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Comments: My complete comment is contained in the attachment (includes text and figures).

#### Executive Summary

(Robert X. Black: conf.flp.rxb@gmail.com)

(The complete version of this comment is available at: <https://tinyurl.com/vcp62t5>)

This represents a formal comment on the proposed Foothills Landscape Project (FLP; #525091). Similar to many other Rabun County residents, I live directly adjacent to National Forest land that will be affected by the project. Concentrating on a specific local region of interest, I provide analysis, discussion and summary feedback on the activities currently proposed in the project plan. In doing so, I also hope to bring broader public awareness of issues that likely exist elsewhere in the project domain.

First, two general aspects of the current FLP plan that are worth noting:

- (1) Over 53,000 acres of the Chattahoochee-Oconee National Forest are subject to commercial logging activities (More than 1/3 of project area!)
- (2) A [ldquo]flexible toolbox approach[rdquo] will be used in the local implementation of the land management actions. One critical implication of this adaptive strategy is that all activity options remain on the table for all of the affected areas. Thus, the scope of any activity (including commercial logging!) is subject to change.

For the region of interest I have also discovered several specific issues/concerns:

-> Inconsistencies in the scientific motivation for certain proposed activities

-> Undesirable impacts upon nearby residential road infrastructure and safety

-> Detrimental impacts upon local scenic beauty and recreational opportunities In response to these issues, my primary conclusions for the region of interest are:

- (1) Currently proposed Oak Maintenance (includes commercial thinning and prescribed burns) and Canopy Gap (includes commercial clear-cutting) activities should be removed from consideration.
- (2) A commercial logging approach to proposed Pitch Pine Maintenance activities should be replaced or removed from consideration.

Although my focus is intentionally local, the analysis is quite relevant to activities proposed for other parts of the project domain. For the region of interest my analysis reveals that, in its current form, the Foothills Landscape Project represents

[ldquo]the wrong work in the wrong places for the wrong reasons.[rdquo]

Additional details on the nature of, and reasoning behind, these conclusions are provided in the analysis and discussion on the following pages.

1 FLP web page: <https://www.fs.usda.gov/detailfull/conf/home/?cid=FSEPRD514937> Enter your own comment on the Foothills Landscape Project by 01/10/2020 at: <https://cara.ecosystem-management.org/Public/CommentInput?Project=52509>

## Background/Introduction

Rabun County is filled with natural scenic beauty, much of it contained within the Chattahoochee-Oconee National Forest. This includes dramatic mountains (and vistas), innumerable streams and waterfalls, scenic recreational areas and extensive hiking trails through long stretches of unbroken wilderness. This beautiful forested land offers a wealth of outdoors natural experiences and recreational opportunities. I consider myself to be extremely fortunate to live within this region, which attracts multitudes of visitors and drives the local tourist industry. There is a great concern among many of the residents of Rabun County (myself included) that the Foothills Landscape Project places much of this Natural Forest landscape in great jeopardy.

My wife and I live in Rabun County within the Screamer Mountain residential community on the east side of Clayton. Our neighborhood directly borders a portion of the Chattahoochee-Oconee National Forest that will be impacted by the proposed Foothills Landscape Project (the western [hook] portion of region 9.A.3; see Fig. 1). We live near a spectacularly beautiful stream area (with many large waterfalls) that extends from our neighborhood down to the Kingwood residential community. The well-maintained Kingwood Nature Trail follows the stream from Kingwood uphill to the Screamer Mountain community (Figs. 2-3). The trail affords scenic views of the stream and several waterfalls, with a spur trail that leads directly to Laurel Falls, a popular hiking destination for Kingwood residents and guests (Figs. 3-4). The trail and stream are bordered by (and in some places pass through) the National Forest. We greatly enjoy hiking the trail and I help to maintain the upstream portion of the trail. Therefore, I am quite familiar with the forest structure in this tract of National Forest, putting me in an excellent position to comment on the suitability and likely impact of the current Foothills Landscape Project plans. The Chattahoochee-Oconee National Forest area located to the east of the stream area and Screamer Mountain residential community is the central focus of the following discussion. For reference, summary background information regarding the Foothills Landscape Project (FLP) approach (which is formally contained within the FLP Environmental Assessment or FLPEA) is provided in the Appendix (Page 8 of the current document). The Appendix is immediately followed by the 8 figures that are referenced in my discussion.

