

August 13, 2021

Edward Hunter Jr., Forest Supervisor
Chattahoochee-Oconee National
Forest
Foothills Landscape Project-Environmental Assessment
1755 Cleveland Hwy Gainesville, GA 30501

Re: Environmental Assessment for the Foothills Landscape Project

Dear Supervisor Hunter,

Thank you for providing the continued opportunity to comment on the Chattahoochee National Forest's Foothills Landscape Project as it moves through the Environmental Assessment process. The Nature Conservancy (TNC) is a global conservation organization dedicated to conserving the lands and water on which all life depends. The Chattahoochee National Forest supports an extraordinary level of biological diversity that TNC is keenly interested in conserving. As such, please accept the following comments on behalf of the organization.

While the scope of the Foothills Landscape Project is considerable, TNC appreciates the necessity of increasing the pace and scale of work to improve the resiliency of the forest as a whole. TNC acknowledges the pace at which the current forest plan objectives are being implemented is not enough to make the needed gains to restore and/or maintain both terrestrial and aquatic habitats the U.S. Forest Service currently manages.

With the ultimate outcome of a healthier and more biodiverse resilient forest, TNC advocates for an active approach to forest management and restoration when necessary. As a science-based organization, peer-reviewed research guides this methodology which includes the expansion of prescribed fire application at the temporal and spatial scale that occurred historically, as well as silvicultural treatments to reduce basal area specifically for shortleaf pine, oak regeneration, and woodland restoration. TNC is encouraged to see these ecological principals incorporated into the Foothills Landscape Project. Successful implementation will provide a mosaic of biologically diverse and connected systems necessary to sustain the conservation values TNC supports.

TNC has prioritized and been active in the conservation of the Etowah and Conasauga River freshwater ecosystems since the 1990s. The organization has implemented numerous projects focused on improving fish and mussel biodiversity, with a result of improved water quality overall within these watersheds. Therefore, TNC supports the Forest Service's planned work to improve stream health via abating sediment runoff from unpaved roads, erosion and barriers to aquatic species movement from poorly designed and undersized culverts at stream crossings throughout the Foothills Landscape. The prioritization work conducted by the Center for Aquatic Technology Transfer (CATT) team will ensure this work will be executed in places with the potential for greatest benefit to aquatic resources in the Chattahoochee-Oconee National Forest (CONF). TNC has worked closely with CONF personnel on several culvert replacement projects, which have multiple benefits including ensuring continued access for the public and for land management crews to conduct essential activities such as prescribed fire. It is our hope that the planning represented by the Foothills Landscape EA will raise the profile of this important work and bring additional resources to the CONF to priority stream barrier and sediment runoff projects.

Specifically, proposed actions described in the Foothills Landscape Project that TNC supports includes:

- Management in Unique Habitats focused on the protection of Rare, Threatened, and Endangered Species and natural communities.
- Vegetation management that would restore and improve uneven-aged mixed pine and pyric hardwood forests and woodlands in appropriate zones as delineated by the Simone ecozone mapping project. Especially in regard to management of off-site pine plantations.
- An expanded prescribed fire management program to maintain progress in areas already under prescribed fire management while incorporating new burn units in appropriate locations.
- A focus on stream health and water quality through the decommissioning of pertinent infrastructure, replacement of existing culverts, or improved structures at stream crossings to improve aquatic organism passage in priority watersheds.

The Foothills Landscape Project is expansive in scope but positions the U.S. Forest Service to make inroads in creating a more resilient forest. TNC as a landowner and land manager itself, appreciates the need to think at the scale that is necessary to address the ecological challenges that society is currently faced with. We truly appreciate the shift from a purely conditional based approach to a programmatic analysis approach that will allow for ongoing public engagement. TNC is ready to support a streamlined NEPA approach in conjunction with a citizen led Collaborative to engage in the process of project selection.

Respectfully,

Dan Ryan
Director Conservation