United States Forest Service
Chattahoochee-Oconee National Forests Supervisor's Office
1755 Cleveland Highway
Gainesville, Georgia 30501

Re: Foothills Landscape Project - Environmental Assessment

To Whom it May Concern:

Environmental Review, Inc. has reviewed the Environmental Assessment for the Foothills Landscape Project in Chattahoochee National Forest and has the following comments:

Introduction

The United States Forest Service seeks to begin the Foothills Landscape Project in Chattahoochee National Forest in Georgia. The project spans 157,625 acres of forested land, ranging from mountains to foothills. The topics covered by Environmental Review Inc. in this review are as follows: 1. Improving soil and water quality over the course of the project. 2. Enhancing and providing habitat for rare and quality species and also desired game and nongame species. 3. Indigenous and cultural resources. 4. Enhancing recreation. 5. Providing additional information for overall improvement of the document.

Section I - Soil & Hydrology

1. On page 102 of the web optimized assessment, it states that long-term impacts are expected, mostly through timber harvesting and new trails as outlined in the soil report. In the event that filling/reclamation projects are necessary in the long-term, what protocols are in place to ensure that soil health is maintained? If filling projects are in fact anticipated, is there any language that requires soil used at deposition sites to be of equal or greater quality than that of the current soil?
2. Many watersheds are classified as “at-risk” in the Hydrology Report. The Georgia Environmental Protection Division is responsible for monitoring these sites, but it is unclear if either the state or private companies are responsible for managing remediation projects of such areas. Who will be performing these remediation projects over the course of the Foothills Landscape Project and in the future?

Section II - Wildlife

3. On page 29 of the Terrestrial Wildlife Report, it is noted that the white-tailed deer fawn recruitment has steadily declined, likely due to a combination of predation, weather, hunting, and habitat-related factors. That said, deer are known to have a large influence on plant communities and tree recruitment (Rooney, 2001). In terms of predation, the report speculates that a rising coyote population can be attributed to a falling fawn recruitment rate. Black bears are also hypothesized as a source of adult deer predation, but it is noted that this is largely unstudied in Georgia. The top-down control of the

white-tailed deer population may need to be more closely studied in the future in order to help determine potential impacts to plant communities in Chattahoochee National Forest in the case of black bear or coyote population declines.

4. The gray bat is listed as a threatened or endangered species in the project area. Page 13 of the Terrestrial Wildlife Report states that this species' hibernacula are located outside of the project area, so the most likely impacts to the species would be due to impaired water quality affecting their aquatic insect prey. What information exists regarding the status of its prey species populations?
5. Page 21 of the Aquatic Resource Report lists two aquatic insects as Regional Forester Sensitive Species; the Georgia beloneurian stonefly and Edmund's snaketail dragonfly. These species are noted to be affected by potential sedimentation and habitat alteration. What remediation projects could be implemented if these impacts should occur?
6. The sections listed under "Environmental Impacts" include tables referencing the potential direct and indirect impacts of proposed action plans and make heavy use of qualitative language to describe indicators in listed species/habitats. For instance in Table 29, the implementation of Alternative 3 states "Many of the changes may decrease habitat in the short run but will ultimately provide species with new habitat opportunities". Providing the data and/or studies that led to this conclusion would clarify the possible effects to the habitat of terrestrial species, especially those that are threatened or endangered (Indiana bat, northern long-eared bat).
7. The separate effects of each proposed action plan are listed in sections of "Environmental Effects", but cross-reference of how proposed actions will affect other areas is not clear. For example, how will proposed actions in Alternative 2 and 3 for recreation and inventoried roadless areas affect terrestrial wildlife and their habitat, if they will have any effect?

Section III - Cultural Resources

8. Table 25 on page 88 of the environmental assessment contains a row titled "Traditional Cultural Properties and Sacred Sites", which is the only time that this is mentioned during the report. The existence of indigenous cultural sites is heavily implied, especially because indigenous tribes are credited as consulted in the citations of this document. If there are in fact areas of indigenous cultural significance in the project area, they should be identified by name, tribal affiliation, and cultural significance. Additionally, Table 19 which details botanical resources should contain information on the cultural significance attributed to any of the listed species.
9. In the "Impacts" section on page 62, it states that corresponding specialist reports provide complete analysis for each issue on how cultural resources and non-native invasive species will be affected by proposed action plans. Three different specialist reports are provided on the Foothills Landscape Project page with little to no reference to them in the Foothills Project EA. If more data/content was directly stated to this section from the specialist reports, it would improve the ability of the general public to understand the effects of the proposed plans and form more cohesive comments.

Section IV - Recreation

10. Alternative 2 proposes the decommission of a section of two motorized trails, Tatum Lead and Milma Creek OHV trails. Tatum Lead leads into private property and has led to habitat and resource loss, while Milma Creek is underused. Is it not possible to improve each trail instead of building new trails and decommissioning them, possibly redirecting Tatum Lead and connecting Milma Creek trail to higher-trafficked areas?

Section V - Additional Information to Be Included

11. Under the sections "Indication and Measures" for "Aquatic Resources" and "Terrestrial Wildlife", the listed indications and measures are unclear and vague, with more detailed tables referenced (Tables 18 and 29, respectively) in aquatic resources is unclear and refers to vague (measures). Both of the "Indication and Measures" sections under "Aquatic Resources" and "Terrestrial Wildlife" could have included more information and gone into greater detail about the proposed actions and their effects on respective areas.
12. The proposed actions for Alternative 2 "would only occur if the existing condition identified the need for active management and the purpose of this analysis is met". It would be assumed that the proposed plans were formed on the basis that existing conditions already met the need for active management.
13. There are several data tables in the environmental assessment that do not list percentages of affected areas. Most notably, table 14 on page 28 could be made more effective by adding an additional column listing percentages of Total Acres by Risk Level, as it otherwise requires the reader to calculate said percentages manually.

References

Rooney, Thomas (2001), *Deer impacts on forest ecosystems: A North American perspective*.

Forestry: An International Journal of Forest Research, Volume 74, Issue 3, 2001, Pages

201–208

Please direct all responses to these comments to the following email addresses: mcoughl1@terpmail.umd.edu ; leesteve1987@gmail.com ; soilscientist@yahoo.com ; scjohnsonfl99@gmail.com

Sincerely,

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