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**Re: Fightingtown Creek Wildlife Habitat Project**

Dear Ruth and Jeff,

We would like to thank you for all your hard work in developing and improving the Fightingtown Creek Wildlife Habitat project. We also appreciate you and your staff's availability and willingness to discuss the project and consider changes to improve the project. Through those conversations, it has been clear that you have sincerely been interested in improving the project and finding solutions that will benefit the forest and targeted wildlife, as well as satisfy the interests of diverse groups.

We also appreciate you organizing a field trip to bring together some of those diverse groups to discuss the project and potential improvements. Field trips are invaluable for making sure we are all talking about the same things and have a common base to build consensus from. The discussions in the field helped us understand both the desires and concerns of other parties. The field trip also clarified for us your intent with the project and how treatments would actually be carried out on the ground.

Sharing some of the constraints you face in implementing the project also helped us understand why you designed the project as you did and why some suggested changes were not adopted. We appreciate you trusting us enough to share that information. Knowing some of the requirements for a viable timber sale will help us make more realistic suggestions in the future.

We realize all of these discussions and changes to the project have taken additional time and effort on the part of you and your staff. Our hope is you feel like these efforts have been worthwhile and will take a similar collaborative approach to future projects. We believe these efforts have resulted in a substantially improved proposal in Alternative 3. In general, we believe the suite of stands selected in Alternative 3 does a good job of maximizing benefits to wildlife while minimizing some negative impacts. In particular, we note that several of the stands included in this project are relatively young that were clearcut in the past. Those stands are generally at a low point in terms of mast production, coarse woody debris, cavities, and other traits useful to wildlife. Choosing those stands allows the retention of more mature stands that are much higher in all of those beneficial characteristics.

## Some remaining concerns and recommendations

Alternative 2 provides inadequate safeguards in terms of retaining mature oaks, habitat diversity within treated stands, and general long term effects on wildlife habitat within the project area. While many issues have been resolved in the evolution from Alternative 2 to Alternative 3, we still have a few concerns about Alternative 3. We question whether the benefits are worth the cost for two stands. Stand 680022 is one of the more oak dominated and mature stands in the project area. The site quality is higher than where scarlet oaks typically grow, and consequently they reach sizes in this stand that are unusual for north Georgia. The generally dry upper soil layers and lack of a well developed herbaceous layer make us question whether proposed treatments would enhance the quality of habitat for some targeted wildlife species. Hence, treating this stand seems like trading relatively high value wildlife habitat for lower quality habitat than could be produced in other stands. Applying a shelterwood treatment rather than an even-aged regeneration treatment reduces the losses, but does not fundamentally address the problem.

Stand 680039 is the only stand accessed from McClure Creek Road (Forest Service Road 796). We observed the road to be unusually narrow leading us to believe that a large amount of widening and soil displacement would be necessary to prepare the road for logging trucks. That situation raises concerns about sedimentation in McClure Creek. At the same time, hemlock is a major canopy component of the operable parts of the stand. Hemlock woolly adelgid will cause substantial openings in this stand, so treatments in this stand will produce less of a change than they would in almost any other stand. So again, the benefit to cost ratio in this stand seems low.

Both of these stands are in the McClure Creek drainage, and we believe current project designs pose a significant risk to aquatic life in that stream. While treatment stands are generally well distributed within the project, five adjacent stands are concentrated in the upper McClure Creek area. As described in our September 2015 scoping comments, this concentration raises the issue of cumulative impacts. Of particular note, the stream continuously flows through or is directly adjacent to treatment stands for over half a mile. That situation creates ample opportunity for streamwater heating, especially given the small size of the stream through that reach and if trees are harvested within the 100-ft riparian buffer.

Treating so many stands within one watershed also extends the time period that soils are exposed somewhere in the watershed and correspondingly increases the likelihood that one or more stands will be impacted by an extreme weather event. Best Management Practices are generally effective at reducing sedimentation from routine rain events, but they are not designed to handle extreme events. Precipitation in the region is becoming more erratic with more frequent droughts and more intense rainfall<sup>1</sup>. Thus, climate change is expected to increase the frequency of extreme events. How would McClure Creek fair if the rain events that affected the District in December 2015 were repeated while stands were being harvested?

