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First name: Rusty

Last name: Garrison

Organization: Georgia DNR, Wildlife Resources Division

Title: Director

Comments: The Georgia Department of Natural Resources, Wildlife Resource Division appreciates the opportunity to provide comments on the USFS Foothills Project draft environmental assessment. Our agency's comments are attached.

January 9, 2020

Ms. Betty Jewett Forest Supervisor

United States Forest Service

1755 Cleveland Highway

Gainesville, Georgia 30501

Dear Betty:

Congratulations on completion of the draft Environmental Assessment (EA) for the United States Forest Service (FS) Chattahoochee-Oconee National Forest's Foothills Project (Project). This document is the culmination of a robust and unprecedented public participation effort through a deliberate and transparent process. Thank you for your leadership in commencing this innovative project that will facilitate achieving measurable actions towards the goals and objectives identified in the Land and Resource Management Plan for the Chattahoochee-Oconee National Forest.

The Georgia Department of Natural Resources, Wildlife Resources Division (WRD), appreciates the opportunity to provide comments on the draft EA for the Project. Our staff have reviewed the EA and its supporting documents. Many of the proposed actions in Alternative 2 are critical for the recovery of rare species. WRD concludes that the recommendations proposed in Alternative 2 impose no significant negative impact to aquatic resources, terrestrial wildlife resources, or rare plant species and communities in the Project area. Thus, WRD supports the recommendations proposed in Alternative 2.

Further, the Project utilizes an adaptive management (AM) strategy in lieu of the traditional approach of identifying site-specific areas with specific methods, which fails to consider environmental stochasticity. The need for rapid response and flexibility to unpredictable environmental stochasticity is requisite to ensure efficient, effective, and successful Project implementation. An AM approach addresses this need by providing a "flexible toolbox" as determined by real-time, specific conditions or a combination of conditions that leverages changes in forest conditions to achieve the maximum benefit to forest health and resiliency ensuring the landscape progresses toward desired conditions. WRD concurs with, and supports, this strategy.

WRD believes the EA accurately describes the current conditions within the Foothills Landscape and we support the goal to restore biologic integrity, resilience to disturbance, connectivity, and soil and water quality. To this end, we offer the following comments and suggestions for your consideration.

Concerning erosion, runoff and sedimentation, we agree that the stability of some aquatic habitats within the Project area are at risk due to changes in stream morphology and embeddedness as a result of sediment

delivery. We concur that pool habitat is lacking in many streams and that sediment loading is excessive, resulting in negative impacts to aquatic populations. Additionally, we agree with the EA's findings that erosion and runoff from roads are major contributors of sediment in streams. Additionally, road and culvert improvements may have a positive impact on rare plant species/rare plant communities by reducing erosion and reducing the spread of non-native invasive species (NNIS) propagules (a substantial problem in some roadside mountain bogs). WRD supports the proposed actions and the priority placed on addressing erosion issues on roadways with excessive sediment runoff. We appreciate the priority given to streams designated as impaired (i.e. 303(d) or 305(b)) and those with sensitive species. WRD supports the desired conditions and proposed sediment reduction actions listed in Table 3 and recommendations regarding fuels management to minimize catastrophic wildfire, which can adversely affect streams by increasing sediment run-off and increasing stream temperatures due to shade loss.

Regarding stream habitat improvement, we concur with the findings of the EA that stream habitat generally has been degraded across the Foothills Landscape due to increased sedimentation and the lack of large woody debris. We agree with the assessment regarding benefits of large woody debris in streams by creating structural complexities important to stream-dwelling organisms. However, we differ regarding the contribution of infected and dying hemlocks as a source of large woody debris for streams. Based on our experience, dying hemlocks deteriorate slowly then break apart during high winds into small fragments starting at the top. If the contribution of hemlocks is indeed a limited source for large wood, as we have observed, it further underscores the need for increased actions to restore large woody debris from other sources.

We appreciate the recognition given to the importance of brook trout and to the recreational benefits of both rainbow and brown trout in the Aquatic Resources Report. We support the recommendations to continue stream habitat projects on impaired streams and those with sensitive species. We concur with the proposed action to increase large woody debris in streams and maintain existing structures to extend their functionality. Further, we recommend expanding the proposed action to include high priority trout streams.

The Project contains several small lakes that can receive significant recreational use. We agree with the need for fish habitat improvements as identified in the Aquatic Resources Report. We support the proposed actions to improve recreational lake fishing by adding habitat structures and boosting the carrying capacity through lake fertilization.

Pertaining to aquatic organism passage, we share the FS concerns regarding the impacts that stream crossings may have on aquatic organism passage. Recent work to replace perched culverts on Bryant Creek and Walnut Fork with bottomless culverts are a testimony to the FS's commitment to restore connectivity and aquatic organism passage. WRD supports the proposed actions to remove barriers where possible and we recommend an editorial revision to the heading "Replace Barriers to Aquatic Organism Passage" (page 61) by changing "Replace" to "Remove" as this better conveys the goals of this recommendation.

