APPENDIX G

RESPONSE TO PUBLIC COMMENTS

The Content Analysis Enterprise Team (CAET) in Salt Lake City, Utah received letters, emails, and CDs with comments on the Draft Environmental Impact Statement and draft plan. This appendix is the set of responses to those issues raised in those comments that relate to the Chattahoochee-Oconee National Forest. The CAET extracted concern statements from the material submitted, coded them, and organized them into eight chapters and one supplement as follows:

- Chapter 1 – Process, planning, policies, and laws
- Chapter 2 – Alternatives
- Chapter 3 – Environment
- Chapter 4 – Transportation
- Chapter 5 – Recreation
- Chapter 6 – Special designations/lands
- Chapter 7 – Natural resources management
- Chapter 8 – Social and Economic Values
- Supplement – Fire

That organization is maintained within this appendix.

Within each chapter, individual concern statements are coded with the chapter number followed by a dash and a consecutive number for each statement. For example, the first concern statement in Chapter 1 was coded 1-1, the second 1-2, and so on through the chapters. Many concern statements were broad and included within them numerous subtopics. In these cases, the subtopics were not numbered but were written separately. For the supplemental concern statements, they were simply numbered consecutively.

The CAET also coded each concern statement and/or subtopics for the geographic area(s) to which it specifically referred. That coding structure is as follows:

- (A) = National Forests in Alabama
- (C) = Cherokee National Forest, TN
- (O) = Chattahoochee-Oconee National Forest, GA
- (J) = Jefferson National Forest, VA
- (S) = Sumter National Forest, SC

Many comments were non-specific to individual Forests. The CAET used their judgment in coding concern statements to the appropriate geographic scale. Comments broad enough to relate to every Forest were coded with all five identifiers whether or not the specific Forests were mentioned in the text. Some comments related to a subset of Forests. Some were specific to only one Forest. The concern statements shown here do not include those that were specific to any one of the other Forests. These are addressed in the Response to Comments appendix for the appropriate Forest.

As furnished to each Forest by the CAET, concern statements were followed by the original text from which the concern statement was generated. As RO and Forest staff developed responses, this text was replaced with the reply. However, the comment text was referred to as responses were written to keep them very focused on the points raised by the commenter. In many instances, concern statements are written as if they were intended to be broad and general but actual text was much more focused so the response is also focused as well. This occasionally creates an impression that the response is not well matched to the statement.

This appendix provides a cross-cutting look at the wide range of interests brought to bear on national forest management. It also illustrates quite well the opposing positions taken on what the national forests ought to be or do. Considered as a whole, this appendix amply proves why Congress, preliminary to passing the National Forest Management Act, found national forest management to be complex. In the twenty-seven years since, management has only grown more complex.

Chapter 1
Process, Planning, Policies, and Laws

General Planning Issues

1-1. Public Concern: The Forest Service should recognize that the PRLMP places too much emphasis on project level analysis. (A)(C)(O)(J)(S)

Response: The Forest Plans are strategic documents that make decisions on desired conditions, goals, objectives, standards, management prescription allocations, land suitability, monitoring requirements, recommendations for Wilderness Study Areas and Wild and Scenic Rivers, establishing an Allowable Sale Quantity, and where applicable, consenting to oil and gas leasing. Any further decisions on how to meet this strategic plan direction is best addressed at the project level.

1-2. Public Concern: The Forest Service should better incorporate management area direction into the forest plan. (O)

Response: The Forest Plan can provide three levels of direction, Forest-wide, Management Area, and Management Prescription. Management Prescription direction is specific to the management of various types of areas or resources. This direction includes a description of desired conditions, and standards to reach these conditions. These prescriptions are an overlay of the Management Area boundaries, thus providing specific direction within these watersheds for the specific resources. As an example, Prescription 9A1 is assigned to source water watersheds providing direction on the management to address water supply.

1-3. Public Concern: The Forest Service should establish a realistic time period for revising the forest plan. (A)(C)(O)(J)(S)

Response: While we were on a tight time frame to make changes between the Draft and Final, time was allocated to make the changes that were needed in the documents, as well as any re-analyses (such as rerunning the Spectrum model) that were needed.

1-4. Public Concern: The Forest Service should revise and release for comment the PRLMP and DEIS before the publication of the final revised plan and EIS. (A)(C)(O)(J)(S)

TO REFLECT THE FOREST SERVICE'S OWN RECORDS AND ANALYSIS OF THE NATURAL COMPOSITION AND DYNAMICS OF THE SOUTHERN APPALACHIAN FOREST ECOSYSTEM (A)(C)(O)(J)(S)

Response: The comment refers to what has become known as the "Quentin Bass material." Contrary to assertions made by some commenters, information compiled by Bass was considered during planning. It was distributed to staffs of all Southern Appalachian forests undergoing revision, and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. There are many points of agreement, which are corroborated by a predominance of mainstream scientific literature. These areas of agreement are incorporated in the Revised Plan and EIS. There are, however, some of Bass' conclusions with which we disagree, as do some members of the academic and research communities with whom we have consulted. Therefore we see no reason to issue a revised DEIS and draft plan.

1-5. Public Concern: The Forest Service should develop timelines for all management actions. (O)

Response: The comment refers specifically to implementing the new plan language regarding restricting bikes and horse to designated trails. The Forest will establish a process for designating trails, so that implementation of the new direction will take place over time.

Decisionmaking Authority

Role/Authority

1-6. Public Concern: The Forest Service, as required by NFMA and the Endangered Species Act, should proceed with formal consultation with the U.S. Fish and Wildlife Service. (A)(C)(O)(J)(S)

BECAUSE THE PROPOSED ACTIVITIES MAY AFFECT THREATENED AND ENDANGERED SPECIES AND BECAUSE INADEQUATE INFORMATION AND ANALYSIS EXIST TO CONCLUDE THAT PROPOSED ACTIVITIES ARE NOT LIKELY TO ADVERSELY AFFECT ANY SPECIES (A)(C)(O)(J)(S)

Response:

1) We have consulted with the Fish and Wildlife Service. Consultation was initiated on August 15, 2003. We received written concurrence on our findings.
2) There is no requirement in the National Forest Management Act to consult with the Fish and Wildlife Service.
3) We have complied with requirements for management and recovery.

1-7. Public Concern: The Forest Service should not allow state agencies to control National Forest System lands. (O)

Response: National Forest System lands are not controlled by state agencies. The National Forest Management Act is among the laws clearly authorizing that the USDA Forest Service is to administer NFS lands. However, a cooperative relationship exists between the federal and state agencies due to overlapping interests in natural resource management, such as habitat management for wildlife. Generally, the USDA Forest Service manages the habitat (the land), and the state natural resource departments (in this case the Georgia Department of Natural Resources) have certain responsibilities for the wildlife resources (the animals themselves). Federal and state agencies work closely together to leverage their human and monetary resources for the most effective outcome, while each retains its independent authority and prescribed function.

Role of Interest Groups

Environmental Groups

1-8. Public Concern: The Forest Service should not allow environmental groups to dictate National Forest System lands policy. (C)(O)

Response: Policy development is generally beyond the scope of individual Forest LRMPs. However, National Forest Management Act regulations require that a public involvement process be followed when NFS management plans are developed, amended, or revised. Environmental groups are among the individuals and groups typically interested in participating in the planning process. Issues and concerns expressed by participating parties do weigh into the mix of information used to develop LRMP goals, objectives, and desired conditions.

Industry/Business Groups

1-9. Public Concern: The Forest Service should not allow industry groups to dictate National Forest System lands policy. (C)(O)(J)(S)

Response: The responsible official (in the case of a Forest Plan this is the Regional Forester) must consider comments from all interested agencies, tribes, groups, organizations, and individuals. The decision, which is documented in the Record of Decision, must be based on a determination of the Net Public Benefit of the action. The “Rationale for the Decision” documents the decision.

Role of General Public

1-10. Public Concern: The Forest Service should provide meaningful opportunities for citizen involvement in National Forest System lands management decisions. (A)(C)(O)(S)

Response: The Forest provided many opportunities for this involvement by making available the draft documents, taking comments for at least 90 days, holding meetings, and analyzing all comments.

Local Citizens/Communities

1-11. Public Concern: The Forest Service should utilize local citizens to provide guidance on National Forest System lands management issues. (O)

Response: The public involvement processes associated with developing and revising forest plans are open to anyone interested in participating. Local citizens are welcome to participate, as are all other interested parties. Additional opportunities for local citizen involvement occur as the plan is implemented through projects.

Outreach/Agency Communication Efforts

1-12. Public Concern: The Forest Service should ensure that northern Georgia is involved in the forest plan revision process to the extent that southern Georgia is involved. (O)

Response: This comment apparently refers specifically to a meeting held in northern Atlanta just as the draft was released. That meeting was held in response to public comment received about the release of the draft and it was added to the set of four other meetings scheduled; three in northern Georgia on the Chattahoochee and one in middle Georgia on the Oconee. There was a press release to local newspapers about the original four meetings.

1-13. Public Concern: The Forest Service should have better informed the public in Georgia of the proposal to allow boating above the Highway 28 Bridge. (O)(S)

Response: As stated by one commenter, 'the Sumter NF does have administrative responsibility'. Their analysis process for either allowing or disallowing boating on the Chattooga Wild and Scenic River above the Highway 28 bridge, was discussed with CONF personnel and agreed upon. This topic was specifically discussed in a 1998 Clemson, SC public meeting about the river, which members of the CONF IDT attended. At that time we agreed for the Sumter taking another look at the pros and cons of additional

boating above the bridge. We agree with the Sumter's findings of no additional boating above the Highway 28 bridge.

1-14. Public Concern: The Forest Service should have better involved the public in the forest plan revision process. (A)(C)(O)(J)(S)

Response: The Forest provided many opportunities for this involvement by making available the draft documents, taking comments for at least 90 days, holding meetings, and analyzing all comments.

Use of Public Involvement/Comment

1-15. Public Concern: The Forest Service should, in the PRLMP, consider the public's support for the Roadless Area Conservation Rule. (O)(J)

Response: We recognize the public support for roadless areas. All inventories roadless areas will be managed in such a way as to maintain the roadless character.

1-16. Public Concern: The Forest Service should have better integrated public input from the August 2002 public meetings into the preferred alternative. (A)(C)(O)(J)(S)

Response: Comments allude to the Forest "ignoring" public comments received during the earlier planning process. This was not the case. The public meetings held in August of 2002 were very helpful to the Forest planning process. In the final decision, all input was considered in balancing the final decisions about the Plan.

1-17. Public Concern: The Forest Service should explain why drastic changes were made to the draft forest plan without public input. (A)(C)(O)(J)(S)

PARTICULARLY IN THE LATTER STAGES OF THE REVISION PROCESS (A)(C)(O)(J)

Response: The changes referred to are: (1) a re-allocation of a portion of the upper Conasauga River watershed from 9.A.3 Watershed Restoration to 7.E.2 Dispersed Recreation, and (2) a reduction in the acres of inventoried roadless areas recommended for wilderness designation. The switch from 9.A.3 was because the upper Conasauga came out in the watershed assessment as being in excellent shape while other streams listed as sediment-impaired were also in the 9.A.3. Our intention for the prescription was to use it for watersheds in trouble so it did not fit the upper Conasauga. The change from recommended wilderness was an accumulation of concerns about the supply relative to demand, the Forest proportion of all wilderness in the Southern Appalachians, the lack of diverse support, and – most of all – analysis results

that demonstrated the need for management flexibility to create and maintain wildlife habitats in the higher elevations most affected by recommended wilderness blocks.

The 7.E.2 prescription was chosen in large part because it is very similar in direction and allowed management intensity to 9.A.3 and differs primarily in emphasis. The 7.E.2 prescription is also consistent with current uses of the area. Regarding wilderness, we continue to constrain activities within inventoried roadless areas such that, recommended or not, the roadless character is maintained.

1-18. Public Concern: The Forest Service should require a new comment period if there are significant changes from the draft plan to the final plan. (A)(C)(O)(J)(S)

Response: A new comment period, and a supplemental EIS may be required if the responsible official decides that significantly new information is unearthed or if changes in the decision are outside the range of the alternatives already considered in the draft EIS. In this case, no new information is being presented and the range of the alternatives presented in the draft EIS encompasses the decision that is being made.

Public Meetings

1-19. Public Concern: The Forest Service should schedule public meetings in the Atlanta, Georgia area. (O)

Response: The Chattahoochee-Oconee National Forests held a public meeting at the Gwinnett County Civic Center in north Metro Atlanta on Saturday, May 17 from 10AM to 2PM. This was one of five scheduled public information meetings following the release of the Draft EIS and Forest Plan.

1-20. Public Concern: The Forest Service should schedule a public meeting in southern Georgia. (O)

Response: The Chattahoochee-Oconee National Forests held a public meeting at the Rock Eagle 4-H Facility 10 miles north of Eatonton, GA on Wednesday, April 23 from 5PM to 8PM. The location was identified to be available to interested publics in the vicinity of the Oconee National Forest. This was one of five scheduled public information meetings following the release of the Draft EIS and Forest Plan.

1-21. Public Concern: The Forest Service should not schedule a public meeting in Atlanta, Georgia. (O)

Response: Public involvement is key to the process of Forest Plan revision. Public meetings are designed to provide information and be responsive to public input and involvement. Meeting locations are intended to provide a forum for a wide cross-section of the public that both visit and live in proximity to the Forests.

1-22. Public Concern: The Forest Service should accept public input at public meetings. (O)

RATHER THAN SIMPLY DISSEMINATE INFORMATION AT THESE MEETINGS (O)

Response: This comment apparently refers to public meetings held after release of the Draft EIS and Draft Plan. These public meetings were developed to provide the public an opportunity to ask questions and gain information to provide more meaningful comments on the documents. The 90-day comment period was the opportunity for the public to provide input and comments.

1-23. Public Concern: The Forest Service should schedule additional public meetings for the PRLMP. (O)(J)

Response: The comment refers to the new Categorical Exclusion (CE) categories that the commenter perceives a limiting public input and challenges to projects implementing a Forest Plan, therefore increasing the need for input into the Plan itself. The Plan revision process has involved numerous public meetings over several years in which input was gathered. We also received hundreds of written comments on the draft Plan. The new CE regulations are designed to streamline the process, not to bar public input.

1-24. Public Concern: The Forest Service should better publicize public meetings. (O)

Response: Public notification for the Forest Plan Revision information meetings was publicized in letters released with the Draft documents, on the Forest Service Internet web sites, in local media outlets in the planning area, and at Forest Service offices. Two meetings were later added in Atlanta and near Eatonton with public notification through letters mailed to the Forest's public mailing list.

Adequacy of Comment Period

1-25. Public Concern: The Forest Service should extend the comment period. (A)(C)(O)(J)(S)

TO 180 DAYS (O)

Response: The responsible official has provided adequate opportunities for public comment and dissemination of information on the analysis and the decision being made.

Collaborative Planning

1-26. Public Concern: The Forest Service should collaborate with interested parties to resolve National Forest System lands issues. (A)(C)(O)(J)(S)

INCLUDING THE COOPERATIVE MANAGEMENT OF THE URBAN-WILDLAND INTERFACE (O)

Response: Chapter 2 of the Plan identifies under the State and Private Forestry section a goal to, "cooperate with landowners in joint, mutually advantageous conservation efforts. Where possible, work with private landowners and conservation groups on lands adjacent to, or in proximity to, Forest Service ownership for the purposes of conservation efforts…" Within the Urban-Wildland Interface, which comprises much of the Chattahoochee Oconee National Forest, collaborative efforts with interested parties will be encouraged and utilized to address Urban-Wildland Interface issues. The recent Chenocetah prescribed burn on the Chattooga Ranger District is a good example of the kind of collaboration that will occur in these areas. National Forest land adjacent to the city limits of Cornelia received a prescribed fuel reduction burn in the spring of 2003 to lessen the chances of a wildfire. The county, city, state agencies, and local residents all played a part in this collaborative effort. This approach is also consistent with the National Fire Plan, which guides Federal Wildland Fire Management Agencies in how to reduce the impact to communities threatened by wildfire.

1-27. Public Concern: The Forest Service should collaborate with state agencies to further aquatic conservation goals. (A)(C)(O)(J)(S)

Response: The Forest Service does collaborate with state agencies to further aquatic conservation goals.

Trust and Integrity

1-28. Public Concern: The Forest Service should not mislead the public through the use of euphemisms. (O)

Response: This specific comment was with regard to the use of the term 'vegetation management' which the commenter equated to being timber harvest. We use this broad term to mean any form of manipulation of vegetation including mowing, grazing, prescribed fire, non-commercial treatments, and finally timber harvest. When timber harvest is meant, timber harvest is identified.

1-29. Public Concern: The Forest Service should, in the PRLMP, make a criminal offense of falsifying information concerning timber cuts, habitat, waterways, sensitive species, etc. (O)

Response: The USDA Forest Service, as a part of the executive branch of government, does not have the authority to make laws. Law-making authority is reserved for the legislative branches of government.

Use of Science

Best Available Science

1-30. Public Concern: The Forest Service should base the draft forest plan on sound science. (A)(C)(O)(J)(S)

Response: The selected alternative is the result of our best efforts to resolve the multiplicity of issues this plan is attempting to address. Many of those issues conflict with each other, so efforts were made to find the "middle ground" where we could best address multiple issues at the same time. Efforts to define this "middle ground" were dependant upon sorting through the best scientific information available, interdisciplinary team interactions, public input from the various public meetings held throughout this whole planning process, meetings with our various partners, etc. This is no single "source" of information or single "viewpoint" that "drove" this decision. See the Record of Decision for more information on the rationale behind selecting Alternative I.

Maps/Inventories/GIS

1-31. Public Concern: The Forest Service should improve the "textures" of polygons in GIS maps. (A)(C)(O)(J)(S)

Response: The Forest used the best mapping capability it had available at the time. In the future we expect that better maps will be produced. We appreciate the comments concerning the quality of our maps.

Agency Organization and Funding

General

1-32. Public Concern: The Forest Service should be under the jurisdiction of the Department of the Interior and not the Department of Agriculture. (A)(C)(O)(J)(S)

Response: While this view is appreciated, it is not something within the purview of the Forest Land and Resource Management Plan or the Agency's authority.`

Funding

1-33. Public Concern: The Forest Service should recognize that an excessive amount of taxpayer dollars have gone into the forest plan revision process. (O)

Response: We agree that the process has been much more time consuming and expensive than first envisioned in 1996. This recognition is now National. In fact, a value derived from the effort has been its contribution to that National recognition that changes are needed to the process requirements. Beyond that much of the work that supported the preparation of the plan is an investment into future management and will continue to yield benefits both on this forest and throughout the sister forests in the effort for years to come.

1-34. Public Concern: The Forest Service should address, in the forest plan, funds from commercial and salvage timber sales that are used for bureaucratic overhead. (O)

Response: The Forest plan does not address project funding from any specific source; whether annual appropriations, challenge cost sharing, recreation fees, or timber receipts. Information is given about program costs and the revenues received. Appendix B of the EIS specifically addresses the cost of Forest Service timber activities and acknowledges that there is the mechanism of returning receipts back to the renewable resources in the area that generated them. If we were interested in maximizing our budgets there would be a quantitative timber objective and the other objectives would also be focused on lands that would maximize timber revenues, which they are not. Congress passed the law that provided for the return of timber receipts to the lands that generated them in the 1940's and more recently re-affirmed that approach in its handling of recreation fees. Each Forest as one part of accountability reports the status of such funds from any timber program to the Washington Office annually. Regional Office reviews are also conducted and close attention is paid to how much of the money actually funds activities on the ground. As part of annual budget appropriation, Congress is also quite well aware of any funds originating outside it. The position that these are slush funds for maximizing budgets and maintaining the Forest Service organization is unfounded.

1-35. Public Concern: The Forest Service should seek additional funding to conduct monitoring. (A)(C)(O)(J)(S)

Response: Funding is clearly a limiting factor for monitoring as well as any other activity of forest management. Funding needs for the monitoring of this plan will be assessed and planned on the Forest in the initial year of implementation and for each subsequent year. Funding needs will be reported to the President for agency budget formulation. Funding levels ultimately are the purview of Congress and the President.

Additional actions that are being taken and continually explored to stretch available funds and provide for monitoring needs include:

- Application of remote sensing, geographic information systems and expanded data analysis capacity
- Utilization of information provided by other agencies
- Partnerships with agencies, universities and professional organizations
- Utilizing qualified volunteers to supplement the agency workforce

Monitoring Task Sheets will be developed to utilize these resources to extend the agency capacity to monitor the effectiveness of the plan. Annual review and adjustment to the Monitoring Task Sheets will provide for changes needed due to technological advances, shifts in funding and priorities, workforce changes, and new opportunities for cooperation. Research needs will be identified and updated each year for additional effectiveness and validation needs that exceed the monitoring program itself.

1-36. Public Concern: The Forest Service should not encourage the competitive outsourcing of Forest Service work. (O)

Response: We appreciate your concern, however the competitive sourcing initiative is not within the purview of the NFMA planning process.

1-37. Public Concern: The Forest Service should specify, in the final forest plan, the effects of the current administration's outsourcing initiative. (A)(C)(O)(J)(S)

Response: The initiative known as competitive sourcing could eventually have impacts on the Forest; however, no scenarios have been developed to predict these. Other than reasonably foreseeable budgets, administrative process is not considered in land and resource management planning or the NEPA analysis that is required to accompany it.

1-38. Public Concern: The Forest Service should better integrate the different disciplines within the agency. (A)(C)(O)(J)(S)

Response: Planning Teams, supported by the Regional Office supplied many different disciplines. The Interdisciplinary process is, by regulation, an

integrated process. Specialists in all major resource areas must work cooperatively on jointly developed direction for the plan.

Education

1-39. Public Concern: The Forest Service should conduct natural resource education programs for the public. (A)(C)(O)(J)(S)

INCLUDING PROGRAMS FOR A HEALTHY FOREST AND WILDLIFE (C)(O)(J)

INCLUDING PROGRAMS THAT WILL EXPLAIN HOW FOREST VISITORS CAN IMPROVE AIR QUALITY (C)(O)(J)

Response: This is a good suggestion and one that is carried out on every National Forest to some degree. Environmental education is a very valuable tool for National Forest management and can be done to the extent that budgets allow. Land and resource management planning does not normally address environmental education and, in the case of this and the other Southern Appalachian forests, it is not included. Other programs on the forests do address environmental education.

Editorial or Technical Comments/Corrections

Specific Comments/Corrections

Chattahoochee National Forest

1-40. Public Concern: The Forest Service should make recommended editorial/technical changes to the documents. (O)

Response: The ID Team reviewed the each specific suggestion or correction and appropriate changes were incorporated into the final documents.

Multiple Forests

1-41. Public Concern: The Forest Service should specify research needs, as recommended in Appendix I. (A)(C)(O)(J)(S)

Response: Research needs are specified in Appendix I of the Plan.

1-42. Public Concern: The Forest Service should include, in Appendix I, a listing of research needs. (A)(C)(O)(J)(S)

Response: Research needs are specified in Appendix I of the Plan.

1-42-1. Public Concern: The Forest Service should address, to comply with NFMA, several research questions. (A)(C)(O)(J)(S)

Response: The National Forest Management Act, through its implementing regulations, requires, in Section 36 CFR 219.28, that such research needs be identified in forest planning. The Regulation also states that "particular attention should be given to research needs identified during the monitoring and evaluation…" One commenter supplied a list of some suggested areas of research for consideration. We have considered these. Most are questions that will be addressed through monitoring and evaluation under the plan. Most research on national forests is done through Forest Service's research branch and in response to monitoring. Chapter 5, of the Forest Plan, addresses research needs associated with the plan.

1-43. Public Concern: The Forest Service should tailor the language in Appendix B to reflect the process used in developing the five Southern Appalachian Forest Plans. (A)(C)(O)(J)(S)

Response: Appendix B language has been changed in the FEIS.

Relation to, or Consistency with, Other Plans, Directives, Etc.

Forest Service Plans, Directives, and Policies

1-44. Public Concern: The Forest Service should ensure that the PRLMP is consistent with national and regional guidance. (A)(C)(O)(J)(S)

Response: The development of the Revised Forest Plans for the National Forests in the Southern Appalachian (with the exception of the Nantahala-Pisgah NFs) involved a high level of coordination between the Regional Office and the five forest planning revision efforts. This coordination started with the development of the Southern Appalachian Assessment, the issuance of the Notice of Intent, and then the identification of the "common" issues to be addressed. Regional guidance was provided in such things as the regional old growth guidance, guidance on determining the roadless area inventory, guidance on evaluating the roadless areas for possible wilderness designation, guidance on watershed analyses, a common set of Management Prescriptions, common "themes" for the alternatives, a common set of "design criteria" for developing Alternative I, and common outlines for the Forest Plan and the EIS. In addition to this guidance, teams were set up which included individuals from both the Forests and the Region to develop a common approach to developing Forest Plan direction and environmental

impact analyses. These teams included one for addressing fisheries and wildlife issues, one for addressing recreation/wilderness/scenery issues, one for addressing riparian/watershed issues, and another informal team to address forest management issues. Lastly, all the Southern Appalachian Planners met periodically to work on coordination/consistency issues. All this was used to develop a regionally consistent framework for developing revised forest plans in the Southern Appalachians. However, there were also "local" issues, concerns, publics, situations, circumstances, that needed to be addressed. So while there was the "regional framework" for conducting planning, the Forests could vary within that framework to meet local needs.

1-45. Public Concern: The Forest Service should include a field guide or implementation guide as appendices to the forest plan. (A)(C)(O)(J)(S)

Response: Management direction in the original Forest Plan in the 1980s included both standards and guidelines for management actions. Current regional agency practice is to include only management direction meeting the definition of a standard in the Revised Forest Plan. (Standards are specific resource management directions and often preclude or impose limitations on management activities or resource uses, generally for environmental protection, public safety, or to resolve an issue.) Some items were suggested during the planning process that are essentially the "how to's" of implementing the Forest Plan. These guides for implementation may take the form of field guides or handbooks and will be kept separate from the Revised Forest Plan.

Healthy Forest Initiative

1-46. Public Concern: The Forest Service should not incorporate the Healthy Forest Initiative into the PRLMP. (O)

Response: The Forest Service is an agency of the executive branch of government and works for the President. Reference to the Healthy Forest Initiative is information for the decision-maker as to how well alternatives align with the President's program for National Forest management as a factor that may be considered in selecting the preferred alternative.

Planning Rule

1-47. Public Concern: The Forest Service should incorporate the general direction of the revised planning rule in the Region 8 forest plan revisions. (A)(C)(O)(J)(S)

Response: There are many good concepts presented in the proposed planning rule of 2002, and where those concepts were consistent with the

1982 planning rule, we attempted to implement those concepts. However, since the "revised" planning rule is still draft and subject to change, we cannot implement something that is draft and we have to follow the rule that is in effect, which is the 1982 planning rule.

Consistency among Region 8 Forest Plans

1-48. Public Concern: The Forest Service should ensure that regional consistency takes precedence over the autonomy of individual forest plans. (A)(C)(O)(J)(S)

Response: Throughout the planning process for the National Forests in the Southern Appalachians, efforts have been made to meet both regional consistency concerns as well as providing the flexibility to address local concerns. Often times, efforts to address regional consistency would be in conflict with meeting local needs, and visa versa. In order to address these often mutually exclusive efforts, the strategy was developed where there would be a common framework for the Revised Plans and EISs (in terms of such things as a set of common issues, a common set of management prescriptions to choose from, and common approaches to conducting various planning analyses). However, within this common framework, the individual Forests could make adjustments to meet their local situation (this included "localizing" the desired condition statements, goals, objectives, standards and management prescription allocations).

1-49. Public Concern: The Forest Service should use consistent formats across the five forest plans. (A)(C)(O)(J)(S)

Response: To the extent that it was practical consistent formats were used for the forest Plans and EISs. We felt that this was important since the plans would come under intense public review and we wanted that review to go smoothly and make it possible for cross-forest comparisons.

1-50. Public Concern: The Forest Service should coordinate management of the Chattooga River Watershed. (O)(S)

BY APPLYING IDENTICAL PRESCRIPTIONS TO BOTH SIDES OF THE RIVER (O)

Response: The management prescription for the Chattooga Wild and Scenic River will be the same for the Chattahoochee-Oconee and the Sumter. All river corridor standards will be the same as will be the administrative application of those standards. All other management prescriptions adjacent to the river corridor (and within the watershed) may not be exactly the same between the two forests, but the emphasis and desired condition are very similar. Identical management prescriptions were suggested at one time but that was found to

be impractical based upon the past land management activities on either side of the river, but away from the WSR corridor.

Legal

Federal Laws, Acts, and Policies

National Environmental Policy Act

1-51. Public Concern: The Forest Service should comply with NEPA. (A)(C)(O)(J)(S)

Response: The NEPA process has been followed in the development of the EISs that accompany the Revised Forest Plans.

1-52. Public Concern: The Forest Service should consider that the PRLMP and accompanying DEIS violates provisions of NEPA. (A)(C)(O)(J)(S)

BY BASING DECISIONS ON ARBITRARY DECISIONS (A)(C)(O)(J)(S)

Response: The alternatives and desired conditions were not arbitrary. Alternative C considered, but not in detail, a custodial level of management that essentially allows the forest to be shaped by natural disturbances. Alternative G provided large acreages late successional forest. Naturally generated disturbances cannot be relied upon for the desired timing, size, and distribution needed for regeneration and openings in other alternatives. See responses to the following comments: 7-76; 2-2; 2-4, 2-8, 7-117, and 2-15.

BY NOT ADEQUATELY ANALYZING CUMULATIVE IMPACTS (A)(C)(O)(J)(S)

Response: The DEISs disclose the environmental effects, including cumulative effects of the proposed programmatic alternatives commensurate with the Forest Plan stage of decision making. Forest Plans do not generally make final irreversible or irretrievable decisions. See also the responses to comment 3-38

BY NOT REVEALING ALL OF THE ENVIRONMENTAL CONSEQUENCES OF PROPOSED ACTIONS (A)(C)(O)(J)(S)

Response: The commenter disagrees with the assumptions underlying standards for buffer widths to protect streams. We believe the standards are adequate. See response to comments 3-61, 3-64, 3-66, 3-67, 3-16, and 3-18.

BY NOT CONSIDERING THE ALTERNATIVE OF RETURNING FORESTS OF THE REGION TO THEIR NATURAL DYNAMICS (A)(C)(O)(J)(S)

Response: Refer to response to PC 7-26.

