Appendix C: Response to Comments

1. Reponses by concern to the Scoping Period for the Fightingtown Creek Early Successional Habitat / USDA Forest Service - Chattahoochee-Oconee National Forest / Conasauga Ranger District 2

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Concern #	# of Comments
1	218
2	18
3	12
4	21
5	1
6	17
7	8
8	10
9	6
10	9
11	6
12	2
13	1
14	4
15	1
16	1
17	1
18	1
19	1
20	2
21	3
22	5

Concern #1: Please do not cut any mature trees, instead cut young or degraded stands.
Response #1:
The National Forest Management Act (NFMA) and other regulations require that National Forests be managed to support viable populations of native and desired non-native plants, fish, and wildlife within the planning area. These regulations focus on the role of active management in providing for species' viability. Timber harvest is a tool often utilized to create or improve wildlife habitat and maintain viable populations, particularly when a species or community is in decline. A young forest provides vital habitat for a suite of wildlife species, and young forests are not necessarily "degraded" because of their age or stage of successional development. The maintenance of a full range of successional stages is important in providing habitat for wildlife dependent on habitat other than old, mature forests. In the Fightingtown Creek project area, nearly three-quarters of the forest acreage is over 80 years old, and 41 percent is over 100 years old or older. This large block of mature forest is extremely valuable wildlife habitat; however, without periodic disturbance or regeneration of some forest habitat, viable populations of disturbance-dependent species are not provided for. This project proposes the regeneration of 436 acres, which is less than 1% of the project area.
Concern #2: Activities associated to the project (timber harvest, etc.) would create and increase sediment that can get into the streams and affect aquatic habitat.
Response #2:
Soil sedimentation and its impact to soil, water and aquatic resources will be analyzed in the EA.

Concern #3: Activities associated with the removal of timber and material from the forest using mechanized equipment, could cause soils disturbance and erosion, especially on steep slopes.
Response #3:
The adverse impacts to the soil resources in the project area will be analyzed in the EA.
Concern #4: Activities associated with the removal of timber could cause an impact to the soil resource.
Response #4: The impacts of harvest removal in the soil will be analyze in the soil section of the EA.
Concern #5: This proposed project is an excellent example of recognizing the issues surrounding the lack of forest management and actively pursuing a means to fulfill the USFS obligation to increase habitat diversity for wildlife and the benefit to all forest users.
Response #5: Thank you for your comments.
Concern #6: There is opposition to the proposed harvesting of mature or old-growth forest stands to create early-successional habitats within the project area.
Response #6:
Late-successional forests (> 80 years old) are abundant in the Fightingtown Creek Project area. These forests account for nearly three-quarters of the forested acreage within the project area (8605 acres). Of these, over half or 4798 acres are older than 100 years old.

The proposed action includes 436 acres of treatment, including 275 acres of timber harvest within late-successional forests (stands older than 80 years in age). Four stands, or 105 acres of treatment would occur in stands older than 100 years old. This represents 2 percent of all stands within the project area that are older than 100 years in age. None of the stands proposed for timber harvest can be defined as old-growth or are even within 20 years of meeting minimum age criteria for old-growth based on Forest Service, Region 8 guidelines for old-growth.

The proposed action does include the allocation of over 400 acres of forest stands to old growth conservation within the Fightingtown Creek Project Area. Stands best meeting the Forest Service, Region 8 guidelines for old-growth would be selected for old-growth conservation. The details of this process will be disclosed in the EA.

Additionally, an alternative is being developed that includes alternate harvest methods for creating the desired early-successional habitats within the project area. Harvest treatments included under this alternative would retain more mature overstory trees, favor large oaks for retention, and create a variety of habitat attributes within individual harvest units. This alternative will be described in the EA.
Concern #7: The even-aged timber management included in the Proposed Action will result in the loss of mature oak and a reduction in mast available for wildlife.
Response #7:
Mid to late successional oak-dominated forest account for 29 percent of the acres in the project area (3423 acres). Oaks are also important associates in cove hardwoods stands which are present on nearly 5000 acres within the 11,675 acre project area. Mast production is not a limiting habitat attribute within the project area. However, early-successional forest habitats are.

This project does not include management actions in oak-dominated stands. Proposed treatments are limited to mesic deciduous forest, dominated by yellow poplar or in white pine stands. Oaks are a varying component within proposed treatment areas.

An alternative to the proposed action has been developed to address concerns related to the harvest and loss of mature oaks and their mast production. This alternative would retain more overstory trees, favor oaks for retention and enhance conditions for oak regeneration in some treatment areas. The effects of project alternatives on oak and mast production will be disclosed in the EA.

