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Environmental Assessment

Revised Land and Resource Management Plan Amendment Updating Standards for Federally Listed Bat Species

(LRMP Amendment #4)

Chattahoochee-Oconee National Forests, GA

Banks, Catoosa, Chattooga, Dawson, Fannin, Floyd, Gilmer, Gordon, Greene, Habersham, Jasper, Jones, Lumpkin, Monroe, Morgan, Murray, Oconee, Oglethorpe, Putnam, Rabun, Stephens, Towns, Union, Walker, White and Whitfield Counties

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Table of Contents

SUMMARY

Standards in the 2004 Revised Land and Resource Management Plan (LRMP) need to be updated to reflect new guidance for federally endangered bat species. The proposed amendment to the LRMP would add seven new standards and modify two existing standards.

This proposed amendment is programmatic in nature and does not authorize any ground disturbing activities. This Environmental Analysis (EA) is tiered to the 2004 Final Environmental Impact Statement (FEIS) prepared for the LRMP. Site-specific analysis of effects would be conducted following the NEPA process as individual projects are proposed.

INTRODUCTION

Purpose and Need for Action

The Land and Resource Management Plan (LRMP) for the Chattahoochee-Oconee National Forests was finalized in January 2004. Since then, new information regarding federally-listed Indiana bats (*Myotis sodalis*) has emerged. In addition to the Indiana bat there are several more bat species that may be federally listed as endangered in the future.

In April of 2012, a federally endangered female Indiana bat was radio-tracked from a winter hibernacula in Tennessee to State-owned land outside of Ellijay, GA. The female bat and 12-15 unknown others were documented roosting under loose bark for approximately 10 days in April. This indicates that suitable summer/maternity habitat is likely to be present in northern Georgia, but to what extent is unknown. In 2016, a second Indiana bat was observed hibernating in a cave on National Park Service land in Walker County. The forests of North Georgia represent the southern edge of the summer range of Indiana bats, and population densities are likely to be extremely low.

Indiana bats were not considered in the Final Environmental Impact Statement for the LRMP or its associated documentation because at that time an Indiana bat had not been observed in Georgia for almost thirty years.

In addition to the occurrence of an Indiana bat, the U.S. Fish and Wildlife Service (USFWS) listed the northern long-eared bat (NLEB) as a Threatened species under the Endangered Species Act on April 2, 2015. On January 14, 2016 a final 4(d) rule for the conservation of the species was published in the *Federal Register*. During summer, NLEBs roost singly or in small colonies in cavities, underneath bark, crevices, or hollow live trees or snags, and occasionally structures such as barns. This species has been captured throughout Georgia (including on the Chattahoochee National Forest) during recent summers. White-nose syndrome (WNS) and the continued spread of the disease has been identified as the primary threat to the NLEB. WNS has recently emerged as a disease affecting bats that hibernate in caves and abandoned mines during winter. This disease is caused by the fungus *Pseudogymnoascus destructans*, and has caused the death of millions of bats in the eastern United States and Canada. This fungus grows in relatively cold conditions with high humidity, which makes many caves, abandoned mines, and other underground structures optimal growing sites for the disease during winter (Perry, 2013). WNS was discovered in Georgia in 2013, and it continues to spread throughout the United States.

After the listing of the NLEB the USFWS issued the Final 4(d) rule they also issued a new range wide BO on the 4(d) rule. As long as the NLEB is listed as Threatened, the Chattahoochee-Oconee National Forests will operate under the range wide NLEB BO done for the Final 4(d) rule. If the listing status of the NLEB is changed to endangered then the Chattahoochee-Oconee National Forests would implement all standards contained in the amended LRMP to the predicated range of the NLEB.

As required by Section 7 of the Endangered Species Act we started consulting on these issues with our partners with the USFWS. Through this process the Forest realized that there is a need to amend the LRMP to include standards that will better protect federally endangered bat species. The Chattahoochee-Oconee National Forests are proposing to amend the LRMP to include new standards and modify existing standards that will provide for protection of endangered bat species. These standards were developed in coordination with the USFWS and Georgia Department of Natural Resources. The standards are designed to protect roosting bats and insure that suitable habitat is retained on the Forests while still allowing restoration activities that will benefit bats and other species.

Proposed Action

The Chattahoochee-Oconee National Forests proposes to add the following standards to Chapter 2 of the LRMP. Projects implementing the LRMP will comply with these standards when applicable and these standards would be incorporated into the proposed action for the environmental analysis that would accompany such a proposal. For each project-level analysis, the USFWS would be consulted per Section 7 of the Endangered Species Act.

FW-233. Trees known to have been used as roosts by Indiana bats or other federally endangered bat species are protected from cutting and/or modification until they are no longer suitable as roost trees, unless their cutting or modification is needed to protect public or employee safety. Where roost tree cutting or modification is deemed necessary, it occurs only after consultation with the U.S. Fish and Wildlife Service.

FW-234. No snags (standing dead trees) will be cut for fuel wood from April 1 through August 31.

FW-235. Snags are not intentionally felled from April 1 through August 31 unless needed to provide for immediate safety of the public, employees, or contractors. Exceptions may be made for projects such as insect and disease control, salvage harvesting, and facility construction. Exceptions will require evaluation by a qualified individual (i.e. biologist or other individual approved by the district biologist) for current Indiana bat or other federally endangered bat species use and may require coordination with the U.S. Fish and Wildlife Service.

FW-236. For non-silvicultural projects which include, but are not limited to prescribed fire line construction, right of way clearing, hazard tree removal and recreation area management, currently suitable Indiana bat or other federally protected bat species roost trees will be felled from September 1 through March 31. This standard shall apply only to those parts of the Forest that are deemed to be within the range and provide suitable habitat for federally endangered bats. The Forest will coordinate with the U.S Fish and Wildlife Service to determine the range and suitable habitat of endangered bats based on the most up to date information, at least annually. If tree removal occurs between April 1 and August 31, the trees shall be evaluated by a qualified individual (i.e. biologist or other individual approved by the district biologist) to determine if the snag is being used by Indiana bats or other endangered bat species and may require coordination with the U.S. Fish and Wildlife Service.