BY HAVING THE CONTENT ANALYSIS TEAM IN SALT LAKE CITY ANALYZE THE COMMENTS (A)(C)(O)(J)(S)

Response: Comments were read, sorted, catalogued, and grouped by the Content Analysis Team—the responses were made by the Forests and Regional Office ID Team members and specialists.

BY NOT ANALYZING ALL VIABLE ALTERNATIVES (A)(C)(O)(J)(S)

Response: The range of alternatives is adequate. See responses to the following comments: 2-3, 6-45, 6-8, 2-4, 2-8, 7-87 and 3-149.

BY NOT PROVIDING A FULL AND FAIR DISCUSSION OF SIGNIFICANT INFORMATION (A)(C)(O)(J)(S)

Response: The commenter does not explain what information was omitted or discussed unfairly or insufficiently.

BY NOT DISCLOSING SIGNIFICANT INFORMATION FROM THE AGENCY'S OWN RECORDS (A)(C)(O)(J)(S)

Response: There is no requirement to include discussions from all proponents of theories on the genesis of current forest conditions or to incorporate the data they claim as supporting.

BY NOT TAKING A "HARD LOOK" AT THE ENVIRONMENTAL CONSEQUENCES OF AGENCY ACTIONS (A)(C)(O)(J)(S)

Response: The teams did consider the information available concerning the natural processes that occur in the Southern Appalachians. Acres in many of the Management Prescription allocations do not have scheduled entries to create successional forests, and instead rely primarily on natural processes.

BY FAILING TO DISCLOSE OR RESPOND TO THE OPPOSING EVIDENCE AND ANALYSIS PRESENTED BY AN EMPLOYEE OF THE AGENCY (A)(C)(O)(J)(S)

Response: See response to the two preceding subtopics.

BY NOT ADDRESSING THE UNCERTAINTIES AND RISKS ASSOCIATED WITH THE SUCCESSION-BASED MANAGEMENT APPROACH (A)(C)(O)(J)(S)

Response: The management activities contemplated under the alternatives are not new and uncertain practices. The effects of these activities at a programmatic level are disclosed in the EIS. Site-specific effects will be analyzed at the project level. See previous three responses.

BY NOT DEVELOPING A REASONABLE RANGE OF ALTERNATIVES BASED ON THE AGENCY'S OWN HISTORIC RECORDS AND INTERNAL ANALYSES OF THESE RECORDS (A)(C)(O)(J)(S)

Response: See responses to preceding sub-topics. There is no requirement to develop an alternative that does not meet the purpose or desired conditions. Alternative C, custodial management, was considered, but not developed. See also the responses to comments 2-2 and 2-8.

BY NOT INCLUDING ALL RELEVANT INFORMATION IN THE DOCUMENTS (A)(C)(O)(J)(S)

Response: There is no requirement that all information in the process record be in the DEIS or that all theories and information reviewed be included in the record. NEPA documentation was not intended to be encyclopedic. See responses to preceding sub-topics.

BY NOT USING GOOD DATA AND RELYING ON SPECULATION (A)(C)(O)(J)(S)

Response: The first part of this comment lacks specificity as to any information or data that the commenter claims was not good. With respect to the Biological Opinion, in accordance with USFWS procedures, the Biological Opinion is issued when the ROD is issued. NatureServe is a reputable contractor we used to create a database on species and their habitats.

BECAUSE ROADLESS AREAS ARE NOT ADEQUATELY ADDRESSED (A)(C)(O)(J)(S)

Response: See responses to comments 2-3, 6-8, and 6-45.

BECAUSE THE DEIS FAILS TO IDENTIFY AND ANALYZE IMPACTS IN MANY AREAS (A)(C)(O)(J)(S)

Response: See responses to the preceding sub-topic -- roadless. Also, see response to comments 3-143, 3-149 and 3-160.

BY NOT ENSURING CONSISTENCY BETWEEN RESOURCE PLANS AND LAND MANAGEMENT PLANS (A)(C)(O)(J)(S)

Response: See responses by Tim Mersmann concerning the species selected for MIS.

National Forest Management Act (NFMA)

1-53. Public Concern: The Forest Service should consider that the PRLMP violates provisions of the National Forest Management Act. (A)(C)(O)(J)(S)

BY FAILING TO DISCLOSE RECORDS AND STUDIES RELEVANT TO THE REVISION PROCESS (A)(C)(O)(J)(S)

Response: The comments refer to what has become known as the "Quentin Bass Material." Contrary to assertions made by some commenters, information compiled by Bass was considered during planning. It was distributed to staffs of all Southern Appalachian forests undergoing revision,

and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. Refer to response to PC 3-170 for more information.

Endangered Species Act

1-54. Public Concern: The Forest Service should ensure consultation with the National Marine Fisheries Service if agency activities adversely affect any listed fisheries species or their habitat. (O)(S)

Response: "Consultation" is a process by which Federal agencies review their proposal(s) with the U.S. Fish and Wildlife Service. The National Marine Fisheries Service has responsibility under the Endangered Species Act for listing marine species No listed or proposed marine species exist on the Chattahoochee or Oconee National Forests.

1-55. Public Concern: The Forest Service should consult with the U.S. Fish and Wildlife Service in order to comply with the Endangered Species Act. (A)(C)(O)(J)(S)

Response: We have consulted with the Fish and Wildlife Service. Consultation was initiated on August 15, 2003. We received written concurrence on our findings. "Consultation" is a process for which Federal agencies review their proposal(s) with the Fish and Wildlife Service. It may either be informal for formal for each species depending on the findings of the Biological Assessment completed by FS biologists. The consultation process is completed when the FS receives a concurrence or a biological opinion for that species. It is important to note that the consultation with the Fish and Wildlife Service is conducted for each species in a proposal, not the entire proposal.

1-56. Public Concern: The Forest Service should place emphasis on threatened and endangered species reintroduction and conservation in all forest plan alternatives. (O)

Response: The Forest is working closely with the USFWS at the Plan level to incorporate direction for appropriate management, conservation and reintroduction of federally listed species and to ensure this direction is present in any alternative selected. This direction is incorporated as Forest-Wide objectives and standards and objectives and standards in various Management Prescriptions. Project level activities that involve federally listed species must include coordination with USFWS if there is a chance of having even a beneficial effect on the species. Conservation and recovery of T&E species is accomplished on-the-ground, at the project level. Thus, these project-level activities must also be conducted through consultation with USFWS to ensure compliance with ESA.

Data Quality Act

1-57. Public Concern: The Forest Service should recognize that the PRLMP is in violation of the Data Quality Act. (A)(C)(O)(J)(S)

Response: The Data Quality Act (DQA) is an attempt by Congress to ensure that federal agencies use and disseminate accurate information. The DQA requires federal agencies to issue information quality guidelines ensuring the quality, utility, objectivity and integrity of information that they disseminate and provide mechanisms for affected persons to correct such information. Congress enacted the DQA primarily in response to increased use of the Internet, which gives agencies the ability to communicate information easily and quickly to a large audience. The comments that led to this Public Concern Statement point to the Forest not providing alternatives to large scale burning programs. This is a process question and not one that turns on providing accurate and complete information.

Eastern Wilderness Act

1-58. Public Concern: The Forest Service should ensure compliance with the Eastern Wilderness Areas Act. (A)(C)(O)(J)(S)

Response: The Forest Service is directed by the Code of Federal Regulations to evaluate and consider roadless lands for wilderness. 36 Code of Federal Regulations (CFR), 219.17 Evaluation of Roadless Areas, directs the Forest Service, unless stated differently by law, to evaluate and consider roadless areas for recommendation as potential wilderness areas during the forest planning process. Roadless areas include previous inventoried roadless areas which remain essentially roadless and undeveloped, and have not been designated as wilderness or designated to not be considered for wilderness by law, and other essentially roadless areas at the discretion of the Forest Supervisor.

The Forest Service is directed by the Forest Service Handbook to identify any additional roadless areas. FH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.1 - INVENTORY OF POTENTIAL WILDERNESS directs that the first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act (chapter 9).

Chapter 2

Alternatives

Alternatives Development/Range

2-1. Public Concern: The Forest Service should continue to use the design criteria to guide the formulation of alternatives. (A)(C)(O)(J)(S)

Response: The "design criteria" was used only for the process of developing Alternative I. The other alternatives were developed to meet the "themes" of those alternatives.

2-2. Public Concern: The Forest Service should evaluate a no commercial logging alternative. (A)(C)(O)(J)(S)

TO PROTECT MULTIPLE ENVIRONMENTAL RESOURCES (O)(J)(S)

TO PROTECT WATERSHEDS (O)

TO PROTECT SPECIES AND HABITAT (O)

TO PROTECT TOURISM VALUES (O)(S)

BECAUSE THERE IS NO ADEQUATE RATIONALE FOR NOT INCLUDING THIS ALTERNATIVE (A)(C)(O)(J)(S)

Response: Numerous comments were made about the desire to have the National Forests managed under Alternative C, which is an alternative with "minimal human intervention", or to have an alternative with "no commercial timber harvesting". These two concepts are closely related and the responses to these concepts are therefore also similar. The rationale for not analyzing these alternatives in detail is described in Chapter 2 of the EIS under "Alternatives Considered But Eliminated From Detailed Study". Alternative C was an alternative developed and considered, but after additional analysis and developing more alternatives, it was determined that the other alternatives would better meet the purpose and need, and do a better job of addressing all the issues. So it was decided we did not need to continue analyzing this alternative any further.

The purpose and need of revising the forest plan is to address the changing conditions that were identified in the Southern Appalachian Assessment, the Forest's Analysis of the Management Situation, and the changing public values as represented by the 12 common issues and 4 local issues. Alternative C would not address all these needs. The Multiple-Use Sustained Yield Act states that the Secretary of Agriculture should "develop and administer the renewable surface resources of the national forests for

multiple use and sustained yield of the several products and services obtained there from" (Section 2). Alternative C does not accomplish this. Additionally, in the regulations implementing the National Forest Management Act, the requirement to "maintain viable populations of existing native and desired non-native vertebrate species in the planning area" (36 CFR 219.19) would not be met.

Many comments argue that no commercial harvesting is needed to protect watersheds and wildlife. But there are hundreds of different species of wildlife on the national forest, and "human intervention" is needed to provide or enhance the habitats for some of those species. Currently, the percentage of the total forest acres in "mid- to late-successional" habitats is approximately 50% 0n the Chattahoochee National Forest and 28% on the Oconee National Forest.. Also the riparian corridor prescription is applicable in all the alternatives except Alternative F, and this management will protect the Forest's aquatic resources. Elsewhere in the Plan, protective measures are in place to protect the watersheds in the Forest.

Providing for recreational opportunities is a key component of every alternative, and two of the issues to be addressed with the Forest Plan involve providing for recreational opportunities and managing the forests to protect their scenic resources.

Some argue that commercial logging costs the taxpayer or is a subsidy to the timber industry. But having a contractor implement the management actions needed to meet the desired conditions, and returning money to the US Treasury in the process, is often the most cost-effective way to accomplish meeting those objectives.

2-3. Public Concern: The Forest Service should consider a wider range of wilderness and roadless area recommendations. (A)(C)(O)(J)(S)

Response: There was a range of wilderness alternative considered. In Alternative G, 22 areas were considered for 1B (wilderness study). Only the Lance Creek SAA inventory area was not considered because it is mostly encompassed within the Ed Jenkins National Recreation Area. Kelly Ridge was included in this consideration. In other alternatives in which some SAA inventory areas were not considered, Old Growth will be conserved within those areas if it occurs (such as it does within KR), but old growth does not satisfy habitat needs for high elevation, early successional migratory bird species as was suggested it does, by one commenter.

2-4. Public Concern: The Forest Service should revise the DEIS to consider a full spectrum of reasonable alternatives. (A)(C)(O)(J)(S)

INCLUDING AN ALTERNATIVE THAT ELIMINATES COMMERCIAL LOGGING (A)(C)(O)(J)(S)

Response: Refer to response to PC 2-2.

INCLUDING A REASONABLE RANGE OF ALTERNATIVES FOR THE MANAGEMENT OF HIGH PRIORITY WATERSHEDS (O)

Response: Refer to response to PC 3-24.

INCLUDING A REASONABLE RANGE OF ALTERNATIVES FOR ALL TERRAIN VEHICLES (O)

Response: Individual management prescriptions were assigned an OHV 'option' with a range across prescriptions from 'none' to 'OHV trail systems provisionally OK'. The differing sets of management prescriptions used in each alternative and the variation in their acreages thus resulted in variation for OHV use. Low-intensity management alternatives such as E and G resulted in little or no opportunity for OHV use. Relatively high intensity management alternatives resulted in relatively high opportunity for OHV use. Short of prohibiting them altogether – which we did not have authority to do – our judgment is that there is a reasonable range.

INCLUDING A REASONABLE RANGE OF ALTERNATIVES THAT PROVIDE A VISUAL CORRIDOR MANAGEMENT APPROACH FOR THE BENTON MACKAYE AND PINHOTI TRAILS (O)

Response: Refer to response to PC 5-86.

INCLUDING A REASONABLE RANGE OF ALTERNATIVES FOR THE MANAGEMENT OF CULTURAL AND HERITAGE RESOURCES (O)

Response: Cultural resource management must comply with numerous laws and within that framework there is very limited opportunity for variation. The decision space is too small to create separate alternatives within what there is. In addition, management of cultural resources was not a public issue and the range of alternatives is created in response to issues. Finally, the 4.E.1 Cultural Heritage Area management prescription was carefully written to provide for conservation education and interpretive services as well as the restoration of period landscapes associated with specific areas.

INCLUDING AN ALTERNATIVE TO PRESCRIBED BURNS AND EVEN-AGED MANAGEMENT (A)(C)(O)(J)(S)

Response: The alternatives presented in the EIS provide a range of levels of prescribed burning. (See Chapter 2 of the EIS, Comparison of Alternatives, under the Forest Health Issue.) See the response to PCs 7-169, 7-170, 7-171, 7-177, and 7-178 for a description of the reasons why some level of prescribed burning is needed.

In terms of even-aged management, the level of management in each alternative is a function of the actions needed to meet the desired conditions of the management prescription allocations. Chapter 2 of the EIS in the Comparison of Alternatives, shows the range of management prescription allocations. See also the response to PC 7-95 for a description of the reasons why some level of even-aged management is needed.

INCLUDING ALTERNATIVES C, H, E, AND G (A)(C)(O)(J)(S)

Response: The EIS in Chapter 2, under Alternatives Considered But Eliminated From Detailed Study, describes the rationale for why Alternatives C and H were not analyzed in detail. See also the responses to PCs 2-2 and 2-8. Alternatives E and G are viable alternatives that were considered in detail. The Record of Decision documents the rationale for why Alternative I was selected over the other alternatives.

2-5. Public Concern: The Forest Service should develop an alternative that provides the early successional levels of 12-15% needed to optimize overall wildlife habitat. (O)

Response: In the EIS, the Forest developed and analyzed a series of alternatives that provided a wide range in levels of early successional habitat. To provide for a diversity of habitats, we defined four mixes or "options" of successional forest conditions to be assigned to specific portions of the national forest landscape (see definitions of options in the Successional Forests section of the EIS). A wide variety of multiple resources considerations influenced the development of the alternatives, including successional habitat abundance and distribution across the forest, settings for other multiple uses, and legal and logistical constraints on management opportunity, some of which (such as acres of existing Wilderness) constrained the levels of early successional habitat. Projected percentage of early successional habitat (based on allocation of successional stage options) ranged from less than 1 to greater than 12 percent on the Chattahoochee and from less than 3 to nearly 15 percent on the Oconee. This range of alternatives analyzed was adequate to evaluate the needs of early successional species, late successional species, and those requiring a mixture of successional stages.

2-6. Public Concern: The Forest Service should incorporate the Chattooga Conservation Plan as the preferred alternative. (O)(S)

Response: The Sumter and Chattahoochee-Oconee National Forests have coordinated throughout the planning process on the management of the Chattooga River watershed. Allocation of management prescriptions on both sides of the River was based on ecological characteristics, desired conditions, public involvement, and coordination between the two Forests. Both Forests also made extensive use of data and information

from the Chattooga River Watershed Demonstration Project conducted from 1995-1998 in the watershed. The "Chattooga Project", as the effort became know, was a model of involvement between the public, scientific and research community and the Forest Service. The Chattooga Wild and Scenic River corridor between the two Forests/States will be managed following identical Management Prescriptions 2A for the Congressionally-designated corridor, with the Sumter being the lead Forest for administration. Ellicott Rock wilderness, another component of the watershed, will also be managed in a consistent fashion between the Forests.

Alternatives Not Considered in Detail

Alternatives Not Considered in Detail

2-7. Public Concern: The Forest Service should not provide additional analysis for Alternatives C and G. (A)(C)(O)(J)(S)

BECAUSE THE PLAN DOES NOT CONSIDER THE MINIMUM LEVEL BENCHMARK AS AN OPTION FOR MANAGEMENT OF THE ALABAMA NATIONAL FORESTS (A)(C)(O)(J)(S)

Response: We assume the commenter meant Alternatives C and H since Alternative G was developed in detail. We are glad the commenter agrees with our rationale that these two alternatives did not need to be analyzed in detail.

Alternative C

2-8. Public Concern: The Forest Service should reinstate and analyze Alternative C. (A)(C)(O)(J)(S)

BECAUSE THIS ALTERNATIVE WAS UNREASONABLY DROPPED FROM CONSIDERATION (A)(C)(O)(J)(S)

TO PROTECT SPECIES HABITAT (O)

BECAUSE THIS ALTERNATIVE WAS ERRONEOUSLY DROPPED (A)(O)(J)

Response: Refer to response to 2-2.

Specific Alternatives

Multiple Alternatives

2-9. Public Concern: The Forest Service should implement Alternative C, B, or I. (O)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

2-10. Public Concern: The Forest Service should implement Alternative D or F. (A)(C)(O)(J)(S)

BECAUSE THESE ALTERNATIVES BEST RESPOND TO ENVIRONMENTAL ISSUES RAISED IN THE PLANNING PROCESS (A)(C)(O)(J)(S)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

Alternative A

2-11 Public Concern: The Forest Service should recognize that Alternative A would increase the potential for conflicts among user groups near the Appalachian Trail. (C)(O)(J).

Response: The comment was that Alternative A 'provides for timber extraction beyond real demand' and thus sets up indirectly impacts to the AT through access needs for timber removal and conflicts among user groups. Alternative A harvest levels are below historic average harvest, thus within 'real' demand. Also, the AT prescription does not vary among alternatives and specifically addresses access within the trail corridor, crossings, and permissible activities within the corridor.

Alternative E

2-11. Public Concern: The Forest Service should consider that Alternative E did not receive serious consideration. (A)(C)(O)(J)(S)

Response: The Regional Forester looked at all of the alternatives and chose Alternative "I". Other alternatives were considered and not chosen. The Rationale for this decision is listed in the Record of Decision.

Alternative F

2-12. Public Concern: The Forest Service should implement Alternative F. (C)(O)

BECAUSE THIS ALTERNATIVE BEST ACCOMPLISHES MULTIPLE USE GOALS (O)

Response: The Regional Forester looked at all of the alternatives and chose Alternative "I". Other alternatives were considered and not chosen. The Rationale for this decision is listed in the Record of Decision.

2-13. Public Concern: The Forest Service should modify Alternative F to emphasize timber and reduce wilderness recommendations, wilderness study areas, and roadless areas. (O)

Response: Alternative A emphasizes production of goods and services, including timber management with an emphasis on high-quality sawtimber. In would be inappropriate to modify Alternative F since it represents No-Action (in the case, no change from the 1985 Plan).

Alternative G

General Considerations

2-14. Public Concern: The Forest Service should consider that Alternative G did not receive serious consideration. (A)(C)(O)(J)(S)

Response: The Regional Forester looked at all of the alternatives and chose Alternative "I". Other alternatives were considered and not chosen. The Rationale for this decision is listed in the Record of Decision.

Environmental Considerations

Transportation Considerations

2-15. Public Concern: The Forest Service should not implement Alternative G. (C)(O)

BECAUSE THE ALTERNATIVE DOES NOT EMPHASIZE THE IMPORTANT ROLE OF THE TRANSPORTATION SYSTEM (C)(O)

RECREATION CONSIDERATIONS

Response: The Regional Forester looked at all of the alternatives and chose Alternative "I". Other alternatives were considered and not chosen. The Rationale for this decision is listed in the Record of Decision.

Natural Resource Considerations

2-16. Public Concern: The Forest Service should modify Alternative G. (A)(C)(O)

Response: Commenter requested a number of specific changes to Alternative G. The ID Team considered these changes. However, no changes were made to Alternative G between draft and final Plan.

Social and Economic Considerations

Alternative I

General Considerations

2-17. Public Concern: The Forest Service should clarify whether the comparison between the Preferred Alternative and the 1985 Plan is a comparison with the 1985 Plan as implemented or as projected. (A)(C)(O)(J)(S)

Response: Both of these comparisons are used in the EIS. In the case of SPECTRUM and the Inventory and Monitoring Institute (IMI) modeling outputs, Alt. F estimated outputs are based on the allocations of the current plan, cross-matched to their nearest equivalent management prescription in the revision prescription set. In the case of historic timber production numbers, these are 'as implemented'. For the final, tables were attributed with their data source and table headers were reviewed for clarity on this point.

2-18. Public Concern: The Forest Service should explain how Alternative I came to be the preferred alternative. (A)(C)(O)(J)(S)

Response: The rationale for why a particular alternative is chosen is not something that is a part of an environmental impact statement (EIS). An EIS is not a decision document, it discloses the effects of alternative courses of action. At the "Draft" stage, a "preferred alternative" is identified to help facilitate public comment and review. Following that public comment and review, the information in the EIS is updated and a decision is made as to which alternative to select. The rationale for choosing the selected alternative is then documented in the Record of Decision.

2-19. Public Concern: The Forest Service should implement Alternative I. (C)(O)(J)(S)

BECAUSE IT IS SCIENCE BASED AND PROVIDES AN APPROPRIATE BALANCE OF MULTIPLE USES (O)

BECAUSE IT IS BASED ON SOUND SCIENCE (O)

BECAUSE IT BEST MEETS THE MULTIPLE USE OBJECTIVES OF THE FOREST SERVICE (A)(C)(O)(J)(S)

Response: Refer to response to 2-19.

2-20. Public Concern: The Forest Service should not implement Alternative I. (A)(C)(O)(J)(S)

BECAUSE THE FOREST SERVICE IGNORED MUCH OF PEER-REVIEWED RESEARCH AVAILABLE THROUGH THE AGENCY'S RESEARCH BRANCH (A)(C)(O)(J)(S)

BECAUSE THE ALTERNATIVE WAS OVERLY INFLUENCED BY ENVIRONMENTAL GROUPS (A)(C)(O)(J)(S)

BECAUSE IT VIOLATES THE ORGANIC ACT OF 1897 AND THE MULTIPLE-USE SUSTAINED-YIELD ACT OF 1960 (A)(C)(O)(J)(S)

BECAUSE THE PROPOSED PLAN GOES WELL BEYOND KNOWN NATURAL RESOURCE SCIENCE AND JUMPS INTO SPECULATIVE, SUBJECTIVE AREAS OF HUMAN VALUES AND VISIONS (A)(C)(O)(J)(S)

Response: Alternative I was developed to address a multiplicity of issues, and many people, groups, and organizations were involved in its development. It was developed through iterations of working and meeting with our various publics, and we consulted with our partners in research throughout the process. The USFWS has also worked with us throughout the process and they will issue their Biological Opinion prior to the Record of Decision being signed (they do not go through the formal consultation process on draft documents). Alternative I is consistent with the Multiple-Use Sustained-Yield Act and the Organic Act. As for the question on NFMA, the estimates on the methods of harvest are found in the 'Forest Cover' topic of the EIS Logging systems are addressed in Appendix F of the Plan. For the question on the National Historic Preservation Act, goals and objectives for managing Heritage Resources are found in Chapter 2 of the Forest Plan, along with standards for protecting those resources. There is also the existing Forest Service policy, manual and handbook direction for protecting archeological sites that did not need to be repeated in the Forest Plan.

The Forest Plan is designed to avoid and minimize effects on aquatic resources through the forest standards and the riparian corridor management prescription. Concerns about recognizing the importance of transportation are addressed in Chapter 2 of the Forest Plan as well (See the section on Access/Road Management) where goals, objectives, and standards are identified. However, a Forest Plan does not make site-specific decisions on how each road in the transportation system should be managed. It is true that there will likely be an increase in temporary roads over what has occurred in the past few years, but this will be less than the level associated with the original forest plan. Also there are numerous mitigating measures that are put in place to ensure that temporary roads minimize their environmental effects.

2-21. Public Concern: The Forest Service should explain why the preferred alternative has changed so much. (O)

Response: The changes referred to are: (1) a re-allocation of a portion of the upper Conasauga River watershed from 9.A.3 Watershed Restoration to 7.E.2(?) Dispersed Recreation, and (2) a reduction in the acres of inventoried roadless areas recommended for wilderness designation. The switch from 9.A.3 was because the upper Conasauga came out in the watershed assessment as being in excellent shape while other streams listed as sediment-impaired were also in the 9.A.3. Our intention for the prescription was to use it for watersheds in trouble so it did not fit the upper Conasauga. The change from recommended wilderness was an accumulation of concerns about the supply relative to demand, the Forest proportion of all wilderness in the Southern Appalachians, the lack of diverse support, and – most of all – analysis results that demonstrated the need for management flexibility to create and maintain wildlife habitats in the higher elevations most affected by recommended wilderness blocks.

The changes are not as major as might appear. The 7.E.2 prescription was chosen in large part because it is very similar in direction and allowed management intensity to 9.A.3 and differs primarily in emphasis. The 7.E.2 prescription is also consistent with current uses of the area. Regarding wilderness, we continue to constrain activities within inventoried roadless areas such that, recommended or not, the roadless character is maintained.

Environmental Considerations

2-22. Public Concern: The Forest Service should implement Alternative I. (A)(C)(O)

BECAUSE IT PROVIDES THE GREATEST AMOUNT OF EARLY SUCCESSIONAL HABITAT (O)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

Natural Resource Management Considerations

2-23. Public Concern: The Forest Service should not implement Alternative I. (A)(C)(O)(J)(S)

BECAUSE IT ALLOWS FOR TOO MUCH TIMBER HARVEST (O)

BECAUSE THE ALTERNATIVE DOES NOT PROVIDE THE ACTIVE MANAGEMENT NECESSARY FOR FOREST AND WILDLIFE HEALTH (A)(C)(O)(J)(S)

BECAUSE THE ALTERNATIVE DOES NOT PROVIDE ADEQUATE EARLY SUCCESSIONAL HABITAT (O)

BECAUSE THE FOCUS OF THE PREFERRED ALTERNATIVE IS HUMAN COMPROMISE AND CONSENSUS RATHER THAN FOREST HEALTH AND SCIENCE BASED NATURAL RESOURCE MANAGEMENT (A)(C)(O)(J)(S)

Response: The nature of forest planning is such that compromises have to be an integral part of developing a forest plan. If all the publics and all the scientists agreed on what is the "right" way to manage a forest, then developing a Forest Plan would be considerably easier. However, scientists do not agree, and the public has a wide range of wants/needs/concerns with respect to the management of the national forests, as is evidenced by all the comments received.

A major emphasis of Alternative I is to manage the forest ecosystems to meet the needs of the wide variety of wildlife habitats found on the national forest. This often includes active management to create those conditions. Forest health is another key component of this alternative. Within this alternative, approximately 461,098 acres have been classified as "suitable for timber production" and periodic, scheduled harvesting activities will take place on these lands. For a majority of the other lands, "unscheduled" and "unplanned" harvesting activities may still take place in order to address forest health needs.

Special Designations Considerations

Wilderness Considerations

2-24. Public Concern: The Forest Service should implement Alternative I. (O)

BECAUSE IT TAKES A MORE MODERATE VIEW OF WILDERNESS PRESCRIPTIONS (O)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

2-25. Public Concern: The Forest Service should justify the reduction of wilderness recommendations between the current Alternative I and the draft Alternative I released six months ago. (A)(C)(O)(J)(S)

Response: There were several reasons including biological analysis, socio-economic analysis, GIS analysis and new information that came to light before the draft plan was released. First and foremost, all management prescriptions were allocated within the " rolling alternative" based almost solely on public input. That was the purpose of the rolling alternative - to focus public input instead of burdening the public with commenting on eight or nine alternatives. As the Forest interdisciplinary team (IDT) went through this process, our

publics were consistently told that the management prescription allocations in the rolling alternative were not yet the final product and needed both analysis and a review of response to comments on the draft. The next step of Plan and DEIS development, the "analysis step," could well necessitate changes in how the management prescription allocations were distributed across the Forest to meet the Forest Service's legal requirements and/or the biological needs of certain species, as well as the goals and objectives identified in the revised Plan.

For example, through GIS and biological analysis, one significant factor leading to reducing the amount of proposed wilderness study areas was the limited amount of opportunity available to create, maintain and/or enhance high elevation (above 3,000 ft.) early successional habitat required by certain species. GIS analysis based on current 10-meter Digital Elevation Models (DEMs) showed that the total acreage in Georgia over 3,000 feet is approximately 114,000 acres. The Chattahoochee National Forest accounts for about 109,500 acres or 96.9 percent of that amount with approximately 52,000 acres or 47.5 percent unavailable for sustained habitat management due to previous withdrawals above the authority of the Regional Forester. This leaves about 57,500 acres available to be considered for habitat management. Less than 2 percent of the entire Chattahoochee is in the 0-10 age class (early successional) and less than 1 percent is estimated to occur above 3,000 feet on National Forest. Because high elevation early successional habitats may be critical for the viability of those species associated with those habitats the forest needed flexibility to be able to create, maintain and enhance those habitats. Wilderness study areas do not allow that flexibility.

Status and importance

Early successional habitats in the Southern Blue Ridge provide important, and in some cases, essential foraging and nesting habitat for a wide variety of wildlife species. They become particularly important in late summer and early fall when the plants produce abundant supplies of "energy rich" soft mast food resources. Recent research on Wood Thrush highlights the importance of these habitats to fledging mature forest-dependent neotropical migrants during the post-dispersal period (Anders ***et al.*** 1998, Vega Rivera ***et al.*** 1998).

The early-succession, shrub-scrub, balds category contains a wide variety of habitat types that occur throughout the Southern Blue Ridge at all elevations and topographic positions. It includes early stages of forest regeneration, old and abandoned fields, high-elevation grass and heath balds, mountain wetlands, and agricultural cropland and pastures. Early-successional herbaceous and shrub habitats are defined by the Southern Appalachian Assessment as "***non-cultivated areas with predominant vegetative cover of herbaceous plants and shrubs covering at least 25 percent of the area***"

and include high-elevation balds, abandoned agricultural fields and areas of early forest regeneration. (SAMAB 1996).