Concern #8: There are conflicting opinions and/or concerns over the size/scale and method of timber harvest included in the Proposed Action.

Response #8:

The even-aged harvest method described in the Proposed Action is an appropriate tool for creating the desired habitat conditions outlined in the purpose and need for the project.

Size and distance between harvest units would comply with NFMA regulations. Although clusters of proposed treatment stands exceed 40 acres, it should be noted that much of the acreage within these stands would not be included due to steep slopes or accessibility. Exclusion of such areas will reduce overall size of the harvest units. Harvest units would not exceed 40 acres in size and would be separated by a minimum of 330 feet of mature forest.

Proposed treatments all lie within Management Prescription 9.H which allows for up to 10 percent of the project area to be managed for early-successional habitats (ESH). The range of ESH that could be created within the project area in Management Prescription 9.H is given in the EA.

Additionally, an alternative has been developed that includes alternate harvest methods to create ESH. These methods would retain more mature overstory trees, favor mast producing oaks, create a two-aged forest condition, and have less visual impact.

Concern #9: Wildlife (other than ruffed grouse) may be adversely affected by this proposal.

Response #9:

There is an abundance of late-successional forest (stands over 80 years old) in the project area (and across the larger landscape) which provides habitat for a wide variety of plants and animals. Not all species occur in the same ecological niche, however, and there are many species that utilize young forests for some of their life stages or seasons. This fact is reflected in the Land and Resource Management Plan for the Chattahoochee-Oconee National Forests; it contains objectives to create and/or maintain a range of forest successional stages in order to provide for the needs of area wildlife, including those that are disturbance-dependent. Management Prescription 9.H contains a target range of early successional stage forest (4-10% of the prescription area) in order to provide habitat for species that require this type of habitat.

Concern #10:

- Illegal off-road vehicle use may increase due to the roads created and/or utilized within the project. (37-2, 91-28)
- The visual scenery of the area may be affected. (37-3)
- Usage of the recreational resources in this area may be impacted by the project activities. (51-2, 51-3, 51-8)
- Cutting old growth stands in this project will jeopardize a well-known trout fishing area by increasing the likelihood of flooding.(107-6)
- The user created trail into the fragile Devils Den area should be closed and signed. (91-28)
- This area has historical value. (244-3)
- The natural beauty of the area and its pristine wildlife habitats could be affected by the project. (244-1, 244-3, 51-3) [ID#19]

Response #10:

- The USFS recognizes the potential for illegal off-road activities occurring in relation to roads created or utilized in vegetation management. All temporary roads within the project area will be closed at the completion of the project utilizing earth berms embedded with large tree debris. During the project, roads will be monitored for unauthorized use.
- Treatment areas proposed off of FR 798 (stands 005,008, 009, 013,014 and 022) are primarily located in the lower lying areas and saddles, not on ridgelines. Visual effects will only be seen from

areas directly adjacent to FR 798, which is gated year-round. Stands will be managed to meet or exceed the Scenic Integrity Objectives (High, Medium or Low) as related to their Inventoried Scenic Class. Any potential visual effects will be discussed in the final EA.

- The Cohutta Wilderness and Benton MacKaye Trail, and their related access points are located well away from this project area. Traffic, dust and noise generated by the logging vehicles will not hinder usage of these areas. The Cashes Valley and Fightingtown Creek areas do not contain any developed recreation such as trailheads, day use areas or campgrounds. Dispersed recreation in this area is primarily horseback riding on undesignated trails, and hunting/fishing. Use is primarily by area residents due to the limited road access, and is low overall when compared with other dispersed areas of the Forest. Any affects from dust and noise will be limited in both scope and duration, with an anticipated
- XXX of logging truck "trips" along the access route in a day, over a time period of
- XXX weeks.
- Fightingtown creek is acknowledged as a recreational resource for trout fishing. None of the proposed treatment areas are directly adjacent to Fightingtown Creek, however, several smaller "feeder" or headwater streams are. No cutting will occur within
- XXX feet of any of these feeder streams. Effects to soil and water will be discussed in the EA.
- The user created trail into the Devil's Den area will be evaluated for resource concerns.
- All proposed treatment areas will be evaluated for the presence of cultural resources.

Concern #11:
The proposed creation of ESH may adversely affect the age class distribution and future species composition in the project area. Furthermore, the need for ESH is unnecessary because fine-scale disturbances are present in the project area and future ESH will be created when eastern hemlock succumbs to hemlock wooly adelgid. [ID#20]

Response#11:
The effect of the proposed action and alternatives on the project area's age class distribution and species composition will be discussed in the EA (pages xxx and xxx).