## Analysis/Discussion of FLP plan for the Region of Interest

A substantial portion of the affected FLP area is located in Rabun County. In this comment, I am specifically interested in, and focus my primary attention on, a portion of the Watershed Restoration Area 9.A.3 located east of Clayton (Fig. 1). As illustrated in Fig 2, this [ldquo]hook[rdquo] shaped area is bounded by

- (1) Warwoman Dell (north side; Warwoman Dell is also part of 9.A.3)
- (2) Screamer Mountain residential community (west side)
- (3) Kingwood Resort/residential community (west and south)
- (4) Camp Rainey Mountain (east, land owned by Boy Scouts of America)
- (5) Private residences (southeast)

The western portion of the hook-shaped region borders the stream area and nature trail discussed earlier. Specifically: the stream and nature trail are located west of this part of 9.A.3 (Fig. 2b). Thus, portions of the Kingwood Nature Trail, the stream, Laurel Falls and our neighborhood directly border (and in some cases lie within) the Watershed Restoration Area 9.A.3. Hereafter, [ldquo]the region of interest[rdquo] refers to that part of Area 9.A.3 enclosed by the red oval in Fig. 1b.

To guide the following discussion, Figures 5-8 include zoomed-in portions of several maps included in the FLPEA (Maps 2, 15, 16, 17) focusing on the region of interest. For reference purposes, Figs. 5-8 also include a duplicate version of Fig. 2a that identifies key features of interest (Warwoman Dell, Kingwood Nature Trail, and Laurel Falls; in yellow) and the 9.A.3 boundary (in red).

The FLP begins with a detailed regional classification of natural vegetation (forest) groups (FLPEA Maps 2-4). As discussed in the Appendix, the regional forest characteristics dictate proposed FLP management actions (FLPEA, pp. 46-56). I note that management action [ldquo]Canopy Gap Creation[rdquo] is indicated for [ldquo]yellow poplar- dominated stands and high-productivity oak stands with closed canopies and little vertical structure[rdquo] (FLPEA, p. 52). I additionally note that [ldquo]Midstory Reduction Treatment[rdquo] is indicated for [ldquo]moderate to highly productivity oak sites[rdquo] (FLPEA, p. 49). I emphasize the specificity of the two above actions to sites dominated by yellow poplar or oak. Thus, proposed FLP management actions should directly relate to the existing forest structure (e.g., FLPEA Maps 2-4).

Exploring further, Fig. 5b (the zoomed-in version of FLPEA Map 2) illustrates that the southern portion of the region of interest consists of hemlock forest (along the stream) with a predominantly pine forest east of the stream (in area 9.A.3; with a few small patches of mesic hardwood). The hemlock/pine forest is bordered by a

predominantly oak forest to the west outside of National Forest land in the Screamer Mountain residential community. As a frequent visitor to these spots, I can personally vouch for this forest structure. This is also consistent with corresponding (wintertime) satellite imagery (Fig. 2).

Essential takeaway: The region of interest is neither yellow poplar nor oak dominated. Therefore, the FLP plan indicates that the existing forest structure does not call for either [Idquo]Canopy Gap Creation[rdquo] or any management actions related to [Idquo]Oak Maintenance.[rdquo] Building upon the vegetation group maps, Figures 6-8 include corresponding (zoomed-in) maps of currently proposed FLP management actions for the region of interest (to guide the following discussion):

1) Pine forests. Fig. 6b displays management actions specific to different types of pine forests. The main action proposed for the region of interest is Pitch Pine Maintenance that is a subset of [Idquo]Southern Yellow Pine Maintenance[rdquo] (FLPEA,

p. AP34). Specific proposed methods include [Idquo]ground-based thinning, herbicides, mastication; possible scarification, hand-planting[rdquo] to be immediately followed by prescribed burns and intermittent burns thereafter. Thus, the proposed activities include commercial logging and prescribed burns. The areas affected include a section directly east of the stream/Kingwood Nature Trail (Fig 6a).