Naturally occurring early-successional "shrub-scrub" and grassland habitats originate and are maintained by frequent, large scale natural disturbances including grazing from hoofed animals, tornadoes, hurricanes, ice storms, and, most notably, fire. The elimination of bison and elk soon after European colonization in eastern North America and, most importantly, the active suppression of fire after the 1930's has led to the loss of most natural shrub-scrub and grassland habitat.

These conditions allowed for expansion and abundance of species now facing extirpation or extinction *(e.g.*, Golden-winged Warbler and Appalachian Bewick's Wren, respectively). Since the early 1900's, these habitats have been lost to development *(i.e.,* housing subdivisions), more efficient "clean" farming practices with few hedgerows, and succession which has resulted in much less early-successional habitat and more upland forests occurring in the Southern Blue Ridge overall (Stephenson et al. 1993.).

Habitats similar in structure to natural shrub-scrub communities can be produced through even-aged silvicultural techniques over large areas. However, there is a trend away from some even-aged management techniques, especially large clearcuts on public (National Forests) and non-industrial private lands throughout the South. In fact, there is growing consensus that declines of so many early-successional species may be related to this trend as areas harvested in the 1960's and early 1970's have reverted back to forests (J. Woehr, in lit. Appendix I). Early-successional forests are, by design, transitory and move into later stages of succession quickly unless maintained by some sort of disturbance *(e.g.*, fire, grazing). The use of fire in maintaining early-successional conditions, however, is not well understood or endorsed by the public. Unless massive education is employed burning will not likely be conducted on public land a large enough scale to restore appropriate ecosystem processes. Therefore, the reduction in natural or simulated ecosystem functions involving regular disturbance will continue to allow succession to proceed and forests to mature. Unless more active management approaches are adopted, early-successional habitats and the species associated with them are expected to decline, a process similar to that described for migratory birds and mammals in the Northeast (Litvaitis 1993).

Although under-representation of late successional forests is all but certain in the Southern Blue Ridge, the same is almost certainly true for early successional forests, especially above 915 m (3, 000 ft).

Priority species, species suites, and habitat requirements

Populations of birds associated with early successional habitats are in decline throughout the Southeast, including the Southern Blue Ridge. Only one species, the Blue Grosbeak, is definitely increasing. The highest priority species within the Southern Blue Ridge are the Golden-winged Warbler and Appalachian Bewick's Wren, with Partners In Flight priority scores of 30 and 35, respectively. The Golden-winged Warbler is largely restricted in the Southeast to the Southern Blue Ridge. It is a habitat specialist that uses early successional shrub-scrub, mixed with grass, at elevations between 610 and 1220 m (2000 and 4000 ft) (Hamel 1992). Historically, the warbler was most likely associated with high elevation wetlands, balds, old fields and forest edges that were subject to frequent disturbances which maintained the structural habitat characteristics necessary for this species (Short 1963). Today, these birds are often associated with mid to high elevation clearcuts, which may temporarily mimic conditions likely to have been more frequent prior to present-day fire suppression practices.

Other early successional species, such as Chestnut-sided and Prairie Warblers also may be in need of conservation attention. Although both remain much more common today than they were towards the turn of the century, they have nonetheless declined in many areas in recent years from their mid-century population peaks. These species have relatively small ranges and may continue to decline if semi-permanent early- successional habitat is lost. The Prairie Warbler appears to be associated with shrub-scrub understories of regularly disturbed habitats in the Southern Blue Ridge, including southern yellow pine forests and eastern red cedar-pine glades (Nolan 1978). Early seral stages of mixed pine-hardwood and oak-hickory forests have also been identified as optimal breeding habitats by Hamel (1992). The loss of these habitats through fire suppression during this century appears to be mitigated by the concurrent increase in old fields and regeneration of forests from clearcutting. However, recent losses of shrub-scrub in managed landscapes may be contributing to the decline of not only Prairie Warbler, but also Field Sparrow and Northern Bobwhite.

Chestnut-sided Warbler populations are largely restricted in the Southeast to mid to high elevations within the Southern Blue Ridge. They commonly occur in a variety of habitat types and successional stages but are most often associated with regenerating oak-hickory and northern hardwood stands. Chestnut-sided Warbler has declined as a result of the reduction of disturbance management and the overall maturing of forests. However, it seems that roadside edges are presently providing apparently suitable habitat for Chestnut-sided Warbler, but the quality of this habitat in terms of reproductive success is not known.

Ruffed Grouse, Carolina Wren, Gray Catbird, Yellow-breasted Chat, Indigo Bunting, Chipping and Vesper Sparrow are other early successional species that warrant continued population monitoring because they are considered

locally important by state agencies or are suffering significant population declines regionally in the recent past.

Habitat and population objectives

The main objectives for early successional species are to 1) protect, maintain, and where necessary, restore sensitive early successional habitats such as mountain wetlands and high elevation balds, 2) where even-aged timber management is employed (industrial private lands and state and national forests), increase the size of early successional forest patches while maintaining the number of smaller patches, and 3) in larger tracts of forest, maintain a shifting mosaic of early, mid and late successional habitats with forest cover remaining above 70 percent. In addition, a landscape approach including patch size should be considered.

Tentative population objectives for Golden-winged Warbler would be to maintain 3,000 pairs in southwestern North Carolina; their present stronghold. An additional 500 pairs each should be maintained in west-central and northwestern North Carolina, eastern Tennessee, and in north Georgia for a grand total of 5000 pairs in the Southern Blue Ridge. Reproductive rates should be maintained well-above that needed for local replacement (average 4 fledged young per successful nest as one parameter, D. Buehler and N. Klaus unpubl. data). These changes were also identified as needed and fully supported by our wildlife biologists as they did the environmental analysis for the DEIS and FEIS.

As analysis and new information came in, the IDT also took a closer look at some existing information. For example, they looked at the Chattahoochee's proportion of Wilderness supply and roadless area inventory. The Chattahoochee has had three Acts designating Wilderness. The Southern Appalachian Assessment listed the amount of existing wilderness by Forest in the Southern Appalachians. By far, the greatest amount was on the Chattahoochee, which contains 33 percent of all wilderness acres in the Southern Appalachians. The other Forests in the Southern Appalachians each contribute less than 20 percent of wilderness in the Southern Appalachians.

The IDT also received new information between development of the rolling alternative and the draft and final Plan.

Forest user information for the year 2002 became available during this period, and the IDT began to look at supply and demand for additional wilderness on the Chattahoochee.
In 2002, the total of estimated recreation visits on the Chattahoochee National Forest was 1,917,906, visitors. Of these:

1. dispersed recreation was 261,540 visitors, or 66 percent of the total.

2. day use (primarily picnicking) 552,690 visitors, or 29 percent of the total.
3. overnight use (developed campgrounds) 85,362 visitors, or 4 percent of the total.
4. Wilderness use 18,314 visitors, or 1 percent of the total.

In addition to use figures, the National Visitor Use Model (NVUM) came on line. This model projects future demand for various outdoor recreation opportunities. This information was coupled with another model (FEAST), and it was projected that, for the Chattahoochee, the supply of existing wilderness we now have would meet the projected wilderness demand for the next 50 years.

Based on this new information, the IDT determined that for this plan revision, priorities should be placed on allocating management prescriptions that allow the management flexibility to achieve Plan goals and objectives addressing creation, enhancement and maintenance of wildlife habitats, as well as forest health while not precluding further re-consideration of inventoried roadless areas.

Another report the IDT received in July 2002, was the "Public Survey Report" conducted and prepared by the Forest Service Southern Regional System in cooperation with the Southern Research Station (FS) and the University of Tennessee, Human Dimensions Research Lab, Dept. of Forestry, Wildlife and Fisheries (authors below).

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This report was the result of an initiative to sample opinion regarding national forest management from the broad public in areas most directly affected by Forest Service activities. While there were numerous public meetings on the plan revision held to allow attending interests an opportunity to express their wants, needs and demands for access to and use of national forest resources, these public meetings typically represent only a portion of the

public's interests and seldom represent the so called "silent majority" who do not, or cannot, attend these meetings. The Public Survey Report results provide input from this broader public concerning what they would like to see emphasized in national forest management. To gather this information, a minimum of 400 residents within 75 miles of each SA forest was interviewed.

Overall, in the SA region, more than 5,200 people over the age of 16 years were interviewed. These interviews were approximately 20 minutes long, and consisted of a series of questions to individuals randomly dialed through the use of a computer-aided telephone interviewing system.

Results summary: Among the 20 activities included in the survey of SA residents, the most popular are driving for pleasure (almost 75 percent participate in the combined sub-region), viewing and photographing wildlife, fish or scenery (60 percent), picnicking (56 percent), visiting a wilderness or other primitive area (40 percent), and day hiking (39 percent). Other popular activities include swimming (38 percent), fishing (33 percent), gathering natural products (26 percent), developed camping (25 percent), and off-road driving (24 percent).

The IDT analyzed this information and determined that many of these popular activities could be curtailed on the national forest as roads, access and modes of transportation would be restricted or eliminated if the proposed wilderness study management prescriptions remained as allocated in the rolling alternative. The fact that visiting a wilderness or other primitive area was among the most popular activities was recognized. Therefore, most of the proposed wilderness study areas were kept in a management prescription to maintain their remote character and provide primitive areas for people to visit. As an added protection for these areas, if located in an inventoried roadless area, there is a Forestwide standard to maintain the roadless character of these areas. This standard applies go all inventoried roadless areas across the Forest.

An additional study, which became available in November 2002 from the Southern Research Station, caused the IDT to take another hard look at how the management prescriptions were allocated. This publication is entitled "*Human Influences on Forest Ecosystems, The Southern Wildland - Urban Interface Assessment*," edited by Edward Macie, Regional Urban Forester, USDA Forest Service, Southern Region and L. Annie Hersmansen, Technology Transfer Coordinator, USDA Forest Service, Southern Research Station. This assessment brought to light problems with a rapidly growing population in the Southern region and its effects on the natural resources and potential wildlife habitats as land uses change to accommodate this influx of increased population. Particularly prior to World War II and even up until twenty years ago, most of the land use surrounding the national forests was primarily being managed with agriculture and forestry practices. Generally, wildlife habitats were provided to support fairly high population levels of game and non-game

species. However, the current and past demographic and population projections presented in this report indicate that this has not only changed drastically, it will continue to do so. One only has to ride around North Georgia to see the urban interface first hand. Between 1982 and 1992, 13.3 million acres of rural land were converted to urban and other built-up uses. This total included 6.5 million acres in the South where more rural acreage was converted than in any other region in the country. The highest acreage losses occurred in Texas (1.14 million acres), Georgia (1.05 million acres), and Florida (0.92 million acres). The population projections for the South in the next 20 years are even more daunting. Between 2000 and 2020, the South's population is projected to increase another 23.8 million, reaching almost 114 million people by the close of those two decades. While urban areas in the northern U.S. will continue to be the most densely populated among U.S. regions, at over 540 people per square mile, population density will be rising faster in the South, reaching 391 people per square mile by 2020.

The most obvious landscape effects of human activities are the reduction of total forest area and the fragmentation or remaining forests into smaller, isolated patches. In the interface, development creates new edge habitat and alters habitat from irregular to highly regular and linear. By increasing edge habitat, development increases the number of edge species, but decreases the number of interior species and contributes to the habitat heterogeneity of a landscape. Roads associated with this urbanization have numerous other ecological effects such as: direct mortality of wildlife on roads, increased mortality from hunting, increased harassment of wildlife from roads, increased wood cutting and trampling near roads, increased human-caused fires, increased light pollution, increased dumping, destruction of small populations, increased dust and fumes, spread of nonnative species, increased noise levels, and increases in impervious surfaces resulting in pollution and sedimentation of streams.

Because of these potential effects, the IDT felt that management flexibility to be able to respond to declining habitat quantity and quality on private land was critical on the national forest to offset the adverse effects of the projected increased urbanization surrounding the national forest.

Finally, another publication, entitled "*The Southern Forest Resource Assessment*," prepared by David N. Wear and John Greis in conjunction with the Southern Research Station, was received by the IDT in October 2002.

This publication brought to light the likely problems we'll encounter on the national forest from competing recreation uses. Because only 4.6 percent of the Nation's Federal land and 12 percent of State Park and forestlands are in the South, which has about 33 percent of the nation's population, recreation pressures on public lands are substantial. For example, national forests in the Southern Region are the second most heavily used of the nine Forest Service Regions, with 1.9 visits per acre. Only 7 percent of private land held by

individuals is open to free access by any member of the public, and the trend is toward decreasing access to private land.

Recreation Considerations

2-26. Public Concern: The Forest Service should implement Alternative I. (O)(J)(S)

BECAUSE IT PROTECTS THE APPALACHIAN TRAIL (O)(J)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

Social/Economic Considerations

2-27. Public Concern: The Forest Service should not implement Alternative I as it does not provide adequate opportunities for solitude, spiritual renewal, or adventure. (O)

Response: The Record of Decision for the Revised Land and Resource Management Plan (ROD) explains the rationale for selection/non-selection of a particular Alternative. The ROD also discusses how the issues are addressed by the Alternatives, including the selected Alternative.

Chapter 3

Environment

Environmental Values

Environmental Values (General)

3-1. Public Concern: The Forest Service should protect forests and the environment. (A)(C)(O)(J)(S)

FOR FUTURE GENERATIONS (A)(C)(O)(J)(S)

FOR RECREATION (A)(C)(O)(J)(S)

FOR SOLITUDE AND PEACE (O)(J)(S)

FOR AESTHETICS (O)(J)(S)

TO PROVIDE BENEFITS FOR HEALTH, WELL-BEING, AND QUALITY OF LIFE (C)(O)(J)(S)

TO PREVENT ENVIRONMENTAL EXPLOITATION THAT ENRICHES A FEW (A)(C)(O)(J)

BECAUSE ECOLOGICAL PROTECTION AND RESTORATION IS THE HIGHEST AND BEST USE (A)(C)(O)(J)(S)

TO PREVENT FRAGMENTATION AND PRESERVE LARGE, CONTIGUOUS FOREST AREAS (O)(J)

BECAUSE THE VALUE OF PLANTS, ANIMALS, AND RECREATION IS GREATER THAN THE COMMERCIAL VALUE OF NATURAL RESOURCES (A)(O)(J)

TO PROVIDE CLEAN AIR AND WATER (A)(C)(O)(J)(S)

TO MANAGE CARBON DIOXIDE AND ITS RESULTANT EFFECTS (O)(S)

TO MINIMIZE THE NEGATIVE EFFECTS OF DEVELOPMENT (A)(C)(O)(J)(S)

TO PROTECT GREENSPACE (O)

FOR MULTIPLE REASONS (O)(S)

BECAUSE THE FOREST AND SPECIES ARE IRREPLACEABLE (A)(O)

BECAUSE FORESTS BELONG TO THE PUBLIC AND SHOULD BE MANAGED FOR PUBLIC VALUES (A)(C)(O)

FOR AREAS LISTED IN 'MOUNTAIN TREASURES' (A)(C)(O)(J)(S)

FOR ETHICAL OBLIGATIONS TO OTHER SPECIES (O)(S)

TO FULFILL AGENCY RESPONSIBILITIES (A)(O)(J)

Response: The Revised Forest Plans address 12 common issues and other local issues that include the wide range of desires, wants, needs, and concerns that have been expressed by the users of the national forests. Often times, meeting one set of needs/concerns is in conflict with meeting other needs/concerns. The challenge is to try to find the appropriate level of management that will best address all these issues. The Record of Decision

explains how the Selected Alternative is the alternative that does the best job of trying to meet the public's demands while protecting the resources.

3-2. Public Concern: The Forest Service should expand the amount of land that is protected. (A)(O)

Response: The commenter had received misinformation that indicated the revised CONF was going to greatly reduce the level of protection afforded these lands. Quite the contrary, the revised Plan should improve the condition of the Forests and provide additional levels of protection to species and restoration of native vegetation when appropriate.

3-3. Public Concern: The Forest Service should protect plants and animals. (O)

Response: The commenter had received misinformation that indicated the revised CONF was going to greatly reduce the level of protection afforded these lands. Quite the contrary, the revised Plan should improve the condition of the Forests and provide additional levels of protection to species and restoration of native vegetation when appropriate.

3-4. Public Concern: The Forest Service should conduct site-specific analysis and review scientific data. (A)(C)(O)(J)(S)

TO DETERMINE WHAT EFFORTS ARE NEEDED TO PROTECT RESOURCES (A)(C)(O)(J)(S)

Response: A Land and Resource Management Plan (LRMP) establishes a framework for managing a National Forest in terms of goals, objectives, standards, management prescription allocations, and monitoring requirements. However, a LRMP generally does not make decisions pertaining to site-specific activities. A NEPA-compliant analysis still needs to be accomplished before making any site-specific project decisions. It is at the project level that this site-specific analysis will occur and any new science or new data is considered with respect to the project being proposed.

Physical Elements

Physical Elements (General)

3-5. Public Concern: The Forest Service should consider the economic and ecological value of intact forest communities for important ecosystem services. (O)

Response: The selected alternative was designed to address the Forest Service's Natural Resource Agenda (Watershed Health, Recreation,

Sustainable Forest Ecosystem Management, and Forest Roads) and the Regional Forester's Emphasis Areas (Watershed Health/Water Quality, Habitat For Wide-Ranging Species, T&E Recovery Plans, Old Growth, Semi-Primitive/Remote Recreation Opportunities, Roadless Areas, and Lands Suitable for Timber Production). The effects of the alternatives are discussed the Final Environmental Impact Statement.

3-6. Public Concern: The Forest Service should follow Forest Service Manual and Handbook directions for soil management and watershed management. (C)(O)

BECAUSE THEY DIRECT THE FOREST SERVICE TO PROTECT SOIL AND WATER QUALITY (O)

BECAUSE THEY PROVIDE STANDARDS AND GUIDELINES (C)(O)

Response: Manual and Handbook direction will be followed throughout implementation of the Plan. Goals, objectives and standards for protection of water quality can be found throughout Chapter 2 and Chapter 3 of the Plan.

3-7. Public Concern: The Forest Service should conduct appropriate analysis on biological diversity and address the issue more adequately. (A)(C)(O)

BECAUSE BIOLOGICAL DIVERSITY IS INADEQUATELY ADDRESSED AND JUSTIFIED (O)

Response: Adequate discussions of terrestrial and aquatic species are found in both the Plan and EIS for the Plan. The Plan provides for a diverse range of habitats across the Forest, supporting an associated diverse suite of species. Protection and management of those habitats and associated species is discussed. TES species are also discussed in the BA and BE documents.

3-8. Public Concern: The Forest Service should better address habitat for animals, plants, and fish. (O)

BECAUSE HABITAT IS INADEQUATELY ADDRESSED (O)

Response: Habitat is addressed in several ways in the plan. Some ways in which habitats are addressed include major forest communities, old growth communities, rare communities, special habitat attributes and aquatic habitats. Each of those habitats has species associates and spatial distribution data to help managers make decisions about representation of those habitats on the landscape. Species viability is addressed and species are ranked by each forest. Habitats and the species associated with those habitats are addressed in effects analysis, the viability assessments, and in the Draft Forest Plan.

Soils and Geology

3-9. Public Concern: The Forest Service should provide greater protection of soils. (A)(C)(O)(J)(S)

Response: The revised CONF Plan recognizes the importance of soils and provides descriptions of soil characteristics in the EIS. Standards are developed to provide protection for planned management activities. Forest-wide standards in Chapter 2 of the plan contain protective measures for soils. Site-specific analysis will be conducted at the project level and further protection provided as needed.

3-10. Public Concern: The Forest Service should develop stringent regulations to protect soils. (A)(O)

TO AVOID SOIL EROSION AND STREAM SILTATION (O)

Response: The revised CONF Plan recognizes the importance of soils and provides standards for soil protection in planned management activities. Forest-wide standards in Chapter 2 of the plan contain protective measures for soils. Site-specific analysis will be conducted at the project level and further protection provided as needed.

Forest Service resource management actions affecting soils comply with direction to protect soil quality such as state Best Management Practices and other erosion control measures. Site-specific mitigation measures are developed on a project specific basis to address soil conditions and protection needs. This is reflected in the Watershed Management section of Chapter 2 of the Forest Plan, and in Riparian Corridor Management Prescription of Chapter 3.

3-11. Public Concern: The Forest Service should prepare quality and detailed soil inventories, baseline conditions, and site-specific analysis and mitigation measures. (A)(C)(O)(J)(S)

TO MAKE INFORMED DECISIONS THAT COMPLY WITH THE NATIONAL FOREST MANAGEMENT ACT (O)(J)(S)

TO PRESENT SOILS DATA TO THE PUBLIC (O)(J)(S)

TO IMPLEMENT APPROPRIATE MITIGATION MEASURES (O)(J)(S)

TO PROVIDE APPROPRIATE MONITORING (O)(J)(S)

TO DEMONSTRATE KNOWLEDGE OF SITE-SPECIFIC SOILS AND THEIR PROPERTIES (O)(J)(S)

TO ESTABLISH OBJECTIVES ON BASELINE CONDITIONS (O)(J)(S)

BECAUSE THRESHOLD VALUES ARE NO LONGER ACCEPTABLE (O)(J)(S)

TO TAKE A "HARD LOOK" AT SOILS (O)(J)(S)

TO EVALUATE HOW ACTIONS WILL EFFECT SOILS DIRECTLY, INDIRECTLY, AND CUMULATIVELY (O)(J)(S)

Response: The EIS provides general soils descriptions. Soil inventories, baseline conditions, site-specific analysis and additional mitigation measures will be developed as needed for projects as they are developed.

3-12. Public Concern: The Forest Service should provide evidence of past monitoring and effects of best management practices and mitigation. (O)

Response: Results of monitoring are provided in the annual report to the public on the performance of the Forest. Additionally, the results of monitoring and mitigation were reflected in the Need for Change disclosed in the Analysis of the Management Situation release in 1996 prior to beginning revision. One of the items identified was a need to expand and strengthen direction on best management practices to resources other than timber and roads. This change is reflected in the direction under Forest-wide standards in Chapter 2 and the Riparian Corridor management prescription.

3-13. Public Concern: The Forest Service should develop tangible standards, guidelines, and monitoring requirements for soil conditions and quality. (O)(S)

FOR THE RECOVERY OF AREAS THAT HAVE BEEN NEGATIVELY AFFECTED (O)(S)

TO AVOID NEGATIVE EFFECTS ON SOILS (O)(S)

TO FULFILL THE PURPOSE OF THE LAND AND RESOURCE MANAGEMENT PLAN (O)(S)

Response: Forest-wide standards and Forest Service manual direction require projects to identify soils with existing or potential problems during the planning and design phase. Implementation of projects includes necessary mitigation measures to address erosion, compaction or other detriments to soil productivity.

Karst/Cave and Mine Resources

3-14. Public Concern: The Forest Service should write a cave management plan. (A)(C)(O)(J)(S)

Response: The revised forest plan includes caves under the Rare Community Prescription, which provides this habitat a high level of protection wherever it occurs. Management plans for individual caves represents too fine a level of detail for inclusion in the forest plan. However, it is important to note that provisions of the Federal Cave Resources Protection apply in addition to forest plan direction. Management plans for specific significant caves may be prepared during plan implementation where needed to meet requirements of this law and the forest plan.

Air Quality

3-15. Public Concern: The Forest Service should protect forests and watersheds. (O)

BECAUSE PEOPLE NEED CLEAN AIR AND OXYGEN (O)

Response: The selected alternative was designed to address the Forest Service's Natural Resource Agenda (Watershed Health, Recreation, Sustainable Forest Ecosystem Management, and Forest Roads) and the Regional Forester's Emphasis Areas (Watershed Health/Water Quality, Habitat for Wide-Ranging Species, T&E Recovery Plans, Old Growth, Semi-Primitive/Remote Recreation Opportunities, Roadless Areas, and Lands Suitable for Timber Production). Forest and watershed protection are integral have been to this effort.

Water Resources

Surface Water

3-16. Public Concern: The Forest Service should implement requirements that protect all streams and surface waters within national forest boundaries. (A)(C)(O)(J)(S)

Response: Federal, State and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The revised CONF Plan protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level.

3-17. Public Concern: The Forest Service should allow water diversion only to benefit the viability of aquatic species. (C)(O)

Response: Off-stream uses of water from CONF sources include fish hatcheries, self-served domestic water supplies, and two municipal water supplies. Such special uses by private parties are permitted uses of the national forest and occur following a permitting process that involves review of site-specific environmental impacts. Goals, objectives, and standards regarding special uses can be found in Chapter 2 of the revised CONF Plan.

Water Quality

3-18. Public Concern: The Forest Service should protect water quality. (A)(C)(O)(J)(S)

FOR HUMAN SURVIVAL (O)(J)

Response: Federal, State and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The revised CONF Plan protects water quality and aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level.

3-19. Public Concern: The Forest Service should specify standards and guidelines for water quality standards. (O)

Response: Federal, State and local laws require that aquatic resources, streams, and surface waters be protected. Forest Plan standards are in place to insure water quality is maintained, including the use of Best Management Practices (BMPs) as a minimum to meet these objectives. Forest-wide standards for watersheds and riparian areas are found in Chapters 2 and 3 of the Plan. Additional mitigation may be applied on a project-level as needed.

3-20. Public Concern: The Forest Service should modify sediment yield models to reflect conditions of, and restricted to, national forest lands. (C)(O)(S)

BECAUSE TIMBER HARVEST SHOULD NOT BE RESTRICTED DUE TO LOWER WATER QUALITY STANDARDS DOWNSTREAM THAT RESULT FROM ACTIONS ON PRIVATE LANDS (C)(O)(S)

Response: The sediment model is a tool used to examine the relationship between relative sediment yields and activities proposed in each of the forest plan alternatives. This model also estimates cumulative effects. Because streams function as a conduit for transporting sediment cumulative effects cannot be assessed if the analysis is restricted to National Forest lands. Further, NEPA requires the assessment of cumulative effects to include both public and private lands.

Watershed Condition

3-21. Public Concern: The Forest Service should protect watersheds. (A)(C)(O)(J)(S)

BY REDUCING THE AMOUNT OF LAND AVAILABLE FOR TIMBER HARVEST (O)

TO PROTECT THE WATER SUPPLY FOR AN INCREASING POPULATION (C)(O)(J)(S)

TO PROVIDE WATER FOR ATLANTA (O)

TO ENSURE WATER AVAILABILITY DURING DROUGHT (O)(J)(S)

TO MAINTAIN COMMERCE AND ECONOMIES (O)

TO PROTECT CRITICAL HABITAT AND SPECIES (O)

BECAUSE WATERSHED PROTECTION IS AN INHERENT GOVERNMENTAL RESPONSIBILITY (O)

TO COMPLY WITH LAWS, REGULATIONS, AND DIRECTIVES (A)(C)(O)(J)(S)

Response: Federal, State and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The revised CONF Plan protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level. Forest wide standards have been developed to provide overall watershed protection during management activities.

3-22. Public Concern: The Forest Service should protect streams. (A)(C)(O)(J)(S)

BY USING VEGETATION AROUND WATERWAYS TO COLLECT RUNOFF (A)(C)(O)(J)(S)

Response: Federal, State and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The revised CONF Plan protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level. Forest wide standards have been developed to provide overall watershed protection during management activities.

3-23. Public Concern: The Forest Service should analyze where soils and water quality have been most negatively affected, or are most sensitive, and use that data as a baseline for protecting watersheds. (C)(O)

Response: The EIS lists all sediment-related impaired streams in 5th Level HUCs or watershed management areas. Plan goals and objectives set priorities for watershed assessments, including 6th Level HUCs with sediment impaired stream reaches. Mitigation measures, including Best Management Practices (BMPs) for forestry, are included as standards in the Plan to minimize any affected resources when projects are implemented.

3-24. Public Concern: The Forest Service should designate high priority watersheds to receive special protection. (A)(C)(O)(J)(S)

ESPECIALLY WITHIN BASINS WITH HIGH SEDIMENT LOADS (O)

BECAUSE THE LACK OF PROTECTION IMPERILS AQUATIC SPECIES AND ECOSYSTEMS (O)

Response: Plan goals and objectives set priorities for watershed assessments, including sediment impaired stream reaches and watersheds with aquatic T&E on Forest or within one stream mile of the furthest

downstream FS boundary. Other priorities include road condition surveys and prioritizing any corrective action in watersheds with T&E as described above. Standards in watersheds with T&E on Forest or within one stream mile of the furthest downstream FS boundary further constrain management activities. Informal consultation with USDI Fish and Wildlife service resulted in additional Plan direction for protection and management of federally listed aquatic and terrestrial species.

3-25. Public Concern: The Forest Service should establish a goal to return the ecology of watersheds to the conditions in which species evolved. (O)

TO IMPROVE THE STATUS OF IMPERILED SPECIES (O)

Response: Chapter 2 of the Draft Plan includes goals, objectives, and standards for watershed management/restoration, for the maintenance of soil productivity, and for the restoration/maintenance of aquatic ecosystems. The emphasis is on providing conditions to protect aquatic species and habitats

3-26. Public Concern: The Forest Service should incorporate direction, goals, objectives, and standards to address a whole watershed approach of aquatic conservation for recommended issues. (A)(C)(O)(J)(S)

Response: Goals, objectives, and standards for conservation of aquatic resources are included in the revised CONF Plan. The Forest Service also participates in recovery plans with the U.S. Fish and Wildlife Service for federally listed species.

3-27. Public Concern: The Forest Service should establish explicit management categories and prescriptions for riparian areas. (A)(C)(O)(J)(S)

INCLUDING EPHEMERAL STREAMS (A)(C)(O)(J)(S)

Response: Explicit management direction and prescription for riparian areas are included in the revised CONF Plan.

3-28. Public Concern: The Forest Service should adopt additional goals, as recommended, directed toward attaining watershed health. (A)(O)

TO FULFILL REGIONAL GUIDANCE FOR WATERSHED MANAGEMENT (A)(O)

Response: The ID Team considered the specific suggestions. Goals, objectives, and standards for various aspects of watershed health are in Chapter 2 of the revised CONF Plan.

3-29. Public Concern: The Forest Service should specify land allocations, standards, guidelines, and planning processes, as recommended, for aquatic conservation areas. (A)(C)(O)(J)(S)

Response: Goals, objectives, and standards for conservation of aquatic resources are included in the revised CONF Plan. The Forest Service also participates in recovery plans with the U.S. Fish and Wildlife Service for federally listed species.

