

January 10, 2020

Betty Jewett, 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 Jewett,

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 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 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 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 is enthusiastic that the Foothills Landscape Project has an increased focus on aquatics, which will allow more collaborative conservation projects within the forest, with downstream benefits to the system. Additionally, road closures as detailed in the Foothills Landscape Project will undoubtedly improve the health of these aquatic systems by removing a primary source of sedimentation.

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

- Designation of up to 5,050-acres of Old-Growth Stands for Conservation.
- Implementation of up to 50,000 acres of Prescribed Burning.
- Implementation of up to 7,400 acres of Woodland Community Restoration.
- Implementation of up to 43,800 acres Oak and Oak-Pine Maintenance.
- Implementation of up to 7,500 acres of Southern Yellow Pine Restoration.
- Implementation of up to 12,400 acres of Southern Yellow Pine Maintenance.
- Implementation of Up to 1,700 acres Oak and Oak-Pine Restoration.
- Creation of up to 10,500 acres of Young Forest.
- Replacement of existing culverts or improved structures at stream crossings to improve aquatic organism passage and stream function on up to 225 stream crossings on the Etowah drainage, the Chattooga River, Mill Creek and Holly Creek 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.

Respectfully,

Dan Ryan
Director of Conservation