FW-237. During all silvicultural treatments, retention priority is given to the largest live available trees that exhibit characteristics favored by roosting Indiana bats or other federally endangered bat species while still meeting stand prescription objectives.

> *Note: A typical roost is located under exfoliating bark of a dead ash, elm, hickory, maple, oak, poplar or pine although any live or dead tree that retains large, thick slabs of peeling bark is suitable. Average diameter of maternity roost trees is 45 cm (18 in) and average diameter of roosts used by adult males is 33 cm (13 in). Height of the tree (snag) is greater than 3m (10 ft.), but height of the roosting tree is not as important as height relative to surrounding trees and the position of the snag relative to other trees, because relative site is unimpeded by vines or small branches. The tree is typically within canopy gaps in a forest, in a fence line, or along a wooded edge. Primary roosts usually are not found in the middle of extensive open fields, but often are within 15m (50 ft.) of a forest edge. Primary roosts usually are in trees that are in early-to-mid stages of decay (U.S. Fish and Wildlife Service, 2007).*

FW-238. Compliance of Indiana bat and other federally endangered bat species standards will be monitored. The Forest will submit an annual report to the U.S. Fish and Wildlife Service documenting compliance with Standards. The documentation will include the amount of timber harvesting and amount of prescribed burning on the Forests that year.

FW-239. Monitoring for Indiana bats and other federally protected bat species will be conducted through acoustic surveys and mist netting efforts or other methods acceptable to the U.S. Fish and Wildlife Service. Acoustic survey routes and areas for mist netting surveys will be developed in coordination with the U.S. Fish and Wildlife Service and Georgia Department of Natural Resources. The Forest will work with U.S. Fish and Wildlife Service, Georgia Department of Natural Resources and other partners to complete an average of five mist netting nights per year on or adjacent to National Forest Land.

The Chattahoochee-Oconee National Forests proposes to modify the following standards to the Land and Resource Management Plan. Projects will also comply with these standards when applicable as described above.

Existing Standard FW-090

Unless necessary for insect or disease control or to provide for public and employee safety, standing snags or den trees will not be cut or bulldozed during vegetation management treatments unrelated to timber salvage. For timber salvage treatments, all live den trees, and a minimum of five snags per acre from the largest size classes will be retained. Distribution of retained snags may be clumped (LRMP, p. 2-27).

Modified Standard FW-090

Unless necessary for insect or disease control or to provide for public and employee safety, standing snags or den trees will not be cut or bulldozed during vegetation management treatments unrelated to timber salvage. For timber salvage treatments, all live den trees, and an average of five of the largest suitable snags (snags with exfoliating bark) per acre will be left. Snags in the early stages of decay should be selected over older snags whenever possible. If possible, these snags should be clumped into groups instead of spread throughout the harvest area.

Existing Standard FW-091

In even-aged regeneration areas where at least two snags per acre are not present or cannot be retained as residuals, at least two standing snags per acre will be created from larger diameter classes within the original stand. In addition, a minimum of five of the largest diameter living trees per acre will be retained to provide potential future snags during the early and middle stages of stand development. Distribution of snags and live residuals may be scattered or clumped at stand scale. Live den trees are not to be used for snag creation, but may count toward live residuals (LRMP, p. 2-27).

Modified Standard FW-091

For all timber harvest involving even-aged management and two-aged management (Appendix F, LRMP)

- Retain all snags in cutting units unless they are an immediate hazard.
- Sales will be designed (landing and skid trails) to avoid snag removal when possible.
- When an average of five snags per acre is not present create snags from the dominant and co-dominant trees to reach an average of five snags per acre throughout the unit.
- To meet basal area requirements priority will be given to trees that exhibit characteristics favored by roosting Indiana bats or other federally endangered bat species while still meeting stand prescription objectives.
- Snags closer to the forest edge will be favored over those out in the middle of a large expanse. Snags do not count toward the required residual basal area.
- Residual basal area will be clumped or left in travel corridors.
- Live potential bear den trees will be retained and not be used for snag creation (See standard FW-010).

For clearcutting (even-aged management) and clearcut with reserves (two-aged management).

- A minimum of 15 ft^2 (square feet) of overstory basal area will be maintained for units greater than 10 acres. Overwood will not be removed.

For seedtree and shelterwood (even-aged management) and seedtree with reserves and shelterwood with reserves (two-aged management).

- A minimum of 20 ft^2 of overstory basal area will be maintained. Overwood will not be removed.
- Windthrow protection will be provided to an average of five snags per acre by retaining all trees within 20 feet of these snags. Trees left for windthrow protection may count towards the required basal area.
- Snags selected to receive windthrow protection are those most suitable for use by Indiana bats or federally endangered bat species, i.e., yellow pine and oak snags of the largest size classes with exfoliating bark.

Decision Framework

Given the purpose and need, the deciding official reviews the proposed action and the other alternatives in order to make the following decisions:

1. Whether or not to amend the 2004 Revised LRMP as described in the Proposed Action.

Public Involvement

The proposal was listed in the Schedule of Proposed Actions beginning in April 2014. A letter was mailed to 128 individuals or organizations and emailed to another 212 individuals or organizations on April 23, 2014 thus notifying 340 individuals, groups and other agencies of our intention and requesting any comments or potential issues on the proposal. An affidavit of publication requesting comments was published in the Gainesville Times (newspaper of record) on April 25, 2014. A total of six responses were received during this initial scoping period.

A 30-day comment period was published in the Gainesville Times on July 13, 2016. A total of two responses (emails) supporting the project were received during this time.

Planning Record

Additional documentation, including more detailed analyses of project-area resources, may be found in the project planning record located at the Supervisor's Office in Gainesville, GA and online at https://www.fs.usda.gov/project/?project=44342. It contains planning records, scoping letter, comment request letters, field notes and maps.