3-30. Public Concern: The Forest Service should rewrite forest wide goals, objectives, and standards to fulfill requirements of their respective classifications and criteria, and to implement recommendations for watershed health. (A)(C)(O)(J)(S)

BECAUSE SOME ACTIVITIES ARE STATED AS OBJECTIVES (O)

BECAUSE SOME OBJECTIVES SHOULD BE STATED AS GOALS (O)

BECAUSE SOME OBJECTIVES ARE UNCLEAR (O)(S)

BECAUSE SOME OBJECTIVES WOULD SERVE BETTER AS STANDARDS (O)

BECAUSE SOME OBJECTIVES WILL NOT PROVIDE ANY ON-THE-GROUND BENEFITS (O)

BECAUSE SOME OBJECTIVES NEED TO BE QUANTIFIED (A)(C)(O)(J)(S)

BECAUSE MANAGERS ARE NOT EXPECTED TO PRODUCE OUTCOMES (A)(C)(O)(J)(S)

Response: Goals, objectives and standards were developed that respond to issues and concerns for the protection, enhancement and restoration of riparian areas, perennial, intermittent and ephemeral streams. Forest wide standards were developed as well as Riparian Corridor specific standards. Goals, objectives and standards were reviewed using this and similar comments. Between draft and final many of the objections raised were dealt with on their merits and appropriate changes made.

3-31. Public Concern: The Forest Service should allow flexibility in managing riparian zones. (A)(O)

BY MODIFYING WORDING TO ALLOW SITE-SPECIFIC REVIEW AND AN INTERDISCIPLINARY ANALYSIS TO DEFINE THE CORRIDOR (O)

Response: The Riparian Corridor Management Prescription has been revised in the Final Plan to allow site-specific analysis for corridor widths where needed.

3-32. Public Concern: The Forest Service should establish riparian corridor standards that specify provisions to guide timber harvest and the construction, use, and maintenance of roads. (A)(C)(O)(J)(S)

TO PROTECT RIPARIAN FUNCTIONS AND AQUATIC RESOURCES (A)(C)(O)(J)(S)

BECAUSE INCREASES IN ROAD USE CAN CREATE NEGATIVE EFFECTS, EVEN WHEN THE AMOUNT OF ROAD REMAINS CONSTANT (A)(C)(O)(J)(S)

BECAUSE RECONSTRUCTION AND MAINTENANCE CAN CAUSE NEGATIVE EFFECTS (A)(C)(O)(J)(S)

Response: Specific road and timber harvest standards are specified in the riparian corridor prescription, forest wide standards and referenced in State BMP requirements. Standards are also stipulated in contract clauses for road construction and timber harvest. The need for additional standards, road stabilization techniques, and use restrictions will be determined at the project level.

3-33. Public Concern: The Forest Service should adopt FW-51 and make the replacement of culverts that block stream biota a priority. (O)(S)

Response: Thanks you for your support of this standard. This standard has been adopted in the revised CONF Plan.

3-34. Public Concern: The Forest Service should specify standards for the protection of watersheds. (O)(S)

TO PROTECT HUMANS AND WILDLIFE AS POPULATIONS GROW AND FRESH WATER IS DEPLETED (O)

WITH SPECIFIC GUIDELINES THAT LIMIT INTERPRETATION (O)

TO RESTRICT RECREATION DEVELOPMENT (O)

TO RESTRICT TIMBER HARVEST AND PROTECT WATERSHEDS OF CONCERN (O)(S)

Response: The revised CONF Plan contains numerous goals, objectives, and standards regarding the protection of watershed. See Chapter 2 of the Plan.

3-35. Public Concern: The Forest Service should clarify the watershed health index information, and specify that sediment mitigation is not reflected in the table. (O)

BECAUSE THE INFORMATION IS CONFUSING AND MISLEADING (O)

Response: The Watershed Health Index (WHI) and associated process has been renamed to the Watershed Condition Rank (WCR) to better reflect the analysis process used. The actual process has only undergone minor changes. This section of the EIS has been reworded and comments incorporated.

3-36. Public Concern: The Forest Service should specify protection at the watershed scale with corridors that extend to the drainage divide. (A)(C)(O)(J)(S)

TO FOCUS ON THE WHOLE WATERSHED (A)(C)(O)(J)(S)

TO PROVIDE MANAGEMENT STANDARDS FOR UPSLOPE CONDITIONS AND ACTIONS (A)(C)(O)(J)(S)

TO PROVIDE ANALYSIS OF WATERSHED-SCALE PROCESSES (A)(C)(O)(J)(S)

BECAUSE RIPARIAN CORRIDORS DO NOT PROVIDE SUFFICIENT MITIGATION TO ENSURE WATERSHED HEALTH (A)(C)(O)(J)(S)

BECAUSE LAND-DISTURBANCE ACTIVITIES CAN CAUSE PERSISTENT NEGATIVE EFFECTS (A)(C)(O)(J)(S)

Response: Protection is provided in the plan for streams, lakes, aquatic resources wetlands and floodplains (see Riparian Prescription). Riparian Corridor widths were based on research findings, monitoring data and current literature recommendations. Further protection will be considered and prescribed as needed when projects are developed.

3-37. Public Concern: The Forest Service should specify requirements to conduct a watershed analysis prior to initiating site-specific project planning, and stipulate the framework for the analysis. (A)(C)(O)(J)(S)

TO INCLUDE CRITERIA BASED ON WATERSHED FUNCTION, ECOSYSTEM PROCESSES, AND CONSERVATION BIOLOGY (A)(C)(O)(J)(S)

TO ENSURE THAT SCIENCE PRECEDES PLANNING AND THAT ANALYSES FOCUS ON RESOURCES (A)(C)(O)(J)(S)

TO INCLUDE INTEGRATED FIELD ASSESSMENTS AND HISTORICAL ANALYSES (A)(C)(O)(S)

TO INCLUDE A 'CLOSE LOOK' AT HABITAT TO SUSTAIN VIABLE SPECIES POPULATIONS (A)(C)(O)(J)(S)

Response: Watershed Analyses are conducted by the forest as needed and where it is determined that a watershed analysis should be completed to develop a project. Frameworks recommended for the watershed analysis include "Ecosystem Analysis at the Watershed Scale" and " Hydrologic Condition Analysis".

3-38. Public Concern: The Forest Service should conduct a full cumulative effects analysis and discard results and conclusions based on the watershed health index and associated analyses. (A)(C)(O)(J)(S)

BECAUSE THE UNDERLYING ANALYSES ARE FATALLY FLAWED WITH FALSE ASSUMPTIONS, MISINTERPRETATIONS, AND UNSUPPORTED CONCLUSIONS (A)(C)(O)(J)(S)

BECAUSE MORE INFORMATION IS NEEDED CONCERNING CUMULATIVE EFFECTS (A)(C)(O)(J)(S)

BECAUSE THE WATERSHED HEALTH INDEX MASKS POTENTIALLY SIGNIFICANT EFFECTS (A)(C)(O)(J)(S)

BECAUSE THE CUMULATIVE EFFECTS ANALYSIS DOES NOT CONSIDER POTENTIAL IMPACTS TO WATER QUALITY AND AQUATIC HABITAT BEYOND SEDIMENT YIELDS (A)(C)(O)(J)(S)

BECAUSE ACCURACY OF THE MODEL IS REPORTED TO BE ± 50% (A)(C)(O)(J)(S)

BECAUSE WATERSHEDS AND FISH SPECIES WITHIN THE SAMPLE WERE NOT REPRESENTATIVE ACROSS THE SOUTHERN APPALACHIANS, NOR FOR SPECIFIC LOCATION OR SPECIES (A)(C)(O)(J)(S)

BECAUSE ALL CUMULATIVE EFFECTS ANALYSIS RESTS ON THE SEDIMENT MODEL'S ESTIMATES (A)(C)(O)(J)(S)

BECAUSE THE CUMULATIVE EFFECTS ANALYSIS DOES NOT CONSIDER THE EFFECTS OF INCREASED SEDIMENT ON MUSSELS AND OTHER SPECIES (A)(C)(O)(J)(S)

BECAUSE DATA COLLECTION AND ANALYSIS EXHIBIT MALFEASANCE (A)(C)(O)(J)(S)

BECAUSE DATA ADJUSTMENTS WERE MADE WITHOUT MONITORING OF ACTUAL CONDITIONS (A)(C)(O)(J)(S)

BECAUSE DIRECT, INDIRECT, AND CUMULATIVE EFFECTS ARE IGNORED (A)(C)(O)(J)(S)

BECAUSE WATERSHED SELECTION AND SAMPLING METHODS ARE QUESTIONABLE (A)(C)(O)(J)(S)

BECAUSE THE CUMULATIVE EFFECTS ANALYSIS DOES NOT PROVIDE USEFUL INFORMATION (A)(C)(O)(J)(S)

BECAUSE THE WATERSHED HEALTH INDEX DOES NOT PROVIDE ANALYSIS BY MANAGEMENT ACTIVITY AND ALTERNATIVE (A)(C)(O)(J)(S)

BECAUSE THE CUMULATIVE EFFECTS ANALYSIS FAILS TO CONDUCT ANALYSIS AT THE SUB-WATERSHED SCALE (A)(C)(O)(J)(S)

BECAUSE THE WATERSHED HEALTH INDEX IS NOT VALID (A)(C)(O)(J)(S)

BECAUSE THE FOREST SERVICE MUST CONSIDER ALL EFFECTS OF PAST AND FUTURE ACTIVITIES (A)(C)(O)(J)(S)

BECAUSE THE CONCLUSIONS OF THE WATERSHED HEALTH INDEX AND CUMULATIVE EFFECTS ANALYSIS ARE A MISAPPLICATION OF SCIENCE (A)(C)(O)(J)(S)

Response: The Forest Service has chosen to address cumulative effects on aquatic species with the watershed condition ranking because it is the most likely source of impacts from management activities, correlates to changes in endemic aquatic species populations, and is the best available science

The purpose of the Watershed Health Index and associated analyses was designed to identify large-scale attributes that may contribute to maintenance of aquatic systems. Further, the relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian land use and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.

The Watershed Health Index was replaced with the Watershed Condition Ranking (the relationship between locally adapted species and sediment).

Sediment was used as a surrogate to represent all adverse effects on water quality and the effects on associated beneficial uses.

The expectation is not 1.0 because virtually no streams are composed of 100% endemics. It was never implied in Scott & Helfman (2001) that 0.5 was the point of being 'in balance'. Different regions and drainages support different levels of endemism as indicated by least-disturbed reference conditions. Although data from all southern Appalachian forest were not used to develop the model, the data was stratified by physiographic province and based on species described as highland endemics (those that evolved in high elevation conditions). Therefore, the ecological traits that make the species used in the analysis sensitive to disturbance should be similar to other highland endemics. Nevertheless, fish data from Virginia are currently being analyzed.

The sediment model is a consistent, repeatable process that addresses the effects of management activities upon the aquatic environment.

The relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. The effects of increased sediment on mussels and other species were not analyzed because of the lack of appropriate data.

The WHI did provide analysis by alternative and included all soil disturbing management activities. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian land use and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.

3-39. Public Concern: The Forest Service should implement recommended actions to address aquatic conservation needs of the region. (A)(C)(O)(J)(S)

Response: Goals, objectives, and standards for conservation of aquatic resources are included in the revised CONF Plan. The Forest Service also participates in recovery plans with the U.S. Fish and Wildlife Service for federally listed species.

3-40. Public Concern: The Forest Service should incorporate suggestions from the conservation community concerning watersheds. (O)

Response: Recommendations from SAFC and the Pacific Rivers Council stress the importance and protection of key watersheds in the Southern Appalachians that support imperiled fish, mussels and crayfish. The forest has recognized the importance of aquatic resources and has developed a riparian prescription with specific standards to protect aquatic fauna and biota. Additionally, forest-wide standards have been developed specifically to respond to concern for T&E species (i.e. the Conasauga, Etowah and Coosa basins). See biological assessment for T&E aquatic species.

The conservation community suggestions were used for watersheds of biodiversity in "Protection of Aquatic Biodiversity in the Southern Appalachian National Forest and their Watersheds: Information for use in the Forest Plan Revision process and Beyond". Suggestions incorporated include priority for land acquisition and other standards to focus attention on watersheds of greatest concern (Upper Conasauga River , Holly Creek and Etowah River).

3-41. Public Concern: The Forest Service should manage watersheds under 9.A.3 or 9.A.4, as recommended, and follow regional guidance to develop management standards. (A)(C)(O)(J)(S)

Response: Management Prescription 9A1 has been allocated to three areas on the Forests currently defined as source water areas used to withdraw water either within NF land or in close proximity for off-stream treated sources. Prescription 9A3 has been allocated to areas on the Chattahoochee with streams identified on the Georgia 303(d) list of impaired streams. Objectives in Chapter 2 of the Plan will address conditions of impairment and support projects and treatments to reverse impairment conditions found on the Forest, by Forest Service rehab efforts or through collaboration for situations outside Forest Service jurisdiction.

The Forests followed the process of developing watershed-based direction, using Regional protocols, prior to release of the Draft Forest Plan. Subsequent work on Plan management direction has established a priority framework for watershed-based activities focused on identifying and correcting unacceptable aquatic conditions. Consultation with USFWS since has identified watershed-specific standards for aquatic T & E species and these have been included. Monitoring tasks have also been developed specific to watersheds identified with federally listed T&E species. Taken together, Plan direction does establish strong watershed-based management even without using the 9.A.4 management prescription. The outcome of the process did not identify any additional watershed specific direction that was not addressed through Forest-wide direction.

Specific Areas

3-42. Public Concern: The Forest Service should protect Hurricane Creek, and protect all riparian areas from off-highway vehicle (OHV) use. (O)

Response: The Hurricane Creek area, west of Dalton and south of Rocky Face, has been allocated to Management Prescription 4I, Natural Areas – Few Open Roads, in the final Forest Plan. The Riparian Corridor Management Prescription allows OHV use only at designated crossings.

3-43. Public Concern: The Forest Service should restore the Laurel Creek watershed. (O)

Response: Laurel Creek, located on the Tallulah Ranger District, is allocated to Management Prescription 9A3, Watershed Restoration. This allocation was based on the current identification of Laurel Creek by the EPA as a "watch" stream for impairment of water quality. Several Forest Service projects are underway to address problem sites within the watershed.

3-44. Public Concern: The Forest Service should include objectives, as recommended, for the Conasauga, Hiwassee, Nolichucky, and Etowah Rivers and Citico Creek. (C)(O)

TO ACHIEVE RESILIENT AND STABLE WATERSHED CONDITIONS (O)

Response: The objectives presented by the commenter were considered. In the judgment of the IDT, the concepts for ecological restoration presented in the comment are incorporated in the Plan at Forest-wide scale. In addition, these were written so as to be adaptable to being re-scaled into sub-areas of the Forest, whether watersheds or ecological units. However, we disagree about basing restoration on just two data sources, each from the early 20th century, as being too limited in time.

Chattooga River Watershed

3-45. Public Concern: The Forest Service should manage the Chattooga watershed with identical prescriptions across forests, and issue identical maps that are easy to interpret. (C)(O)(S)

TO PROVIDE CONSISTENCY ACROSS FORESTS AND FACILITATE PUBLIC COMMENT (C)(O)(S)

Response: The Sumter and Chattahoochee-Oconee National Forests have coordinated on the management of the Chattooga River watershed throughout the Plan Revision process. Allocation of management prescriptions on both sides of the River was based on ecological characteristics, desired conditions, public involvement and coordination between the two Forests. The Chattooga Wild and Scenic River corridor will be managed following identical

Management Prescriptions 2A for the Congressionally-designated corridor, with the Sumter being the lead Forest for administration.

3-46. Public Concern: The Forest Service should manage the Chattooga watershed as a cooperative effort among the Chattahoochee, Sumter, and Nantahala National Forests. (O)(S)

Response: Chattooga River watershed has land areas managed administratively by the three National Forests in the three states where the lands occur. The three Ranger Districts charged with project level management coordinate on projects crossing administrative boundaries, and assist each other with resources when needed. The land areas on the Forests differ ecologically, requiring desired conditions and management allocations responsive to ecosystem needs and public involvement.

3-47. Public Concern: The Forest Service should expand prescription 12.A to include the entire Chattooga River watershed. (C)(O)

Response: The 12.A prescription was developed and used for inventoried roadless areas not recommended for wilderness study. It could not be used in the Chattooga River watershed as currently written since State and county roads and private land would all become involved and the decisions needed to meet the intent of the 12.A prescription would then be outside Forest Service authority. In addition, allocating such a large area of land to a single restrictive prescription would compromise other goals and objectives of the plan.

Chattahoochee River Watershed

3-48. Public Concern: The Forest Service should protect the Chattahoochee River basin. (O)(S)

Response: Chapter 2 of the Draft Plan includes Goals and Objectives for watershed management and restoration for all watershed management areas. Federal, State, and local laws require that aquatic resources, streams, and surface waters be protected. The Upper Chattahoochee Watershed (0313000101), north of Helen, Georgia, includes 3,645 acres allocated to management prescriptions that include restoration of vegetation communities. Most of the NF land (a total of 39,240 NF acres) in this Watershed is allocated to the Designated Wilderness/Wilderness Study prescription (16,539).

3-49. Public Concern: The Forest Service should protect the headwaters of the Chattahoochee River watershed by establishing management area standards. (O)

Response: Chapter 2 of the Draft Plan includes Goals and Objectives for watershed management and restoration for all watershed management areas. The Forest followed the process of developing watershed-based direction, using Regional protocols, prior to release of the Draft Forest Plan. The outcome of the process did not identify any additional watershed specific direction that was not addressed through Forest-Wide objectives and standards. The Upper Chattahoochee Watershed (0313000101), north of Helen, Georgia, includes 3,645 acres allocated to management prescriptions that include restoration of vegetation communities. Most of the NF land (a total of 39,240 acres) in this Watershed is allocated to the Designated Wilderness/Wilderness Study prescription (16,539 acres).

3-50. Public Concern: The Forest Service should protect the Kelly Ridge watershed, Lake Burton, and Timpson Creek. (O)

Response: Chapter 2 of the Draft Plan includes Goals and Objectives for watershed management and restoration for all watershed management areas. Federal, State, and local laws require that aquatic resources, streams, and surface waters be protected. These areas are included in the Hiawassee River- Chatuge Lake (0602000201) and the Tallulah River (0306010207) Watershed Management Areas or HUCs. Most of the NF land (a total of 48,051 NF acres) in the Hiawassee River- Chatuge Lake Watershed is allocated to the Designated Wilderness/Wilderness Study prescription (15,727 acres). Most of the NF land (a total of 66,290 NF acres) in the Tallulah River Watershed is allocated to management prescriptions with a Mid- to Late-Successional Forest emphasis (32,446 acres).

Conasauga River Watershed

3-51. Public Concern: The Forest Service should return the Conasauga River to the watershed restoration category. (O)

WITH A PRESCRIPTION THAT REFLECTS THE RIVER'S UNIQUENESS AND FRAGILITY (O)

TO PROTECT FLORA, FAUNA, AND WATER QUALITY (O)

BECAUSE IT IS ONE OF THE MOST BIOLOGICALLY DIVERSE RIVERS WITH OVER 90 SPECIES OF FISH (O)

BECAUSE THE CONASAUGA EXHIBITS THE HIGHEST RATE OF SPECIES EXTINCTION IN THE WORLD (O)

Response: The Upper Conasauga River watershed contains approximately 48,095 acres of National Forest lands in Georgia, which is about sixty-six percent of the total land area of the watershed. These acres are protected from commercial, industrial and residential development providing a forested watershed that provides multiple uses to numerous forest visitors and benefits to the native species in the water and on the lands. The Management Prescriptions allocated to the watershed correspond to ecological

characteristics and desired conditions. Management of the National Forest at the Forest and project level will address the concerns related to aquatic habitats and the resident species identified in the watershed.

3-52. Public Concern: The Forest Service should place the Conasauga under Prescription 9.A.3 for watershed restoration. (O)

Response: Management Prescription 9A3, Watershed Restoration, was initially allocated to portions of the Upper Conasauga River watershed in 1999. Allocation at that time was in response to listing of five streams identified as impaired, in addition to several road problems contributing to habitat degradation. Actions have occurred since 1999 to change the picture, and support reconsideration of the use of 9A3. The streams listed as impaired have been "de-listed" by Georgia EPD based on re-sampling. Watershed assessments, not available in 1999, have found streams to be in better condition than earlier identifications. The stand-alone Riparian Corridor Management Prescription, was embedded into all other prescriptions, ensuring a consistent care for streams everywhere. The IDT allocated the 9A3 prescription in the Final Plan to several sub-watersheds on the Forest that have streams identified as impaired on the 303(d) list.

3-53. Public Concern: The Forest Service should designate the Conasauga River as an aquatic threatened and endangered species watershed 9.A.4. (A)(O)

Response: The Upper Conasauga River watershed contains approximately 48,095 acres of National Forest lands in Georgia which is about sixty-six percent of the total land area of the watershed. These acres are protected from commercial, industrial and residential development providing a forested watershed that provides multiple uses to numerous forest visitors and benefits to the native species in the water and on the land. The Management Prescriptions allocated to the watershed correspond to ecological characteristics and desired conditions. Management of the National Forest at the Forest and project level will address the concerns related to aquatic habitats and the resident species identified in the watershed.

The Riparian Corridor Management Prescription (11) provides an emphasis on protection of the function and values of the stream, aquatic habitat and associated riparian areas. This prescription occurs on all perennial and intermittent streams throughout the watershed. Along the main channel of the Conasauga River the prescription allocation is 2B 1 or 2, proposed wild and scenic rivers, which will also emphasize protection of the existing functions and values along the streams.

Consultation with the US Fish and Wildlife Service has identified specific standards for aquatic T & E species within the Conasauga and Etowah

watersheds. Monitoring tasks have also been developed specific to watersheds identified with federally listed T&E species. Taken together, Plan direction does establish strong watershed-based management even without using the 9.A.4 management prescription.

Riparian Areas and Wetlands

3-54. Public Concern: The Forest Service should better protect riparian areas. (A)(C)(O)(J)(S)

Response: Protection is provided in the plan for streams, lakes, aquatic resources wetlands and floodplains (see Riparian Prescription). Specific standards are prescribed in the Riparian Prescription and forest wide standards.

3-55. Public Concern: The Forest Service should protect waterways, brooks, and perennial streams from siltation, changes in water temperature, and changes in volume. (O)

Response: Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. A significant focus of the revised Forest Plan is the recognition of the stream network, including perennial, intermittent and ephemeral, and the need for protection and management to protect and enhance the functions and values of these areas of the forest landscape. The Riparian Corridor management prescription is a "stand-alone" in providing both emphasis and management direction for these areas. Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected.

3-56. Public Concern: The Forest Service should state that sensitive riparian areas will be protected from roads, grazing, weeds, and heavy equipment. (O)(J)

Response: Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. A significant focus of the revised Forest Plan is the recognition of the stream network, including perennial, intermittent and ephemeral, and the need for protection and management to protect and enhance the functions and values of these areas of the forest landscape. The Riparian Corridor management prescription is a "stand-alone" in providing both emphasis and management direction for these areas. Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected.

3-57. Public Concern: The Forest Service should analyze the benefits of managing ephemeral streams under the riparian prescription as compared to managing the streams for other resources. (A)(C)(O)(J)(S)

Response: Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.

3-58. Public Concern: The Forest Service should include ephemeral streams in the definition of the riparian corridor and set management standards. (A)(C)(O)(J)(S)

BECAUSE DEFINITIONS IN AN APPENDIX CAN BE CHANGED WITHOUT A PLAN AMENDMENT (A)(C)(O)(J)(S)

Response: Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level . Standards for managing ephemeral streams are included in forest wide standards.

3-59. Public Concern: The Forest Service should adopt the original definition of riparian corridor. (A)(C)(O)(J)(S)

Response: Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.

3-60. Public Concern: The Forest Service should specify standards for protecting streamside management zones and fingers. (A)(C)(O)(J)(S)

Response: The Riparian Prescription standards protect streams and aquatic resources. Riparian corridors also capture much of the area that would be

protected with SMZs. Where additional protection is needed, forest will implement SMZs (I.e. for steep slopes). Furthermore, State BMPs will be followed which specify SMZs for silvicultural activities.

3-61. Public Concern: The Forest Service should expand riparian areas, riparian corridors, and buffer zones. (A)(C)(O)(J)(S)

BECAUSE HEADWATER STREAMS AND NON-PERENNIAL STREAMS ARE INTENSIVELY AFFECTED BY MANAGEMENT ACTIONS (A)(C)(O)(J)(S)

BECAUSE THE PROPOSED RIPARIAN CORRIDOR STANDARDS ARE INADEQUATE TO PROTECT AQUATIC SYSTEMS (A)(C)(O)(J)(S)

TO PROTECT STREAMS FROM SILT (O)

TO PROTECT AMPHIBIAN SPECIES (O)

TO BENEFIT TROUT (O)

BECAUSE STUDIES SHOW THAT INCREASED SIZES FOR RIPARIAN AREAS PROVIDE BETTER PROTECTION (O)

TO INCLUDE A BUFFER APPLIED AS A RADIUS TO THE BEGINNING OF AN IDENTIFIABLE CHANNEL (O)

BECAUSE100 FEET IS INSUFFICIENT NEAR STEEP SLOPES (O)

TO 100 FEET (O)(S)

BY DOUBLING BUFFER ZONES CONTAINING THREATENED AND ENDANGERED SPECIES (O)

TO 200 FEET FOR WETLANDS (O)

FROM 300 TO 650 FEET (A)(O)(S)

BY RESTRICTING TIMBER HARVEST WITHIN 500 FEET OF RIPARIAN AREAS (A)(O)(S)

BY ESTABLISHING STRINGENT STANDARDS, AS RECOMMENDED (A)(C)(O)(J)(S)

Response: Riparian areas are determined on the basis of physical and biological characteristics (vegetation, soils, and hydrology). Riparian corridors (fixed buffers) are established to encompass the Riparian area. Where fixed widths do not capture the Riparian area, distances are adjusted. SMZs in forest wide standards are employed as needed at the project level where additional protection is necessary.

3-62. Public Concern: The Forest Service should reduce the widths of riparian zones. (C)(O)(J)(S)

BECAUSE PLAN WIDTHS ARE NOT CORROBORATED BY RESEARCH FINDINGS (C)(O)

BECAUSE PRIOR LENIENT RESTRICTIONS RESULTED IN NO SIGNIFICANT ENVIRONMENTAL EFFECTS (C)(O)

BECAUSE WIDTHS CREATED WITHOUT CONSIDERING SITE CHARACTERISTICS IS 'COOKBOOKING' (O)

BECAUSE SUCH WIDTHS ARE NOT JUSTIFIED BASED ON LARGE WOODY DEBRIS REQUIREMENTS (O)

BECAUSE SUCH WIDTHS ARE UNREASONABLE FOR SMALL TRIBUTARIES AND STEEP GRADIENT, BOULDER DOMINATED STREAMS (O)

BECAUSE PLACING DEBRIS IS MORE EFFECTIVE THAN NATURAL DEBRIS (C)(O)

Response: The Riparian Prescription establishes a level of protection- through fixed riparian corridor widths- to maintain, restore and enhance riparian functions and values. Riparian corridor widths can be reduced when it is deemed necessary to manage for Riparian Associated values.

3-63. Public Concern: The Forest Service should adopt Seth Wenger's publication as a guideline for delineating riparian buffer widths. (O)

BECAUSE IT REPRESENTS THE BEST AVAILABLE SCIENCE (O)

Response: The Riparian Prescription establishes a level of protection- through fixed riparian corridor widths- to maintain, restore and enhance riparian functions and values. Riparian corridor widths can be reduced when it is deemed necessary to manage for Riparian Associated values.

3-64. Public Concern: The Forest Service should explain the rationale for eliminating ephemeral streams from the riparian corridor, removing protection, and weakening prescriptions to protect and restore riparian ecosystems. (A)(C)(O)(J)(S)

Response: Subsequent to issuance of Riparian Management direction, ephemeral streams were removed from the riparian corridor description because ephemeral streams do not have the physical or biological characteristics that qualify as "Riparian". Protection for ephemeral streams was not removed but rather moved to forest-wide standards. The changes made in the Riparian Prescription have not weakened protection of the Riparian area but allows for greater management options for Riparian associated species.

3-65. Public Concern: The Forest Service should implement aquatic conservation and management direction. (A)(C)(O)(J)(S)

TO ATTAIN DESIRED FUTURE CONDITIONS FOR THE AQUATIC SYSTEM (A)(C)(O)(J)(S)

TO FULFILL FEDERAL DUTIES TO CONSERVE AND RECOVER PROTECTED SPECIES (A)(C)(O)(J)(S)

Response: Standards are specified in the revised CONF Plan to protect and conserve all aquatic resources. In addition, the Forest Service participates in recovery plans with the U.S. Fish and Wildlife Service for federally listed species.

3-66. Public Concern: The Forest Service should designate secondary riparian zone buffers beyond the primary riparian zones. (A)(C)(O)(J)(S)

TO MITIGATE EFFECTS OF MANAGEMENT ACTIONS ON LAND ADJACENT TO THE RIPARIAN ZONE (A)(C)(O)(J)(S)

TO PROVIDE A BUFFER TO SUSTAIN THE CORE RIPARIAN BUFFER AND SUPPORT WILDLIFE HABITAT (A)(C)(O)(J)(S)

BECAUSE RIPARIAN AREAS ARE UNLIKELY TO RETAIN INTEGRITY AND RESILIENCY IF THE WATERSHED IS NEGATIVELY AFFECTED (A)(C)(O)(J)(S)

TO PROVIDE SIZEABLE FACTORS OF SAFETY FOR ECOLOGICAL PROTECTION OF STREAMS (O)

TO PROTECT SPECIES (A)(C)(O)(J)(S)

Response: The Riparian Prescription was developed to provide protection, enhance and restore riparian functions and values. Minimum buffer widths and standards were developed to protect streams, lakes, wetlands and floodplains. Additional Streamside Management Zones are included where needed to provide additional protection (i.e. steep slopes or highly erodible soils).

3-67. Public Concern: The Forest Service should define the ephemeral zone as the overall drainage areas of streams, and protect the entire area. (A)(C)(O)(J)(S)

Response: Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.

3-68. Public Concern: The Forest Service should implement riparian zones as recommended by Forest Service biologists. (O)

TO ESTABLISH BUFFER ZONE WIDTHS FOR ECOSYSTEM HEALTH (O)

Response: The Riparian Corridor management prescription provides flexibility to manage for riparian area restoration to benefit riparian associated species and the ecological functions of the associated components within the corridor.