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<sup>1</sup> Laseter, Stephanie H, Chelcy R Ford, James M Vose, and Lloyd W Swift Jr. 2012. Long-term temperature and precipitation trends at the Coweeta Hydrologic Laboratory, Otto, North Carolina, USA. *Hydrology Research* 43(6): 890-901

The upper part of the watershed was also subject to extensive timber operations from 25 to 50 years ago that deposited substantial sediment in the stream. Before that, a farm occupied part of the area and contributed even more sediment. The cumulative effects analysis in the EA considered only impacts from the past 10 years, so it omitted these impacts. Cumulative impacts should not be based on some arbitrary time horizon but instead on how long past activities continue to affect organisms or their habitat. Much of the sediment from earlier timber operations and farming remains in the stream. Thus, the cumulative impacts of current operations have not been adequately evaluated.

This sedimentation is particularly important, because rare and sensitive aquatic organisms live in McClure Creek. We have heard reports of brook trout above the upper falls on McClure Creek, essentially in the heart of project activities. This population was likely severely stressed by the ongoing drought, and will not have time to recover by the beginning of project implementation. Perhaps more significantly, hellbenders are reported from the stream (EA at 41). Sedimentation is considered one of the leading threats to hellbenders. Sediments can fill in the spaces underneath large rocks that hellbenders use as dens and cover larval habitat. Den rocks partially filled by previous loads of sediment may be rendered completely unusable by another influx.

Logging on steep slopes and associated erosion and sedimentation has been one of our chief concerns with this project from the start. So naturally some of our members were alarmed when they saw what appeared to be loopholes in the Forest Service's commitment to follow Georgia Forestry Best Management Practices and avoid logging on steep slopes. On page 36, the draft EA states

*Typically* harvest operations occur on slopes below 35 percent slopes. Portions of a stand with sustained slopes greater than 35 percent are *generally* excluded from harvest unit layout. Therefore, it is *likely* that no timber harvest operations would occur on soils in the 45-60% slopes and a portion of the 25-45% slope category.

(emphasis added). From our discussions with you and clearer statements elsewhere in the draft EA (pp. 13, 38, and 45), we understand that you are in fact committed to following best management practices and avoiding logging on sustained slopes of over 35% slope. We feel clear and consistent communication of that commitment is important to ensure the project is carried out as intended and resources are protected in the event of changes in Forest Service personnel. This is particularly critical given that the forester who helped develop this project has already moved on to another position. Written records could become the only direction for the Fightingtown Creek Wildlife Habitat Project.

We appreciate your commitment to protecting rare species in the project area. We are concerned though that planned safeguards may be inadequate for two species. We understand that broadleaf tickseed (*Coreopsis latifolia*) is locally common in parts of the Cohuttas. However, the Cohutta population may represent a large portion of the world population of the species. Natureserve lists the species as globally vulnerable (G3, fewer than 100 populations) and critically imperiled in Georgia (S1; natureserve.org). Bushhogging and standard road

maintenance may benefit the species, but road reconstruction in this project represents a clear threat to roadside populations. Given the rarity of this species in Georgia and globally, and the limited extent of the populations along Williamson Cove Road (Forest Service Road 792), we feel it is prudent and practical to protect these populations during road reconstruction.

Kidneyleaf twayblade (*Listera smallii*) typically grows in dense shade with little to no herbaceous competition. A 50-foot buffer may not be sufficient to maintain these conditions. When the sun is not directly overhead, light can easily pass underneath the crowns of trees within the buffer. Increased light levels may lead to increase herbaceous growth and competition around the twayblades. The loss of hemlocks and their dense shade may already be putting increased stress on this species in Georgia.

Two other species warrant special consideration for retention. Shortleaf pine is scarce in the project area and generally declining throughout its range. Indeed, forest plan objectives 3.1 and 8.1 are specifically designed to promote shortleaf pine in response to that decline. Shortleaf pines are a component of stand 683001. They are scarce enough within the stand that they could be retained without altering the type of treatment used in the stand. If they are cut out, the species will likely not regenerate in the stand, a scenario we saw played out elsewhere in the watershed on the field trip.

Dogwoods have recently undergone severe population declines across the region due to dogwood anthracnose. Their high-fat fruits produced each fall are particularly well suited for fueling the journeys of migrating song-birds, a wildlife group that is already under pressure from the loss of wintering habitat. Dogwoods also have high scenic value as evidenced by their popularity as ornamentals and selection as the state tree of Missouri and Virginia. They generally have low basal area relative to canopy dominant species, so retaining them should not alter treatment options. Their longevity and tolerance for high light conditions should allow them to survive well as leave trees.

We are often frustrated by scoping notices and environmental assessments that seem to be more intent on selling rather explaining a project to the public. In general, this EA appears to be an exception, and we appreciate the effort staff put into researching and clarifying aspects of the project. We do, however, feel that some statements are problematic and need further clarification in this project and future projects, in general.