Issues

The Forest Service reviewed the public comments received during the initial scoping period beginning April 25, 2014 and the 30 day comment period beginning on July 13, 2016. No significant issues were identified. Responses to all comments received can be found in Appendix A of this document. Internal comments were addressed through modification of the Proposed Action during development of this EA.

ALTERNATIVES

Alternative 1 (No Action)

Under the No Action alternative, the current 2004 Revised LRMP would not be amended at this time.

Alternative 2 (Modified Proposed Action)

Incorporate seven new standards and modify two existing standards in the 2004 Revised LRMP. The proposed standards and modifications to existing standards can be found on pages 3 – 5 of this document.

Affected Environment and Environmental Consequences

This amendment is programmatic in nature and does not authorize any ground disturbing activities. This EA is tiered to the 2004 FEIS prepared for the LRMP. Site-specific analysis of effects would be conducted following the NEPA process as individual projects are proposed.

Forest LRMP Restoration Goals and Objectives

Existing conditions

The existing LRMP contains goals and objectives related to the restoration and/or maintenance of several native forest communities, including shortleaf pine, mountain longleaf pine, and pitch pine (LRMP pg. 2-6). Due to the shade intolerance of these pine species, even-aged or two-aged management systems which provide very open conditions are used to restore these species. The existing LRMP standards for even-aged and two-aged systems include those to protect scenic integrity, water quality and aquatic habitats, den trees, and snags. The following existing standards are related to the retention of overstory trees in vegetation management:

- FW-088, retain residual trees in shelterwood or seedtree (two-aged) methods of regeneration for at least five years;
- FW- 103, shape and feather the edges of cutting units;
- FW-11-022, silvicultural activities in riparian corridors must meet or exceed Georgia Best Management Practices for Forestry, including the recommendation to retain an average of 50 ft^2 basal area within 100 feet of perennial and intermittent streams;
- FW-078, retain a minimum of 20 ft^2 of canopy or midstory trees within ephemeral riparian corridors; and
- FW-091, a minimum of five of the largest live trees per acre are retained to provide potential future snags in even-aged regeneration cutting units.

These existing standards result in conditions which potentially affect the restoration of native yellow pine communities, because retained overstory trees cast shade on planted seedlings.

Direct and Indirect Effects

Alternative 1 (No Action)

Under the No Action Alternative, there would be no change to the selected LRMP standards described in the Modified Proposed Action of this EA. As a result there would be no change to the determination of effects originally described in the FEIS prepared for the LRMP.

Alternative 2 (Modified Proposed Action)

The modification of standard FW-091 could have a direct or indirect effect on the restoration of native pine communities due to the future retention of 15-20 ft^2 of overstory basal area in cutting units 10 acres and larger. This would result in a greater amount of shade cast by this overstory and this may have a negative effect on seedling growth and survival. This effect would be somewhat mitigated by the clustering or clumping of retained trees near the edge of the cutting unit.

This effect would not be deleterious to the degree that seedling survival is threatened. Conditions would still be open enough for adequate seedling growth and survival.

Cumulative Effects for both alternatives

No past, present, or reasonably foreseeable future action was identified which could result in cumulative effects if combined with the effects of this modified proposed action. Modified standard FW-091 would replace existing standard FW-091, therefore the effects would not be cumulative.

Terrestrial Wildlife – Snags, Dens, and Downed Wood

Existing Conditions

Snags, dens, and downed wood are important habitat elements for a variety of wildlife species. Large snags are used as nesting and feeding sites and perches by birds, and recently documented occurrences of rare bats roosting in snags near the Forest have emphasized the importance of this resource. Den trees are used for nesting, roosting and hibernating by a variety of species. Downed woody debris provides cover and feeding sites for amphibians, reptiles, small mammals, and invertebrates. These elements are typically most abundant in older forests. Snags, den trees, and downed wood are abundant throughout the Forests, some as a result of recent southern pine beetle activity, periodic ice and windstorms, and fire.

Existing standard FW-090 requires the retention of all snags during normal vegetation management activities, with the exception of safety hazards and in the case of insect and disease control. In salvage situations, when snags and dead and dying trees are abundant, all live den trees and a minimum of five snags per acre are retained.

In even-aged regeneration areas, existing standard FW-091 requires that two snags per acre will be retained or created if they are not present, and a minimum of five of the largest live trees per acre are retained to provide potential future snags. The effects of these standards on species which use snags and den trees is disclosed in the FEIS (pg. 3-230-232). The FEIS identified the pileated woodpecker *(Drycopus pileatus)* as the Management Indicator Species to help indicate the effects of forest management on species that utilize snags. This species forages and nests in snags, with some foraging also occurring on fallen logs and other forest debris. The pileated woodpecker is a common breeding bird on the Forests and its populations are tracked annually by breeding bird surveys. Survey data indicate that local pileated woodpecker populations are stable (R8 Bird data, 2014).

Existing conditions and effects analyses for rare bats utilizing snags will be discussed in the section on Proposed, Endangered, Threatened, Sensitive, and Locally Rare species.

Direct and Indirect Effects

Alternative 1 (No Action)

Under the No Action Alternative, there would be no change to the selected LRMP standards described in the Modified Proposed Action of this EA. As a result there would be no change to the determination of effects originally described in the FEIS prepared for the LRMP for wildlife resources.

Alternative 2 (Modified Proposed Action)

This alternative may have direct or indirect effects on terrestrial wildlife, including the pileated woodpecker and other species utilizing snags. This alternative includes new standards which would result in a greater number of snags retained or created in some project areas, and this would benefit terrestrial wildlife using snags. However, this change will be implemented over time, in individual project areas across the Forests and is therefore unlikely to result in any predictable or measurable change in effects described in the FEIS for pileated woodpeckers.

Cumulative Effects for both alternatives

No other past, present or future projects were identified which would combine with the effects of this amendment and result in a cumulative effect.

