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Chattahoochee-Oconee National Forest
Chattooga River Ranger District
ATTN: Mike Brod, Wildlife Biologist
809 Highway 441 South
Clayton, GA 30525

Re: Waterguage Road Open Woodland, Bog Restoration, and Prescribed Burning Unit Projects

Dear Mike,

Thank you for the opportunity to participate in the development and proposed implementation of the Waterguage Road Open Woodland project and related proposals. Georgia ForestWatch (GFW) appreciates the collaborative approach the Chattooga River Ranger District, and especially its' wildlife biologist, Mike Brod, have taken by including us in the pre-scoping planning process for this proposal. It has been a progressive and rewarding experience to engage with the Forest Service, Department of Natural Resources (DNR), and other interested groups and people on the ground during this planning process. We believe that through collaboration this project has been improved from its initial conceptual model. We will be interested in your review of public comments about the proposal, and ask that we remain on the mailing list for all further communication regarding this proposal.

Georgia ForestWatch is a largely volunteer, forest conservation organization committed to the protection and restoration of the native biodiversity of the public lands in Georgia's mountain and piedmont areas. Our members regularly visit the Chattahoochee-Oconee National Forests (CONF) for the purposes of nature study, hiking, outdoor recreation, spiritual rejuvenation, and pursuit of solitude. We view the streams, aesthetic beauty, large contiguous forest tracts, rich biodiversity of aquatic and terrestrial flora and fauna, as well as fantastic recreational areas and opportunities in the mountains of North Georgia as our natural heritage. We seek to ensure that the integrity and legacy of this forest resource is maintained and passed down for future generations to enjoy. Our members and the public alike view the United States Forest Service's preeminent role as being the leading and trusted stewards of our public forests. The national forestlands in the proposed project areas are necessary to maintain clean water and habitat for numerous species of flora and fauna, and perhaps the greatest contribution of this forest to natural systems and human society is the regulation and supply of quality water to all life downstream.

Georgia ForestWatch engages in a variety of activities including education, forest monitoring, leading hikes, promoting the natural values of the region and publishing informative articles to encourage citizen participation in outdoor recreation and general conservation activities. As you know, we have had a long history of interest in the Chattahoochee-Oconee National Forests. For

many years, our members have monitored the region, and raised concerns about the impacts of logging practices, road building, excessive prescribed burning, and the subsequent effects on long term forest health. Again, we sincerely appreciate the opportunity to express our concerns and have our voices heard.

Given this overall interest in our national forests, the district will not be surprised to know that Georgia ForestWatch believes the Waterguage proposal, including the "woodland creation," rotational prescribed burning and "mountain bog enhancement" is of significant enough nature that it requires an full Environmental Assessment (EA) before proceeding. It is our belief that the district errs in asserting that "it appears this project would fall under" a Categorical Exclusion (CE) of the Forest Service handbook, and asks that it take into account the following significant issues and concerns as it proceeds with a proper environmental study of the proposal.

Comments Specific to the 508 acre Woodland Area

The Waterguage project scoping notice states that: *"Site specific plant and animal surveys, along with individual "stand exams" have provided data which shows that the Waterguage project would be an ideal area to work toward achieving several of the plant, animal, and habitat goals and objectives described in the Forest Plan."* We believe this statement to be only marginally true, due to the fact that the soils of some of the 508 acres targeted for "woodland creation" do not appear *"ideal"* for the creation of such habitat. To elaborate this point, based on Continuous Inventory of Stand Condition (CISC) data, the average Site Index (SI) for these 508 acres was calculated to be 78. The lowest Site Index (SI) for this project area was listed as SI = 60 for Compartment/Stand number 67003, an area included on the western portion of the woodland thinning area, and comprising roughly 10 acres of the total woodland project area. This area with a SI of 60 constitutes roughly 2 % of the proposed 508 acre woodland thinning area, while the mode value for the project area-that is, the most frequently occurring number on this data set- was found to be SI= 70, a value that occurred in 6 out of 10 total SI values listed for the Compartment/Stands within the project area.

