



MARK WILLIAMS
COMMISSIONER

RUSTY GARRISON
DIRECTOR

December 21, 2017

Ms. Betty Jewett
Forest Supervisor
United States Forest Service
1755 Cleveland Highway
Gainesville, Georgia 30501

Dear Ms. Jewett:

Congratulations on the development of a Proposed Action for the Foothills Landscape Project (Proposed Action) and thank you for undertaking a robust and deliberate public involvement effort to facilitate the Proposed Action. My staff has reviewed the document and our comments are provided herein. Several have commented that the character of the document indicates that habitat improvement projects will be central to the resulting decision. The Wildlife Resources Division (WRD) is heartened by this as well as the inclusive scope of the document.

The Forest Service (FS) has done a good job of being responsive to many of our previous comments and input from the Community Conversations. The Proposed Action utilizes an “adaptive management” strategy in lieu of the traditional FS approach to identifying specific treatments, in specific areas with specific methods. Given the size and expanded scope of the Foothills Project, the adaptive management strategy is appropriate, and allows the FS to contemplate and, in some cases, take advantage of changes in the project area over time. We concur with and support this approach.

In using the specific Project Design Criteria to achieve the goals specified in the Proposed Action, we believe the FS strikes a balance in keeping the project responsive while conserving natural resources. To improve the Proposed Action, we recommend revising the various “range of action” statements to include a “Not Less Than” amount (e.g., “not less than [specified acreage] up to [specified acreage]”). Currently the Proposed Action lists “up to [specified acreage]” for: southern yellow pine restoration; oak, oak-pine community restoration; woodland community restoration; fuels reduction (fire); prescribed burning and young forest creation. Given the effort of the Foothills Project is restoration of various communities, we recommend setting the not-less-than acreage for each at the point where you may consider adequate restoration of that community has occurred.

WRD strongly supports the plan's analysis and range of actions for the various community restoration, young forest creation and fire treatment goals. Using the adaptive management process requires some prioritization to achieve desired results. We recommend the FS prioritize accomplishment of goals on or within existing pine plantations where appropriate. Even-age pine plantations typically exhibit heavy shade at the forest floor, which has suppressed growth and essentially provides a "blank slate" for a variety of efforts. Typically, these areas have had previous access and are more likely to retain some access. In addition, pine plantations are rarely the subject of much public ardor, and are generally regarded as unnatural and of little benefit in natural ecosystems. Furthermore, without active management these stands are likely to persist in a similar condition for many years. We further recommend prioritizing restoration of existing, remnant communities before conversion of one community to another (excepting pine plantations).

WRD urges a considerate approach to determine how best to use limited road maintenance dollars and would like the FS to reconsider the referenced road maintenance changes. A transportation analysis has been conducted separately and road classifications within the Foothills may be changed up to and including decommissioning roads. We recommend the FS consider any road to be decommissioned first be daylighted as described in the Proposed Action for maintained roads, then ripped to reduce compaction, seeded in place and closed to non-administrative vehicular access. Such roads can be maintained in perpetuity by occasional mowing or winter discing. We believe this enhances foot access, would still serve as fire breaks if necessary, would satisfy the road closure requirement while saving the FS money, and would provide some structural and age diversity. On these roads within WMAs, WRD is willing to partner with the FS to provide this maintenance.

It appears that some issues such as property acquisition, fish spawning substrate or OHV trail improvements have not been addressed in the Proposed Action. If these actions are otherwise authorized through another mechanism such as a categorical exclusion or previous analysis, we suggest mentioning those actions within the analysis area that may be undertaken concurrently with implementation of the Proposed Action and which may achieve some of the Plan goals and simply referencing the established authorization mechanism.

We request the FS consider specifically addressing potential boater access issues (e.g., Lake Rabun boat ramp). We recommend that any proposed closure of recreation sites based on a determination of overuse (e.g., parking, erosion, vegetation loss, etc.) should be offset with a plan to handle/direct that use elsewhere as those displaced by such closures will move to the next best similar site. Additionally, we suggest that the FS look for opportunities to focus significant restoration efforts around and adjacent to our efforts at Tallulah Gorge. The NonGame Conservation Section of WRD is currently conducting significant work in support of rare community restoration in that area and both WRD and FS will benefit from this synergy.

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WRD supports the FS's Proposed Action for the Foothills Landscape and believes that the adaptive management process is the proper framework to administer the Foothills Project. It is also WRD's position that the combination of fire along with the suite of mechanical treatments identified is the most logical approach to accomplish much of the desired restoration work. The FS set an aggressive schedule for the meetings and analysis and we hope for an equally robust implementation schedule as well. We look forward to discussions regarding that implementation schedule in the very near future.

As always, my staff remains willing and available to assist you when we can.

Sincerely,

A handwritten signature in black ink, appearing to read "R2 Garrison", written in a cursive style.

Rusty Garrison

Cc: Jon Ambrose
John Bowers
Matt Thomas