3-69. Public Concern: The Forest Service should review its own research and establish guidelines that are amenable to actual management of the riparian zone. (O)

Response: The Riparian Corridor management prescription was based on research findings, monitoring data and current literature recommendations. Collaboration to produce the prescription involved the Southern Appalachian National Forests Riparian Team, FWRBE (Wildlife & Fisheries) Team, Regional Office subject matter specialists, agency and university research scientists, and program specialists from state and Federal agencies.

3-70. Public Concern: The Forest Service should establish riparian corridor widths based on the best available science. (O)

Response: The widths in the Riparian Corridor management prescription were based on research findings, monitoring data and current literature recommendations. Collaboration to produce the prescription involved the Southern Appalachian National Forests Riparian Team, FWRBE (Wildlife & Fisheries) Team, Regional Office subject matter specialists, agency and university research scientists, and program specialists from state and Federal agencies.

3-71. The Forest Service should not require shade strips in true ephemeral streams or the upper sections of intermittent channels. (O)

BECAUSE IT WILL COMPLICATE SILVICULTURAL ACTIVITIES AND AFFECT PROJECT FEASIBILITY (O)

Response: Forest-wide standards for ephemeral streams require retention of vegetation cover to provide a filter for sediment from upslope disturbances and stability of the flow area. Shade protection is not an emphasis of the direction.

3-72. Public Concern: The Forest Service should identify candidate sites and spatial restoration goals for riparian areas and successional habitat. (O)

Response: The Forest Plan guides all natural resource management activities and sets management standards for the Forest. It describes resource management practices, levels of habitat production, protection and management, and the availability and suitability of lands for resource management. It provides broad program-level direction for management of the Forest. Decisions regarding specific sites where activities will occur are made at the project-level. At the project level, decisions are made on which activities will take place, the specific area where the activities will occur, and even the methods to achieve the desired outcome. The project-level decisions use the information/allocations/standards etc. from the Forest Plan to develop and implement the project.

3-73. Public Concern: The Forest Service should actively manage riparian corridors. (A)(O)(J)(S)

TO BENEFIT A VARIETY OF WILDLIFE (A)(O)(J)(S)

Response: Timber harvesting activities may occur in Riparian Corridors when they are needed to maintain, restore or enhance riparian functions and values and to meet the needs of Riparian associated species. 36 CFR 219.27(c)(1) states that harvesting activities can occur on lands classified as not suited for timber production when such activities are necessary to protect other multiple-use values or are needed to meet forest plan objectives. Riparian corridors were designated as not suitable for timber production because it was determined that managing these lands for the purposes of having "regulated crops of trees … for industrial or commercial use" (36 CFR 219.3) was inconsistent with meeting the desired conditions of the riparian corridor.

3-74. Public Concern: The Forest Service should modify objective 4.1 to increase early successional habitat within riparian zones to at least 5 percent. (O)

TO PROVIDE HERBACEOUS FOOD FOR GROUSE, DEER, TURKEYS, WOODCOCK, AND SONGBIRDS (O)

Response: Riparian areas provide a wide variety of resource benefits. Early successional habitat in riparian areas is an important habitat component for a number of wildlife species. However, the majority of species associated with forested riparian corridors are associated with older forest conditions. In recognition of this, the forest plan permits the creation of a limited quantity of early successional habitat in the riparian corridor while maintaining most of these areas in mid and late-successional conditions. Many of the early successional riparian conditions also can be provided in upland situations immediately adjacent to the riparian corridor and many of these adjacent upland areas provide opportunities to create a much higher level of early successional habitat.

3-75. Public Concern: The Forest Service should not designate riparian corridors as unsuitable for timber harvest, but as suitable. (A)(C)(O)(J)(S)

BECAUSE UNSUITABLE DESIGNATION FORFEITS OPPORTUNITIES TO CREATE EARLY SUCCESSIONAL HABITAT (O)

BECAUSE THE AGENCY WILL BE INCAPABLE OF HARVESTING TIMBER FOR 'OTHER PURPOSES' (O)

BECAUSE JUDGES WILL RULE AGAINST TIMBER HARVEST IN AREAS THE AGENCY HAS DEEMED AS UNSUITABLE FOR TIMBER HARVEST (O)

BECAUSE SITE-SPECIFIC ANALYSIS CAN BE CONDUCTED FOR DECISIONS ON TIMBER HARVEST (O)(C)

BECAUSE EARLY SUCCESSIONAL PLANTS FOR RIPARIAN AREAS ARE UNIQUE (O)(S)

BECAUSE THERE IS NO SCIENTIFIC JUSTIFICATION FOR RESTRICTIONS (C)(O)(S)
RIPARIAN AREAS

Response: Timber harvesting activities may occur in Riparian Corridors when they are needed to maintain, restore or enhance riparian functions and values and to meet the needs of Riparian associated species. 36 CFR 219.27(c)(1) states that harvesting activities can occur on lands classified as not suited for timber production when such activities are necessary to protect other multiple-use values or are needed to meet forest plan objectives. Riparian corridors were designated as not suitable for timber production because it was determined that managing these lands for the purposes of having "regulated crops of trees … for industrial or commercial use" (36 CFR 219.3) was inconsistent with meeting the desired conditions of the riparian corridor.

3-76. Public Concern: The Forest Service should specify that vegetation manipulations can occur within the riparian corridor. (O)

Response: The forest service can in several circumstances use vegetation manipulation to achieve objectives. For example the forest service can use vegetative manipulation to create conditions for those riparian associated species that require that habitat for its viability. Maintenance and enhancement of rare communities is also an example of a circumstance that may require vegetative manipulation for the maintenance and enhancement of those communities.

3-77. Public Concern: The Forest Service should not require retention of all overstory trees within riparian corridors. (C)(O)

BECAUSE EARLY SUCCESSIONAL HABITAT IN RIPARIAN AREAS IS CRITICAL FOR MANY SPECIES (C)(O)

Response: The forest service can in several circumstances use vegetation manipulation to achieve objectives. The forest service can use vegetative manipulation to create conditions for those riparian associated species that require that habitat for its viability. Maintenance and enhancement of rare communities is also a circumstance that may require vegetative manipulation for the maintenance and enhancement of those communities.

3-78. Public Concern: The Forest Service should not conduct any timber harvest within the headwaters of any streams. (O)(S)

Response: There are restrictions of management activities within the study corridor of a Wild and Scenic River (WSR) candidate. But, these restrictions really are no different than what could occur if the stream does become a WSR. Threatened and endangered species management activities could

occur, as could activities that would not harm the streams outstandingly remarkable values. These activities would be according to the stream's classification – wild (no work except T&E, and no roads); scenic (restorative, and low key wildlife habitat); and recreational (restorative, forest health, and wildlife habitat management).

3-79. Public Concern: The Forest Service should provide specific language requiring riparian areas to be protected from sedimentation. (O)

Response: Forest-wide standards for watershed management in Chapter 2 and the Riparian Corridor management prescription in Chapter 3 provide direction on erosion and sediment control for all resource activities. Additional measures to mitigate potential impacts are developed at the time of project development.

3-80. Public Concern: The Forest Service should not restrict silvicultural activities around "ephemeral" streams. (O)(J)(S)

BECAUSE THE PRACTICALITY OF MANAGEMENT FOR THESE ZONES IS QUESTIONABLE (J)

BECAUSE EPHEMERAL STREAMS ARE IMPOSSIBLE TO DEFINE AND VALID SCIENTIFIC EVIDENCE TO SUPPORT RESTRICTIONS IS LACKING (O)(S)

Response: Silvicultural activities may occur around or across "ephemeral" stream channels with mitigations. Standards however, have been developed to reduce nonpoint source pollution from management activities and maintain ground stability since ephemeral streams are hydrologically connected to the stream system.

3-81. Public Concern: The Forest Service should define "riparian area" and implement restrictions on placing trails in areas with streams. (O)

TO PREVENT DISTURBANCE BY HIKERS AND HORSES (O)

Response: "Riparian Area" is defined in the first paragraph of the Riparian Prescription. Riparian Corridor standards for recreation and trails are designed to insure that new trail construction, reconstruction and relocation occurs where it is necessary to improve existing trails, accommodate adjacent terrain, and to reduce risks to riparian and aquatic resources.

3-82. Public Concern: The Forest Service should define "riparian area" and not implement restrictions on placing trails in areas with streams. (O)

TO ALLOW ACCESS FOR HIKERS AND HORSES (O)

Response: "Riparian Area" is defined in the first paragraph of the Riparian Prescription. Riparian Corridor standards for recreation and trails are designed to insure that new trail construction, reconstruction and relocation occurs where it is necessary to improve existing trails, accommodate adjacent terrain, and to reduce risks to riparian and aquatic resources.

3-83. Public Concern: The Forest Service should provide trails with water access for horses and allow stream crossing. (O)

Response: Stream crossings and access for horses are allowed in the Riparian Prescription.

3-84. Public Concern: The Forest Service should construct crossing structures across streams. (O)(J)

Response: Stream crossings in a managed forest environment are essential and are designed to minimize disturbance to the riparian area and aquatic resources. Standards in the Riparian Prescription, forest-wide standards and contract specifications for road construction are developed to insure they do not adversely impact aquatic species.

3-85. Public Concern: The Forest Service should restrict all-terrain vehicle (ATV) use within riparian buffers except at designed stream crossings. (O)(J)

Response: The Riparian Corridor management prescription directs all non-pedestrian trail construction be outside of the Corridor distances except for stream crossings. Stream crossings will be constructed so they do not adversely affect the passage of aquatic organisms or natural flow regimes.

3-86. Public Concern: The Forest Service should require that equipment used in riparian areas consist of a large foot print with rubber tires, and be allowed only when necessary for restoration. (O)

Response: Equipment specifications for projects in the riparian corridor are developed as appropriate to the project needs, site conditions and the season of implementation.

3-87. Public Concern: The Forest Service should specify that equipment use is allowed within riparian and wetland areas for specified purposes. (O)

TO PERMIT ORGANIZATIONAL ASSISTANCE IN FISHERIES MANAGEMENT ACTIVITIES (O)

Response: The Riparian Corridor management prescription identifies the permitted uses of equipment within the corridor, including fisheries management.

3-88. Public Concern: The Forest Service should modify plan wording by removing the suggestion that road construction may occur in the riparian corridor. (O)

Response: The Riparian Corridor management prescription identifies the restrictions on road construction, reconstruction and maintenance within the corridor distances. A complete prohibition of road construction would be impractical creating situations where resource objectives could not be achieved in a sound ecological manner.

3-89. Public Concern: The Forest Service should modify wording to Standard 11-033. (O)

BECAUSE 'MINIMIZED' AND 'MODERATE' ARE NOT STANDARDS (O)

Response: We understand the commenter's point that "moderate" and "minimize" are not measurable in an objective sense. A standard imposes limitations on resource management practices but is not required to be numerically measurable.

3-90. Public Concern: The Forest Service should specify that botanical products shall not be collected in riparian areas unless the collection benefits the riparian area and values. (O)

Response: The riparian corridor management prescription prohibits commercial collection of botanical products if it adversely affects ecological functions.

3-91. Public Concern: The Forest Service should manage riparian areas for early successional habitat to benefit wildlife. (O)

Response: The forest service can in several circumstances use vegetation manipulation to achieve objectives. The forest service can use vegetative manipulation to create conditions for those riparian associated species that require that habitat for its viability. Maintenance and enhancement of Rare Communities is also a circumstance that may require vegetative manipulation for the maintenance and enhancement of those communities.

3-92. Public Concern: The Forest Service should designate forest land suitability in riparian corridors the same as the overlying management prescription. (O)

BECAUSE THE NARRATIVE AND STANDARDS ARE TOO RESTRICTIVE FOR WILDLIFE MANAGEMENT (O)

Response: The Riparian Corridor management prescription allows vegetation treatments and habitat improvements for riparian associated species, and to enhance the recovery of the diversity and complexity of vegetation.

3-93. Public Concern: The Forest Service should delete the term "riparian-dependent species" from Standards 11-001 and 11-003. (O)

BECAUSE THE TERM IS TOO NARROWLY DEFINED AND EXCLUDES MANAGEMENT FOR OTHER WILDLIFE SPECIES (O)

Response: Riparian associated species was substituted for riparian dependent. However that will correspond with the riparian habitat association report that identifies those species that require some component of the riparian community to maintain its viability.

3-94. Public Concern: The Forest Service should specify objectives and standards to actively manage for hard mast of oak and hickory early successional habitat within riparian areas. (A)(C)(O)(J)(S)

Response: Comments were split on the desirability of using active vegetation management within riparian areas for the benefit of wildlife. Some commenters want more specific direction for managing these highly productive areas for oak mast production and early- successional habitats. Others feel these areas should be used to emphasize old growth restoration and protection of aquatic species and water quality. The revised plan attempts to accomplish both. We have recognized the importance and value of riparian areas by creating a separate prescription for riparian corridors. Desired conditions within this prescription emphasize late-successional forests, and many standards are included to ensure maintenance of water quality. These qualities are of primary importance. However, this prescription does not rule out active management, when it can be conducted in ways compatible with maintaining or enhancing riparian resources. The plan includes objectives for creating 1 to 2 percent per decade of early-successional habitats within riparian corridors for the benefit of specific wildlife species. Flexibility exists within Plan direction to accommodate a purpose of hard mast enhancement but there is no quantitative objective for its production specific to the riparian area. Vegetation management projects that enhance mast production or create early successional habitat may be proposed for riparian areas during plan implementation. Monitoring will track the acreage and condition of riparian corridors, including levels of vegetation management activities implemented.

3-95. Public Concern: The Forest Service should correct inconsistencies in statements on habitat and vegetation management in riparian areas, and modify paragraphs as recommended. (O)

TO EMPHASIZE A MOSAIC OF COMMUNITIES AND SUCCESSIONAL STAGES (O)

Response: The language in the FEIS related to vegetation management in riparian areas has been modified to more closely reflect the direction provided in the riparian corridors prescription (MRx 11). It provides that tree removals may only take place if needed to enhance the recovery of the diversity and complexity of vegetation, rehabilitate both natural and human-caused disturbances, provide habitat improvements for TES or riparian-associated species, reduce fuel buildup, provide for visitor safety, or for approved facility construction/renovation.

3-96. Public Concern: The Forest Service should conduct vegetation management within riparian areas. (C)(O)

BECAUSE MANAGEMENT ACTIVITIES CAN OCCUR WITHOUT NEGATIVE EFFECTS (C)(O)

Response: Timber harvesting activities may occur within the Riparian Corridor when needed to maintain, restore or enhance riparian functions and values and to meet the needs of riparian associated species, and to enhance the recovery of the diversity and complexity of vegetation.

3-97. Public Concern: The Forest Service should revise the riparian prescription, similar to that of the riparian team recommendation in 2001, to be more protective. (O)

BECAUSE THE CURRENT PRESCRIPTIONS ARE COUNTER TO SCIENCE, BIOLOGICAL EXPERTISE, AND THE INTERESTS OF THE PUBLIC (O)

Response: The Riparian Corridor management prescription was based on research findings, monitoring data and current literature recommendations. Collaboration to produce the prescription involved the Southern Appalachian National Forests Riparian Team, FWRBE (Wildlife & Fisheries) Team, Regional Office subject matter specialists, agency and university research scientists, and program specialists from state and Federal agencies. External input and comment was used throughout the process to identify public concerns

Biological Elements

Biological Elements (General)

3-98. Public Concern: The Forest Service should manage forests to support a diversity of plants and animals. (O)

Response: The Forest manages for diversity of plants and animals by providing a wide range of habitat from early successional to old growth.

Objectives and Standards for management of these various habitats as well as for rare communities are found throughout the revised Plan.

3-99. Public Concern: The Forest Service should protect habitat. (O)

TO BENEFIT PLANT AND ANIMAL SPECIES FOR FUTURE GENERATIONS (O)

BY PROTECTING WATERSHEDS AND PROHIBITING TIMBER HARVEST AND ATV USE (O)

TO REDUCE SEDIMENT RUNOFF (O)

Response: The forest plan was developed to provide habitat for the wide diversity of plant and animal species that are found on the Forest. This includes protection and enhancement of habitats of species ranging from threatened and endangered species and species of viability concern, migratory birds, to more common species such as deer, turkeys, squirrels and bears. The overall emphasis of the plan is to manage the forest to provide habitat for a full range of native and other desired species. The plan recognizes that an important role of the forest is to provide habitat for species requiring older forest, which is often uncommon on private lands. For this reason, much of the forest will be maintained in mid and late successional forest conditions.

Timber harvest is not an end in itself in the Plan. There is no timber output objective. Rather timber harvest is an efficient means to create and maintain desired wildlife habitat conditions. The decision that OHVs are a legitimate recreation use of National Forester has been made at authority higher than the Regional Forester. The Plan greatly constrains where trail systems may be considered and within those areas further restricts the locations and characteristics of trails.

Native Species

3-100. Public Concern: The Forest Service should reintroduce native flora and fauna that are no longer present. (O)

Response: Several goals in the revised CONF Plan refer to providing for the full range of native species. The Forest Service would be a cooperating agency in any proposed reintroductions of missing native flora and fauna on National Forest System lands. The Forest Service has been actively involved in past efforts and is currently involved with reintroducing blight resistant American chestnut trees into some NFS landscapes.

Biodiversity

3-101. Public Concern: The Forest Service should manage biodiversity in an ethical and effective manner. (O)(J)

TO INCLUDE PASSIVE MANAGEMENT (O)

Response: Providing for viability of plants and animals is a major emphasis of this plan. A range of management intensity has been designed using allocation of management prescriptions to various parts of the forest. Different mixes of management prescriptions were considered through the various alternatives in the EIS.

Wildlife

Wildlife (General)

3-102. Public Concern: The Forest Service should not survey wildlife populations. (O)

Response: Survey (inventory) requirements for PETS species have been addressed in the regional supplement to the Forest Service Manual (2672.43). This document requires each project proposal and species therein to be evaluated for the need to inventory. This process can be viewed at http://www.southernregion.fs.fed.us/planning/vmeis/final FSM_2670_supplement.pdf.

3-103. Public Concern: The Forest Service should modify plan wording, as recommended. (O)(J)

TO BENEFIT WILDLIFE AND WILDLIFE HABITAT (O)(J)

Response: The ID Team considered all comments. This section has been revised as determined appropriate by the ID Team.

3-104. Public Concern: The Forest Service should develop specific terminology to refer to game species and non-game wildlife. (O)

Response: The term “wildlife” as used in the forest plan is intended to be relatively general and encompasses the wide-variety of species occurring on the forest. It is often used when describing some of the broad goals and objectives of the plan such as those designed to protect, restore, maintain and enhance wildlife and plant populations and communities. The plan uses more specific language when addressing standards directed toward specific species (such as Threatened and Endangered species) or groups of species (such as bats, migratory birds, cavity nesters, etc). Several of the specific terms such as game species and non-game species are defined in the glossary.

Wildlife Population Management

3-105. Public Concern: The Forest Service should specify prescriptions for wildlife management enhancements. (C)(O)

Response: The Forest Plan provides wide flexibility for enhancement of wildlife habitats. There are a number of specific prescriptions where wildlife habitat management is the primary emphasis. These include 8.A.1 Mix of Successional Forest Habitats, 8.A.2 Forest Interior, Mid-Late-Successional Forest Habitats, 8.D Red-cockaded Woodpecker Habitat Management Area, 8.D.1 Red-cockaded Woodpecker Sub-Habitat Management Area, and 8.E.3 High-Elevation Early Successional Habitat. The other prescriptions have a primary emphasis other than wildlife habitat management but most still provide ample opportunities for enhancement of wildlife habitats.

3-106. Public Concern: The Forest Service should not plant forage for wildlife. (O)

BECAUSE IT IS A WASTE OF TAX MONEY (O)

Response: A detailed discussion of the benefits of wildlife openings can be found in the Permanent Openings, Old Fields, Rights-of-Way, and Improved Pastures Section of the FEIS. Permanent openings are used by a variety of wildlife, both game and non-game species. This includes numerous neotropical migratory birds, raptors, woodpeckers, small mammals, bats, furbearers and game species such as wild turkey, white-tailed deer, black bear, and ruffed grouse. The small acreage maintained in permanent openings provides an important source of nutritious forage for deer and other wildlife through out the year, especially when high-quality natural foods are in short supply. Maintained openings benefit wild turkeys by providing nutritious green forage in the winter and early spring and seeds during late summer and fall. Because of the abundance of insects and herbaceous plants produced in these openings they are especially important as brood rearing habitat for young turkeys. Linear openings, especially those associated with young regenerating forests provide optimal brood habitat conditions for ruffed grouse. The funds expended to establish and maintain these wildlife openings provide a key habitat component and multiple benefits to the wildlife found on the Forest.

3-107. Public Concern: The Forest Service should manage forests to return wildlife to a natural state with biodiversity. (A)(C)(O)(J)(S)

FOR LONG-TERM FOREST HEALTH (A)(C)(O)(J)(S)

Response: Many commenters expressed a desire to see national forests managed for maintenance and restoration of "natural conditions" to support healthy ecosystems, clean water, and abundant wildlife, as opposed to an emphasis on resource extraction. We feel the revised plan is in line with these priorities. Within the Southern Appalachian region, vegetation management will be driven by the need to create desired ecological conditions, not to meet resource extraction goals. These plans clearly focus on the ecological conditions left on the ground, not on resources removed. Although timber

production emphasis prescriptions were defined during planning, none have been included under the preferred alternative. All prescriptions used emphasize ecological restoration, recreation, or special area protection.

This emphasis does not mean that there will be no commercial timber sales implemented under the revised plan. Timber sales are one of the most important and efficient tools we have for creating desired conditions on the ground. To use this tool effectively, in most cases we designate individually which trees are to be cut and which are to be retained, and carefully administer the sale to ensure disturbance to soil, water, and remaining trees is within specified limits. This approach is not only effective, it is efficient: by selling cut trees, we generate revenue rather than paying for the service. An added benefit is that sold material is used and generates economic activity within surrounding communities. However, to repeat, any proposed timber sales must make sense in terms of the on-the-ground condition created as a result.

Fisheries and Aquatic Wildlife

Aquatic Wildlife and Habitat

3-108. Public Concern: The Forest Service should not use electric shock to conduct fish counts. (O)

Response: Electro-fishing is arguably the profession's most effective method in sampling fish (Snyder 1995). Only an extremely small proportion of a fish population is injured by electro-fishing, and with natural mortality for salmonids at annual rates of 30%-60%, the long term effects of electro-fishing can be discounted. Other methods are used on the Chattahoochee National Forest in determining fish species such as seining and snorkeling. Alternative methods are primarily used when sampling in waters with federally listed aquatic species.

Lit Cite: Synder, D.E. 1995. Fisheries. Impacts of electro-fishing on fish. Fish and Wildlife reference service (MIN #809440039). 214 pages

3-109. Public Concern: The Forest Service should implement fisheries management prescriptions, as recommended. (O)

Response: The statement you support has been retained in all prescriptions you listed and added to a few others. It has been revised slightly to indicate that management activities are focused more broadly on aquatic habitats, and do not apply just to fisheries management. Fisheries (Native and Non-Sport)

3-110. Public Concern: The Forest Service should protect trout streams. (O)

Response: The Riparian Corridor management prescription is applied to all perennial and intermittent streams on the Forest, complying with Georgia's Best Management Practices for Forestry. The distances of the Riparian Corridor and the BMP handbook specifically address protection of trout streams.

3-111. Public Concern: The Forest Service should stock streams with native speckled trout. (O)

Response: There is an objective in the plan addressing brook trout management.

3-112. Public Concern: The Forest Service should stock streams with native brook trout. (O)

Response: There is an objective in the plan addressing brook trout management.

3-113. Public Concern: The Forest Service should change wording to restrict stocking to native species negatively affected by human influence, and allow stocking of non-native species only under specified conditions. (O)(S)

Response: A standard similar to what is being suggested has been added to the Plan.

3-114. Public Concern: The Forest Service should specify that fisheries management and the stocking of non-native trout species will be permissible for wild and scenic rivers, or alternately, change prescriptions to recreational rivers. (O)

Response: There are no restrictions on fisheries management on river segments designated as Wild sections.

3-115. Public Concern: The Forest Service should address fisheries management and provide prescriptions, standards, and requirements for monitoring. (C)(O)(S)

Response: Fisheries management is incorporated into desired future condition and standards in the land management plans. Monitoring questions can be found in Chapter 5 of the land management plans. Details of proposed monitoring can be found in Appendix F of the plans.

3-116. Public Concern: The Forest Service should provide consistent prescriptions for Georgia and South Carolina, and coordinate with each state's department of natural resources. (O)(S)

BY REVISING THE FISHERIES MANAGEMENT STATEMENT ON P. 3-132 (O)(S)

Response: The management prescriptions are similar, especially in emphasis and desired conditions; some of the standards are not similar. This is due to on the ground situations or historic management differences. In all cases the Forest coordinates with Georgia Department of Natural Resources on all projects.

3-117. Public Concern: The Forest Service should specify that it will conduct inventorying and monitoring and act to restore, enhance, and manage aquatic habitat conditions. (O)(S)

TO MAKE PRESCRIPTIONS WITHIN THE CHATOOGA RIVER WATERSHED CONSISTENT (O)(S)

TO ALLOW STOCKING OF RAINBOW AND BROWN TROUT (O)

Response: The Plan has been changed to have fisheries management for 4H be the same as 2A3.

Fisheries (Sport)

3-118. Public Concern: The Forest Service should manage the Soquee River under prescription 4.H. (O)

Response: The headwaters of the Soquee River (Goshen Creek) was investigated and found not to be eligible for further consideration for WSR. Goshen Creek lies mainly within Tray Mountain wilderness area and does not need the 4.H management prescription. Soquee River is mostly on private land (and adjacent to roadways); the Forest Service has no jurisdiction in that situation.

Threatened, Endangered, and Sensitive Species

3-119. Public Concern: The Forest Service should consult with the U.S. Fish and Wildlife Service, address protection and management of federally-listed aquatic species within the forest plans, and implement recommended guidelines. (O)(J)

TO PROTECT FEDERALLY-LISTED SPECIES (O)

TO PROTECT CRITICAL HABITAT (O)

TO PROTECT WATER QUALITY (O)

TO MANAGE USER ACTIVITIES TO AVOID EFFECTS TO LISTED SPECIES (O)

Response: All of these concerns from USFWS were addressed during informal consultation between the Forest and USFWS. Additional direction for protection and management of federally listed species, both terrestrial and aquatic, was added to the Plan as a result.

3-120. Public Concern: The Forest Service should conduct a formal study of the potential effects of trout stocking within the Conasauga and Etowah rivers on listed threatened and endangered species. (O)

Response: Standards have been added to the Plan to address this concern.

3-121. Public Concern: The Forest Service should prohibit improvement of aquatic resources for trout within habitat occupied by listed threatened and endangered species. (O)

Response: Standards have been added to the Plan to address this concern.

3-122. Public Concern: The Forest Service should use identical statements in Management Prescriptions 1.A and 1.B regarding monitoring of threatened and endangered species. (O)

Response: Monitoring for threatened and endanger species is discussed in Chapter 5 and Appendix G of the Plan.

3-123. Public Concern: The Forest Service should specify that it will monitor and protect mussels. (A)(O)(J)

Response: Standards have been added to the Plan to address this concern.

Terrestrial Wildlife and Habitat

General

3-124. Public Concern: The Forest Service should specify details regarding the provision of large, contiguous, forested, and remote areas for wildlife. (A)(C)(O)(J)(S)

Response: By its nature, national forest land represents some of the largest blocks of contiguous forestland left on the landscape. For most species, the relatively small scale of disturbance imposed by national forest management does not significantly affect the value of these lands for species needing large blocks of forest (for example, see analysis for interior forest birds [See EIS topic 'Forest Interior Birds']. However, some species do require remoteness and lack of frequent disturbance from human presence. On the national forest, remote areas are provided by several prescriptions, including 1.A

Designated Wilderness, 1.B Recommended Wilderness, and 12.A Remote Backcountry Recreation.

Due to the current healthy status of the Chattahoochee's forest wide bear population (USDA Forest Service 2000), the assumption is made that sustaining existing levels of habitat remoteness is acceptable. The section on Black bear in the FEIS for the Chattahoochee-Oconee Revised Forest Plan displays the expected quantity of remote habitat by Alternative. Alternatives G, E and A would provide highest total acres of remote habitats, and Alternatives D and B would provide least acres.

Black Bear

3-125. Public Concern: The Forest Service should better protect black bear habitat. (A)(C)(O)(J)(S)

Response: Due to the current healthy status of the Chattahoochee's forest wide bear population (USDA Forest Service 2000), the assumption is made that sustaining existing levels of habitat remoteness is acceptable. The section on Black bear in the FEIS for the Chattahoochee-Oconee Revised Forest Plan displays the expected quantity of remote habitat by Alternative. Alternatives G, E and A would provide highest total acres of remote habitats, and Alternatives D and B would provide least acres. This analysis indicates that black bears and their habitat will continue to be well provided for under the preferred alternative.

3-126. Public Concern: The Forest Service should only set aside 4 percent of black bear habitat as open space and 0-10 year age forest. (C)(O)

Response: Black bears are common throughout most of the Chattahoochee National Forest. The Forest Plan does not designate any specific areas where black bear habitat management will be emphasized (MRx 8C Black Bear Emphasis). Habitat needs for bears will be provided through the various management prescriptions across the Forest. As discussed in the Black Bear Section of the FEIS, the preferred alternative will provide both abundant late successional habitat, which provide hard mast and den trees, and adequate early successional forests which are important sources of soft mast and herbaceous plants. The preferred alternative is expected to maintain approximately 3-4 of the Chattahoochee National Forest in early successional forest (0-10year age class). The majority of the forest will be in mid and late successional forest conditions.

Avifauna

3-127. Public Concern: The Forest Service should implement stronger avian monitoring, habitat restoration, objectives, and active management. (A)(C)(O)(J)(S)

FOR TARGETED SPECIES (A)(O)

Response: In order to comply with the provisions of Executive Order 13186, a team of biologists from each of the five Southern Appalachian revision forests (as well as the Daniel Boone National Forest) worked closely with the Migratory Bird Office of the U.S. Fish and Wildlife Service (FWS) to incorporate bird conservation measures in the revised plan. (Refer to Migratory Bird section of the Chattahoochee-Oconee FEIS for the Revised Forest Plan). Cooperation involved reviewing relevant Partners in Flight Bird Conservation Plans and meeting with FWS personnel on multiple occasions to develop and revise recommended management strategies. Management strategies that have been incorporated into the revised plan include objectives and standards for restoration and maintenance of key habitat conditions, such as high-elevation early-successional habitat, mature forest with diverse canopy structure, early successional forest, mature riparian forest, riparian forests with dense understories, canebrakes, and open pine and oak woodlands, savannas, and grasslands. In fact, much of the vegetation management directed at major forest community types in the revised plan is driven by bird conservation needs.