Wildlife

Alternative 1 (No Action)

Under the No Action Alternative, there would be no change to the selected standards, guidelines, and other wildlife direction described in the Modified Proposed Action of this EA. As a result there would be no change to the determination of effects originally described in the FEIS prepared for the 2004 Revised LRMP for wildlife resources.

Alternative 2 (Modified Proposed Action)

This alternative should result in an increase in snag retention for some projects and this would benefit wildlife such as pileated woodpeckers that utilize snags. However, this change would be minimal and is unlikely to result in any predictable or measurable change in effects to wildlife resources described in the FEIS for the 2004 Revised LRMP.

Cumulative Effects for both alternatives

No other past, present or future projects were identified which would combine with the effects of this amendment and result in a cumulative effect.

Proposed, Threatened, Endangered or Sensitive Species

This Environmental Assessment tiers to the FEIS and associated Biological Assessment and Biological Opinion prepared for the 2004 Revised Land and Resource Management Plan. The FEIS and Biological Assessment can be found online at:
http://www.fs.usda.gov/detailfull/conf/landmanagement/planning/?cid=stelprdb5413247&width=full
The following information is summarized from the Biological Assessment and Biological Evaluation (BABE) prepared for Proposed, Threatened, Endangered and Sensitive species potentially affected by this amendment. The BABE is on file in the project record and available for review on request.

Existing Conditions

The existing LRMP was developed after extensive consultation with the USFWS. A Biological Assessment/Biological Evaluation (BABE) of the actions proposed in the LRMP was prepared and the USFWS concurred with the Forest Service's determination that the implementation of the LRMP was not likely to adversely affect any federally listed species or their habitats. This analysis was summarized in the FEIS. The FEIS and BABE did not address the effects of the implementation of the LRMP on Indiana bat, because at that time an Indiana bat had not been observed in Georgia for almost thirty years. Like the Indiana bat, the NLEB was not considered during forest planning and finalization of the LRMP because the species was common at the time.

New information regarding these species necessitates consultation with the USFWS, which has resulted in the proposed LRMP amendment analyzed in this EA.

Indiana bat

Several North American bats have been severely impacted by the spread of White Nose Syndrome (WNS). WNS has recently emerged as a disease affecting bats that hibernate in caves and abandoned mines during winter. The search for information about bat populations and movements regarding WNS has resulted in wide-ranging research and new information about several species, especially federally-listed species such as the endangered Indiana bat. In April of 2012, a female Indiana bat was radio-tracked from a winter cave hibernacula in middle Tennessee to state land outside of Ellijay, Georgia, immediately adjacent to national forest land. The female bat and 12-15 unknown others were documented roosting in trees under loose bark for approximately 10 days in April. This occurrence indicates that suitable summer roosting and maternity habitat is likely to be present in north Georgia, but the extent of this is unknown. The forests of North

Georgia represent the southern edge of the summer range of Indiana bats, and population densities are likely to be extremely low, but the potential exists for federal actions on the Forests to affect this species during their summer roosting period.

Northern long-eared bat

In addition to the occurrence of an Indiana bat, on October 2, 2013, the U.S. Fish and Wildlife Service (USFWS) proposed to list the northern long-eared bat (*Myotis septentionalis*), known as NLEB, as endangered under the Endangered Species Act. This species was formerly common and known throughout Georgia. This species was listed primarily because it has been impacted by WNS, rather than habitat-related factors. Public comments and additional information resulted in a proposal to list the species as a threatened species with a species-specific rule under section 4(d) of the Act, excepting specific forms of take (Federal Register 2016). A final listing of the species as threatened with an interim 4(d) rule was made on April 2, 2015. The final 4(d) rule was published on January 15, 2016. The listing rule adopted the take prohibitions at 50 CFR §17.31 and §17.32 for this species with certain exceptions. These exceptions include forest management and other specifically defined activities.

As with Indiana bat, there are no known summer roosting or maternity colonies of NLEBs on the Forests, but the potential exists and therefore federal actions may affect them.

Other bat species

Rafinesque's big eared bat (*Corynorhinus rafinesquii),* small-footed bat (*Myotis leibii*), and southeastern bat (*Myotis austroriparius)* are Regional Forester's Sensitive Species which may occur on the Forests and potentially utilize live or dead trees for summer roosting.

Direct and indirect effects

Alternative 1 (No Action)

Under the No Action Alternative, there would be no change to the potential effects or effects determination for any threatened, endangered, or sensitive species in the BAE prepared for the LRMP. No new standards would be added to the LRMP and rare bats would not have additional protections.

Alternative 2 (Modified Proposed Action)

The seven new standards and two modified standards are designed to protect known roost trees used by Indiana bats, NLEBs, and other tree-roosting bats (federally-listed or sensitive species) and protect existing snags when possible. The standards would provide additional retention of live trees in even-aged and two-aged regeneration; these trees may be utilized by roosting bats and provide future snags. Seasonal restrictions related to live tree or snag cutting would also benefit roosting bats.

This proposed action is not likely to adversely affect Indiana bats, NLEB, or other tree-roosting bats, because effects are expected to be wholly beneficial.

Table 1 shows Proposed, Threatened and Endangered Species known to occur or with the potential to occur on the Chattahoochee-Oconee National Forests and the affect Alternative two would have on them and their determination in the Biological Assessment prepared for the 2004 Revised LRMP.

Cumulative Effects for both alternatives

No other past, present or future projects were identified which would combine with the effects of this amendment and result in a cumulative effect on any Proposed, Threatened, Endangered or Sensitive species.