The issue of Site Index is noteworthy based on the premise that naturally occurring "woodlands" *typically* exist on areas with a SI of 50 or less. Stands with a Site Index of 70 or greater, with the soil type found within the project area, would most likely support a productive mixed hardwood/pine forest community in the absence of extensive anthropogenic manipulation and frequent medium intensity prescribed fire.

Upon further investigation of the Site Index values present within the project area vicinity we have created and attached a map of the Waterguage woodland boundaries, as well as surrounding Compartment/Stands with SI less than or equal to 60. This map was generated using Forest Service CISC data to build a query to show all of the Compartment/Stands within the project vicinity that met the SI less than or equal to 60 criteria, areas meeting this criteria are highlighted in yellow on the map. The 508 woodland project area is highlighted in red on this map, and as mentioned above only a small 10 acre stand meets the SI less than or equal to 60 query criteria. It is also interesting to see the abundance of Compartment/Stands surrounding the project area that have a SI less than or equal to 60. It would seem more appropriate to conduct woodland habitat creation on some of these sites as opposed to the Waterguage area currently proposed for treatment. Not only is the Waterguage area proposed for Stands with SI greater than 60, but the 1,000 acre burn unit falls largely on sites with

higher SI values. We would be interested in learning how the District concluded that the current project area is the most suitable, when the SI values illustrated by CISC data suggest otherwise. It is important to note that GFW recognizes that SI values are not the sole defining factor in determining whether or not a given area is appropriate, however SI is at the very least a somewhat useful tool in establishing the relative site productivity for a given forest type on a specific site. With this said, it would again seem as though other neighboring areas might be more conducive to the successful creation of open woodland habitat and this should be verified on the ground.

It has also come to our attention that open woodland restoration is actively underway in Arkansas and Missouri and that site rating systems have been created for selecting appropriate sites for guiding management in those areas. These systems should be investigated by CONF personnel.

With this said, GFW is not necessarily opposed to the creation of underrepresented habitat types on appropriate areas of this national forest. We in fact support the management of lands on the CONF for various protected, endangered, threatened, and sensitive flora and fauna if the creation of such habitat and the associated recovery efforts of such populations are proposed for the appropriate sites. As mentioned in the scoping notice, the northern portion of the Waterguage project area has in fact been subjected to fairly frequent prescribed fire and perhaps other mechanical treatments prior to this scoping notice. As a response to the treatments the area has exhibited an increase in grasses, forbs, and shrubby vegetation. We believe that a woodland condition will be difficult to maintain within the project area due to the tendency of the project area to support forest and not woodland, a clear reflection of soils overly deep and fertile to support an open woodland condition. Furthermore we feel that unless fire is used in perpetuity the land will eventually revert back to a forested condition, laden with early successional species like Virginia pine and tulip or yellow poplar. With regard to species composition and cohort structure within the proposed project area, we wonder how and when the next age class of trees will be allowed to be recruited to replace the "would be" mature woodland trees. The scoping notice fails to address the period of time and means by which desired regeneration for the next generation of woodland overstory trees will be established. It is also important to note that such a dramatic shift from closed canopy forest to open woodland in certain areas across the project area will result in the mortality of many residual trees. Will the Forest Service leave a higher residual basal area to allow for mortality following mechanical treatment to take the stand to the desired Basal Area targets?

