



TO:
Chattahoochee National Forest
1755 Cleveland Highway
Gainesville, GA 30501

FROM:
Chattooga Conservancy
9 Sequoia Hills Lane
Clayton, GA 30525

December 1st, 2016

RE: FOOTHILLS LANDSCAPE COLLABORATION

To Whom It May Concern,

On behalf of the Chattooga Conservancy, we hereby submit the following comments relating to the Foothills Landscape Community Collaboration. The Chattooga Conservancy is a non-profit conservation organization working to “protect, promote, and restore the natural ecological integrity of native Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands.” The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattahoochee National Forest. Members, staff, and board members of our organization participate in a wide range of recreational activities on these national forest lands, including activities in the Chattooga River watershed. The Chattooga Conservancy represents the interests of approximately 600 total members that support our work. We write to provide commentary on the Foothills Landscape Initiative as a whole and also to point to specific activities that we would like to see included in the project. Our comments are directed primarily to the portion of the Foothills Landscape project that is located in the Chattooga River watershed.

I. Project Boundaries and Ecoregion Overlap

Widely accepted USDA land classifications are in disagreement with the Chattahoochee National Forest’s delineation of a “foothills landscape” ecotype in the Chattooga River watershed, specifically: 1) The USDA Forest Service’s “Ecoregions of North America” (Robert Bailey, USDA-FS, “Jointly supported by the USFS and The Nature Conservancy, Conservation Science Division”) clearly places the Chattooga River watershed in the Southern Appalachian Mountains zone; and, 2) The USDA’s Plant Hardiness Zone Map clearly places the Chattooga River watershed in the Blue Ridge Mountains and Valleys zone. This ecoregion supports a mixed oak-pine forest in the valleys, and an oak-dominated and mixed hardwood forest in the

higher elevations. Thus, we question the delineation of a “foothills landscape” ecotype in the Chattooga River watershed, and the Forest Service’s assertion that “shortleaf and pitch pine forests are the dominant forest types” here. In addition, please note that we endorse managing the Chattooga River watershed as a distinct ecological unit, which has been supported to some degree by all three national forests in the watershed, and request that Chattahoochee National Forest planners align land management initiatives (in the Chattooga watershed) with this watershed-scale model.

II. Specific Activities to be Included in Project

In addition to the aforementioned concerns, there are several specific activities that we would like to see included in the project. These include the following:

Native Canebrake Ecosystem Restoration. According to the Land and Resources Management Plan for the Chattahoochee-Oconee National Forests, canebrake communities are to be managed for restoration and maintenance.¹ The Chattooga Conservancy would like to see canebrake restoration prioritized in the portions of the project area falling within the Chattooga River watershed, and would also like to help any Forest Service efforts to take on such a task. At present, we are engaged in a project with the Andrew Pickens District of the Sumter National Forest to restore approximately 29 acres of canebrake ecosystem within the Chattooga Wild and Scenic River corridor, and have enjoyed great progress on this monumental effort. Should a similar project be pursued within the Chattooga River watershed portions of the project area, our organization could help contribute to the overall effort.

Off-road Use. We request that the Foothills Landscape Initiative include a concerted effort to address illegal off-road use at Earl’s and Sandy Ford within the Chattooga River watershed. Such use is well documented and continues to persist, causing environmental damage within a sensitive river corridor and decreasing the Chattooga Wild and Scenic River’s recreational, ecological and solitude Outstandingly Remarkable Values. Efforts to address this use might include obstruction structures on frequently user-created off-road trails and increased monitoring and law enforcement on peak season days to ensure that vehicles do not enter these trails, or enter the river itself. We also request attention to stopping ORV access into the Bartram Trail, the Chattooga River Trail, and into the wild and scenic river corridor at “8-Ball” rapid and the confluence of Stekoa Creek and the Chattooga River.

Prioritize Restoration of Impaired Streams and Watersheds. For instance, Warwoman Creek, which is included in the project boundary, is listed as an “impaired” waterway by the Georgia Department of Natural Resources due to sedimentation. “Impairment” status is given to waterways that are unable to meet their designated use, in this case recreation-fishing, because of point and/or non-point source pollution. Several Forest Service roads within a close proximity of Warwoman Creek are suspected to be contributing to its impairment. Forestry practices are also

¹ *Land and Resources Management Plan for the Chattahoochee-Oconee National Forests*, 3-162 stating that “[Concerning Native Canebrakes] Primary management needs are restoration and maintenance through overstory reduction and periodic prescribed fire.”

listed in the Total Maximum Daily Load plans (TMDL) for Warwoman Creek, as a potential cause of sedimentation. The Chattooga Conservancy would like to see an active effort to address such impairment in the Foothills Landscape Initiative by correcting, closing and/or re-engineering eroding Forest Service roads, and by ensuring that any forestry practices within the Warwoman watershed do not contribute to sedimentation.

In addition, a large portion of the Stekoa Creek watershed is encompassed in the Foothills Landscape Initiative project boundary. Stekoa Creek has a long and well-documented history of polluting the National Wild & Scenic Chattooga River; in fact, correspondence between the U. S. Forest Service (USFS), interest groups and the GA EPD about this issue dates back to at least the late 1970s and early 1980s. The Stekoa Creek watershed includes the reaches of several primary tributaries that are also impaired from excessive loads of both fecal coliform and sediment. These tributaries are: Scott Creek (a portion is located within the project boundary), Saddle Gap Branch, Chechero Creek, She/Pool Creek (Pool Creek is a small tributary to She Creek) and Cutting Bone Creek. With the exception of only Cutting Bone Creek, all these tributaries are listed by the GA EPD and the EPA as impaired waters. Forestry practices and proximity to gravel/dirt roads are listed in these streams' TMDLs as suspected contributors to their impairment. The Chattooga Conservancy requests an active effort to address such impairment in the Foothills Landscape Initiative by correcting, closing and/or re-engineering any eroding Forest Service roads in the Stekoa Creek watershed, and by ensuring that any forestry practices within this watershed do not contribute to sedimentation.

Lastly, we also request an inventory of horse trails emanating from the Willis Knob Horse Camp, and the implementation of mitigation measures for sources of erosion and sedimentation from this recreational pursuit.

III. General Actions to be Included in Project

Vegetation Management.

- Commercial timber extraction is expected to be a component of the Foothills project. It should not be implemented where the potential for erosion is significant, or upslope from impaired streams, or if it requires the construction of a new road.
- Protect stands of old growth, and designate old growth restoration areas. Strive to identify undisturbed habitats that can serve as connecting corridors between areas of old growth.
- Any timber management prescriptions should employ silvicultural prescriptions that mimic natural disturbance, such as single tree or small group selection.
- Identify and designate areas for restoration forestry practices, i.e., areas that are in monoculture plantations that could be moved towards a mixed oak-pine forest (in the valleys), and an oak-dominated and mixed hardwood forest (in the higher elevations).
- Identify populations of invasive species, and implement management activities to eradicate NNIS.

Roads.

- Decommission roads that have negative effects on water quality, or that create excessive road densities for forest interior species.
- No new road construction –The Forest Service has a growing, \$8.4 billion road maintenance and reconstruction backlog, and receives only a fraction of the annual maintenance funding it needs to maintain its existing road system to environmental and safety standards.

We appreciate this opportunity to provide comments on the Foothills Landscape Initiative, and look forward to continuing to work with Forest Service land managers on this project.

Sincerely,

A handwritten signature in blue ink that reads "Nicole S. Hayler". The signature is written in a cursive, flowing style.

Nicole Hayler