2) Oak maintenance. Fig. 7b displays corresponding proposed actions for oak tree maintenance. In the region of interest, actions include Midstory Reduction and Intermediate Thinning. Proposed thinning methods include [Idquo]ground-based harvest, herbicide, mastication[rdquo] followed by prescribed burns (FLPEA, p. AP34). The proposed activities include commercial logging and prescribed burns. Areas directly affected include the northern section of the Kingwood Nature Trail and the eastern edge of the Screamer Mountain residential community (Fig. 7a).

3) Canopy Gap/Woodland Restoration. Fig. 8b displays the areas where Canopy Gap and Woodland Restoration management actions are currently planned. Canopy gap creation appears to be a euphemism for commercial clear cutting of  $\frac{34}{100}$  acre parcels of NFS land. Quoting the FLPEA: [Idquo]trees would be selectively removed from all crown positions (upper, mid and understory levels) and tree sizes[rdquo] (FLPEA,

p. 52). So-called gaps would be up to 0.75 acre in size and implemented over as much as 25% of designated Canopy Gap areas. Further intermediate commercial thinning would also be performed in between the gaps (in the remaining 75% of the affected area). The oddly named [Idquo]Woodland Restoration[rdquo] consists of creating open [Idquo]woodland[rdquo] blocks and requires [Idquo]both partial overstory and midstory removal, with a residual basal area of 20-40 ft<sup>2</sup> per acre, as well as prescribed burning[rdquo] (FLPEA, p. 52). This action involves [Idquo]ground-based harvest, herbicide, mastication[rdquo] (FLPEA, p. AP35). Thus, proposed activities for both Canopy Gap Creation and Woodland Restoration include widespread commercial logging with the latter requiring regular prescribed burns. As shown in Fig. 8, the proposed Canopy Gap area includes most of the western edge of the region of interest (the hook-shaped portion of 9.A.3). Thus, as currently posed, the FLP plan explicitly proposes areas of commercial clear cutting in the region of interest. To be more specific: Canopy gap

clear cutting is proposed for areas that are directly next to (or include) the (i) stream, (ii) Kingwood Nature Trail, (iii) Laurel Falls and (iv) the Screamer Mountain neighborhood.

A synthesis of the above discussion illustrates that the current plan includes glaring inconsistencies for the region of interest. As discussed earlier, according to the FLP proposal, the management action Create Canopy Gap is specifically targeted for [yellow poplar-dominated stands and high productivity oak stands] (p. 52 and p. AP35). Since, according to the FLP data presented (Fig. 5b; FLPEA Map 2) the area under discussion is not predominantly yellow poplar or oak forest, proposed Oak Maintenance and Canopy Gap actions for this area are inconsistent with existing forest conditions (outlined in FLPEA Table 3; p. 15). Thus, both Oak Maintenance and Create Canopy Gap are inappropriate actions in the region of interest and should be removed from the plan (even before considering the logistical hurdles discussed in the next section). A critically important broader implication is that the maps provided in the current FLP plan are not consistent with one another.