Following release of draft plans and EISs, we met again with FWS personnel to review and discuss proposed revised plans during the public comment period. Based on this review, the FWS submitted comments to individual forest staffs, in some cases leading to further modifications of revised plans. After consultation with the USDI FWS service The Chattahoochee-Oconee National forest added objectives to increase burn acreages and set translocation and midstory control objectives on the Oconee National Forest based on direction given by FWS for the recovery of the RCW. The Chattahoochee-Oconee National Forest also made some other minor changes to the Revised Forest Plan based on consultation with the FWS that will enhance habitats for T&E.

3-128. Public Concern: The Forest Service should protect migratory birds and their habitat. (O)

BECAUSE THE SOUTHERN APPALACHIAN MOUNTAINS SERVE AS SANCTUARIES (O)

Response: The Forest Service will protect resident landbirds and migratory birds occurring on the forest. The Forest Service has cooperated with the Nature Conservancy, Georgia Wildlife Resource Division and USDI Fish and Wildlife Service to manage migratory birds and their habitats. Habitat relationships and viability assessments for birds occurring on the forest are included in the appendices for the DEIS.

3-129. Public Concern: The Forest Service should modify avian plans, goals and objectives, as recommended. (O)

Response: The Golden-winged warbler does receive similar attention, as does the Cerulean warbler. It already and will continue to be an inventoried and monitor species. High elevation early successional habitat will be created and maintained as described in the plan objectives. It does not serve as a good MIS based on its lack of representation on the forest. Balds and right-of –ways have been removed as components of high-elevation early successional habitat. Creation and maintenance are part of the goal and objectives for creating early successional habitats.

We agree canebrake management will be increased for historical representation and to provide habitat for the Swainson warbler in coordination with Georgia WRD and USDI Migratory Bird Office.

The infrequency with which Bachman sparrows are seen during point counts on the Chattahoochee-Oconee National Forest make them a poor choice as MIS. Generally speaking populations have to be present to determine effects of management on a species.

3-130. Public Concern: The Forest Service should identify candidate sites and restoration goals for riparian and early successional habitats to support bird species, and direct managers to develop and implement restoration actions. (O)(S)

Response: The Forest has coordinated with the USDI FWS Migratory Bird Office in order to manage for all bird species with viability concerns including increased emphasis on Golden-winged and Cerulean warbler based on direction from FWS. Restoration and maintenance of Swainson warbler populations is a main driver for canebrake restoration on the Chattahoochee-Oconee National Forest. Appalachian Bewicks wren is not known to occur on the Chattahoochee-Oconee however if during inventory and monitoring this species is found immediate actions would be taken to manage for this species based on its viability concern.

3-131. Public Concern: The Forest Service should conduct habitat restoration to increase herbaceous cover. (A)(C)(O)

TO PROMOTE VIABILITY OF THE GOLDEN-WINGED WARBLER (C)(O)

FOR VARIOUS AVIAN SPECIES (A)(C)(O)

Response: See response to Public Concern 3-127.

Threatened, Endangered, and Sensitive Species

3-132. Public Concern: The Forest Service should protect and restore threatened, endangered, sensitive, and locally rare species and their habitat. (A)(C)(O)(J)(S)

Response: Objectives and standards that protect habitat are present in several prescriptions, including the 9F Rare Community Prescription, the Riparian Prescription, and the Red-cockaded woodpecker prescription. Forest-wide standards and objectives for habitat protection are found in the section on federally listed, sensitive and locally rare species and elsewhere throughout the Plan. Habitat is also addressed in the Biological Assessment (T&Es) and the Biological Evaluation (Sensitive species) for the Plan.

3-133. Public Concern: The Forest Service should address the likelihood of take during monitoring and comply with Endangered Species Act requirements for permits and exemptions. (O)

Response: This comment was handled in informal consultation with USFWS.

3-134. Public Concern: The Forest Service should use the best available science to guide management of listed species. (O)

Response: While this is not a specific legal requirement for the FS, as it is for the US Fish and Wildlife Service, we contend our consultation with that agency and other researchers results in the best guidance to manage listed species. The concurrence we received for management of listed species is an assurance of that process.

3-135. Public Concern: The Forest Service should retain fish, wildlife, range, botany and ecology (FWRBE) team bat standards. (O)

Response: The appropriate FWRBE team standards were added to the Plan and Biological Assessment during informal consultation with USFWS.

3-136. Public Concern: The Forest Service should develop and implement a detailed management prescription, including strategies as recommended, for the red-cockaded woodpecker. (O)

TO FULFILL FOREST SERVICE RESPONSIBILITIES UNDER THE ENDANGERED SPECIES ACT (O)

Response: Consultation with USDI FWS has and will continue to be done regarding RCW and other issues relating to T&E species and natural resource management on the Chattahoochee-Oconee National Forest. The USDI FWS office has reviewed the Biological Assessment and concurred with its finding of 'not likely to adversely affect' federal threatened or endangered species. The BA has been cross-walked into the plan to make sure that the BA is reflected in the Plan management direction for RCW.

3-137. Public Concern: The Forest Service should not change the analyses within the Draft Environmental Impact Statement based on the revised recovery plan for the red-cockaded woodpecker. (C)(O)

Response: Recovery is a priority for listed species on the forest. Prescription(s) provide areas of emphasis for these species. We have received concurrence for these actions from the US Fish and Wildlife Service.

3-138. Public Concern: The Forest Service should make the recovery of threatened and endangered species a priority in the forest plan revision. (A)(C)(O)(J)(S)

Response: Recovery is a priority for listed species on the forest. Prescription(s) provide areas of emphasis for these species. We have received concurrence for these actions from the US Fish and Wildlife Service.

3-139. Public Concern: The Forest Service should specify survey requirements for protected, threatened, endangered, threatened, and sensitive species. (A)(C)(O)(J)(S)

BECAUSE LACK OF SURVEY REQUIREMENTS AND THE DROPPING OF SENSITIVE SPECIES IS ARBITRARY (A)(C)(O)(J)(S)

Response: Survey (inventory) requirements for PETS species have been addressed in the regional supplement to the Forest Service Manual (2672.43). This document requires each project proposal and species therein to be evaluated for the need to inventory. This process can be viewed at http://www.southernregion.fs.fed.us/planning/vmeis/final FSM_2670_supplement.pdf.

3-140. Public Concern: The Forest Service should comply with direction requiring management and recovery of threatened, endangered, and sensitive species. (A)(C)(O)(J)(S)

Response: We have complied with requirements for management and recovery.

3-141. Public Concern: The Forest Service should implement actions to reduce risks to at-risk species. (O)

Response: Most of the very high and high-risk species occur in habitat that is also rare, often with little opportunity of being increased. Extractive activities, roads, and recreation are not responsible for their rarity. However, management to maintain and increase the habitat is addressed where possible (e.g. mountain bogs). Actions to reduce risk to these species and habitats are addressed in the 9F Rare Community Prescription, in various objectives and standards throughout the Plan, and in the BA and BE

documents. Risk to these species is also evaluated at the project level, with mitigation of adverse impacts prescribed when necessary to reduce or eliminate risk to these species.

3-142. Public Concern: The Forest Service should conduct a salamander survey and implement steps to protect rare species. (O)(J)

Response: In some cases, commenters highlighted individual species groups, such as salamanders, as needing more specific direction for inventory and monitoring to ensure their viability. Individual species or species groups identified as monitoring elements are listed in the Monitoring Summary Table (Appendix G). Monitoring of these species and species groups is expected to continue through the life of the plan. Other species or species groups, such as salamanders, would be considered if there was a viability concern and the species or group was selected through periodically prioritizing species or species groups for focused inventory and monitoring efforts during plan implementation.

Locally Rare Species

3-143. Public Concern: The Forest Service should specify all state-listed plants and animals, and consider the effects of management actions on these species. (A)(C)(O)(J)(S)

TO INCLUDE COAL SKINKS (A)(C)(O)(J)(S)

Response: Commenters focused on the need to identify and protect, maintain, or enhance locations where viability concern species occur, especially when these occurrences are outside of areas targeted for optimal protection and management (e.g., rare communities). They argue that maintaining or enhancing these occurrences is necessary to provide for species viability. We agree. This issue also is a question of where in the overall planning process such consideration should occur. Site protection is generally considered and provided at the project level through site-specific environmental analysis. In addition, known locations of viability concern species can be used during plan implementation to select sites for projects designed to maintain or restore important habitats. Because of their site-specific nature, these considerations are plan implementation functions that are more appropriately addressed outside of the plan.

Ultimately, our success at meeting viability requirements must be viewed from the perspective of the entire planning process, which includes not just the strategic forest plan, but also plan-to-project considerations, site-specific project analysis, and monitoring feedback. We believe the treatment given to species viability in the Revised Plan and EIS provides us with a solid, and much improved, strategic framework from which to meet species viability requirements as the Revised Plan is implemented and monitored.

3-144. Public Concern: The Forest Service should conduct full surveys and inventories of species and their habitats sufficient to ensure viability. (A)(C)(O)(J)(S)

BECAUSE THE FOREST SERVICE HAS NOT CONDUCTED NECESSARY SURVEYS AND INVENTORIES (A)(C)(O)(J)(S)

BECAUSE THE FOREST SERVICE HAS PROVIDED NO POPULATION MONITORING DATA OR ANALYSIS TO DOCUMENT THAT SPECIES WILL BE MAINTAINED (A)(C)(O)(J)(S)

BECAUSE HABITAT DATA IS AN UNSUITABLE SURROGATE FOR POPULATION DATA (A)(C)(O)(J)(S)

BECAUSE THE USE OF HABITAT DATA AS A SURROGATE HAS BEEN DISCOUNTED BY THE FEDERAL JUDICIARY (A)(C)(O)(J)(S)

BECAUSE THE VIABILITY ANALYSES IS BASED ENTIRELY ON NATIONAL FOREST LANDS AND IGNORES ALL OTHER LAND OWNERSHIP ACTIVITIES AND THEIR DIRECT, INDIRECT, AND CUMULATIVE EFFECTS (A)(C)(O)(J)(S)

BECAUSE OF THE USE OF EXPERT JUDGMENT AND ARBITRARY APPROACHES AND DECISIONS (A)(C)(O)(J)(S)

BECAUSE THERE ARE NO ANALYSIS AND EXPLANATION OR JUSTIFICATION FOR INCLUDING OR EXCLUDING SPECIES IN RARE SPECIES MONITORING PROGRAMS (A)(C)(O)(J)(S)

BECAUSE ACTUAL POPULATION DATA IS REQUIRED (A)(C)(O)(J)(S)

BECAUSE ESTIMATES OF MANAGEMENT ACTION EFFECTS ARE QUESTIONABLE WITHOUT EXISTING DATA (O)

BECAUSE THE ABSENCE OF POPULATION DATA AND BASELINE INFORMATION INCREASES THE CHANCE OF MAKING DECISIONS WITH REGRETTABLE CONSEQUENCES (O)

BECAUSE THE STRATEGY FOR VIABILITY ANALYSIS IS DESIGNED TO GET AROUND SIERRA CLUB V. MARTIN (A)(C)(O)(J)(S)

BECAUSE MONITORING THAT LACKS SCIENTIFIC BASIS VIOLATES NEPA AND IS ARBITRARY AND CAPRICIOUS (A)(C)(O)(J)(S)

Response: Some commenters expressed satisfaction that viability evaluations have identified species and habitats most at risk, leading to appropriate attention to conservation of the most threatened habitats and communities. Other commenters pointed to the need for additional "fine-filter" considerations to provide for species viability. Most of these commenters focused on the need for more specificity regarding inventory and monitoring of species of viability concern, including those of local viability concern ("locally rare" species). We agree that inventory and monitoring are critical and necessary components of a program to provide for species viability. The issue is where in the overall planning process the details of these components are considered and documented.

Because of the incredible diversity of species on the forest monitoring populations of every species of potential viability concern is not feasible. Practical monitoring programs must combine monitoring of habitat conditions, populations of indicator species, and populations of priority viability concern species. This combination is reflected in the Revised Plan's monitoring

chapter, which includes monitoring questions that cover all of these elements. The Monitoring Summary Table in Appendix G of the Revised Plan provides more specifics on relevant elements to be monitored, including some individual species and species groups. Task sheets, to be used for implementing the monitoring program, provide additional detail, and are available upon request. In addition, a monitoring element in the Monitoring Summary Table indicates additional inventory and monitoring of viability concern species (including "locally rare" species, where appropriate) will occur based on prioritization developed and revised during plan implementation. Prioritization will involve use of more site-specific information on species occurrences, in addition to the more general information from the viability evaluations in the EIS. Although many commenters express desire to see more of this detail at this time, more detail at this strategic planning level is not necessary to complete plan revision. Given the large number of species and the site-specific considerations involved, and the likelihood that priorities will shift throughout the life of the plan as information is obtained, it is appropriate to establish these additional details as part of plan implementation.

Related comments contend that the set of selected Management Indicator Species (MIS) are inadequate to represent all species of viability concern. As discussed above, indicator species are but one part of our biological monitoring program. We have made no effort to select MIS to represent all species of viability concern, nor is there a requirement for us to do so. MIS, as described in 36 CFR 219.19, serve a variety of purposes during forest planning, not all of which are relevant to species viability. Only where appropriate are MIS selected for the Revised Plan "because their population changes are believed to indicate the effects of management activities on other species of selected major biological communities" (36 CFR 219.19 (1)). The selection of MIS is documented in Chapter 5 of the revised plan, in the relevant sections of the EIS, and in the Management Indicator Species Selection Process Record, which is available upon request. Some commenters correctly noted that we have de-emphasized the role of MIS in viability analysis. We have reduced emphasis on MIS because of the current state of science, which calls into question many traditional uses of the indicator species concept (see MIS Selection Process Record for a brief review). Nevertheless, our selection and use of MIS in this plan revision meets both the letter and intent of regulations.

3-145. Public Concern: The Forest Service should build a fine filter species monitoring program, and disregard the existing coarse filter viability analyses. (A)(C)(O)(J)(S)

BECAUSE EXPERT JUDGMENTS WERE USED (A)(C)(O)(J)(S)

BECAUSE EXPERT JUDGMENTS WERE INFORMED BY SPECTRUM WHICH DOES NOT ACCURATELY MODEL THE DYNAMICS OF SOUTHERN APPALACHIAN FORESTS (A)(C)(O)(J)(S)

BECAUSE SPECIES ASSIGNMENTS AND METHODOLOGIES WERE SUPPOSED TO BE REVIEWED BY A PANEL OF SCIENTISTS (A)(C)(O)(J)(S)

BECAUSE THE HABITAT ANALYSIS IS BASED ON QUESTIONABLE HABITAT MODELING AND EDUCATED GUESSES (A)(C)(O)(J)(S)

BECAUSE DATA BY QUENTIN BASS IS NOT REFERENCED (A)(C)(O)(J)(S)

BECAUSE THE PLANS FAIL TO ESTABLISH FINE FILTER MONITORING (A)(C)(O)(J)(S)

BECAUSE THERE ARE NO GUIDELINES TO ADDRESS LOCALLY RARE SPECIES, MANY OF WHICH HAVE HIGH VIABILITY CONCERNS (A)(C)(O)(J)(S)

BECAUSE THE PLAN FAILS TO PROVIDE STANDARDS FOR THREATENED, ENDANGERED, SENSITIVE, AND LOCALLY RARE SPECIES (A)(C)(O)(J)(S)

BECAUSE MANAGING LOCALLY RARE SPECIES WITH A COARSE FILTER WOULD BE IRRESPONSIBLE AND INVITE EXTIRPATION (C)(O)

BECAUSE THE PLANS DO NOT ASSURE VIABILITY FOR LOCALLY RARE SPECIES (C)(O)

Response: Refer to response to 3-144.

3-146. Public Concern: The Forest Service should establish goals, objectives, and standards for monitoring threatened, endangered, sensitive, and locally rare (TESLR) species. (A)(C)(O)(J)(S)

Response: Monitoring requirements for these species are in Chapter 5 of the revised CONF Plan and Appendix G, Monitoring Summary Table.

3-147. Public Concern: The Forest Service should address rare species via habitat development/protection and a mosaic of successional habitats. (O)

Response: The Forest Service and the FWRBE team have developed a species viability assessment that recognizes species using all successional stages of the forest. There will be representation and distribution of age classes and vegetative communities to support the diversity of native and desirable non-native species occurring on the forest.

3-148. Public Concern: The Forest Service should abolish programs related to sensitive and locally rare species. (C)(O)(J)(S)

BECAUSE SUCH DESIGNATION IS LAWSUIT FODDER (O)(S)

BECAUSE SUCH SPECIES DO NOT DESERVE PROTECTION WHICH HALTS MANAGEMENT ACTIONS (O)(S)

ADOPTIONS OF SUCH LISTS COULD HAVE LEGAL IMPLICATIONS AND INCUR OBLIGATIONS (C)(O)(J)(S)

Response: Dropping programs relating to sensitive and locally rare species are not decided in the revision of the Forest Plan.

Management Indicator Species

3-149. Public Concern: The Forest Service should specify numerous management indicator species, including plants, aquatic life, insects, fish, birds, and particularly, salamanders. (A)(C)(O)(J)(S)

TO STUDY FOREST HEALTH AND COMPLY WITH LAWS (A)(C)(O)(J)(S)

TO REPRESENT A RANGE OF SPECIES AND DIVERSITY (O)

Response: Refer to response to 3-144 and public concern 3-150.

3-150. Public Concern: The Forest Service should include aquatic species as management indicator species. (A)(C)(O)(J)(S)

TO EVALUATE THE EFFECTS OF TIMBER HARVEST AND ROADS (A)(C)(O)(J)(S)

TO EVALUATE THE EFFECTS OF FORESTRY AND AGRICULTURE (A)(C)(O)(J)(S)

TO PROPERLY ASSESS WETLANDS (O)

Response: The Forest Service chose to monitor aquatic communities rather than MIS for the following reasons: The use of MIS is controversial because it is based on the assumption that suitable habitat for the indicator is also suitable for other associated species. For a species to be a good indicator of changes in habitat, it has to be one of the most sensitive members of the community to a particular stressor. These species are often rare and/or difficult to monitor. Species that exhibit these characteristics show inconsistent patterns that cast doubt on their usefulness as indicators. Researchers (citations available upon request) have found that fewer samples are needed to precisely estimate community level attributes than to estimate species attributes and recommend the use of species groups or community indices over individual species for stream fish studies.

3-151. Public Concern: The Forest Service should consider a reasonable range of alternatives for proposed endangered, threatened and sensitive species as management indicator species. (A)(C)(O)(J)(S)

Response: MIS are species selected "because their population changes are believed to indicate the effects of management activities" (36CFR 219 (a)(1)). Many TES are not tied to forest management activities and/or are rare, and often occur in rare habitat. Thus they would not reflect "effects of management activities". The Forest Plan does use T&E species as MIS where their populations reflect effects of forest management activities and where population trends of the species are capable of being effectively and efficiently monitored and evaluated. There are also numerous objectives and standards throughout the Plan that ensure that federally listed species occurring on the Forest will be monitored.

3-152. Public Concern: The Forest Service should include black bear as a management indicator species. (O)

Response: The Black Bear is a MIS (see Draft Resource Land Management Plan Chapter 5.

3-153. Public Concern: The Forest Service should better address effects, on and changes, in habitat and species of management indicator species. (O)

Response: Management Indicator Species will be addressed at the project level. Selection of MIS and the reason for the selections are done at the plan level. The effects on and the MIS and the habitats or attributes they are indices of are addressed in the Environmental Assessment at the project level.

3-154. Public Concern: The Forest Service should not use habitat types as indicators for species viability. (A)(C)(O)(J)(S)

BECAUSE A MIX OF SUCCESSIONAL HABITAT DOES LESS WELL FOR SPECIES THAT NEED MATURE FORESTS (A)(C)(O)(J)(S)

BECAUSE STATEMENTS ABOUT HABITAT ELEMENTS WITH THE HIGHEST RISK SPECIES ARE NOT SUPPORTED BY SPECIES/HABITAT RELATIONSHIP TABLES (A)(C)(O)(J)(S)

Response: refer to response to PC 3-144.

3-155. Public Concern: The Forest Service should include management indicator species whose home range is within the forest boundary. (O)

Response: The reason for selection of MIS is explained in Chapter 5 of the Draft LRMP. Species were selected by the Fisheries, Wildlife, Range, Botanical and Ecological Team (FWRBE). Management indicator species (MIS) are to be selected "because their population changes are believed to indicate the effects of management activities" (36 CFR 219 (a)(1)). They are to be used during planning to help compare effects of alternatives (36 CFR 219.19(a)(2)), and as a focus for monitoring (36 CFR 219.19(a)(6)). Where appropriate, MIS shall represent the following groups of species (36 CFR 219 (a)(1)):

1. Threatened and endangered species on State and Federal lists,
2. Species with special habitat needs,
3. Species commonly hunted, fished, or trapped,
4. Non-game species of special interest, and
5. Species selected to indicate effects on other species of selected major biological communities.

3-156. Public Concern: The Forest Service should adopt the entire group of salamanders as management indicator species. (A)(C)(O)(J)

Response: refer to response to PC 3-144.

3-157. Public Concern: The Forest Service should adopt a broader definition of management indicator species to include native aquatic species and requirements for monitoring plans. (O)

Response: The Forest Service chose to monitor aquatic communities rather than MIS. The use of MIS is controversial because it is based on the assumption that suitable habitat for the indicator is also suitable for other associated species. For a species to be a good indicator of changes in habitat, it has to be one of the most sensitive members of the community to a particular stressor. These species are often rare and/or difficult to monitor. Species that exhibit these characteristics show inconsistent patterns that cast doubt on their usefulness as indicators. Researchers (citations available upon request) have found that fewer samples are needed to precisely estimate community level attributes than to estimate species attributes and recommend the use of species groups or community indices over individual species for stream fish studies.

The Forest Service will be monitoring aquatics through various methods including, but not limited to, macroinvertebrates and fish community structure. Monitoring questions can be found in Chapter 5 of the land management plans. Details of proposed monitoring can be found in Appendix G of the revised CONF Plan.

3-158. Public Concern: The Forest Service should not use the same management indicator species for all alternatives. (A)(C)(O)(J)(S)

BECAUSE EACH ALTERNATIVE IS SUPPOSED TO REPRESENT DIFFERENT MANAGEMENT REGIMES AND OBJECTIVES (A)(C)(O)(J)(S)

Response: Our selection and use of MIS in this plan revision meets both the letter and intent of regulations. Refer to response PR 3.145.

3-159. Public Concern: The Forest Service should not use common species and community level monitoring as (or in lieu of) management indicator species. (A)(C)(O)(J)(S)

BECAUSE THERE IS NO SCIENTIFIC SUPPORT FOR THIS APPROACH (A)(C)(O)(J)(S)

BECAUSE MANAGEMENT INDICATOR SPECIES ARE SUPPOSED TO INCLUDE SPECIES WITH SPECIAL HABITAT NEEDS, THREATENED AND ENDANGERED SPECIES, AND NON-GAME SPECIES OF INTEREST (A)(C)(O)(J)(S)

TO COMPLY WITH REGULATIONS AND PROVIDE FOR ACCOUNTABILITY (A)(O)(J)

BECAUSE A COMMUNITY APPROACH MAY MISS DECLINES IN ONE OR MORE OF THE SPECIES (A)(O)

Response: Our selection and use of MIS in this plan revision meets both the letter and intent of regulations. Refer to response PR 3.145.

3-160. Public Concern: The Forest Service should provide explanation and documentation for the elimination and reduction of management indicator species, and the selection of management indicator species and monitoring methodologies. (A)(C)(O)(J)(S)

BECAUSE THE PROPOSED APPROACH VIOLATES NEPA (A)(C)(O)(J)(S)

BECAUSE THE PROPOSED APPROACH VIOLATES THE NATIONAL FOREST MANAGEMENT ACT (A)(C)(O)(J)(S)

Response: Our selection and use of MIS in this plan revision meets both the letter and intent of regulations. Refer to response PR 3.145.

Forested Vegetation

Forest Vegetation–General

3-161. Public Concern: The Forest Service should provide more current forest inventory and analysis data than those collected in 1986. (O)

Response: At the time the timber supply and demand analysis was done and the growth and yield simulations were made, the latest data available was from the 1986 field season. That data was released by FIA in 1988. In addition, the data was only used to characterize comparable National Forest conditions rather than track individual locations. While the use of more recent data likely would show some shifts, they would not be major and are not likely to produce significantly different results.

3-162. Public Concern: The Forest Service should acknowledge that the classification used for major forest communities is a generalization. (A)(C)(O)(J)(S)

Response: One commenter suggests that we make clear that the classification of major forest communities used in the terrestrial species viability evaluation is a generalization so that the limitations of the classification are apparent, and that the classification used is of little use as a screen for viability concern species. All classification systems are generalizations. To plan for habitats, the continuum of conditions on the ground must be generalized into a classification system so that they may be analyzed. For the terrestrial species viability evaluation, we looked at a variety of forest community classification systems, including the Forest Services CISC data classification, NatureServe's vegetation classification, and the classification system developed for old growth planning. While each of these has its advantages, none exactly matched the habitat association groupings

that were most apparent when we looked at the full set of habitat needs for each species of potential viability concern. To facilitate and simplify species viability analysis, we lumped some forest communities together in cases where keeping them separate did not add appreciably to our ability to focus management direction or analysis. With the exception of the woodlands savannahs and grasslands community, which has very low representation on the Chattahoochee-Oconee National Forest, major forest communities used in the viability analysis are defined and cross-walked to other classification systems at the beginning of each associated forest community section in the EIS. The commenter does not specify where they feel this lumping has resulted in erroneous or misleading conclusions.

Woody Debris

3-163. Public Concern: The Forest Service should provide for the protection and recruitment of large woody debris by retaining all trees within one site potential tree height of a stream. (A)(C)(O)(J)(S)

BECAUSE LARGE WOODY DEBRIS PROVIDES HABITAT AND COVER FOR AQUATIC AND TERRESTRIAL SPECIES (A)(C)(O)(J)(S)

BECAUSE LARGE WOODY DEBRIS CONTRIBUTES TO NUTRIENT CYCLING (A)(C)(O)(J)(S)

BECAUSE LARGE WOODY DEBRIS CREATES STRUCTURE IN STREAMS AND PREVENTS EROSION (A)(C)(O)(J)(S)

BECAUSE THE HEIGHT OF A SITE POTENTIAL TREE EXCEEDS 75 FEET, WHICH IS WIDER THAN MINIMUM BUFFER WIDTHS (A)(C)(O)(J)(S)

Response: Comments focus on recruitment of course woody debris into stream systems. Some commenters feel that ephemeral stream guidelines are not sufficient to provide this recruitment. Provisions in the Riparian Prescription, including emphasis on late successional forests, are designed explicitly to provide for coarse woody debris. The riparian corridor specified is also wide enough (100+ feet) to ensure that riparian tree cover is available for large woody debris recruitment. MRX 11 also addresses whether or not large woody debris will be removed from a channel but assumes that it normally will not be. In addition, there is a Forest Wide Standard for ephemeral streams in Chapter 2 requiring the retention of 25 square feet of basal area for a width of 25 feet on either side of the ephemeral stream.

Native Species

3-164. Public Concern: The Forest Service should modify the narrative regarding canebrakes. (O)

Response: There could be circumstances where canebrake restoration might not take priority over a local riparian goal. An example would be a

riparian area with presence of a federally listed species where cane management could adversely affect the listed species.

3-165. Public Concern: The Forest Service should promote native grassland/savanna/woodland restoration, with an emphasis on shortleaf pine. (O)

Response: Thank you for your agreement. The plan includes specific objectives for the restoration of this habitat.

Management Prescriptions

3-166. Public Concern: The Forest Service should develop specific objectives and monitoring programs for every forest prescription. (O)

Response: Monitoring is discussed in Chapter 5 of the revised CONF Plan and monitoring questions and elements are listed in Appendix G. The purpose of monitoring is not to expend vast sums of time and energy monitoring every possible item, but to select those few items that can give the most information in a cost and time effective manner.

3-167. Public Concern: The Forest Service should modify various management prescriptions used in the Chattahoochee National Forest. (O)

Response: The changes suggested were each considered individually. Some re-allocation was done to respond to this and other comments. However, the early successional option was not changed within a management prescription for a localized area for two reasons; (1) it would greatly increase the complexity of modeling and application, amounting to a new prescription, and (2) it would create inconsistencies with sister forests.

Objectives

3-168. Public Concern: The Forest Service should modify certain objectives for the Chattahoochee National Forest. (O)

Response: The definition of early successional habitat is included in the glossary. The descriptions of what constitutes early successional habitat including communities and age have been modified. Several dynamics have been considered and a considerable amount of others will surface when projects are proposed and implemented.

Quentin Bass Material

3-169. Public Concern: The Forest Service should acknowledge the Quentin Bass material in the forest plan revision process. (A)(C)(O)(J)(S)

Response: Several commenters questioned the appropriateness of the even-aged successional model inherent in the Successional Forest Options incorporated in the Revised Plan. They frequently cited materials raised in a paper by a forest specialist that contend that Southern Appalachian forests are naturally uneven-aged, and regenerate predominately through "gap-phase dynamics" rather than by larger, more severe disturbances. Some commenters fault the Forest Service for not considering this information.

Contrary to assertions made by some commenters, information compiled by Bass was considered during planning. It was distributed to staffs of all Southern Appalachian forests undergoing revision, and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. There are many points of agreement, which are corroborated by a predominance of mainstream scientific literature. We agree that ***some*** major forest types in the Southern Appalachians are low disturbance systems that commonly regenerate through natural development of relatively small canopy gaps, and that frequent fire in these systems is not desirable. These areas of agreement are incorporated in the Revised Plan and EIS through direction and analysis for mesic deciduous forests, which include cove, riparian, mixed mesophytic and northern hardwood forests. This direction and analysis considers the amount of these forests allocated to Forest Successional Options 1 and 2 (which should be dominated by gap-phase processes), the need for canopy gaps within these forests, and the limited role of fire (See Mesic Deciduous Forest Section of FEIS and appropriate objectives and standards from the Revised Forest Plan for the Chattahoochee-Oconee National Forest). There are, however, some of Bass' conclusions with which we disagree, as do some members of the academic and research communities with whom we have consulted.

