

August 10, 2021

Edward Hunter, Jr.
Forest Supervisor
Attn: Stephanie Israel
1755 Cleveland Highway
Gainesville, GA 30501

Reference: Email dated July 13, 2021 from USDA Forest Service to D.L. Grindle

Subject: Opportunity to Comment on Revised Foothill Landscape Project Environmental Assessment

Dear Forest Supervisor:

I am responding to reference email and appreciate the invitation to comment on the Revised Project Plan.

First, I must congratulate you and your team on the document. It was well conceived and obviously required a tremendous effort to assemble so many elements including the myriad of charts and graphs into a cohesive publication.

I have attempted to divide my comments into specific subjects of the plan or to point out what I think are important items that were apparently omitted.

Item 1 - Plan Development

The plan describes in great detail the process used to develop and refine its contents, including numbers of letters, comments and public meetings covering both the 2017 and 2019 versions of the plan.

I attended some five meetings, and submitted multiple pages of comments as did members of my family and many friends. I was unable to find reference to my input in plan revisions as described in the "Grid" on pages 32-34. How is it determined which comments are worthy of being incorporated into the plan?

The plan references a working group of stakeholders who will continue to refine and perhaps prioritize implementation of plan elements during 2021. I wondered how this group was selected.

Page 32D references development and inclusion of a 3rd alternative which seems logical. It was not clear to me whether this is a favored approach or is the selection decision on alternatives subject to further deliberation?

Item 2 – Specificity

The plan is very specific on some intended actions. However, in other instances such as conversion of logging roads to trails, creation of new trails, closure of certain trails, etc. The plan provides distances such as 10 miles of new trails or 2 miles of reroutes but doesn't identify the exact location. Perhaps the specific locations haven't yet been determined. This presents a dilemma. While I am certainly in agreement with the concept of more quality opportunities for forest users, one cannot object to a closure or new route that is not yet identified.

Item 3 – Inholdings/Stakeholders

There were many references to Stakeholders in developing/revising the plan. Even though the invitation to comment on the plan addresses me as a stakeholder, I think it was used as a generic term for anyone who commented earlier and/or placed their names on the mailing list for notifications. I suppose technically any US citizen is a stakeholder. However, when I use the term stakeholder relative to the Foothills Plan, I am referring to people (other than USFS staff) that are engaged in the plan development/revision process.

Owners of “inholdings” should automatically be considered key stakeholders. For instance, I have invested thousands of dollars in treating Hemlocks, some on adjacent USFS property, large ones that are expensive to treat. Also, my property is managed under a plan developed by a consultant. The food plots are costly and provide forage for wildlife over a wide area, not just my land. This property has also been included in USFS controlled burns. On the negative side, I encounter poachers and trespassers who enter from USFS roads and trails. I suspect others owners of inholdings have similar situations. That is why I believe we are key stakeholders maybe more so than some of those that are currently using that designation.

I did find charts in the plan that identify the location and size of various inholdings but other than addressing their inclusion in controlled burns I found no reference to collaborative engagement.

Because of my inholdings I do receive notices of USFS actions which are occurring nearby. This is greatly appreciated.

Item 4 – Enforcement

There are many laws, rules and regulations covering use of USFS land. These are only meaningful if effectively enforced.

In view of the effort to solicit increased forest users, enforcement will play a more critical role in the future. I question whether there is adequate staff currently with one person covering activities in multiple counties. My experience when interacting with members of this organization has been most positive, they seem competent and dedicated. I wonder how much situational discretion they are allowed to exercise. It seems the enforcement community certainly showed its ability during the Rainbow Family invasion of 2018. I think this key element of keeping forest users safe should be addressed in the plan.

When enforcement staff is urgently needed it shouldn't take an excessive amount of time for arrival. Is there an agreement with other enforcement agencies to respond?