The scoping notice mentions that "woodland obligate or dry site" plants have been found within the project area. This claim is true but the inference questionable. Simply because small populations of these plant species have been found along roads within and adjacent to the project area should not imply that this area was once a permanently occurring woodland habitat type. In natural plant communities numerous plant types ranging from mesic to xeric and shade tolerant to shade intolerant exist in the seed bank and/or in small quantities within the project area. We believe that such an array of species exists due to the gap phase structural dynamics of the historically occurring forest type of this region. This is to say that natural disturbance regimes, mainly windthrow and stem mortality, and to a far lesser extent lightning ignited fires, were the driving factors in creating openings to the forest floor, temporarily allowing for an increase in the shade intolerant, and/or xeric plant species. For further clarification a plant species typed as Xeric or Facultative Upland (FACU) have the potential to occur on both ends of the establishment and survivorship spectrum. This is to say that a plant or tree species commonly associated with more xeric ridge tops or uplands such as

Chestnut oak for example, and ***only*** as an example, can occur in smaller and less frequently distributed numbers on more mesic sites. We believe that land managers should not make the assumption that since Chestnut oaks are found on a mid-slope, that the entire area must be xeric. In order for a "permanent" woodland to have occurred some driving mechanism must have caused a stage of "arrested succession", a phenomenon not commonly observed in the scheme of natural forest stand dynamics in the region of North America where the project area lies.

Despite our requests, the Forest Service has neglected to furnish the monitoring and/or bird census data that provided conclusive guidance to suggest that Pine Warbler, Prairie Warbler, Field Sparrow, Northern Bobwhite, Brown-headed Nuthatch, and Eastern Wood Pewee have been found in, or near the project area. Furthermore, we believe that the probability of successful colonization of Northern Bobwhite quail in the vicinity of the project area is extremely low.

For the reasons stated in this section we believe that a more thorough Environmental Assessment (EA) of the effects of this project should be conducted. Based on the information found by researching the soil series and Site Index of the 508-acre woodland portion of this project area, an Environmental Assessment, if conducted properly, should theoretically show that this project will result in the degradation and an overall reduction of site fertility or Site Index of the woodland section of the project area. We believe that such an assessment will likely reach the suggested conclusion due to the fact that the site will require frequent and relentless burning to destroy the "O" (organic horizon), not the "duff" layer, which is independent and not considered as a true "soil" horizon layer, as well as the "A" horizon of the soils within the project area. Upon destruction of the soil horizons most conducive to the support of higher woody vegetation (i.e. trees), the result will likely be a grassy, brushy woodland condition. We suggest this is not good forestry science or craft.

As previously discussed, naturally occurring woodlands typically occur as a function of poor soil fertility which would likely include a low Site Index and/or annual growing season precipitation levels that do NOT exceed 20 inches during the growing period. Other circumstances that could lead to natural woodlands might be soils of sandstone geology, soils that contain quartzite or other similar materials containing a sandy texture causing them to be excessively well drained and drought prone. Since none of these circumstances occur within the project area it would seem plausible that the soils within the woodland project area will need to be unnaturally degraded to mimic the conditions found in naturally occurring woodlands. This again could not be considered good forestry.

As briefly addressed above there is no discussion or suggestion for initiation of the next age cohort to replace the would-be dominant residual trees within the woodland area, once it is created. The long term future direction and implementation of maintenance of this woodland is also not clearly addressed. As far as we can discern from the information presented in the scoping, the Chattooga River Ranger District simply proposes to conduct the initial mechanical thinning activities for the woodland and burn the site on a short fire return interval in perpetuity. This is not proper restoration. Though burning in perpetuity may, over time, degrade the site to some different condition from the present one, we doubt it will be representative of any original and natural forest community. Despite our doubts, at what point will rotational fire be withheld so that natural seeding of trees can occur and at what point will the forest community be resilient and self supporting, no longer requiring active management?

We do recognize that the creation of this habitat is called for in the current Land and Resource Management Plan due to the lack of abundance on the Upper Piedmont and Blue Ridge Province of North Georgia. We believe that this habitat was historically rare, especially when the "variable" of Native American and early European activities is removed from the equation, and the true function of the ecosystem is objectively evaluated and managed. It seems counter productive to use anthropogenic fire, whether Native American or European to support modern use of prescribed fire. Native American and European settlers fired the woods for reasons far from ecological or restorative. In fact, destructive, use of fire by European descendents was a compelling precursor and reason for the establishment of the Forest Service.