Table 1. Proposed, Threatened and Endangered Species known to occur or with the potential to occur on the Chattahoochee-Oconee National Forests and the affect Alternative two would have on them and their determination in the Biological Assessment prepared for the 2004 Revised LRMP

Species		Status	Determination of effect for Alternative 2
Common Name	**Scientific Name**		
Plants			
Smooth purple coneflower	*Echinacea laevigata*	Endangered	No effect
Rock gnome lichen	*Gymnoderma lineare*	Endangered	No effect
Swamp pink	*Helonia bullata*	Threatened	No effect
Small whorled pogonia	*Isotria medeoloides*	Threatened	No effect
Green pitcher plant	*Sarracenia oreophila*	Endangered	No effect
Large flowered skullcap	*Scutellaria montana*	Threatened	No effect
Persistent trillium	*Trillium persistens*	Endangered	No effect
Relict trillium	*Trillium reliquum*	Endangered	No effect
Birds			
Red-cockaded woodpecker	*Picoides borealis*	Endangered	No effect
Woodstork (foraging habitat only-no nesting on Forest)	*Mycteria americana*	Endangered	No effect
Mammals			
Gray bat (foraging only-no caves)	*Myotis grisescens*	Endangered	No effect
Indiana bat	*Myotis sodalis*	Endangered	May affect, but not likely to adversely affect
Northern long-eared bat	*Myotis septentrionalis*	Proposed Endangered	May affect, but not likely to adversely affect
Fish			
Blue shiner	*Cyprinella caerulea*	Threatened	No effect
Etowah darter	*Etheostoma etowahae*	Endangered	No effect
Amber darter	*Percina antesella*	Endangered	No effect
Goldline darter	*Percina aurolineata*	Threatened	No effect
Conasauga logperch	*Percina jenkinsi*	Endangered	No effect
Mussels			
Fine-lined pocketbook	*Hamiota altilis*	Threatened	No effect
Alabama moccasinshell	*Medionidus acutissimus*	Threatened	No effect
Coosa moccasinshell	*Medionidus parvulus*	Endangered	No effect
Southern clubshell	*Pleurobema decisum*	Endangered	No effect
Southern pigtoe	*Pleurobema georgianum*	Endangered	No effect
Triangular kidneyshell	*Ptychobranchus foremanianus*	Endangered	No effect
Snails			
Interrupted Rocksnail	*Leptoxis foremani*	Endangered	No effect
Amphibian			
Bog Turtle (S. pop.)	*Clemmys muhlenbergii*	Threatened (Similar Appearance)	No effect

Table 2 shows Sensitive Species known to occur or with the potential to occur on the Chattahoochee-Oconee National Forests and the effect Alternative two would have on them and their determination in the Biological Evaluation prepared for the 2004 Revised LRMP.

Table 2. Sensitive Species known to occur or with the potential to occur on the Chattahoochee-Oconee National Forests and the effect Alternative two would have on them and their determination in the Biological Evaluation prepared for the 2004 Revised LRMP

Species		Status	Determination
Common Name	**Scientific Name**	**State/Federal**	
Vascular Plants			
Schwerin's false indigo	*Amorpha schwerinii*	G3G4	No Effect
Georgia rockcress	*Arabis georgiana*	G1/C	No Effect
Spreading yellow false foxglove	*Aureolaria patula*	G3	No Effect
American barberry	*Berberis canadensis*	G3	No Effect
Alabama grape fern	*Botrychium jenmanii*	G3G4	No Effect
Small mountain bittercress	*Cardamine clematitis*	G3	No Effect
Stiff sedge	*Carex biltmoreana*	G3	No Effect
Fort Mountain sedge	*Carex communis var. amplisquama*	G5T3	No Effect
Wretched sedge	*Carex misera*	G3	No Effect
Radford's sedge	*Carex radfordii*	G2	No Effect
Roan Mountain sedge	*Carex roanensis*	G2G3	No Effect
Cuthbert's turtlehead	*Chelone cuthbertii*	G3	No Effect
Small spreading pogonia	*Cleistes bifaria*	G4?	No Effect
Whorled stoneroot	*Collinsonia verticillata*	G3G4	No Effect
Broadleaf tickseed	*Coreopsis latifolia*	G3	No Effect
Large witchalder	*Fothergilla major*	G3	No Effect
White-leaved sunflower	*Helianthus glaucophyllus*	G3	No Effect
Smith's sunflower	*Helinathus smithii*	G2Q	No Effect
Harper's wild ginger	*Hexastylis shuttleworthii var. harperi*	G4T3	No Effect
Taylor's filmy fern	*Hymenophyllum tayloriae*	G2	No Effect
Butternut	*Juglans cinerea*	G4	No Effect
Fraser's loosestrife	*Lysimachia fraseri*	G3	No Effect
Sweet pinesap	*Monotropsis odorata*	G3	No Effect
Piedmont ragwort	*Packera millefolia*	G2	No Effect
Small's beardtongue	*Penstemon smallii*	G3	No Effect
White fringeless orchid	*Platanthera integrilabia*	G2G3/C	No Effect
Tennessee leafcup	*Polymnia laevigata*	G3	No Effect
Beadle's mountain mint	*Pycnanthemum beadlei*	G2G4	No Effect
Oglethorpe oak	*Quercus oglethorpensis*	G3	No Effect
Appalachian rose gentian	*Sabatia capitata*	G2	No Effect
Bay starvine	*Schisandra glabra*	G3	No Effect
Southern Oconee bells	*Shortia galacifolia var. galacifolia*	G2G3T2T3	No Effect
Blue Ridge catchfly	*Silene ovata*	G3	No Effect
Fall goldenrod	*Solidago simulans*	G2	No Effect
Georgia aster	*Symphyotrichum georgianum*	G2G3/C	No Effect
Ash-leaved bush pea	*Thermopsis. fraxinifolia*	G3?	No Effect
Lance-leaved trillium	*Trillium lancifolium*	G3	No Effect
Least trillium	*Trillium pusillum*	G3	No Effect
Illscented trillium	*Trillium rugelii*	G3	No Effect
Jeweled trillium	*Trillium simile*	G3	No Effect
Carolina hemlock	*Tsuga caroliniana*	G3	No Effect
Piedmont barren strawberry	*Waldsteinia lobata*	G2G3	No Effect
Nonvascular Plants			