#### Logistics of Commercial Logging Activities in the Region of Interest

The region of interest presents substantial logistical barriers to the extensive use of commercial logging as it is largely bordered by private property (to the west, east and south). As such, access would need to be gained via some combination of the following: the private roads of the Screamer Mountain and Kingwood residential communities, BSA Camp Rainey Mountain and/or from the Warwoman Dell area (from the north). Access via the Screamer or Kingwood communities would require extended periods of time during which commercial log trucks would need to travel on narrow (mostly one lane), privately owned roads that pass through residential communities. This trucking activity would almost certainly lead to substantial wear, tear and the likely destruction of road surfaces and roadbeds. Who would fund the necessary repair and/or replacement of these roads (I suspect that the NFS has not accounted for such costs)? Of perhaps even greater concern is the substantial safety risk that would be imposed on residents suddenly required to circumnavigate one-lane roads with tractor-trailers. Who would ensure proper management of traffic flow in such situations? The Warwoman Dell option would seem to necessitate (a) building a logging road extending from the Warwoman Dell area and (b) the passage of log truck traffic either around or through Warwoman Dell and the Bartram Trail. Given the recognized scenic and recreational character of both Warwoman Dell and the Bartram Trail, this option also seems to be a less than desirable choice. There would appear to be no viable access option that doesn't either (a) adversely impact adjacent residential communities or (b) effectively destroy the scenic beauty and recreational character of the NFS land (particularly Warwoman Dell), itself.

#### Summary/Suggested Changes to the FLP for the Region of Interest

-> Scientific motivation. The current plan contains substantial deficiencies in its stated justification of [improving biological integrity]. More specifically: Multiple management actions proposed for this

area are inconsistent with existing forest conditions.

-> Residential impacts. Extended periods of commercial logging traffic via the adjacent residential communities (e.g., Screamer Mountain & Kingwood) will have a substantial detrimental impact on private road infrastructure and travel safety for community residents.

-> Community impacts: Scenic integrity and recreational opportunities. Commercial logging activities outlined in the current FLP plan would have a devastating impact on the Kingwood Nature Trail, the adjacent stream and waterfalls (including Laurel Falls) and Warwoman Dell (as well as existing scenic beauty surrounding all these areas).

Summary Conclusions: A collective consideration of (i) deficiencies in the biological justification, (ii) logistical concerns for implementing commercial logging activities and (iii) anticipated detrimental impacts on local residents and the broader Rabun County community lead to the following conclusions:

(1) Currently proposed Oak Maintenance (which includes commercial thinning and prescribed burns) and Canopy Gap (includes commercial clear-cutting) activities are inappropriate for this portion of Watershed Restoration Area 9.A.3 and should be removed from consideration.

(2) A commercial logging approach to proposed Pitch Pine Maintenance activities is not viable for the region of interest and should be replaced or removed from consideration.

Thus, for the region of interest my analysis reveals:

In its current form the Foothills Landscape Project represents [ldquo]the wrong work in the wrong places for the wrong reasons[rdquo]

I will finish by noting that Mother Nature was doing just fine maintaining the Northeast Georgia forest until we decided to come in and remove all the trees in the early 20th Century. It is evident to me that She is now currently very well on her way to successfully implementing her own forest [ldquo]management plan[rdquo] and requires little help from us (apparently to justify commercial logging in our National Forest)!!

Sincerely yours,

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CC: Kingwood Resort

Screamer Mountain Community USFS, Chattooga River Ranger District Clayton Tribune

Appendix

Broad Summary of Foothills Landscape Project Approach

(references maps and tables in the FLP Environmental Assessment [FLPEA])

The Foothills Landscape Project is a proposed group of ecological restoration activities for [ldquo]improving biologic integrity, increasing the ecosystem[rsquo]s resilience to disturbance, maintaining or restoring connectivity, and supporting high water quality and soil productivity[rdquo] in National Forest Service land over North Georgia where the Appalachian mountains transition to foothills. The Foothills Landscape Project (FLP) area is considered to consist of 5 principal ecological vegetation zone groups (FLPEA Maps 2-4):

Hemlock cove forest

Mesic hardwood forest (moderately moist)

Oak-dominated forest

Pine-dominated forest

Riparian(wetlands adjacent to streams/rivers)

Existing concerns for each major forest community are summarized in the FLPEA (Table 1; column 7). In response to the concerns, the Chattahoochee-Oconee National Forest Service has identified 40 broad