We are willing to support such projects for the sake of wildlife and habitat diversity when these projects are fully and thoroughly thought out and conducted on appropriate sites and soils. Georgia ForestWatch feels that if this project is in fact going to move forward, additional planning and analysis is required to ensure the long-term success and viability of this habitat creation. We believe that since the Waterguage project is slated to become a "demonstration area", the Forest Service should take advantage of this opportunity and create the highest quality woodland habitat possible on sites **most** appropriate, thus increasing the potential for success. If this area is to become a "standard" for other woodlands in the Southeastern United States, then the Forest Service should lead by example. To elaborate, we believe it would be beneficial to the quality of the proposed woodland habitat to be seeded or planted with a diverse array of woodland herbaceous plants, shrubs, and trees. Since the Chattooga River Ranger District has partnered with Georgia Plant Conservation Alliance, perhaps a collaborative effort can be made to locate and acquire these plants or seeds.

Comments Relative to Prescribed Fire on Approximately 1,000 acres

The scoping notice also states that lightning fires and Native American burning were primarily responsible for creating and maintaining open woodland conditions, and, to a lesser extent, open, boggy conditions. Georgia ForestWatch believes that there is no substantial evidence available that links this claim to the Waterguage project area. Even if there was evidence to support this assertion, it would have very little legitimacy in terms of the "natural" ecosystem function of the project area, due to Native Americans and early European settlers acting as an anthropogenic force on the landscape. With regard to lightning fires in the project area, we believe this assertion is also only marginally true as it is applied to the project area. On the ground visits indicate the Waterguage area was struck by lightning at least twice during the summer of 2008, amidst what is touted as the "worst drought in a century", without any evidence of fire. We do not doubt that lightning ignited fire can, could, or did occur within the project area, but simply wish to draw attention to the fact that the site was repeatedly struck by lightning and no fire was produced during a very dry period.

We also draw the district's attention to the Forest Plan's fire management standards, which are intended to demonstrate how the proposed burns should be conducted. These standards include requirements such as avoiding burning mesic forests when possible (Standards FW-190-192,) standards for fire lines (FW-194-196,) the retention of litter and duff (FW-202,) and protections for already-eroded soils (FW 204.) A site-specific analysis in an Environmental Assessment is needed to analyze if and to what extent these conditions exist in the project area and how they will be addressed.

Such assessment also should detail specific fuel load data and an explanation of the methods used to develop that data. Previous fuel load data, both pre and post burning, from similar past projects should be included.

The burn areas should all have "no ignition zones" mapped. These should include north aspect slopes (35-45 degrees) and all riparian areas. A special effort needs to be made to limit the number of ignition points in these units. The result of large-scale fires should be a mosaic pattern, reflecting burning of varying intensity, and consisting of burned and unburned areas in an effort to mimic the disturbance regime of naturally occurring fire. Under no circumstances should the fire intensity reach the point where mid-story trees are removed, nor should the fire "crown out," or burn the soil so severely as to leave only the mineral soil exposed and prone to erosion. As an example of recent prescribed fire activity on the district, we attach several photos from the recently completed Wolf Creek Burn, which show extreme fire intensity on a ridge top and nearby slopes. (These photos were taken by Georgia ForestWatch co-district leader Honor Woodard on December 5, 2008, in the vicinity of waypoints: 1) N. 34.79702° & W. 83.34847°, 2) N. 34.79696° & W. 83.34831°, 3) N. 34.79957° & W. 83.35316°.

As pointed out in Georgia ForestWatch's recent comments regarding the Chattooga district's separate proposed prescribed burning of some 6,000 acres, the burn segment of the Waterguage proposal also appears to contradict many of the Forest Service's own historical records, reports, findings and scientific studies, as detailed in the administrative appeal by Georgia ForestWatch, et al. of the 2004 revised Land and Resource Management Plan Revision for the Chattahoochee-Oconee National Forests. The Forest Service has never fully disclosed, considered or directly addressed the current information about fire regimes in the forests of the Southern Appalachians, and more specifically the fire regime of Northern Georgia. Information and research discussing the limited role fire plays in many of the referenced forests appears not to have been considered. It is our opinion that further evaluation and consideration be conducted before continuing the massive burning campaign proposed on the Chattooga River Ranger District, which appears at least partially driven by budgetary incentives. We encourage the Forest Service to direct its focus on furthering the progress and implementation of sound environmental and silvicultural practices.