Species		Status	Determination
Common Name	**Scientific Name**	**State/Federal**	
A liverwort	*Acrobolbus ciliatus*	G3?	No Effect
A liverwort	*Drepanolejeunea appalachiana*	G2?	No Effect
A liverwort	*Lejeunea blomquistii*	G1G2	No Effect
A hornwort	*Megaceros aenigmaticus*	G2G3	No Effect
A liverwort	*Nardia lescurii*	G3?	No Effect
A liverwort	*Pellia appalachiana*	G4	No Effect
A liverwort	*Plagiochila caduciloba*	G2	No Effect
A liverwort	*Plagiochila echinata*	G2	No Effect
Sharp's leafy liverwort	*Plagiochila sharpii*	G2G4	No Effect
Carolina plagiomnium	*Plagiomnium carolinianum*	G3	No Effect
Pringle's platyhypnidium	*Platyhynidium pringlei*	G2G3	No Effect
Appalachian haircap moss	*Polytrichum appalachianum*	G3	No Effect
A liverwort	*Radula sullivantii*	G3	No Effect
A liverwort	*Riccardia jugata*	G2	No Effect
Birds			
Bachman's sparrow	*Aimophila aestivalis*	G3	No Effect
Peregrine falcon	*Falco peregrinus*	G4	No Effect
Bald eagle	*Haliaeetus leucocephalus*	G5	No Effect
Migrant loggerhead shrike	*Lanius ludovicianus migrans*	G5T3Q	No Effect
Mammals			
Rafinesque's big-eared bat	*Corynorhinus rafinesquii*	G3G4	May affect individuals, but is not likely to contribute to need for Federal Listing
Southeastern bat	*Myotis austroriparius*	G3G4	May affect individuals, but is not likely to contribute to need for Federal Listing
Eastern small-footed bat	*Myotis leibii*	G3	May affect individuals, but is not likely to contribute to need for Federal Listing
Southern water shrew	*Sorex palustris punctulatus*	G5T3Q	No Effect
Insects			
Georgia beloneurian stonefly	*Beloneuria georgiana*	G2	No Effect
Tiger beetle	*Cicindela ancocisconensis*	G3	No Effect
Barrens tiger beetle	*Cicindela patruela*	G3	No Effect
Cherokee clubtail	*Gomphus consanguis*	G3	No Effect
Mountain river cruiser	*Macromia margarita*	G3	No Effect
Edmund's snaketail	*Ophiogomphus edmundo*	G1G2	No Effect
Appalchian snaketail	*Ophiogomphus incurvatus*	G3	No Effect
Diana fritillary butterfly	*Speyeria diana*	G3G4	No Effect
Reptiles			
Bog turtle	*Glyptemys muhlenbergii*	G3	No Effect
Amphibians			
Southern Appalachian salamander	*Plethodon oconaluftee (teyahalee)*	G3	No Effect
Crustaceans			
Oconee stream crayfish	*Cambarus chaugaensis*	G2	No Effect
Conasauga blue burrower	*Cambarus cymatilis*	G1	No Effect
Chickamauga crayfish	*Cambarus extraneus*	G2	No Effect
Little Tennessee river crayfish	*Cambarus georgiae*	G2	No Effect

Species		Status	Determination
Common Name	**Scientific Name**	**State/Federal**	
Hiwassee Headwaters crayfish	*Cambarus parrishi*	G2	No Effect
Beautiful crayfish	*Cambarus speciosus*	G2	No Effect
Fish			
Ocmulgee shiner	*Cyprinella callisema*	G3	No Effect
Bluestripe shiner	*Cyprinella callitaenia*	G2G3	No Effect
Altamaha shiner	*Cyprinella xaenura*	G2G3	No Effect
Holiday darter	*Etheostoma brevirostrum*	G2	No Effect
Coldwater darter	*Etheostoma ditrema*	G1G2	No Effect
Trispot darter	*Etheostoma trisella*	G1	No Effect
Wounded darter	*Etheostoma vulneratum*	G3	No Effect
Lined chub	*Hybopsis lineapunctata*	G3G4	No Effect
Mountain brook lamprey	*Ichthyomyzon greeleyi*	G3G4	No Effect
Robust redhorse	*Moxostoma robustum*	G1	No Effect
Popeye shiner	*Notropis ariommus*	G3	No Effect
Highscale shiner	*Notropis hypsilepis*	G3	No Effect
Frecklebelly madtom	*Noturus munitus*	G3	No Effect
Freckled darter	*Percina lenticula*	G2	No Effect
Olive darter	*Percina squamata*	G3	No Effect
Fatlips minnow	*Phenacobius crassilabrum*	G3G4	No Effect
Mussels			
Brook floater	*Alasmidonta varicosa*	G3	No Effect
Tennessee heelsplitter	*Lasmigona holstonia*	G3	No Effect
Georgia pigtoe	*Pleurobema hanleyianum*	G1/C	No Effect
Inflated floater	*Pyganodon gibbosa*	G3Q	No Effect
Ridged mapleleaf	*Quadrula rumphiana*	G4	No Effect
Alabama creekmussel	*Strophitus connasaugaensis*	G3	No Effect
Southern creekmussel	*Strophitus subvexus*	G3	No Effect
Alabama rainbow	*Villosa nebulosa*	G3	No Effect

Forest Products

Alternative 1 (No Action)

Under the No Action Alternative, there would be no change from current management and no effect on Forest Products as described in the FEIS prepared for the 2004 Revised LRMP.

Alternative 2 (Modified Proposed Action)

Alternative 2 should result in modifications to the way some timber sales are designed or laid out to meet snag, windthrow, and basal area requirements, but Alternative 2 is not expected to measurably affect Forest Product outputs. Alternative 2 may also result in seasonal restrictions within 2.5 miles of a federally endangered bat maternity colony, but this is not expected to result in any measurable affect to Forest Product outputs.

Cumulative Effects for both alternatives

No other past, present or future projects were identified which would combine with the effects of this amendment and result in a cumulative effect on Forest Products or economics.

Other Resources

Other resources include soil, air, water, minerals, recreation, visual and heritage resources.