Bass' presentation of forest conditions in the late 1800s and early 1900s depends heavily upon the Ashe and Ayers Report and descriptions contained in the field notes and maps of the tracts of land that were acquired for inclusion in the National Forests. Bass also has provided substantive literature (bibliography) to support his views. However, he rejects or ignores the substantial body of scientific literature (much of it published in the last 10 years) that contradicts his conclusions regarding the role of fire and other disturbance in maintaining upland oak and pine forest types.

Unlike the scientific literature used and cited during planning, Bass' analysis has not been through the rigorous process of peer review, critique, and publication in mainstream scientific journals. Prior to filing of the whistleblower complaint, the Forest Service contracted review of Bass' analysis by Paul and Hazel Delcourt of the University of Tennessee, who have

published widely on historical disturbance ecology. Their written review indicates areas of agreement and disagreement similar to those identified by forest planning teams. It also is important to note that Bass is an archaeologist and not an ecologist or forester, professions that are educated and trained to make ecological interpretations of forest condition data. In his paper, use of terms, lack of reference to the most current scientific literature, and resulting conclusions often do not reflect the best available science. Based on these considerations, we believe Bass' analysis was given an appropriate level of consideration during planning.

Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement. In most cases, too much has changed for this restoration to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.

Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement for plan revision. In most cases, ecological conditions have changed too much for this to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.

Based on synthesis of the scientific literature, our understanding is that Southern Appalachian forests historically have been subject to highly variable disturbance regimes across the landscape. This variation resulted from the interaction of fire, wind, and other disturbance factors with the highly variable topography and edaphic conditions of the mountains. We disagree with Bass, and follow most current scientific literature, in recognizing that fire, primarily of Native American origin, played an important role in maintenance of upland pine and oak forests, and open woodlands, savannas, and grasslands. Compared to today, forest structure was likely more open on upland sites, due to the influence of fire, and more heterogeneous on lower slopes and coves, due to gap-phase dynamics of older forests. Overall, within-stand structures were likely variable due to the variable effects of natural disturbance factors. Many areas would not easily be categorized as either even-aged or uneven-aged, but some level and pattern of older residual overstory trees would almost always be present, even in areas providing important early-successional habitat. This variable structure can be approximated with uneven-aged, two-aged, and even traditional even-aged management systems, all of which involve retention of varying levels of overstory structure. A patchwork of uniform even-aged stands established by clean clearcuts is clearly outside the historical range of variation of forest structure and is also clearly not the desired condition for any portion of the national forest.

Although the Revised Plan includes objectives for restoration of native fire-maintained habitats, we recognize that we will not be able to restore the influence of fire to the landscape to historical levels due to a variety of logistical and social reasons. Creation of early-successional forests can compensate for the loss of open fire-maintained habitats for some species. So, although we recognize that the mix of types of early-successional habitats maintained under the Revised Plan cannot reflect historical conditions, we have considered the overall abundance of these habitats within an historical ecological context to arrive at objective levels. As some of these fire-maintained habitats are restored, need for early-successional forest as habitat for some species will decline. However, the need will not disappear; other species, such as ruffed grouse, depend upon the dense woody growth found in early-successional forests. In addition, other multiple-use considerations, such as need for habitat to support game species for recreation, ecological restoration of native forests, forest health considerations, will continue to make creation of some level of early-successional forest desirable.

Botanical Resources

Threatened, Endangered, and Sensitive Plant Species

3-170. Public Concern: The Forest Service should protect threatened, endangered, and sensitive plant species. (O)

Response:

1) Emphasis on restoration and protection of listed and other rare species is provided for by our restoration of ecosystems approach and by protecting rare habitats for these species wherever they occur. We have followed an approach that protects and enhances the habitat as the first priority. Conservation work, including reintroduction, for each species is proposed and completed in projects.
2) Recovery is a priority for listed species on the forest. Prescription(s) (list them) provide areas of emphasis for these species. We have received concurrence for these actions from the US Fish and Wildlife Service.
3) Locally rare species are identified to ensure the biological diversity of the planning area is not diminished. While not protected by any specific law, locally rare species receive further consideration in project proposals if there is a concern.

3-171. Public Concern: The Forest Service should not spend money on the Sumter and Chattahoochee National Forests for table mountain pine beyond those areas currently in existence. (O)

BECAUSE THESE FORESTS ARE LOCATED AT THE SOUTHERN LIMIT FOR THE SPECIES (O)

Response: Table Mountain pine is a species limited to the Southern Appalachians. It is in decline throughout its range. The Forest Service recognizes it as a regionally rare community. The Forest Service responsibility under the National Forest Management Act is, in part, to maintain a diversity of tree cover. In addition, the decline of Table Mountain pine is symptomatic of a decline in the quality of the habitat it needs and is an indicator that other species associated with that habitat could also use help. Finally, individuals at the fringe of a species range can be very important to restoration efforts into the future. For all of these reasons, we feel that spending money on a very focused Table Mountain pine restoration is a wise investment.

Rare Communities

3-172. Public Concern: The Forest Service should develop guidance for the identification and designation of Prescription 9.F, Rare Communities. (O)

Response: The Plan will allocate known location of rare communities prior to the plan. Rare communities only protect habitat for some of the T&E species. The Plan is a programmatic document. The level of surveying addressed in your comment is handled at the project level. All projects require a Biological Evaluation that addresses your concerns about protecting PETS species. Interdisciplinary teams are involved in project planning which include consultation with biologist, botanist and ecologist, which will identify appropriate measures to identify and protect rare communities as well as PETS species. All projects require informal or formal consultation wit the USDI Fish and Wildlife Service to assure adherence to the Threatened and Endangered species act.

3-173. Public Concern: The Forest Service should protect or restore rare communities. (A)(C)(O)(J)(S)

AND DISTINGUISH BETWEEN "RESTORE" AND "EXPAND" (A)(C)(O)(J)(S)

Response: Refer to response to Public Concern 3-178.

3-174. Public Concern: The Forest Service should provide guidance that specifies how areas will be delineated and reassigned to Management Prescription 9.F, Rare Communities. (A)(C)(O)(J)(S)

Response: The Chattahoochee-Oconee National Forest is, and will continue to map and allocate lands for newly found rare communities. The Chattahoochee-Oconee National Forest will inventory, protect, maintain, restore and enhance conditions of known rare communities on the Chattahoochee-Oconee National Forest. (See Forest Plan Ch 3 Management Prescription 9.F.) The Forest would follow the requirements needed for a

Forest Plan amendment in order to reallocate lands deemed appropriate for assignment to 9.F.

3-175. Public Concern: The Forest Service should protect a number of rare communities. (O)(J)

Response: The Chattahoochee-Oconee National Forest is, and will continue to map and allocate lands for newly found rare communities. The Chattahoochee-Oconee National Forest will inventory, protect, maintain, restore and enhance conditions of known rare communities on the Chattahoochee-Oconee National Forest. (See Forest Plan Ch 3 Management Prescription 9.F.)

3-176. Public Concern: The Forest Service should assign Management Prescription 4.D to designated botanical areas until a rare community inventory can be produced. (O)

Response: The first sentence in the 4.D Prescription does state that this prescription includes lands that will later be re-allocated to the Rare Community (9F) prescription. The current botanical areas are considered 4.D unless re-allocated to the 9F. There is a Forest-wide standard in the Plan stating that proposed project areas will be surveyed for rare communities prior to project implementation and a database of rare communities across the Forest will be maintained.

3-177. Public Concern: The Forest Service should provide better mapping for unique plant communities. (O)

Response: The Plan contains a Forest-Wide standard stating that a database of rare community locations and conditions will be kept and utilized in project planning. In addition, the Forest is working with local botanists and the State Natural Heritage Program to map and GIS unique botanical and ecological sites regardless of their size. Natural resource specialists at the District and Forest levels usually are aware of these sites. However, they are often hesitant to place these sensitive areas on maps available to the public due to problems such as illegal digging of rare plants or increased visitation to sites such as bogs, resulting in degradation of the sites.

3-178. Public Concern: The Forest Service should protect rare communities. (C)(O)(J)(S)

Response: Several commenters compared provisions for rare communities across forests and found differences. Concerns include lack of delineation of rare communities and allocation of specific acreage to the Rare Community Prescription, and uncertainty about when, where, and how rare communities

would be inventoried, delineated, and allocated. Despite some differences that have resulted as regional recommendations were incorporated into individual plans, each revised plan includes language that makes clear our intent with regard to rare communities. Our intent is that rare communities, as defined in each plan, will be given high priority for maintenance and restoration wherever they occur on the forest. To accomplish this intent, it is clear that we will need to improve our inventories of rare communities as the plan is implemented. We will improve rare community inventories through a variety of approaches, including project-level surveys where needed to ensure maintenance or restoration of rare communities. As rare communities are located and mapped, they will automatically be allocated to the Rare Community prescription, unless or until such allocation would result in a substantial impact to achievement of conditions and outputs envisioned in the plan. The plan indicates that rare communities will be monitored for number and acreage of occurrence, condition (which includes presence of rare species), management needs, and management accomplishments. This focus will ensure that rare communities continue make a critical contribution to community and species diversity on the forest. Additional species-specific provisions, called for by some commenters, are addressed in responses to Public Concerns 3.145 and 3.181.

3-179. Public Concern: The Forest Service should map and inventory all rare communities. (O)

Response: The Chattahoochee-Oconee National Forest is, and will continue to map and allocate lands for newly found rare communities. The Chattahoochee-Oconee National Forest will inventory, protect, maintain, restore and enhance conditions of known rare communities on the Chattahoochee-Oconee National Forest. (See Forest Plan Ch 3 Management Prescription 9.F.)

3-180. Public Concern: The Forest Service clearly delineate rare communities and allocation; provide specific direction for restoration; establish standards for monitoring, maintaining records, and surveying; identify and protect all special areas; and, establish goals, objectives, and standards for special areas and rare communities. (A)(C)(O)(J)(S)

TO ESTABLISH CONSISTENCY ACROSS FORESTS (A)(C)(O)(J)(S)

Response: Refer to response to Public Concern 3-178.

3-181. Public Concern: The Forest Service should protect species occurrences that fall within general forest areas outside rare communities. (A)(C)(O)

BECAUSE 25 PERCENT OF VIABILITY CONCERNS FALL OUTSIDE RARE COMMUNITIES (A)(C)(O)

Response: Other commenters focused on the need to identify and protect, maintain, or enhance locations where viability concern species occur, especially when these occurrences are outside of areas targeted for optimal protection and management (e.g., rare communities). They argue that maintaining or enhancing these occurrences is necessary to provide for species viability. We agree. This issue also is a question of where in the overall planning process such consideration should occur. Site protection is generally considered and provided at the project level through site-specific environmental analysis. In addition, known locations of viability concern species can be used during plan implementation to select sites for projects designed to maintain or restore important habitats. Because of their site-specific nature, these considerations are plan implementation functions that are more appropriately addressed outside of the plan.

Ultimately, our success at meeting viability requirements must be viewed from the perspective of the entire planning process, which includes not just the strategic forest plan, but also plan-to-project considerations, site-specific project analysis, and monitoring feedback. We believe the treatment given to species viability in the Revised Plan and EIS provides us with a solid, and much improved, strategic framework from which to meet species viability requirements as the Revised Plan is implemented and monitored.

Mast

3-182. Public Concern: The Forest Service should specify goals, objectives, and standards for hard mast, and discuss hard mast in document sections for wildlife and threatened and endangered species. (O)(J)

BECAUSE HARD MAST IS AN IMPORTANT WILDLIFE FOOD (O)(J)

Response: Hard mast is critical food sources for wildlife in the Southern Appalachians. The importance of acorns to wildlife is discussed in several sections of the EIS including oak and oak-pine forests, black bear, white-tailed deer, wild turkey and ruffed grouse. The quantity of acorns available varies greatly from year-to-year but is closely tied to the acres of mature oak forest. The revised forest plan has a number of objectives related to maintenance and restoration of mature oak forest. These include objectives for thinning and burning in existing oak forest to create suitable conditions for oak regeneration, and objectives for restoration of oak forest on appropriate sites currently occupies by pine plantations or other hardwood species such as gum and maple. These objectives will insure that hard mast will continue to be abundant on the forest.

Chapter 4
Transportation

Forest Transportation System (General)

4-1. Public Concern: The Forest Service should emphasize the importance of the transportation system. (A)(C)(O)(J)

Response: Access and road management was identified as one of the significant issues considered in defining the alternative management strategies. Science-based roads analyses at the appropriate scales (forest, watershed and project-scales) are conducted as required in FSM 7712. The objectives of roads analyses are to provide Forest Service planners and decision makers with critical information to develop road systems that are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal negative ecological effects on the land, and are in balance with available funding for needed management actions.

4-2. Public Concern: The Forest Service should develop and enforce road density standards. (A)(C)(O)(J)(S)

Response: Open roads density standards should only be established when supported by site-specific science-based analysis. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities for implementation. When open road density standards are warranted, measures will be taken to enforce the standards.

4-3. Public Concern: The Forest Service should define what constitutes a trail and the method of getting trails designated. (O)

Response: An official trail is a travelway not suitable for highway vehicles but one the Forest Service has accepted into the trails inventory as a National Forest facility. To be accepted, it must meet environmental quality standards. Designation of a trail refers to its identification as being open or closed to a specific type or types of use. Designation may be by description in text such as in brochures or on the Forest web site or by signing. Trail designations will occur over time through a site-specific planning process.

4-4. Public Concern: The Forest Service should only allow stream crossings when no feasible alternative exists. (C)(O)(J)

Response: Stream crossings will be minimized and will occur only when necessary to achieve a Forest Plan objective. Management Prescription 11,

Riparian Corridors, clearly states in Chapter 3 of the Forest Plan that crossings will occur only at designated points and identifies the activities in which equipment would be allowed.

Roads Infrastructure Management (General)

4-5. Public Concern: The Forest Service should develop goals and objectives for reducing road mileage to fiscally responsible levels. (A)(C)(O)(J)(S)

Response: Response: Each forest has objectives for road management. In addition, before the Record of Decision was signed finalizing the decision on the plan, a Roads Analysis was completed that laid out objectives for road management, including reduction of road miles.

4-6. **Public Concern: The Forest Service should develop more road access to National Forest System lands. (A)(C)(O)(J)**

Response: This concern is best addressed at a watershed or project decision level. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needs for additional access and to recommend priorities.

4-7. Public Concern: The Forest Service should better maintain access so as to not impair forest recreation. (C)(O)

Response: The plan acknowledges the need to provide road access to the forest. There will be areas of the forest that may not be not have road access because providing that type of access may be detrimental to other resource values. As projects and forests activities occur, in areas without road access, the needs for permanent or temporary road access will be analyzed and decisions will be based on the best science available.

4-8. Public Concern: The Forest Service should no longer employ contractors for road maintenance and construction. (O)

Response: The use of contractors to perform road maintenance and road construction is not a Forest Plan decision. However, the use of contractors for this type of work is a common practice. Performance problems would typically be addressed by the contract administrator.

4-9. Public Concern: The Forest Service should pave forest roads with permeable methodologies to stop runoff and increase user access. (A)(C)(O)(J)(S)

Response: National Forest System (NFS) roads serve a multitude of uses and are constructed and maintained to best serve the intended use within available funding. These roads may range from single lane roads with turnouts to double lane roads. Road surfaces vary from native surfaced to bituminous paved roads. Road management objectives are developed for each NFS road that guide road design criteria and planned maintenance. Many factors are considered in determining what type of road surfacing is most appropriate. They include, but are not limited to traffic (volume and types of vehicles), resource protection (water quality, erosion, etc.), climate, strength of underlying soils, user safety and comfort, economics and availability of funds. Road management objectives are reviewed periodically for appropriateness.

Roads Analysis

4-10. Public Concern: The Forest Service should conduct the roads analysis process. (A)(C)(O)(J)(S)

Response: A forest-scale roads analysis has been completed to inform the decision as required in FSM 7712. While it is desirable to have the forest-scale roads analysis completed prior to issuance of the draft, it is not a requirement.

4-11. Public Concern: The Forest Service should incorporate the analysis of the road system into the draft plan revision before it becomes final and involve the public in the roads analysis process. (A)(C)(O)(J)(S)

Response: A forest-scale roads analysis has been completed to inform the decision as required in FSM 7712. The roads analysis process is not a NEPA decision process and therefore does not require a formal public scoping and comment period. Public involvement in identification of issues and assessment of transportation needs and opportunities was encouraged and welcomed.

4-12. Public Concern: The Forest Service should conduct a new roads analysis. (A)(C)(O)(J)(S)

AND THEN DETERMINE OBJECTIVES (A)(C)(O)(J)(S)

AND APPLY OPEN ROADS STANDARDS TO TEMPORARY AND GATED ROADS (A)(C)(O)(J)(S)

AND IDENTIFY ROADS OR MILEAGE TO BE DECOMMISSIONED (A)(C)(O)(J)(S)

Response: The forest-scale roads analysis was not intended to analyze the all roads (classified and unclassified) on National Forest lands. There are multiple scales at which roads analysis may be conducted to inform road management decisions. Roads analysis at the forest-scale provides the context for informing road management decisions and activities at the watershed, area and project level. The forest-scale roads analysis and the

resulting report 1) display the classified roads and display how the roads are intended to be managed; 2) provide guidelines for addressing road management issues and priorities; 3) identify significant social and environmental issues, concerns and opportunities to be analyzed through lower level analyses; and 4) document coordination efforts with other government agencies (FSM 7712.13b.). The Responsible Official has the discretion and duty to determine whether or not a roads analysis below the forest-scale is needed and the degree of detail that is appropriate and practicable. (FSM 7712.13)

4-13. Public Concern: The Forest Service should develop criteria for when a watershed or project scale roads analysis will be needed. (A)(C)(O)(J)(S)

Response: The Forest Service has issued direction on roads analysis at the watershed and project scales. "The responsible Official has the discretion and duty to determine whether or not a roads analysis below the forest-scale is needed and the degree of detail that is appropriate and practicable. Guidance on selecting the appropriate scale and those proposed actions which may trigger a need for a roads analysis is set forth in FSM 7712.13, paragraphs a-c." (FSM 7712.13) Additional guidance is provided in the report *Roads Analysis: Informing Decisions About Managing the National Forest Transportation System* (USDA Forest Service, 1999, Misc. Report FS-643).

4-14. Public Concern: The Forest Service should demonstrate which roads are necessary to implement the forest plan. (A)(C)(O)(J)(S)

Response: 36 CFR 212.5 requires the Forest Service to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands, using a science-based roads analysis at the appropriate scale. The forest-scale roads analysis was not intended to analyze the all roads (classified and unclassified) on National Forest lands. There are multiple scales at which roads analysis may be conducted to inform road management decisions. Roads analysis at the forest-scale provides the context for informing road management decisions and activities at the watershed, area and project level. Outcomes of roads analysis at the watershed and area-scale would identify needed and unneeded roads (FSM 7712.13c)

4-15. Public Concern: The Forest Service should include only realistic projections of environmental effects in the roads analysis based on likely natural processes and management activities. (A)(C)(O)(J)(S)

Response: This comment focused on management of roadless areas rather than roads analysis. Inventories roadless areas will be managed to retain their roadless character. We believe that the environmental effects analysis is based on reasonable projections that reflect natural processes that are likely

and management activities that we anticipate. Since these processes and activities have not yet occurred, it is difficult to determine what they will be; however, it is the job of the interdisciplinary team to make these determinations.

4-16. Public Concern: The Forest Service should better identify National Forest System roads. (C)(O)(J)

Response: The effects analysis at the programmatic Forest Plan level is useful in comparing and evaluating alternatives on a Forestwide basis, but is not intended to provide sufficient detail to be applied to specific locations on the Forest. A Forest-scale roads analysis has also been completed to help inform the decision maker, however, again, it is not intended to provide site-specific analysis. Watershed and project scale analysis will be used to inform site-specific project decisions. It is at these levels of analysis where individual roads in the project area will be identified and effects of implementing a project alternative will be analyzed and disclosed.

4-17. Public Concern: The Forest Service should conduct a meaningful analysis of the effects of road construction and maintenance on aquatic habitats. (A)(C)(O)(J)(S)

Response: The most meaningful analysis of effects to aquatic resources would be done at the project level prior to any specific road construction project. In the revised CONF Plan, The Watershed Health Index (WHI) and associated process has been renamed to the Watershed Condition Rank (WCR) to better reflect the analysis process used. The actual process has only undergone minor changes. This section of the EIS has been reworded and comments incorporated.

4-18. Public Concern: The Forest Service should identify a minimum road system option as required by Forest Service Manual 7712.11. (A)(C)(O)(J)(S)

Response: 36 CFR 212.5 requires the Forest Service to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands, using a science-based roads analysis at the appropriate scale. The forest-scale roads analysis was not intended to analyze the all roads (classified and unclassified) on National Forest lands. There are multiple scales at which roads analysis may be conducted to inform road management decisions. Roads analysis at the forest-scale provides the context for informing road management decisions and activities at the watershed, area and project level. Outcomes of roads analysis at the watershed and area-scale would identify needed and unneeded roads (FSM 7712.13c)

Road Construction, Reconstruction, and Maintenance

4-19. Public Concern: The Forest Service should delete or rewrite Standard 6.B-009. (O)

Response: The standard of concern caps temporary road construction at 0.5 mile 'per entry'; that is, per decade. Given the location, size, and terrain of these areas and the emphasis of the management prescription, we see this as a reasonable compromise between no roads of any kind and unlimited roading.

4-20. Public Concern: The Forest Service should develop standards to ensure that aquatic resources are protected from damage due to increased road use and maintenance. (A)(C)(O)(J)(S)

Response: Standards for aquatic resource protection are located in Chapter 2 of the revised CONF Plan.

4-21. Public Concern: The Forest Service should place top priority on the maintenance or relocation of existing roads located within riparian corridors. (O)

Response: The goals, objectives and standards for access and road management are located in Chapter 2 of the revised CONF Plan. One objective is to inventory and prioritize conditions needing improvement in regard to soil and water resources.

4-22. Public Concern: The Forest Service should clarify whether or not temporary roads are included in construction estimates. (A)(C)(O)(J)(S)

Response: This concern is best addressed at the project level. The construction cost estimates of temporary roads associated with timber harvest are included in the sale appraisal and reflected in the stumpage price.

4-23. Public Concern: The Forest Service should only construct new roads if no other feasible alternative exists to deal with emergency situations. (A)(C)(O)(J)(S)

Response: This concern is best addressed at the project level. The construction cost estimates of temporary roads associated with timber harvest are included in the sale appraisal and reflected in the stumpage price.

4-24. Public Concern: The Forest Service should construct roads for timber harvesting. (A)(O)

AND MAINTAIN THEM FOR OTHER USES (O)

Response: We agree that roads serve multiple purposes. The transportation system is not solely, or even primarily, for timber removal. We do manage our roads for many uses and this would not change under a new Forest Plan.

4-25. Public Concern: The Forest Service should only consider new roads if they help in maintaining and protecting sensitive areas. (A)(C)(O)(J)(S)

Response: The Multiple-use Sustained-Yield Act specifies that National Forest System lands are to be managed for a variety of goods and services including outdoor recreation, range. Timber, water, wildlife and fish. Roads construction would be appropriate if it was determined needed to serve the management of the various uses and resources for which the national forests were proclaimed.

4-26. Public Concern: The Forest Service should not construct additional roads. (A)(C)(O)(J)(S)

BECAUSE EXISTING ROADS ARE NOT MAINTAINED (O)

Response: The preferred alternative calls for a reduction in total road miles. However, as projects and forests activities occur, in areas without road access, the needs for permanent or temporary road access will be analyzed and decisions will be based on the best science available. Based on the roads analysis on the forest level and on the project level, the road maintenance standard could be increased temporarily for the life of the project or permanently. Other roads could have their maintenance standard reduced or even decommissioned. The overall effect of the roads analysis process on a project and forest level indicates that the Forest will reduce the total system miles maintained.

4-27. Public Concern: The Forest Service should consider the costs of road construction for creating the desired conditions outlined in the proposed plan. (A)(C)(O)(J)(S)

Response: This concern is best addressed at a watershed or project decision scale rather than in Forest Planning. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.

4-28. Public Concern: The Forest Service should decrease the number of roads and maintain them better. (A)(C)(O)(J)(S)

Response: This concern is best addressed at a watershed or project decision scale rather than in Forest Planning. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners

and decision makers of needed and unneeded roads and to recommend priorities.

4-29. Public Concern: The Forest Service should curtail runoff from existing roads. (O)

Response: The forest plan goals include "improve conditions of needed roads and trails that are adversely affecting soil and water resources." The goal reflects the desired condition of improved drainage and erosion control on the roads that are adversely affecting soil and water resources.

Road/Removal/Decommissioning

4-30. Public Concern: The Forest Service should close forest roads. (A)(C)(O)(J)(S)

Response: This concern is best addressed at a watershed or project decision level. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.

4-31. Public Concern: The Forest Service should decommission Level 1 and Level 2 roads. (C)(O)(J)

Response: This concern is best addressed at a watershed or project decision level. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.

4-32. Public Concern: The Forest Service should develop objectives or standards for decommissioning roads. (A)(C)(O)(J)(S)

Response: Opportunities and related objectives for decommissioning roads are considered in the Roads Analysis process that was done at the Forest scale and completed before the decision was made on the Forest Land and Resource Management Plan.

4-33. Public Concern: The Forest Service should add direction to management prescriptions for deconstructing roads. (A)(C)(O)(J)(S)

Response: Opportunities and related objectives for decommissioning roads are considered in the Roads Analysis process that was done at the Forest scale and completed before the decision was made on the Forest Land and Resource Management Plan.

Chapter 5
Recreation

Recreation

Recreation Management Prescriptions

Chattahoochee National Forest

5-1. Public Concern: The Forest Service should assign the headwaters of Mountaintown, Fightingtown, and Dyer Creeks Management Prescriptions 12.A and 7.E.1. (O)

Response: These are the allocations for this area in the plan.

5-2. Public Concern: The Forest Service should allocate the Management Prescription 7.E.1, Dispersed Recreation, to Dover Creek, Winkler Creek, and Pheasant Branch. (O)

Response: This area was allocated to the 7.E.2 'Dispersed Recreation Areas with Vegetation Management' prescription, because it is within a Wildlife Management Area and management flexibility was needed for terrestrial wildlife habitat maintenance. In addition, the location relative to other more constrained allocations nearby raises the level of concern for the amount and distribution of habitats for viability.

5-3. Public Concern: The Forest Service should consider changing the Apalachee River tract Management Prescription from Custodial (0) to Dispersed Recreation (7.E.2) or Plant Association Management (9.H). (O)

Response: This tract was re-allocated to the Dispersed Recreation prescription for the final plan.

5-4. Public Concern: The Forest Service should allocate the Management Prescription 7.E.2, Dispersed Recreation with Vegetation Management, to several areas. (O)

Response: These were so assigned in the draft plan.

5-5. Public Concern: The Forest Service should assign the Management Prescriptions 12.A, Remote Backcountry – Few Open Roads, and 7.E.1, Dispersed Recreation, to several areas. (O)

Response: These were so assigned in the draft plan.

5-6. Public Concern: The Forest Service should modify various management prescriptions on the Chattahoochee National Forest. (O)

Response: This comment concerned language changes to the Appalachian Trail management prescription. This prescription was crafted over several years between the Forest Service Washington Office, USFS Region 9, USFS Region 8, the National Park Service, the Appalachian Trail Club, and the state Appalachian Trail Clubs. Any changes to the prescription are done consistently across all the Forests. There were changes made in the final 4.A. prescription based on public comment.

Multiple Forests

5-7. Public Concern: The Forest Service should encourage wildlife viewing and hunting opportunities in Management Prescription 7.E.2, Dispersed Recreation with Vegetation Management. (O)(S)

Response: This is precisely the intent of Management Prescription 7.E.2 and it is written to encourage these activities.

5-8. Public Concern: The Forest Service should assign the Management Prescription 12.A, Remote Backcountry Recreation, to the Big Mountain Area. (O)(S)

Response: This assignment was made in the draft Plan and carries forward to the final Plan.

5-9. Public Concern: The Forest Service should assign the Management Prescription 12.B, Remote Backcountry Recreation Non-Motorized, to several areas on the forest. (A)(C)(O)

INCLUDING PINK KNOB WILDERNESS STUDY AREA (O)

Response: These assignments were made in the draft Plan and carries forward to the final Plan.

Chattooga River Management Prescriptions

5-10. Public Concern: The Forest Service should ensure that management prescriptions for the Ellicott Rock Wilderness are the same for both the Sumter and Chattahoochee National Forests. (O)(S)

Response: These assignments were made in the draft Plan and carries forward to the final Plan.

5-11. Public Concern: The Forest Service should assign a portion of the Chattooga River watershed the Management Prescription 7.E.1. (O)

Response: The IDT reviewed the Dover Creek, Winkler Creek, and Pheasant Branch area allocation. We consider the protections of MRx 11 to be ample for the trout stream mentioned and we feel that the difference between prescriptions 7.E.1 and 7.E.2 are reasonable and needed for the location and resource conditions.

5-12. Public Concern: The Forest Service should allocate the Management Prescription 7.E, Dispersed Recreation, along the Wild and Scenic Chattooga River corridor. (O)

Response: This comment specifically referred to the area adjacent to the W&S River and downstream of Highway 76. Much of this area in earlier work had been proposed to be in dispersed recreation. However, the area south of Highway 76 is particularly high in xeric species; yellow pines and oaks. Each of these is at risk to either southern pine beetle, oak decline, or – in mixed types – to both. The 1999-2002 SPB epidemic underscored this relationship such that a higher level of management flexibility than the 7.E. management prescription afforded was needed in this area.

5-13. Public Concern: The Forest Service should apply Management Prescription 12.A in the Big Mountain Area of the Chattooga River. (O)(S)

Response: This was done in the draft.

Recreation Management (General)

5-14. Public Concern: The Forest Service should allow travel and recreational use along the edges of wildlife openings. (O)

Response: Permanent wildlife openings are established to provide a high quality food source for a variety of wildlife species. The acreage of existing openings on the Forest is limited due to the significant expense and

manpower required to create these openings. Recreational uses such as camping, ATV's, horses, and mountain bikes can cause damage to these established openings and reduce their value to wildlife. Therefore, management of these uses is necessary to prevent damage to the planted food plots and thereby protect the investment made to establish them. Under the revised plan, OHV, horse, pack stock, and bike use will be allowed on designated routes only. However, where designated routes go through or around the edge of wildlife openings, continued will be permitted. In addition, use of linear wildlife openings will be permitted when they are part of a designated route.