We believe the district's thorough Environmental Assessment should also seek to answer the following fire-related questions before proceeding, in efforts to properly guide and inform its own efforts to create new "woodland."

- What evidence exists that fire historically burned in the Waterguage area?
- On what part of the project area are historic woodlands thought to have existed?
- What is the history of fire suppression in this area?
- Has any lightning ignition ever been recorded in the area?
- What is the likely natural fire return interval?
- What are the likely early anthropogenic fire effects on the landscape?
- How did the natural and cultural fire regimes vary by aspect, slope and elevation?
- How does fire alter the soil present on the site (nutrient availability, pH, etc.?)
- How does repeated fire alter forest composition and future forest conditions?

Without well-grounded answers to these and other questions, any use of fire has to be considered experimental and should be done in small units only along with adequate base data and follow-up monitoring. The primary purpose of such fire, even more than achieving explicit management goals, would be to learn about the behavior and results of fire in all kinds of different conditions with variations in factors such as frequency, intensity and season.

Georgia ForestWatch supports careful experimental use of such prescribed fire, including growing-season burns and moderate-intensity burns, on small areas of appropriate sites. Above all, this requires thorough original base data and monitoring on permanent plots over several years in order to learn from the results before repeating the actions on larger areas, which is not mentioned in the district's scoping letter of November 3, 2008. This is particularly necessary, given the proposed unnatural fire regimes (burning once every 3–5 years) outlined in the scoping letter. Such a regime requires comprehensive, detailed monitoring of vegetation and soils. This monitoring on permanent plots should begin before any treatment is carried out, in order to establish baseline data, which is called for in one of the fire management goals in the Chattahoochee National Forest's new Land and Resource Management Plan (Goal 62.) "Participate in research and cooperative opportunities to increase the understanding of prescribed burning and smoke management constraints." We would support the use of prescribed fire for research purposes as described above, but the heavy "rotational" use of fire proposed in the scoping notice is not consistent with this goal. Burning a total of approximately 1,000 acres within the project areas as a single unit is far too large for research purposes, the fire plan is not site-specific, and no provisions are made for monitoring fire effects.

We request the district take special care in mapping its road boundaries and bulldozer lines for the proposed Waterguage burn area to insure that it avoid inadvertent erosion and sedimentation into nearby streams and springheads—a problem that seems evident in the recent Wolf Creek and Chintilly burns on the Chattooga District.

Comments Relative to Riparian Buffer Zones and Mountain Bog Creation

One of the project modifications set forth by the Forest Service in the scoping notice, which we find valuable, would be the Forest Service's proposal to increase the buffer zone in the riparian corridor of the project area to 150 feet or 50 yards, We understand this to mean there would be no logging and no use of wheeled or tracked equipment within such buffers. In correspondence with Chattooga District personnel we have been informed that the buffer zone could be reduced to 100 feet, depending on the slope class. We believe that the 150 foot buffer should be used regardless of slope, due to the fact that the total area of the buffer zone would represent only a fraction of the total project area. We believe that preserving the integrity of the bog area through such a buffer zone is reasonable. We would like to see a slightly larger buffer zone used for this project area, but believe that 150 feet is a good compromise.

