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Organization: The Nature Conservancy

Title: Watershed Coordinator

Comments: Dear Ms. Bell,

The Nature Conservancy in Georgia (TNC-GA) respectfully submits the following comments on the draft [ldquo]Proposed Action for the Foothills Landscape Project[rdquo] dated October 30, 2017.

On connectivity, we were pleased to see that the scoping document calls out the threat of stream crossings and culverts, specifically the collapsed crossing at Mill Creek, which is a high priority project for TNC. We also look forward to seeing the final assessment of stream crossings and the subsequent work that assessment will lead to.

Forest service roads have been identified as a major source of sedimentation in National Forests and we fully support the Forest Service[rsquo]s decision to decommission/transition roads that could be contributing to this degradation. While the scoping is vague on what improvements will be made to the Holly Creek parking/access, TNC would support actions such as paving CCC Camp Rd to the Day-Use area as one of these [ldquo]improvements[rdquo]. Paving CCC Camp Rd has the potential to reduce sedimentation in the headwaters of a key tributary of the Conasauga. Regarding the proposed [ldquo]fishing piers[rdquo] at the Holly Creek Day Use Area, it goes without saying that Holly Creek is a highly biodiverse watershed and home to a number of rare and listed aquatic organisms. We caution against the construction of any in-stream structures and wish to hear more detail about this project before giving our support.

Terrestrially, we applaud the emphasis placed on fire management and the acreage goals laid out in this plan. We were struck, however, by how you separated out silvicultural actions for areas where fire might be applied from those areas where fire wasn[rsquo]t likely. Silvicultural actions are addressing symptoms while fire is addressing the root cause of forest degradation. We don[rsquo]t see much value in purely addressing symptoms and, as such, hope you will bias your actions to those areas in which the health of the forest can be maintained in a natural fashion.

We are thankful for the work that has gone into this process and look forward to partnering with the Forest Service as the plan continues to progress.