GEORGIA FORESTWATCH
PRESERVE PROTECT RESTORE GAFW.ORG

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Please Support Your Forests

Georgia ForestWatch (GAFW) is a community-supported grassroots organization that only exists due to the financial support of our members and private foundations. To achieve our mission of **enhancing the health of over 867,000 acres of Georgia's national forest by protecting our forests and streams, advocating for natural processes, and identifying opportunities to improve forest management,** we rely almost entirely on your generosity.

Please look for our year-end appeal in your mailbox shortly after Thanksgiving. For our members, we will enclose the appeal in our most recent quarterly newsletter. For non-members, you will receive the appeal but without the benefit of the newsletter. GAFW is optimistic we will exceed our $50,000 fundraising goal, but only if our supportive community is especially generous as 2022 comes to a close.

If you are not currently a member but would like to ensure you receive our year-end appeal in the mail and all other benefits, including our most recent quarterly newsletter, please join us as a member today. We will ensure you receive the newsletter, and several other gift items, in your new member packet.

Were you aware that only approximately 20% of our state's national forest land is fully protected from commercial logging? If you support a future where people can enjoy forests that have reached their full majesty, where intact natural processes support healthy ecosystems and thriving biodiversity, and clean streams supply water to millions of Georgians, please give generously today.

Foothills Landscape Project Update

GAFW, in partnership with the Chattooga Conservancy, the Sierra Club of Georgia, the Southern Environmental Law Center (SELC), and the Wilderness Society, provided substantial comments on the Draft Mooneyham Implementation Plan under the Foothills Landscape Project (FLP). The Mooneyham plan is the first set of proposed projects under the FLP. While SELC thankfully provided the legal framework for the letter, GAFW Ecologist Jess Riddle conducted a site survey of the proposed areas. His findings are also reported in detail within the letter.

There was no formal public comment period for this project, but our feedback to the Forest Service is twofold. The first is a response to the U.S. Forest Service's (USFS) adherence to the legal obligations under the National Environmental Policy Act (NEPA), including specific recommendations regarding the proper implementation of programmatic NEPA reviews consistent with guidance from the Council on Environmental Quality (CEQ). The second is site-specific comments on the Mooneyham Implementation Plan and its impact on this forest area. **In summary, we largely support the actions proposed in the Draft Plan but remain very concerned about the USFS's approach to NEPA and the collaborative group.**

Concerns regarding Implementation Plan development:

- The USFS has developed the Foothills Project and the Mooneyham Draft Plan without input from the Collaborative group.
    - GAFW has been involved with the formation of the Collaborative group since its inception, but, to date, it is still loosely structured and lacks direction or cohesion. According to the USFS's guidance the Collaborative was to be stood up before any project proposals.
- The Draft Mooneyham Implementation Plan reflects ongoing confusion regarding when and how to conduct a tiered NEPA review.
    - Our concern is the USFS must clarify what triggers tiered NEPA reviews and what actions will receive it. The USFS is

using a standard of no additional NEPA reviews without "New or Changed Information," which is considered legally incorrect and cannot be used for implementation.

- The USFS must conduct Tiered NEPA Review for all actions involving choices between locations, scopes, or treatments.
    - The Mooneyham Draft Plan identifies specific actions in specific locations and has provided site-specific information for the first time. Per NEPA guidelines, the USFS can now conduct a meaningful comparison of alternative actions and should conduct a NEPA review for the proposed locations.

Ecological analysis of the Mooneyham Implementation Plan:

- There is evidence of at least four landslides in the Mooneyham burn unit. The initiation points for these landslides are not associated with active roads, historic roads, or other historic ground disturbances. Still, all started in prescribed burn areas with partial or complete overstory mortality.
- In areas containing turkeybeard, the Draft Plan recommends raking the duff layer in a buffer around existing turkeybeard plants. However, raking around mature plants can potentially increase mature plants' mortality.
- Compartment 716, Stand 1, is proposed for the commercial thinning of pine plantations to improve forest health. But a review of this site reveals different conditions on the east side of the road (mature chestnut oak) versus the west side (young pines with pockets of oak and shortleaf pine trees retained from a former harvest). As conditions on the east side of the road already contain site-appropriate species, we proposed limiting actions to the west side of the road,
- Compartment 716, Stands 3 & 4 are heavily oak dominated with little oak regeneration. The lack of light is the most likely constraint on oak regeneration and makes these sites appropriate targets for maintenance. The Draft Plan recommends thinning the overstory. But another option would be reducing the midstory, which would also immediately increase light levels, although to a lesser degree.
- There is strong evidence that fire is an integral part of forests on dry sites in the implementation area. Since allowing natural fires to burn unimpeded is not practical, prescribed fire is needed in the project area. However, conditions influencing fire regimes are inconsistent across the implementation area, suggesting that prescriptions for controlled burns should differ across the project area.
- Road daylighting requires less ground disturbance than other harvest layouts, so we support road daylighting to meet early successional harvest objectives.
- American climbing fern (*Lygodium palmatum*) is present, and this locally rare species should be protected from road reconstruction, other mechanical disturbances, and herbicides.
- We support the culvert replacements proposed in the Draft Plan. Culvert replacements help reconnect populations of aquatic organisms, thereby helping to maintain genetic diversity in populations and allowing populations to recolonize reaches after

major disturbances.
- The current dense cover of Virginia pine and loblolly pine is unnatural for multiple sites within the project area and presents an elevated risk of the southern pine beetle. Consequently, we support active management and restoration of these stands.