Although there is "fine scale ESH" in the project area (road corridors, small canopy gaps caused by individual tree falls), and while these small patches add diversity to the forested landscape, they are not large enough to contain high stem densities and other characteristics of larger patches of ESH. This is the reason that ESH acreage is tracked on the Forest in patches larger than 2 acres (Forest Plan).

The effect of the eventual loss of hemlock on the project area will be discussed in the EA.

Concern #12:
There is no need to designate small blocks of old growth because there is an abundance of this habitat in the project area and on the Forest. It may affect future concerns such as forest health or dealing with natural disturbances.

Response #12:
The provision of a well-distributed and representative network of large, medium, and small potential old growth blocks is an important goal of the Forest Plan, and there are specific objectives and standards related to the designation of a certain percentage of each watershed (sixth level HUC unit) (Forest Plan pgs. 2-16-18). Incremental progress toward the designation of 5% of each watershed must be made at the project level.

Timber may be salvaged after a catastrophe as needed, and native pests may be controlled under some conditions depending on the resource values at risk (Forest Plan pg. 3-107-108).

Concern #13:

Proposed Action should be modified to consider a more balanced distribution of early-successional habitat creation across a range of site productivity classes, including sites of lower productivity.

Response #13:

The district has almost exclusively been creating early-successional forest habitats on lower productivity sites during the current planning cycle as a by-product of our shortleaf pine and longleaf pine restoration efforts. Very little or no early-successional habitat has been created on moderate to highly productive sites on the Conasauga Ranger District during the same time period.

The Proposed Action would in fact improve the distribution of early-successional forest habitats on the district by creating up to 436 acres of this habitat on more productive sites in the project area.

The project area is dominated by higher productivity sites due to prominent aspects and the elevations present within the area. Low productivity sites (Site Index 60 ft or lower) are only a minor component of the project area (less than 3 percent). Moderately productive sites (Site Index 70 - 80 ft) account for 60 percent of the project area acreage. Combined, moderately to higher productivity sites (Site Index > 80 ft) comprise nearly 98 percent of the project area. Logically then, the proposed action of creating early successional habitats is going to be skewed towards these higher productivity sites, because lower productivity sites are not available. It should also be noted that the moderately productive sites are most associated with oak forests, and this project purposely avoided oak-dominated stands for early-successional habitat creation. In addition, higher productivity sites contain abundant and diverse understory conditions, which are key habitat attributes for ruffed grouse, a ground-dwelling species.

Concern #14: Project should have a positive economic impact for the local community.

Response #14: An economic analysis for project alternatives will be disclosed in Chapter 3 of the EA.

Concern #15: There is a concern that proposed timber harvest is adjacent to private property.

Response #15:

If any of the proposed timber harvest is adjacent to private property, there will be site-specific design features (such the retention of a buffer or other techniques) based on the current land use of the private property and the type of harvesting proposed on National Forest.

Concern #16: Plants and air quality may be adversely affected by this proposal.

Response #16: The effects of the proposed action and alternatives on vegetation and climate will be analyzed and disclosed in the EA.

Concern #17:

NEPA requires consideration and disclosure of different scientific views. The EA writers should consider these views when analyzing the effects and efficacy of the treatments.

Response #17: Comment noted.

Concern #18: Focus on improving roads, minimizing littering and off-roading activity instead of projects like this.

Response #18: Thank you for your comments.

Concern #19:

Questions the Agency's claim that proposed treatments will result in the regeneration of harvested stands to the intended species composition. This assertion in is based on the current composition of younger, "degraded" stands within the project area where similar harvests were made in the past. [ID#29]

Response #19:

The Proposed Action includes an even-aged regeneration method to create early-successional habitat in mesic hardwood stands dominated by yellow poplar and in white pine-dominated stands. The Agency fully expects that these areas will regenerate to mesic hardwoods dominated by yellow poplar or to white pine in white pine-dominated parent stands.

The Agency acknowledges that previously harvested oak stands in the project area contain proportionately more yellow poplar and fewer oaks than what existed prior to those harvests. The ability of oak to compete with yellow poplar on productive sites during regeneration is well documented in the literature and unfortunately well demonstrated on mesic sites throughout the oak biome. The reference to pine thickets void of hardwood regeneration is a curious comment, since most areas harvested during earlier management entries are in fact hardwood (yellow poplar) dominated (see C783 S10, C782 S07, and lower slopes of C80 S13 of the proposed action), and references to harvesting degraded hardwood stands are made by this commenter and others multiple times in their responses.