We also ask that particular attention be paid to the differing aspects of the wetlands and potential bogs in this particular area of the national forest. The wet areas in the upper part of the drainage are now examples of natural forested wetland habitat. They have a unique composition of canopy, shrubs and sedges and very little sphagnum moss coverage. The overstore is almost exclusively Acer rubrum due to long periods of saturated soils. The dominance of *Carex intumescens* is not

usual for mountain bogs that would harbor pitcher plants and other rare bog elements. It is, however, a good example of just what it is now, a low elevation seepage wetland. (It is not possible today to tell if this area was created naturally or by creation of a small farm pond adjacent to the old home site on this land.) It thus would not be wise to now try to change it into something else. **The Forest Service and the partners interested in this project should study it, identify similar habitats, note changes and only contemplate manipulation of this environment if it threatens to disappear.**

The lower parts of the wetlands in this area are likely old beaver wetlands, currently at a particular successional stage. We ask that the Forest Service and its partners verify and map the traces of old dams in the project area – and ensure the viability of the beavers in this area when they return, as they almost certainly will one day.

With regard to the riparian areas, we believe that beavers (*Castor Canadensis)* should be seriously considered as a means to raise the water table of the bottom land where the wet, but diminishing "bog like" formations exists in the Waterguage project area. We believe that the introduction of beavers will be much more effective in maintaining a wetland or bog condition than would the current anthropogenic approach entailing the manual removal of all woody stems in an effort to reduce evapotranspiration from the area. It is highly probably that this bottomland habitat was originally created and maintained exclusively by beavers. Since this area is being classified as a collaborative demonstration site, and is pooling input and support from numerous leaders in the Southeastern conservation community, we believe that this area is very close to optimal for experimental beaver reintroduction. We acknowledge the validity of the concerns of the Forest Service and Georgia Department of Natural Resources regarding the implications of beaver reintroduction efforts. We believe that if the agency is concerned about reproduction and dispersion of introduced beaver into other areas, the problem can easily be solved by simple wildlife monitoring protocols, in concert with an agency supervised trapping and/or harvest removal program. If populations are monitored appropriately, the Forest Service should easily be able to maintain control of the population and greatly decrease the potential of rogue beavers moving out of the project area. We believe that this alternative, in the long term, makes the most economic and ecological sense for restoring and increasing the "wetland or bog" habitat acreage to North Georgia.

A publication "*Managing Beaver Ponds, working with wildlife" (publication. No. 23)* from the Stewardship Forest series from North Carolina State University in cooperation with the U.S. Department of Agriculture (USDA) further reinforces the concept that beaver pond establishment, persistence, and overall cyclical nature is highly variable. According to this publication the beaver cycle is not 100 years as suggested in conversations with Georgia DNR officials and the Chattooga River Ranger District. The cycle and usage of individual ponds and habitat areas can begin with colonization and end in abandonment in as few as 10 years. Based on this assumption, the beavers would flood an area, exhaust the desirable trees of their preferred diameters and species and move on to another area. If an area was flooded for a minimum of 10 years relatively continuously one would expect to observe mortality of standing larger diameter trees as well as a sharp reduction in shrubby and woody vegetation not occurring on elevated areas and/or hummocks within the flooded area. Upon abandonment of a given beaver pond, it is likely that without the beaver's maintenance the dams would begin to fail within a few short years. The result would be naturally

created early successional habitat, and a wetland condition, likely to persist for a few decades until beavers re-colonized the area, or the site reverted back to a forested condition, as can be observed in the diminishing "bog" within the Waterguage project area.

The publication "*Managing Beaver Ponds, working with wildlife" pub. No. 23* lists the following benefits of active and abandoned ponds:

Active Ponds

- Improve downstream water quality
- Provide watering holes for agricultural and wildlife needs
- Supply important breeding areas for amphibians and fish
- Provide diverse wetland habitats
- Furnish feeding, brood rearing and resting areas for waterfowl
- Encourage many reptile, bat, amphibian, fish and bird species

Abandoned Ponds

- Furnish snags for cavity-nesters and insectivores
- Fallen logs supply cover for reptiles and amphibians
- Provide essential edges and forest openings
- Supply diverse moist-soil habitats within bottomland forests
- Create productive bottomland forests
- Provide foraging and nesting areas for bats, songbirds, owls, and hawks

