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Title:

Comments: FY21 Chattooga River Prescribed Fire Project

To: Chattooga River Ranger District

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From: James Sullivan

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RE: FY21 Chattooga River District Prescribed Fire Project.

Amy McClave and Ryan Foote,

These five units are good choices for prescribed fire. The efforts to restore open canopy woodland/glade in the upper Piedmont have been very successful. I welcome your continued interest in restoring this habitat for the Endangered and sensitive species present as well as the diversity of their associates. Even vertebrates like pine snake are going to benefit from the restoration treatments. I have just a few brief comments for your consideration.

#### FIRE RETURN INTERVAL

The fire return interval of 6-7 years is good. I believe that a decades-long regimen of short return intervals(3-5 years) is unlikely to occur naturally. After these sites have had several short burn cycles, even longer return intervals would be appropriate. The *Echinacea laevigata* site south of Anderson Road had not burned for at least 20 years when discovered, based on age of red maple and black cherry saplings. There were still decent populations of all those prairie species present after 20 years without fire. I'm not saying that the return interval should necessarily be longer all the time, but that it should be variable, maybe within a range of 3-15 years.

#### IGNITION ISSUES

I have long argued that ignition should mimic what would happen naturally. Ignition points should be high in the landscape and the fire allowed to burn down into ravines and lower slopes until it reaches moist condition or fire perimeter. The Black Mountain Unit has steep, mostly east aspect slopes and ravines. There should be no ignition points on those slopes.

Patchy burns are important for sustaining populations of invertebrates, some of which are likely pollinators for the important plant species. Please limit the number of ignition points.

#### SEASONS

Mid-April is growing season in the upper Piedmont. In the past, late March fires have consumed emerging smooth coneflower rosettes. They are perennials and are likely to survive growing season burns, but recruitment from seed, young plants without established deep roots are likely to be damaged. This backs up the argument for variable return intervals as well.

Respectfully,

James Sullivan