There is a clear path forward here. The Forest Service must prepare a tiered environmental assessment covering all Mooneyham actions that involve decisions regarding competing locations, scope, or treatments. Conducting this limited, focused analysis will allow the USFS to move forward with what we consider a beneficial suite of projects lawfully.

Smooth Coneflower

Native to northeastern Georgia, the smooth coneflower (*Echinacea laevigata*) was recently downlisted from endangered to threatened under the federal Endangered Species Act. When originally listed as endangered in 1992, there were only 21 smooth coneflower populations, and now there are 44 distinct healthy populations (11 in Georgia) on protected lands including, Currahee Mountain in the Chattahoochee-Oconee National Forests. In addition to Georgia, the smooth coneflower exists only in Virginia and the Carolinas.

At its healthiest, the smooth coneflower would only have been found in a few pockets of rocky, mineral-heavy soil of pine-oak-hickory woodlands. A full sun-loving species, it requires an open canopy that historically would have been created by natural fire, tree falls, or weather events such as tornados.

If you come across a population of smooth coneflowers, please do not disturb the plants or the area. If you find them within our state's national forests, please take a picture and send it to GAFW at outreach@gafw.org with the location. We will report your findings to the appropriate agencies to ensure they are protected.

Recreational Special Use Permit Update

You will recall GAFW's recent request to our members and community to weigh in on a short-notice recreational special use permit application by for-profit Run Bum Tours LLC to host a 500+ person Sky to Summit trail race event. You can find the original full notification here.

Based on your input GAFW submitted comments in line with our original concerns regarding this vendor and event. While the USFS approved the race, our comments did have an impact on reducing the event's impact on our national forest. District Ranger Ryan Foote approved the event with several adjustments, including implementing a severe weather plan.

GAFW observers monitored the area during the event and afterward. While we do not have the resources to observe the full course, we did observe the event on several sections of the road. Despite the ½ to 1 inch of rain that fell during the event, no significant impact was found on the roads or rest stations observed. Additionally, GAFW conducted post-event monitoring. Again, we could not monitor the full course but found no significant trash or trail markings after the event.

We appreciate the USFS and Run Bum Tours LLC taking our comments and concerns seriously and improving upon the event. While GAFW would still like to see commercial events much smaller than 500+ and recommend all vendors have a comprehensive rain plan, this event appears to have had limited impact.

GAFW's policy supports recreational use, including commercially, within the CONF if the activities are fully vetted and do not negatively impact the ecology or natural balance of the forest or other users or beneficiaries. If you have visited, or are planning to visit, anywhere along this course in the very near future and observe any remaining impact from this event, please let us know at outreach@gafw.org.

If this email was forwarded to you, please register here to receive GAFW updates.

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Thank You

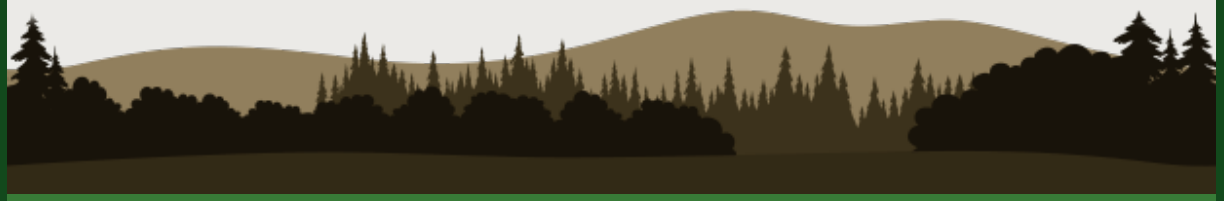
Georgia ForestWatch is the only nonprofit organization with a mission solely dedicated to ensuring the Chattahoochee-Oconee National Forests remain healthy and available for future generations, and we can only pursue our mission with the support of the community.

Please support our mission by ensuring your membership is up to date and providing additional support as you are able.

On behalf of our entire national forests in our beautiful state, we thank you for your support.

Our Mission

Our mission is to enhance the health of over 867,000 acres of Georgia's national forest by protecting our forests and streams, advocating for natural processes, and identifying opportunities to improve forest management. Visit Georgia ForestWatch (GAFW) to learn more.



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