Further comments regarding restoration of the high-elevation mountain bogs

It is unclear exactly how the district intends to proceed with enhancement of the mountain bog located within the proposed project boundaries. The scoping letter of November 3, 2008, mentions "mountain bog enhancement via mechanical treatments on approximately 10 acres." A follow-up communication from the district's wildlife biologist said that "mechanical treatments, if done, would be accomplished in cooperation with the Georgia Plant Conservation Alliance." But that communication also noted that bog "treatments would be accomplished by hand, in a similar fashion as what has been done at Tom's Swamp and other local bogs."

Georgia ForestWatch believes the district needs to specify in its environmental assessment the exact treatment contemplated for this area, as there is a significant difference in potential environmental effects if the work is done with shovels, clippers, hand tools and pure manpower, as opposed to weed eaters and chainsaws, and as opposed to backhoes and wheeled or tracked vehicles.

Additional Questions and Concerns:

- We request more information on how the district proposes to ensure that no non-native invasives species (NNIS) will be brought into the project area and more specifically into

the mountain bog restoration area by the motorized equipment that will be used. Can the district provide any scientific studies or case project areas to support the effectiveness of the district's proposed actions? Will the presence or lack of NNIS in the project area be monitored for changes associated with the management of the area?

- Regarding the anticipated proceeds from the proposed commercial timber sale, we are interested in learning how KV money generated will be used across the project area following the timber sale. What is the timber harvest volume and sales revenue anticipated to be for this commercial thinning project? How much KV money is estimated to be available for use in the project area? It would be useful to review such data so as to intelligently comment on the alternatives. The district's scoping letter mentions four possible activities: Treatment of Hemlock Woolly Adelgid; treatment of non-native invasive plant species; soil and water restoration treatments; and barricading of any illegal ATV trails. We believe that any soil and/or water restoration treatments found necessary within the project boundaries after the timber sale should be a requirement of the timber sale contract. As for the treatment of adelgid-infested hemlocks, as we understand there an existing control plan in force to do this across the Chattahoochee National Forest. Is this plan fully funded or what exactly is the status of this initiative? As for the treatment of non-native invasive plants, it is our understanding that separate funds already are allocated in the new FY '09 fiscal year for this purpose. We would not be opposed to supplementing this work with additional KV money in this project area. We believe if KV funding is used in this manner within the project area funding could be used for the treatment of invasives on other areas of the Chattooga River District. We also ask the district to consider using such KV money as might be generated under the project to decommission any number of the existing skid trails and old logging roads, which provide the opportunity for illegal ATV pathways, as well as potential corridors for further spread of invasive plants into the project area.

- If the final decision includes a proposal to treat non-native invasive species in the project area, how specifically will this be accomplished, and would it entail use of herbicides to try to eradicate these invasives? (We note that the district's scoping letter of November 24, 2008, bases its claim to a Categorical Exclusion on the fact that no herbicides would be used in the area. But much of the district's invasives control work, as well as that of its partners in various bog restoration efforts, has required judicious application of such chemicals.

- We also would ask the district if the Georgia Department of Transportation will be financing any of the bog restoration work in this area, under a highway construction mitigation application we were led to understand had been filed in this instance. If so, how much funding is being proposed and how much restoration work would it support?

- Similarly, how much does the district anticipate in fire management proceeds under this proposal, and how will those funds be allocated over the life of the project?

We look forward to further discussions with the Chattooga District regarding the Waterguage woodland proposal. Again, we appreciate the agency's willingness to hear the concerns, questions, and comments of Georgia ForestWatch, as well as from the public in general. We believe that despite the challenges this project faces, if careful thought, planning, monitoring, and implementation are applied, especially limiting the scope of the project to suitable soils, the probability of success could be greatly increased.

Sincerely,

Darren Wolfgang

Forest Ecologist, Georgia ForestWatch

Wayne Jenkins

Georgia ForestWatch Executive Director