Item 5 – Feral Hog Mitigation

There is an invasion of Feral Hogs/pigs in part of the foothills, soon to be found over the entire area. The multiplication of these forest abusers is almost exponential. I didn't find this significant issue addressed in the plan. Feral hogs have become a widespread problem spanning many states. There is a wealth of material documenting efforts to manage/eradicate them with mixed results. I believe Texas and Alabama are experimenting with carefully administering overdoses of salt through sophisticated feeders to kill them. One thing is certain, failing to address the matter will only result in more rapid spread and more forest damage.

Item 6 – Stream Evaluation, Designation & Restoration

Many trout streams are evaluated and designated on Pages 11 and 16. During the 2017 and 2019 comment period I addressed water quality on the Jones Creek and upper Etowah River watersheds. I believe poor stream management over a long period has diminished their water quality. However, my focus is on Jones Creek. This stream should be divided into 3 sections for evaluation purposes as follows:

Section 1: From the confluence with the Etowah River upstream to Berry Shoals waterfall.

Section 2: From Berry Shoals to the SCS Dry Dam (constructed some 60 years ago for flood control but created many unintended negative consequences).

Section 3: From the SCS Dry Dam to the Headwaters.

Each section represents different stream characteristics and water quality with Section 3 containing the highest quality water and supporting a reasonable population of wild trout. Water quality is not as good below the SCS Dry Dam due primarily to siltation effects including the dam's prohibition of natural high water scouring of the streambed to create gravel bedding areas for trout reproduction. However, I monitored stream temperature on my property in Section 2 for a 6-month period including the summer. Water temperature didn't exceed 70 degrees.

Trout Unlimited was involved with a stream restoration project in section 1 and in the 80's Monte Seehorn led a restoration project in sections 1 and 2 with worthwhile results. It would be a mistake to essentially write off this stream by limiting restoration efforts to placement of large woody debris and/or bank mitigation. For instance, removal of the SCS dry dam along with other silt mitigation measures and supplemental stocking of brown trout coupled with instituting a slot limit or a catch and release requirement would benefit water quality and enhance the fishery. I intend to contact the Georgia DNR and discuss fishing regulations for Jones Creek. These actions would be in keeping with forest wide goal 22. Page 18 of the 2017 Foothills Landscape collaboration update states "approximately 115 streams within the project boundary are designated trout waters. Although these waters are already supporting populations of trout, many of these streams could benefit from habitat enhancement in order for populations to grow."

Therefore, the current and future assessment of Jones Creek on pages 11 and 16 of the revised plan should be revisited.

Decommissioning the campground on the Jones Creek headwaters as suggested in the revised plan will be beneficial, however, allowing disbursed campsites along other portions of the stream will not.

Item 7 – Roads

The plan contains some Positive Actions relative to the Foothills Road Network. However, I am particularly concerned about traffic on FS 28-1 and FS-77 for the following reasons:

- Some GPS Systems route traffic via these roads to the Appalachian Trail at Springer Mountain and to Camp Merrill and/or Cooper Gap.
- Current traffic load, particularly on the weekends, is extremely high.
- FS 28-1 must be used to access a wedding venue on Ridgegate Drive. This can complicate traffic on an already busy road.
- Traffic is “mixed use” with hikers, horses, mountain bikes, motor bikes, trucks, tour vans, cars, etc. User safety is an issue.
- Planned improvements in Jake Mountain campground will attract more road use.
- The agreement with Lumpkin County on FS 28-1 road maintenance from Nimblewill Church Rd. road to Jones Creek Bridge is conceptually good but not well executed by the county. The dirt/gravel road requires frequent grading and ditching. When not done properly it results in excessive silt run-off into Jones Creek.

Is there any plan to reduce traffic on these roads or at least warn users of the dangers they present?

Item 8 – Forest Land Adjustment Act

Will the Foothills plan have a future revision when the 30 parcels of identified land or parts there of are sold off and additional private inholdings are purchased?

Since such sales are at the discretion of the Forest Supervisor, is there a plan or timetable for a decision on selling some or all of subject parcels?

It seems addition of new USFS property would be part of a long-term management plan and certainly prioritizing such acquisitions would be of great importance.

Again, “Thanks” for soliciting comments. I trust mine will be taken in a constructive manner which is how they are intended.

D.L. Grindle
Stakeholder