Alternative 1 (No Action)

Under the No Action alternative there would be no change to the potential effects for soil, air, water, minerals, recreation, heritage resources or any other resources as described in Chapter three of the FEIS for the 2004 Revised LRMP.

Alternative 2 (Modified Proposed Action)

Under the No Action alternative there would be no change to the potential effects for soil, air, water, minerals, recreation, heritage resources or any other resources as described in Chapter three of the FEIS for the 2004 Revised LRMP.

While larger openings would increase viewing distances where implemented, it is expected that there would be fewer openings. The overall amount of area in each Visual Quality Objective as described in the 1999 LRMP would remain unchanged. In addition, it is unlikely that all treated areas would be designed to maximum allowable size due to on-the-ground conditions and the need to blend the openings with natural terrain and avoid areas of special interest such as developed recreation sites.

Similarly, site-specific project analyses would evaluate the actual design and effects of individual proposals and consider public input related to the openings.

Other Required Disclosures

Civil Rights and Environmental Justice

Individual civil rights and the rights of minority groups would not be affected directly or indirectly by the proposed action or the no action alternative considered herein. Women, Native Americans, minority groups, and/or consumer groups should not be impacted by any of the alternatives any differently than any other groups. The decision to be made poses no environmental justice implications.

NFMA Significance

The Forest Service is currently operating under the November 9, 2000 planning rule and the Interpretive Rule of September 29, 2004. According to 36 CFR 219.35 (and subsequently interpreted in 2004), the responsible official may elect to conduct the plan amendment process under the "1982 planning regulations" (those regulations in effect before November 9, 2000). I have elected to conduct this amendment following the 1982 planning regulations. After reviewing the Environmental Assessment that includes Amendment # 3 to the Forest Plan, I have determined that the decision to implement this amendment will not result in a significant change to the Forest Plan. This determination was made after consulting 16 U.S.C. 1604(f)(4), 36 CFR 219.10(f) (1982 regulations), Forest Service Manual 1926.51 – *Changes to the Land Management Plan that are Not Significant* and FSM 1926.52 – *Changes to the Land Management Plan that are Significant* . Based on these planning requirements, I have determined that:

1) This amendment will not significantly alter the levels of goods and services projected by the Forest Plan; nor will it prevent the opportunity to achieve those outputs in later years.
2) The amendment will not significantly affect the entire plan or a large portion of the planning area.
3) Changes in standards and guidelines are minor and designed to increase protection levels.

Irreversible or Irretrievable Commitments

No irreversible or irretrievable commitments of resources would result from either of the alternatives since this amendment is programmatic in nature.

Consultation and Coordination

The Forest Service mailed an initial scoping statement to the Forest Plan Mailing list. This list includes required Federal, State and local agencies as well as individuals who have expressed an interest in the 2004 Revised LRMP.

Prepared by,

Michael Joyce	Forest Fisheries Biologist
Jimmy Rickard	Forest Ecologist
Ruth Stokes	Conasauga Ranger District Wildlife Biologist

Literature Cited

Perry, Roger W. 2013. White-nose syndrome in bats: an overview of current knowledge for land managers. Gen. Tech. Rep. SRS-GTR-184. Asheville, NC: USDA-Forest Service, Southern Research Station. 9 p

U.S. Forest Service. 2004. Final Environmental Impact Statement for the Revised Land and Resource Management Plan for the Chattahoochee-Oconee National Forests, Georgia.

U.S. Forest Service. 2004. Revised Land and Resource Management Plan for the Chattahoochee-Oconee National Forests, Georgia.

U.S. Forest Service. 2014. Region 8 Bird data Year 2014.

APPENDIX A: COMMENTS AND RESPONSES

The following Agencies, groups and individuals responded in writing to the Forest Service Scoping request in April 2014. Comments and responses are summarized below. Comment letters are on file and available for review on request. An affidavit of publication was done on July 13, 2016 in the Gainesville Times for a 30-day comment period. Supportive comments were received during this comment period from one organization and one individual. Copies of this letter are on file and available for review on request.

Wm. Barnett Chitwood

Comment- Recommends language concerning consultation with USFWS be deleted from standards because Forest Service biologists are capable of making decisions that could affect listed bat species. The same product could be achieved without consultation with the USFWS.

Response- While we appreciate your confidence in our ability to manage National Forest System lands in Georgia, like all federal agencies we are required under Section 7 of the Endangered Species Act to consult with the USFWS on matters where Federally Listed Species may be affected. If we fail to do this we are then open to lawsuits which could limit our ability to implement projects. In addition to this, USFWS biologists are looking at species across their range and often provide valuable input concerning project implementation.

Howard S. Bush

Comment- "It would be difficult to enforce since most people with firewood gathering permits would not know if they are cutting the wrong tree. They would only recognize it to be a hardwood which they might want to burn."

Response- This comment is in reference to proposed standard USFWS-234. Shagbark hickory trees have a very distinctive bark and should be easily distinguishable for most individuals. If the shagbark has reached the point where it is not easily distinguishable this most likely means the bark is no longer present and the tree would not provide suitable habitat for bats. The seasonal restriction should be easy to enforce as anyone caught cutting firewood during that time could be given a ticket.

Appalachian Trail Conservancy, John Odell

Comment- We are supportive of proposed changes and increased efforts to protect endangered bats on the National Forest. The proposed changes would have no significant impact on the Appalachian National Scenic Trail (AT) or its users.

Response- Thank you for your support of this proposal, and we agree it should not have a significant impact on the AT or its users.

Comment- Request that any new standards be clearly communicated to the Appalachian Trail Club (ATC) and the Georgia ATC to ensure compliance by volunteers that help maintain the trail.

Response- Our recreation staff will work with the ATC, GATC and other volunteer organizations to clearly communicate the new standards and help ensure they are implemented properly.

Georgia Sierra Club and Friends of Georgia, Larry Winslett

Comment- Both organizations fully support this initiative to further protect native bats in Georgia.

Response- Thank you for your support of this proposal.

Comment- Would like to see these new standards applied to projects currently on the books and those currently being scoped like Cooper's Creek.