WRD acknowledges that recreation is an important benefit of public lands and understands the challenges balancing user conflicts and mitigating damage caused by excessive use. We support the proposed action to install an ADA-compliant fishing pier at the Holly Creek Day Use Area and support efforts to install fishing piers at other lakes. Additionally, we recommend improving access for anglers and for trout stocking at several other locations and further recommend providing ADA-compliant boating access on Lake Rabun (see our April 6 and December 21, 2017 letters). WRD supports the recommendation to evaluate existing trails, including user-created routes, and develop an official designated trail system adjacent to the Chattooga River. We believe angler access trails are needed on the Georgia side of the Chattooga River, especially in the Delayed Harvest Section, to accommodate recreational users.

WRD encourages the FS to pursue pine restoration and prescribed fire application in the landscape proximal to Tallulah Gorge State Park. This area harbors a notable biodiversity of yellow pine ecosystems on the forest. Focusing on connectivity of restoration areas (e.g., connectivity with Tallulah Gorge State Park bum units) would

enhance restoration efforts within the Project landscape. Additionally, we encourage the FS specifically to target table mountain/pitch pine communities within the context of 'southern yellow pine' restoration efforts. These higher elevation pine communities have been affected negatively by fire suppression and southern pine beetle outbreaks worse than other species and represent communities that are far more imperiled than other 'southern yellow pine'.

WRD strongly supports the goal to create 10,500 acres of early succession forest and encourages the FS to target treatments at or above 3,000 feet to provide habitat for Golden-winged Warblers. In the past, such treatments have been a challenge due to watershed analyses that preclude cutting on most ridges. WRD encourages the FS to reconsider these challenges so that biologically significant restoration can take place while reasonably balancing biological restoration and aesthetic desires.

Concerning forest health risks, the ability to respond rapidly to forest pest outbreaks seems to be a significant challenge. For example, the response to the 2016 IPB beetle outbreak in Jones and Jasper counties took a year or longer. WRD encourages the FS to develop a rapid response strategy to forest pest outbreaks in order to protect forest health and resiliency and recommends a response goal of not more than two weeks before treatment implementation begins. These outbreaks are an emergency just like wildfires or other natural disasters.

Regarding rare plant species and communities, the Botanical Resources and Rare Communities Report did a good job of identifying and analyzing rare botanical communities and is consistent with Georgia's State Wildlife Action Plan. Most rare communities found in the Chattahoochee NF are suffering from one, or more, of the following: 1) woody species competition; 2) a closed (or closing) canopy; 3) mesophication with proliferation of off-site species; and/or 4) NNIS competition. Actions taken to reduce woody competition, open the canopy, re-introduce fire where appropriate and practicable, control NNIS, and create a more diverse forest structure across the landscape will benefit rare plant communities and rare plant species. WRD approves of, and supports, the use of Rx Fire and the permitting of herbicides in rare communities to control woody species competition and NNIS.

WRD encourages the FS to consider thoughtfully small-sized rare communities (0.5 to 5 acres in size) for the purposes of prescribed fire, particularly in bogs, fens, and seeps. These wetland communities are usually too wet to burn when the surrounding upland matrix is in prescription. And, when they are dry enough to burn the associated uplands are out of prescription. A solution is to burn the small sites separately. Further, special attention should be exercised when engaging in operations in suspected or possible habitat of the Small Whorled Pogonia (*Isotria medeoloides*). It is exceptionally rare but is found in numerous habitats. WRD encourages the USFS to work with its partners (e.g., WRD, Georgia Plant Conservation Alliance, Interagency Burn Team) on active restoration and management of specific rare communities.

As forest-wide standards and management prescriptions established in the Land and Resource Management Plan for the Chattahoochee-Oconee National Forest (and incorporated in the EA) minimize potentially detrimental impacts of proposed activities on several high priority (i.e. threatened & endangered, management indicator species, and others) species, WRD supports the landscape-level actions proposed and expects these to be benign or beneficial for high priority species. For instance, cliffs, rock outcrops, and other rocky sites potentially inhabited by green salamanders (*Aneides aeneus*) are managed as rare communities and are protected from adverse effects. Since there is a mandatory 200-foot buffer from the base of the cliffs and 100-foot buffer from the top of the cliffs, proposed actions are likely to have no negative impacts on this species. Similarly, management prescriptions that protect rocky areas and talus slopes and maintain riparian corridor canopy during proposed forest management actions (i.e., thinning, woodland restoration, canopy gap creation, prescribed burning) are expected to have minimal effect on roosting habitat of the eastern smallfooted bat (*Myotis leibii*) and Rafinesque's big-eared bat (*Corynorhinus rafinesquii*). These actions can provide beneficial foraging habitat for *M. leibii*, *C. rafinesquii*, and tricolored bat (*Perimyotis subflavus*). The incorporation of other forest-wide standards that protect caves and retain hollow trees and snags are expected to minimize impacts to

hibernacula and roosting sites for the northern longeared bat (*Myotis septentrionalis*), the Indiana bat (*Myotis soda/is*), and *C. rajinesquii*.

In closing, WRD supports the habitat restoration actions proposed in Alternative 2 and the AM strategy requisite to implement the recommended actions. As always, my staff remains willing and available to assist you when we can.