Management Area Prescriptions for different parts of the project area (FLPEA Maps 5, 9, 10 & 11). These provide broad direction on the scope of restoration activities to occur within each area. Specific management actions were developed in relation to perceived local forest conditions and needs. The proposed management actions are summarized in FLPEA Appendix

B. This includes information on what the activity is, how it is performed, size of the area affected and locations where the activity will be performed. For example, the management action [ldquo]Southern Yellow Pine Maintenance[rdquo] will be executed on 12,400 acres of [ldquo]mid to late successional shortleaf pine stands and/or stands that contain pitch or table mountain pine, where midstory conditions are prohibiting natural regeneration[rdquo] via [ldquo]ground-based thinning, herbicides, mastication; scarification, and hand-planting[rdquo] and will involve both prescribed burning and commercial logging.

The district-level land management teams will use an [ldquo]implementation plan[rdquo] (Appendix E) that provides a uniform framework for determining the [ldquo]what, when, where, and how[rdquo] needed to attain the project[rsquo]s ecological restoration goals. The plan is an internal process guide to (a) ensure management activities are consistent with proposed project objectives, (b) guarantee proper channels of communication to partners and stakeholders and (c) serve as a compliance check and planning tool. The project uses a [ldquo]flexible toolbox approach[rdquo] that allows regional land managers to select a suitable restoration approach for each location from the set of management activities (or [ldquo]tools[rdquo]) outlined in Appendix B. Prior to regional implementation, the local forest conditions will be re-evaluated to affirm that restoration needs remain consistent with originally stated project objectives. Decision flow charts in Appendix E of the FLPEA will direct such assessments and regional implementation.

Fig. 1. Zoomed-in portions of FLPEA Map #5. Top (a): Broader view of region 9.A.3. Red rectangle encloses the region plotted in bottom map. Bottom (b): Region used in Figs 5-8. Red oval highlights the specific region of interest (western [ldquo]hook[rdquo] of 9.A.3).

Warwoman Dell

9.A.3(a)

Screamer Mountain Residential PropertiesChattahoochee-Oconee National Forest (9.A.3)\*Kingwood

Boy Scouts of America Resort LLC

(NE GA

Council)KingwoodNature Trail

Laurel Falls\*

KingwoodResidential Properties(b)

Fig. 2. Satellite images with property boundaries (as defined in Rabun County qPublic). Top (a): Same region as in Fig. 1b. Red rectangle encloses region plotted in bottom map. Bottom (b): Specific region of interest (highlighted features are discussed further in text).

Fig. 3. Map of Kingwood Nature Trail (also known as Laurel Falls Trail). This is the same trail that is plotted in yellow in Fig. 2b.

Fig. 4. Photographs of waterfall views from the Kingwood Nature Trail (bottom is Laurel Falls).

Fig. 5. Top (a): Satellite image with 9.A.3 boundary in red and several features of interest highlighted in yellow (background image identical to that in Fig 2a). Bottom (b): Natural vegetation forest groups in region of interest (color shading key provided in lower left).

This is a zoomed-in portion of FLPEA Map #2. See text for further discussion of maps.

Fig. 6. Top (a): Satellite image with 9.A.3 boundary in red and several features of interest highlighted in yellow (background image identical to that in Fig 2a). Bottom (b): Proposed pine tree maintenance plan in region of interest (color shading key provided in lower left). This is a zoomed-in portion of FLPEA Map #15. See text for further discussion of maps.

Fig. 7. Top (a): Satellite image with 9.A.3 boundary in red and several features of interest highlighted in yellow (background image identical to that in Fig 2a). Bottom (b): Proposed plan for oak tree maintenance/regeneration

plan in region of interest (see color shading key). This is a zoomed-in portion of FLPEA Map #16. See text for further discussion of maps.

Fig. 8. Top (a): Satellite image with 9.A.3 boundary in red and several features of interest highlighted in yellow (background image identical to that in Fig 2a). Bottom (b): Proposed plan for canopy gaps and woodland restoration in region of interest (see color shading key). This is a zoomed-in portion of FLPEA Map #17. See text for further discussion of maps.