The EA contains a well-written and informative textbook summary of the current theory of stand dynamics. That section contains a good explanation of how areas cut in this project will gradually develop the structure of current second-growth stands. The EA also points out that stands were selected to minimize the amount of oak currently in treatment stands. We do not dispute any of that information. Our issue is with the claim that treatment stands will regenerate to the same species composition. While the stand selection and changes in treatments from Alternative 2 to Alternative 3 will certainly minimize the changes in species, some important differences will likely still occur. In mesophytic stands that are currently less than 20% oak, what oak there is may be largely eliminated. For instance, competition from tuliptree regeneration is likely to be intense in stands 681013 and 681015 and the oak component may go from say 6% of the stand to a handful of trees. That change would represent a much smaller loss

of oak than would occur in many stands, but the loss of mast could still change what wildlife could survive in that stand.

The EA does not discuss the role of grapes in stand regeneration. We note that along Williamson Cove Road clearcuts from the 1980s are now covered in kudzu-like tangles of grape. The grape tangles have largely arrested succession in these stands and the shade they create is likely to alter future stand composition. We feel it would have been more accurate to say that “the project has been designed to minimize changes in species composition”, which is still valuable.

The EA also repeatedly implies that the lack of early successional habitat is due to a lack of timber harvesting (pp. 2, 28, 48). Lack of timber harvesting is not the cause. Natural processes once supplied sufficient early successional habitat for all species associated with that habitat. Early successional wildlife species in the Fightingtown Creek area are older than North American forest management. Alteration of disturbance processes, like fire and beavers, and changes in the forest age distribution by clearcutting caused the later lack of early successional habitat in Fightingtown. Logging in the 1970s and 1980s alleviated one symptom of the altered processes, lack of early successional habitat, but did not affect the root cause. Timber harvests in the current project can again address that symptom but not the root cause. As we discuss in our September 2015 scoping comments, we continue to question whether this project “[e]mphasizes management, maintenance, and restoration of plant associations to their ecological potential”, the goal of the 9.H prescription.

### **Project strengths and related points**

A wide range of wildlife species will benefit from the low proportion of oak cut in these treatments. As noted in our scoping comments, an exceptionally wide variety of species feed on acorns, and that mast production has only become more important with the decline of American chestnut. The stands selected for treatment in this project have a relatively low proportion of oak, and the inclusion of partial canopy retention and shelterwood treatments in Alternative 3 will also allow retention of a higher proportion of the oaks that are in the stands.

We believe the changes to the project introduced in Alternative 3 represent significant improvements and will help promote biodiversity within the project area. In addition to greater retention of mature, mast producing oaks, the partial retention and shelterwood treatments will create a gradient of light conditions within the treated stands. That gradient will allow tree species with varying levels of shade tolerance and competitive ability to regenerate. That plant diversity will in turn increase diversity of resources available to wildlife. The retained blocks within the treatment stands will also serve as refugia for disturbance-sensitive species and may allow them to recolonize other parts of the stands faster.

Non-silvicultural components of the project will also benefit the watershed. We were pleased to see that Region 8 guidance was followed and old-growth stands are being designated in both sub watersheds. The seasonal road closures will help protect water quality and aquatic species in Fightingtown Creek and its tributaries. Since road maintenance is underfunded across

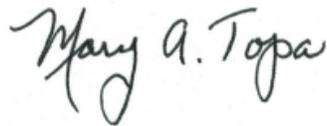
the forest, savings from seasonally gating roads in this area will also help protect water quality elsewhere on the forest. Water quality across the project area is also protected by locating treatments near roads to minimize temporary road construction and associated erosion.

This project stands out as exceptional among recent Forest Service silvicultural projects for the lack of herbicide use. Many recent projects have involved hundreds of acres of herbicide use. Herbicides thought to be benign have turned out to do lingering environmental or human health damage, and chemicals beside the active ingredient may not be disclosed or tested. Those difficult to quantify risks make it prudent to limit or eliminate herbicide use where possible. This project is one of the few that does.

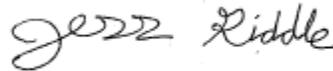
## **Conclusion**

We appreciate your efforts to promote conversations among diverse stakeholders. We feel your willingness to listen to the outputs of those discussions and deeply engage with other comments has resulting in a significantly improved project in Alternative 3. That said, there is still room for improvement in the project in terms of stand selection, protection for rare species, and especially in protecting aquatic habitats associated with McClure Creek. We hope that any further changes to the project will retain its strong points such as the low or absent rates of cutting mature oaks, temporary road construction, and herbicide use.

Sincerely,



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