Response- We have been working to implement these standards as projects are planned, and they are being included in projects such as Cooper Creek and Warwoman.

Ruffed Grouse Society, Linda D. Ordiway, Ph.D.

Comment- In proposed standard FW-233 please clarify is this referring to individual trees or species or trees having the identifying characteristics for roost tree**s.**

Response- For proposed standard FW-233 a tree known to be used as a roost would be identified by physically observing bats roosting in the tree or snag. This is typically accomplished by doing emergence counts in the evening, but may also be accomplished by radio tracking a captured bat to a roost location. It does not refer to trees that just have the characteristics of a roost tree.

Comment- It is intriguing that the primary factor of Northern long-eared bat decline is an organism not associated with Forest Management yet Forest Management suffers the consequences. As a result of this fungus the diversity of the forest could quite possibly be altered due to restrictions placed on management. In the interim conference and planning guidance document for NLEB there is seemingly conflicting recommendations for management, and further in the document it is stated that many types of timber management through proper design will not impact and may in fact improve habitat for the NLEB. With that being said the RGS is appreciative of the effort of the Chattahoochee-Oconee is extending in adapting management to not halt timber/habitat management efforts. Doing so will alter the forest ecology with the impending lag effect for those in the future to face that challenge.

Response- These standards have been developed not just for NLEBs, but also Indiana bats and other bat species that may become listed in the future. Indiana bats were first listed in 1967 and their decline was not due to white nosed syndrome, but they are also susceptible to the disease. Considering the range of the NLEB extends from Georgia north into Canada and west into Montana and Wyoming it is not surprising that there would be conflicting recommendations for management. On the Chattahoochee-Oconee National Forests we are working with the USFWS and Georgia Department of Natural Resources to determine what works best here in Georgia. We agree that properly designed vegetation management projects can be beneficial to federally listed bat species, and we believe these standards will help guide the design of projects.

Georgia Forest Watch, Mary A Topa, Ph.D.

Comment- We request that the agency establish standards to ensure that humans do not contribute to the spread of white-nose syndrome into caves and abandoned mines on the CONF. These standards should include:

- Construct and maintain gates or other structures that allow for entrance and egress by bats at the entrance of caves and mines occupied by federally-listed bats or bats deemed at risk of losing viability within the planning area to reduce the degree of human intrusion.
- Limit human access to caves for educational or recreational use to periods of time when bats are not present. However, because the *Pseudogymnoascus destructans* spores may survive in a cave for long periods of time, we would recommend limiting human access year-round to any cave that may have a significant number of bats.
- Prohibit the use of caves or abandoned mines for disposal sites or alteration of cave or mine entrances except for construction of appropriate gates or barriers.

Response- Existing standard FW-033 in the LRMP addresses placing gates or other structures at caves or mines occupied by significant populations of bats. At this time we are unaware of any caves or mines on the Chattahoochee-Oconee National Forests that contain significant populations of bats. A gate was placed on a cave discovered on the Blue Ridge Ranger District last year to protect a small tricolored bat population. In addition to this, the Regional Forester for the Southern Region, Liz Agpaoa, signed a closure order on June 12th, 2014, that prohibits entering any cave or abandoned underground mine on National Forest System Lands in the Southern Region. This order is in effect

for five years from the date it was signed. A copy of this closure order is available to the public upon request. Because there is already an existing standard and caves are currently closed to the public we do not believe additional standards are needed.

Comment- Northern long-eared bat is also known to roost in man-made structures "such as buildings, barns, a park pavilion, sheds, cabins, under eaves of buildings, behind window shutters, and in bat houses," particularly during the summer. *Id.* at 1055; *see* Scoping Notice at 1(stating that northern long-eared bats roost in "structures such as barns"). Consequently, we recommend that the agency also promulgate a standard stating:

- Old buildings and other man-made structures must be surveyed for bats before they are structurally modified or demolished. If a threatened or endangered bat species is found, these structures will be maintained or alternative roosts suitable for the species and colony size will be provided prior to adverse modification or destruction, in consultation with the U.S. Fish & Wildlife Agency.

Response- Existing standard FW-035 provides direction that, "*Before old buildings and other man-made structures are modified or demolished, they are surveyed for bats. If significant bat roosting is found, these structures will be maintained, or alternative roosts suitable for the species and colony size will be provided prior to adverse modification or destruction.* "We believe this existing standard provides adequate direction, and if a threatened or endangered bat were discovered, we are required under Section 7 of the Endangered Species Act to consult with USFWS prior to moving forward with structure modification or destruction.

Comment- We support steps the agency is taking to ensure that Forest Service management projects do not disturb roosting bats or bat habitat we offer one suggestion. The agency is proposing to add standard FW-235 to the Forest Plan which states that:

- Snags are not intentionally felled from April 1 through August 31 unless needed to provide for immediate safety of the public, employees, or contractors. Exceptions may be made for projects such as insect and disease control, salvage harvesting, and facility construction. . . .

We ask that these "exceptions" be preceded by the modifier "small-scale." The final standard would read "exceptions may be made for *small-scale* projects such as . . ." While not common, the Forest Service may justify large-scale timber projects for the purpose of insect and disease control in the future. As currently written, the standard suggests that snags could be intentionally felled for any project preformed for the purpose of insect and disease control, regardless of size. This potential "loophole" could nullify habitat protection achieved through promulgation of the standard. Northern long-eared bats are known to roost in snags, making it critical that this habitat is protected across the forest whenever possible. *Id.* at 61054. We believe the intent behind this standard, which could be clarified by insertion of "small-scale," is to allow small, necessary projects to move forward without complying with the requirement to avoid felling snags. We recognize the need for this exception but believe it is only appropriate if limited to "small-scale" projects.

Response- After consideration we have chosen not to alter the proposed standard as suggested because we believe "small scale" is too subjective. These standards are designed to be programmatic in nature, and interested stakeholders would have the opportunity to comment on the size of proposed projects during the NEPA process.