This project includes the regeneration of cove hardwood stands dominated by yellow poplar or stands dominated by white pine, and was designed specifically to avoid stands where oak was a major component. In fact, in only three stands (99 acres) included in the Proposed Action does oak comprise more than 20 percent of the current stocking. It is highly likely, if not inevitable, that these three stands will regenerate to a composition in which oak is less abundant than in the parent stand. The reduction of oak on these acres is insignificant, considering the abundance of oak within the project area where no treatments are proposed, and miniscule, when the distribution of oak across the forest is considered (46 percent of the Chattahoochee National Forest).

The purpose of this project is not to regenerate oak, but to create young forest habitat, which is lacking on the Forest and a habitat in which many declining species depend. The Agency has developed an alternative to the proposed action which is more sensitive to the loss of oak as a mast producer and to address oak regeneration concerns. See EA for details of this alternative. The effects of the project alternatives on forest composition is given in the EA.

Concern #20:

Respondent disagrees with the need for any treatment in some stands (680-14, 680-22, 680-39, 681-13, 681-15, 681-18, 682-04, 682-21, 683-01 and 684-15), agrees with the proposed treatment of others (680-09, 680-13, 683-10 and 684-31), and offers an alternative treatment of some stands (680-05, 680-08 and 682-07). The Respondent proposes an alternative to the Proposed Action based on individual comments for each Proposed Action stand.

Response #20:

The alternative offered by the Respondent does not meet the purpose and need for the project because it does not create early-successional habitat (ESH) in a desired spatial arrangement and is limited in scale (62 acres of ESH; 53 acres of variable thinning to create small gaps, and 46 acres of non-commercial thinning to improve oak composition). Additionally, because steep slopes, accessibility and other factors determine the layout of individual harvest units, the acres of proposal are often only a fraction (average of 70 percent) of the acres intended/or proposed for treatment. The Respondent's proposal includes the creation of early-successional habitat on 62 acres. Using average rates of layout to proposed acres of treatment (70 percent) , the proposal submitted by the Respondent would net 43 acres of ESH within an 11675 acre watershed dominated by late-successional forest. The small acreage of treatment makes this proposal economically impractical.

An alternative to the Proposed Action has been developed which incorporates certain elements of the respondents proposed alternative. The newly developed alternative retains more overstory trees, gives preference to oaks for retention, addresses concerns about loss of mast and oak regeneration, and will provide a variety of habitat conditions for early and late-successional forest-dependent wildlife species. This Alternative is described in the EA.

Concern #21:

Elements of the Proposed Action seem contrary or incompatible with the goals established for Management Prescription 9.H because these actions will degrade not restore ecological potential.

Response #21:
This project includes management activities to create early-successional forest habitats. A total of 436 acres of even-aged regeneration harvests would be implemented to create this habitat condition. All harvests would occur within Management Prescription (MRx) 9.H, where management activities should be directed towards the restoration of declining communities, among other emphasis. Activities within this MRx should also emphasize the maintenance of suitable to optimal habitats to support populations of the plant and animal species associated with these communities.

Survey information from across the Southern Appalachian region indicate that bird species dependent on early successional habitats have been on a steady decline due to the lack suitable habitats. Early successional forest habitats are infrequent on the Chattahoochee National Forest, and acutely scarce on mesic hardwood sites across the Forest. The proposed action was developed to address the infrequency of this habitat condition on the National Forest and to improve habitats for declining species.

It is worth noting that MRx 9.H encompasses over 137,000 acres within the Blue Ridge and Upper Piedmont ecoregions of the Chattahoochee National Forest. Proposed treatments to create early-successional habitats on 436 acres could hardly be characterized as significant at this scale or even at the scale of the analysis area.

The Forest Plan also clearly states that restoration within MRx 9.H should be evaluated at the landscape scale, and not at the stand level. When evaluated at the correct scale, the creation of early successional habitat on 436 acres is not degrading the ecological potential within the landscape, but is enhancing its diversity and restoring habitats that are infrequent and necessary for the maintenance of declining bird species. Accordingly, the proposed action is not contradictory to direction for MRx 9.H, but rather is implementing a primary focus for the prescription area - the maintenance of a habitat that is infrequent on the National Forest for which declining species within the project depend.

Concern #22:
Loss of habitat may not be the only cause of ruffed grouse population decline. Predation and other causes of nest failure are also important. Consider stocking ruffed grouse.

Response #22:
Predation and other environmental factors (weather and climate) are certainly important causes of ruffed grouse decline. These factors are closely linked to the importance of suitable habitat and the close juxtaposition of quality habitat components such as mature mast producing oaks, lush herbaceous groundcover for brood rearing, and dense patches with high stem density for breeding and escape cover.