternative 2. As always, my staff remains willing and available to assist you when we can.

Sincerely,

Ted Will

TW/jwb

cc: Thom Litts
John Bowers
Jon Ambrose
Alan Isler
Scott Robinson