5-15. Public Concern: The Forest Service should not presume that a wilderness designation allows only recreation. (A)(C)(O)(J)(S)

Response: The Environmental Impact Statements (EIS) in addressing Issue 8 - Roadless Areas and Wilderness Management discloses that Wilderness, roadless and other un-roaded areas are managed to provide their full range of social and ecological benefits. The EIS further discloses that in addition to outdoor recreation in wilderness, there is a non-user component that values American wilderness. Wilderness is valued for preserving representative natural ecosystems and local landscapes. The very existence of wilderness is valued by the American public as part of the natural heritage of the country.

5-16. Public Concern: The Forest Service should recognize the importance of public land recreation. (A)(C)(O)(J)(S)

AND EMPHASIZE THESE USES ABOVE MONEY MAKING INTERESTS (A)(C)(O)(J)(S)

PARTICULARLY AS DEMAND INCREASES FOR RECREATIONAL OPPORTUNITIES (A)(C)(O)(J)(S)

Response: Outdoor recreation is one the recognized by the Multiple-use Sustained-yield Act that set out the purposes of the National Forest System. The others listed in the Act are range, timber, water, wildlife and fish. Outdoor recreation is recognized as a major use on the CONF. The goals and objectives for outdoor recreation use are located in Chapter 2 of the revised CONF Plan.

5-17. Public Concern: The Forest Service should not support recreational activities at the expense of the ecological integrity of resources. (A)(O)(S)

Response: Outdoor recreation is one the recognized by the Multiple-use Sustained-yield Act that set out the purposes of the National Forest System. The others listed in the Act are range, timber, water, wildlife and fish. The revised CONF Plan contains goals, objectives, and standards for outdoor recreation and the ecological components of the environment. These are located in Chapter 2 of the Plan. The interaction of recreational and components of ecological integrity will be evaluated over time through

monitoring. Appendix G in the Plan spells out the various items that will be monitored.

5-18. Public Concern: The Forest Service should better analyze the supply and demand for wilderness based recreation. (A)(C)(O)(J)(S)

Response: Refer to response to PC 5-21.

5-19. Public Concern: The Forest Service should better analyze the real price of recreational opportunities on National Forest System lands. (A)(C)(O)(J)(S)

Response: The most recent information available at the time of our analysis are prices expressed in 1989 dollars and estimated from 1989 to 2040 are found in the FS publication "Resource Pricing and Valuation Procedures for the Recommended 1990 RPA Program", which is a part of the Process Record. We estimated the real price growth to year 2000 and adjusted the values to reflect 2000 prices. If revised prices are made available from Forest Service Research and Forest Service Strategic Planning and Resource Assessment Units before the Final Draft EIS is release, these new prices will be substituted for the DEIS prices.

5-20. Public Concern: The Forest Service should clarify the use calculations of "Other Unconfined Recreation Opportunities/Experiences" in the supply analysis of wilderness and recreation. (O)

Response: Refer to response to PC 5-21.

5-21. Public Concern: The Forest Service should better document the need for recreation on National Forest System lands. (A)(C)(O)(J)(S)

Response: Many comments were received throughout the planning process concerning the 1997 guidance from the Region on methodologies for calculating recreational supply and demand for wilderness. This included a calculation of the "practical maximum capacity" of roadless and wilderness areas. The Region recognized the concerns with this methodology and issued a letter on March 8, 2002 which emphasized that these calculations are "theoretical" and that the "rationale for the wilderness recommendations should be based on the merits of each roadless area and the sustainability of wilderness values".

As a result, the calculations from this methodology are not included anywhere in the EIS, and they were not a determining factor in making wilderness recommendations. What were determining factors were the factors identified in the Forest Service Handbook at FSH 1909.12, Chapter 7.23b. These factors are:

- The location, size, and type of other wildernesses in the general vicinity and their distance from the proposed area,
- Present visitor pressure on other wildernesses,
- The extent to which non-wilderness lands provide opportunities for unconfined outdoor recreation experiences,
- The habitat needs of certain biotic species (those that need "protected areas" or those that cannot survive in "primitive surroundings"), and
- An area's ability to provide for preservation of identifiable landform types and ecosystems.

The answers to some of these factors are in the individual roadless area descriptions found in Appendix C. However, for some of the other factors within a particular National Forest, the answers were essentially the same for each roadless area. In these cases, an overall assessment of the "need" for wilderness on a National Forest was summarized in the EIS.

Recreation Types/Opportunities

Motorized Recreation

Motorized Recreation–Management Prescriptions

5-22. Public Concern: The Forest Service should not allow OHV usage in the portions of management prescription areas that are adjacent to wilderness (1.A), wilderness study areas (1.B), or the Appalachian Trail (4.A). (O)

Response: The final Plan includes criteria to be considered in planning any OHV trail systems and, in addition, considerations for the management of any trail within such systems. In addition, project-level consideration of proposals to create an OHV trail system or a new trail within a system would include analysis of effects such as OHV sound effects to the recreation setting, roadless criteria, roadless values, or wilderness values and possibilities for illegal access into these areas from off-trail travel.

5-23. Public Concern: The Forest Service should prohibit OHV trails in Management Prescriptions 6.B and 9.A.3. (O)

Response: The Interdisciplinary (IDT) Team found that some areas with good to excellent potential as old growth blocks were bisected by, or adjacent to, roads or motorized trails. The Forest chose not to require trail or road closure, because there is only one old growth criteria of the four primary ones that relates to this situation. It is the one that states an existing old growth area will not have " obvious

human disturbance that conflicts with old growth characteristics…" Conflict with old growth characteristics means the other three primary criteria would be affected and each of these relate to the vegetation. Solitude is not an old growth criterion as either a primary or an associated factor. In addition, the stated recreation goal of high quality recreation implies that recreationists have variety available to them.

5-24. Public Concern: The Forest Service should only allow ATV use in Management Prescription 7.C, OHV Use Area. (A)(C)(O)(J)(S)

Response: Through the 7.C prescription, the LMP identifies where the management will emphasize off highway vehicle ("OHV") recreation. In other prescriptions, OHV recreation may not be emphasized but may be compatible. For example, a single trail or smaller trail system may already exist, or be appropriate for development, in other prescriptions. Finally, it is important to provide logical trail systems including connections between trail systems, trail heads, or points of interest. The Forest Plan states where motorized recreation is prohibited or permitted.

The Chattahoochee-Oconee IDT considered but rejected the concept of 'sacrifice areas'; as some have called them. Packing a high trail density in a small area would cause more problems than it would solve. It would also fail to meet our recreation goal of high-quality recreation. Achieving a quality trail system within a single prescription dedicated to that emphasis would require large land areas. The IDT judged that it was both unnecessary and inappropriate to dedicate relatively large areas of land to near-exclusive use of a single type of recreation.

Additionally, a few comments continued that the EIS failed to consider a range of alternatives for motorized recreation. However, the EIS did examine a range of OHV opportunities among the seven alternatives. Chapters 2 and 3 discuss, by alternative, the acres allocated to the 7C prescription and the percent of estimated change in motorized trails.

Motorized Recreation–Management

5-25. Public Concern: The Forest Service should allow ATV use on National Forest System lands. (C)(O)(J)

Response: Refer to response to 5-24.

5-26. Public Concern: The Forest Service should not open up more National Forest System lands to ATV use. (A)(C)(O)(J)(S)

BECAUSE ATVS DISTURB OTHER FOREST USERS (O)

UNTIL CURRENT ATV TRAILS ARE EVALUATED TO DETERMINE THEIR SUSTAINABILITY WITH AVAILABLE RESOURCES (O)

BECAUSE THE FOREST SERVICE CAN NOT ADEQUATELY ENFORCE CURRENT ATV REGULATIONS (C)(O)

TO PROTECT AIR QUALITY (O)

BECAUSE OF THE DAMAGE CAUSED BY ATV USE (O)

FOR MULTIPLE ENVIRONMENTAL REASONS (A)(C)(O)(J)

BECAUSE THE CURRENT TRAILS ARE NOT PROPERLY MAINTAINED (O)

BECAUSE OF EROSION PROBLEMS ASSOCIATED WITH ATV USE (O)

AND PERSONAL WATERCRAFT USE (O)

EXCEPT IN EMERGENCY SITUATIONS (O)

Response: Refer to response to 5-24.

5-27. Public Concern: The Forest Service should prohibit ATV use on National Forest System lands. (A)(O)(J)

BECAUSE OF THE ENVIRONMENTAL DAMAGE THESE VEHICLES DO (A)(O)

Response: Within the Forest plan, the Chattahoochee-Oconee has no authority to decide on this issue. The Forest Service Chief recognizes the problems associated with OHVs –work goes on with respect to addressing these concerns.

This comment is outside the scope of the Forest plan. These issues are being discussed outside of the plan context.

The implementation of Forest standards will serve as the guide for addressing existing trail systems, management of their environmental impacts, and criteria for the development of any new trails or the reconstruction and relocation thereof.

5-28. The Forest Service should comply with Executive Orders 11644 and 11989 that require the Forest Service to monitor the impacts caused by off-road vehicles and provide an annual report. (O)

Response: Monitoring requirements are listed in Appendix G of the revised CONF Plan. A task sheet detailing monitoring to comply with the executive order is part of the monitoring strategy developed for evaluating plan implementation. An annual monitoring and evaluation report will include findings from any monitoring related to off-road vehicles.

5-29. Public Concern: The Forest Service should include strict standards to control the impact of ATV use on National Forest System lands. (O)

Response: Executive order 11644 legislation provided policies and procedures that ensured that the use of off-road vehicles on public

lands (i.e. Forest Service lands) will be controlled to protect land resources, promote the safety of all users of the lands, and minimize conflicts among the various users of the land.

Executive Order 11644 directs land managers to close areas and trails to OHV use whenever "considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat, or cultural resources" is or will be caused by their use.

The current standards in the plan address the provisions for the management of the Forests existing OHV trails, including construction, reconstruction, relocation, monitoring, and possible closure.

5-30. Public Concern: The Forest Service should not construct motorized recreation trails in terrain that is so steep that it necessitates encroachment on ephemeral stream zones. (O)

Response: Stream crossings in ephemeral zones in steep country will be avoided when ever possible, but may be unavoidable at times. New OHV trail construction, that requires a riparian crossing, will be limited to ephemeral zones at designated crossings. Existing OHV trails in a riparian corridor that are causing unacceptable resource impacts will receive appropriate mitigation measures, including trail closure, if needed.

5-31. Public Concern: The Forest Service should include a sound level analysis added to any list of criteria for OHV usage. (O)

Response: Determination of usage would be made considering effects to various resources, including the effects to the human environment. Sound level would be considered to the extent it is determined to be a significant issue for a specific site.

5-32. Public Concern: The Forest Service should limit ATV use to the current seven legal trails totaling about 131 miles. (O)

Response: We agree with the larger concept that OHV use, as with most uses, must be limited on National Forest.

The final Plan includes additional constraints but not to the degree suggested. The existing trail systems need work. Some of that work may include re-location of trails or trail segments and re-configuration of trail systems. A limitation to existing trails in the face of rising demand would ultimately work against having a high quality experience in an environmentally sustainable way.

5-33. Public Concern: The Forest Service should better maintain existing ATV trails. (O)

Response: A CONF Plan objective provides for OHV trail condition surveys with a prioritization of trails found to be adversely affecting soil and water resources. The objective is to correct situations within five years of plan implementation. Additionally, a plan standard calls for bi-annually maintaining 100 percent of established trails to established standards.

5-34. Public Concern: The Forest Service should include standards and criteria in the draft plan that would prevent ATVs from being allowed in sensitive areas. (O)

Response: OHV restrictions are included in management prescriptions found in Chapter 3 of the revised CONF Plan.

5-35. Public Concern: The Forest Service should adopt the ATV screening criteria from the Jefferson and Cherokee National Forests Plans. (O)

Response: Since the DEIS and draft Plan, the Chattahoochee-Oconee has developed its own screening criteria that are inclusive of the criteria of the Jefferson and the Cherokee. In addition, we have extended them to other considerations as well.

Mechanized Recreation

5-36. Public Concern: The Forest Service should allow flexibility in determining the suitability of bicycle trails in riparian areas. (O)

Response: Chapter 3 of the Forest Plan describes the desired conditions for the riparian corridors and recognizes that both dispersed and developed recreation may be present within these corridors. It is also recognized that the majority of recreation on National Forest lands does occurs in or near water bodies. Bicycle use will be limited to designated trails only. Management Prescription 11, Riparian Corridors (Chapter 3) in the Forest Plan, does not preclude bicycle use on designated trails within riparian areas, but does establish mitigating measures to lessen impacts on the watershed for both existing and planned trails that would allow for bicycle use.

5-37. Public Concern: The Forest Service should not prohibit bicycle use on all permanent wildlife openings. (O)

Response: Permanent wildlife openings are established to provide a high quality food source for a variety of wildlife species. The acreage of existing openings on the Forest is limited due to the significant expense and manpower required to create these openings. Recreational uses such as camping, ATV's, horses, and mountain bikes can cause damage to these established openings and reduce their value to wildlife. Therefore, management of these uses is necessary to prevent damage to the planted food plots and thereby protect the investment made to establish them. Under the revised plan, OHV, horse, pack stock, and bike use will be allowed on designated routes only. However, where designated routes go through or around the edge of wildlife openings, continued will be permitted. In addition, use of linear wildlife openings will be permitted when they are part of a designated route.

5-38. Public Concern: The Forest Service should not limit bicycle use to designated bicycle trails. (A)(C)(O)(J)(S)

BECAUSE NATIONAL FOREST SYSTEM TRAILS SHOULD BE OPEN TO BICYCLING, UNLESS THERE ARE SPECIFIC REASONS TO CLOSE THEM (O)

BECAUSE OF THE SOCIAL BENEFITS OF BICYCLING (O)

BECAUSE THE RECREATIONAL AND HEALTH BENEFITS OF MOUNTAIN BIKING FAR OUTWEIGH THE MINIMAL IMPACTS ON THE LAND (A)(C)(O)(J)(S)

BECAUSE CLAIMS THAT MOUNTAIN BIKES DAMAGE TRAILS AND ARE DANGEROUS TO OTHER TRAIL USERS ARE ERRONEOUS (O)

BECAUSE THE POLICY IS AMBIGUOUS AND NOT BASED ON ANY SOUND POLICY (O)

Response: The ID Team and Forest Leadership Team carefully considered various issues regarding trail use by mountain bikes. Temporary roads or closed system roads not suitable for bike use will be posted as closed at beginning terminus. Bike use will be on designated routes only- no cross-country travel will be allowed. Routes will include authorized trails and open roads. Individual management prescriptions may prohibit the development of new trails.

5-39. Public Concern: The Forest Service should continue to support mountain biking activities on National Forest System lands. (A)(C)(O)(J)

BECAUSE MOUNTAIN BIKERS PROVIDE MANY BENEFITS TO NATIONAL FOREST SYSTEM TRAILS (O)

BECAUSE MOUNTAIN BIKING PROVIDES ECONOMIC BENEFITS TO LOCAL COMMUNITIES (C)(O)

BECAUSE LOCAL MOUNTAIN BIKERS SPEND MANY HOURS PER YEAR ON TRIAL MAINTENANCE, USER EDUCATION, AND MOUNTAIN BIKE PATROLS (A)(C)(O)(J)

INCLUDING TRAILS IN THE BEAR CREEK AND MOUNTAINTOWN AREAS (O)(J)

Response: Mountain bicycle activities will be allowed on designated routes, which will include authorized trails and open roads as designated. Cross-country riding will be prohibited. There is agreement that the Forest Service should continue to support mountain biking as within the capability of the established management prescriptions and to extent possible while meeting other resource goals, objectives, and standards. Additionally the cooperation must continue to be fostered through the various user groups, i.e., hikers, equestrian individual/groups.

5-40. Public Concern: The Forest Service should allow mountain biking on the Pinhoti, Benton MacKaye, and other long-distance routes. (O)

Response: As a separate process not related to the development of the Forest Plan, a comprehensive trails analysis process will be implemented on the Forest. One key point of this formative process is to evaluate existing trails with respect to distribution of use across the Forest as well as assessing the public needs/ demands for National Forest trails. Currently there are 90 miles of designated bike trails on the Forest exclusive of the designated forest development roads available for biking activities. Limited capability due to access legal constraints (management prescription distribution-i.e. wilderness MRx 1.A adjacent to concentrated recreation zone MRx 7.D.)

Non-Motorized Recreation

5-41. Public Concern: The Forest Service should support hiking activities on National Forest System lands. (A)(C)(O)(J)

Response: This is being done, Forest standards are in place for the continued management of hiking trails.

Hunting and Fishing

5-42. Public Concern: The Forest Service should acknowledge that the Big Mountain area on page C-8 is not regularly stocked by the Forest Service. (O)

Response: This section has been revised. The stocking is done by Georgia Department of Natural Resources.

5-43. Public Concern: The Forest Service should protect fishing opportunities on National Forest System lands. (C)(O)

Response: The Forest service provides for a wide range of fishing opportunities from Wilderness to disabled accessible fishing areas.

5-44. Public Concern: The Forest Service should adopt alternative trails standards. (O)

Response: Trail standards have been revised in Chapter 2 – Forest-wide Standards, and Chapter 3 – Riparian Corridor prescription.

5-45. Public Concern: The Forest Service should establish multi-use recreational trails. (O)(S)

Response: A comprehensive analysis study (outside of the land management plan) is currently being performed. Trail use, maintenance, and projected use trends will be analyzed. This study will provide possible avenues for the continued development of multi-use recreational trail development.

5-46. Public Concern: The Forest Service should continue to expand trail access for multi-purpose users. (O)

Response: A comprehensive analysis study (outside of the land management plan) is currently being performed. Trail use, maintenance, and projected use trends will be analyzed. This study will provide possible avenues for the continued development of multi-use recreational trail development.

5-47. Public Concern: The Forest Service should support the GEM Trail. (A)(C)(O)(J)(S)

Response: The demand for trails of all kinds is increasing while budgets for construction and maintenance of trails remain static or often decreases. The overall focus of each of the Southern Appalachian Forests in the plan revision is to work to maintain and improve current trail systems and to analyze any additional needs for trails as funding permits. Analysis of a long distance trail through the Southern Appalachians was not analyzed as part of our plan revision. A long distance trail such as the Great Eastern Mountains Trail will require a separate planning effort that would tier to the revised forest plan.

Trail development is compatible with the revised forest plans as are the goals to reduce congestion on the Appalachian Trail and provide multiple-use trail opportunities. We would encourage interested publics to begin to dialog with all forests that would be affected by the proposed GEM trails to discuss the feasibility and opportunity for success in such an ambitious endeavor.

Appalachian Trail

5-48. Public Concern: The Forest Service should protect the Appalachian Trail. (C)(O)(J)

Response: The Forest Service is charged by the National Trails System Act (P.L. 90-543, as amended) with the protection and management of the portions of the Appalachian National Scenic Trail which are located on National Forest lands and lands administratively transferred to the agency for management. Working with the other members of the cooperative management system for the Appalachian Trail, the agency has developed many tools to accomplish this protection and management, including the *Appalachian Trail Comprehensive Plan*, agency policy and directives, numerous memoranda of agreement, and the development of a unique management prescription for the Appalachian Trail in the Forest Plans. The agency has also striven to balance the need for consistency in the management of the A.T. as a long-distance trail within the Southern Region with the need to respond to unique, site-specific situations. The Appalachian Trail corridor was designated as a unique management area in the original Forest Plan, and that concept is continued as management prescription 4.A in the Revised Forest Plan. The Forest Service is committed to the continued protection and management of the Appalachian National Scenic Trail.

5-49. Public Concern: The Forest Service should remove the Appalachian Trail Management Prescription 4.A. (O)

Response: The Appalachian Trail was designated as the first National Scenic Trail by the National Trails System Act (NTSA). This formal designation separates the A.T. from most other Forest Service trails. The NTSA also requires the conservation of the A.T. and the areas through which it passes. Since 1977, working with A.T. management partners, the Southern Region of the Forest Service has defined the corridor area associated with the A.T. as the foreground visual zone as defined by the current agency system for scenic resource management. Where the traditional or current route of the trail is not the optimal permanent location, the optimal location has been determined through a cooperative process, and is the basis for the trail corridor. In the original Forest Plan, the A.T. corridor was designated as a unique management area with specific management direction, standards, and guidelines. In the Revised Forest Plan, the A.T. corridor is designated as a unique management prescription with specific management direction and standards. Effective management of the Appalachian National Scenic Trail as a long-distance hiking trail relies on the direction found in management prescription 4.A. Changing the definition of the A.T. corridor is outside the scope of the Revised Forest Plan.

5-50. Public Concern: The Forest Service should realize that management of the Appalachian Trail violates the Federal Advisory Committee Act. (C)(O)(J)

Response: The Appalachian Trail was designated as the first National Scenic Trail by the National Trails System Act (NTSA). The act directs the Forest Service and the National Park Service to work cooperatively with volunteers and volunteer organizations to plan, develop, and manage nationally designated trails. Management of the AT is conducted using the cooperative management system detailed in the *Appalachian Trail Comprehensive Plan*, developed by both federal agencies as directed by the NTSA. This management is a full partnership between the Forest Service, the National Park Service, other federal and state land-managing agencies, the Appalachian Trail Conference (ATC), and the members of ATC-affiliated trail clubs. The NTSA, the *A.T. Comprehensive Plan,* and existing agreements between the trail-management partners recognize the need to manage both the actual trail treadway and the lands around the treadway to protect trail values and resources, and provide for the enjoyment of trail users. The management of the Appalachian Trail using the cooperative management system does not violate the Federal Advisory Committee Act (FACA) or the National Trails System Act. Public participation is provided for by the scoping process of the National Environmental Policy Act (NEPA) for specific trail-related projects, and by the public comment process of the Revised Forest Plan. See also the response to related comment 1-19.

5-51. Public Concern: The Forest Service should realize that management of the Appalachian Trail violates the National Trails System Act of 1968. (C)(O)(J)

Response: Refer to response to 5-50.

5-52. Public Concern: The Forest Service should incorporate the "Implementation Guide for the Appalachian Trail" into the forest plan. (O)(J)

Response: Management direction in the original Forest Plan in the 1980s included both standards and guidelines for management actions. Current regional agency practice is to include only management direction meeting the definition of a standard in the Revised Forest Plan. (Standards are specific resource management directions and often preclude or impose limitations on management activities or resource uses, generally for environmental protection, public safety, or to resolve an issue.) Some items were suggested during the planning process that are essentially the "how to's" of implementing the Forest Plan. These guides for implementation may take the form of field guides or handbooks and will be kept separate from the Revised Forest Plan.

5-53. Public Concern: The Forest Service should not incorporate the "Implementation Guide for the Appalachian Trail" into the forest plan. (C)(O)(J)

Response: Refer to response to 5-52.

5-54. Public Concern: The Forest Service should complete a draft version of the implementation guide before the final resource management plan is completed. (O)(J)

Response: Refer to response to 5-52.

5-55. Public Concern: The Forest Service should limit the impact of the Appalachian Trail on surrounding land uses. (C)(O)(J)

Response: Since 1977, the Southern Region of the Forest Service has defined the corridor area associated with the Appalachian National Scenic Trail as the foreground visual zone as defined by the current agency system for scenic resource management. This definition results in a management prescription area of varying width based on the actual seen area from the A.T. Within this management prescription, management activities are designed to emphasize and complement the A.T. experience. This definition, and the management direction and standards which apply within the prescription area, is appropriate for a Congressionally-designated National Scenic Trail, and serves as an effective and quantifiable limit for the A.T. management prescription and adjacent management prescription areas.

Appalachian Trail–Management Prescriptions

5-56. Public Concern: The Forest Service should add to the Chattahoochee-Oconee PRLMP a number of specific standards for Appalachian Trail management in wilderness areas that appear in the 1.A Management Prescription for the Cherokee National Forest. (O)

Response: The standards for management prescription 1.A and 1.B have been revised to include the identified Appalachian Trail-specific standards. These standards were developed and agreed upon by the Forest Service and trail-managing partners and are consistent with other Forests in the Southern Region. They were inadvertently omitted from the Draft Revised Forest Plan.

5-57. Public Concern: The Forest Service should, in Management Prescription 4.A, include a reference to the Springer Mountain Approach Trail in the first sentence of the prescription and ensure that the map for Alternative I reflects this change. (O)

Response: The Forest has made this change. Also done in 4.A desired conditions write-up.

5-58. Public Concern: The Forest Service should clarify that Appalachian Trail management standards be followed in the Ed Jenkins National Recreation Area. (O)

Response: The Forest has done this in the 4.A. desired conditions write up.

5-59. Public Concern: The Forest Service should include language regarding management of the Appalachian Trail in other prescriptions (such as the Ed Jenkins National Recreation Area (3.C) and several wilderness areas (1.A). (O)

Response: The Forest has done this.

5-60. Public Concern: The Forest Service should assign various Management Prescriptions to various areas on the Appalachian Trail. (C)(O)(J)

Response: The Forest manages areas along the AT in a manner consistent with Forest Service Region 8 and Region 9 policy.

5-61. Public Concern: The Forest Service should add a standard that states explicitly that motorized use is prohibited on the Appalachian Trail. (O)

Response: This has been performed. Trail to be posted closed (to motorized use) at trailhead and to have native material, i.e. plants and boulders, placed as barriers to OHV vehicles.

5-62. Public Concern: The Forest Service should modify Standard 4.A-022 to approve new public utilities and rights-of-way only when impacts can be mitigated so as to result in no net loss of Appalachian Trail values and resources. (O)

Response: Inclusion of a standard or standards requiring "no net loss" of Appalachian Trail values was discussed extensively during development of the revised Forest Plans. The inability to objectively define the terms and quantify "loss of values" and "no net loss" resulted in the decision not to include it as a standard. Overall protection of Appalachian Trail values and resources is provided for by existing agency regulations and policy; and by the emphasis narrative, desired condition narrative, and standards for management prescription 4.A in the Revised Forest Plan.

5-63. Public Concern: The Forest Service should modify various Appalachian Trail related standards and objectives. (O)(J)

Response: The ID Team considered the suggestions and those that were determined appropriate were included in the final.

5-64. Public Concern: The Forest Service should consult with the Appalachian Trail Club before making special use permit decisions. (O)

Response: This will be done per previous meeting with the Georgia Appalachian Trail Club and the Forest Service—annual meeting discussion topic. Consultation will be initiated.

5-65. Public Concern: The Forest Service should modify the language addressing lands and special uses for the Appalachian Trail. (C)(O)(J)

Response: Any changes to this particular language must be coordinated at the national and regional levels, and with involvement of other agencies.

Camping

5-66. Public Concern: The Forest Service should keep the campsite on Reed Creek open. (O)

Response: Any change to the campsite on Reed Creek would be made through a project-level decision, not in the Plan.

Equestrian Recreation

5-67. Public Concern: The Forest Service should allow for exceptions of FW-105 to allow users to pass through or around the edges of wildlife openings. (O)

Response: Permanent wildlife openings are established to provide a high quality food source for a variety of wildlife species. The acreage of existing openings on the Forest is limited due to the significant expense and manpower required to create these openings. Recreational uses such as camping, ATV's, horses, and mountain bikes can cause damage to these established openings and reduce their value to wildlife. Therefore, management of these uses is necessary to prevent damage to the planted food plots and thereby protect the investment made to establish them. Under the revised plan, OHV, horse, pack stock, and bike use will be allowed on designated routes only. However, where designated routes go through or around the edge of wildlife openings, continued will be permitted. In addition, use of linear wildlife openings will be permitted when they are part of a designated route.

5-68. Public Concern: The Forest Service should define "riparian area" and ensure that horses have access to water. (O)

Response: The Riparian Corridor prescription does not prohibit watering of horses within the Corridor. It does prohibit the overnight tethering or corralling within 100 feet of streams. "Riparian area" is discussed in Chapter 3 of the revised CONF Plan under Management Prescription 11- - Riparian Corridors.

5-69. Public Concern: The Forest Service should not rely on gravel roads to provide trails for equestrian use. (C)(O)(S)

Response: The Forest Service transportation system consists of a variety of roads. Roads are defined as "a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail". Classified roads are defined as "roads wholly or partially within or adjacent to National Forest System lands that are determined to be needed for long-term motor vehicle access, including State roads, county roads, privately owned roads, National Forest System roads, and other roads authorized by the Forest Service (36 CFR 212.1)."

These roads are divided into functional classes depending on whether they act as arterial, collector or local roads. Each road is then assigned a maintenance level. Maintenance levels 2-3 are roads maintained for high clearance vehicles or for passenger vehicles where the surface is not smooth. Maintenance level 4 is for passenger vehicles with a smooth surface and maintenance level 5 roads are designed to be smooth and dust free, and may be paved surfaces.

The proposed revised plan restricts horses to trails designated for horse use and classified roads. Roads are not a substitute for well designed and planned horse trails, however they do provide additional opportunities to enjoy the national forests on horseback and help meet some of the rapidly escalating demand for horseback riding opportunities. Each forest has many miles of roads, particularly maintenance level 2-3 roads that generally are narrower in width with surfaces that are more difficult for vehicles and have generally slower vehicle traffic. Some of these are graveled roads, however surface type often depends on the native materials in the area. Many of these are barely over the 50-inch definition and provide canopied and attractive travel corridors.

The new plan direction tries to provide a balance between protecting the environment and providing horseback riding opportunities. Restricting horses to designated trails and classified roads will reduce the number of user created trails that are contributing to soil loss and degraded water quality. Additionally, it should help clear up confusion about where it is legal to ride, e.g. only on numbered roads and designated trails. By allowing horses to ride

on classified roads, people living adjacent to national forest will still be able to ride into the forest and have access to the designated trail system as well as the road system. Horseback riders riding on the road system will be encouraged to be safe and realize that they may encounter motor vehicles if they choose to ride on classified roads.

5-70. Public Concern: The Forest Service should increase partnerships to deal with equestrian issues. (C)(O)(S)

Response: The Forest has a strong partnership with respect to equestrian issues. Trail groups/clubs are integral in the labor aspect of Forest grants. Local volunteers are a strong part of the equestrian trail maintenance activities and their labor is a 'payment in kind' value when applying for matching grant funds.

5-71. Public Concern: The Forest Service should use local volunteers to help support equestrian use on National Forest System lands. (C)(O)(S)

Response: The Forest Service has a strong volunteer effort on this Forest. Local volunteers are a strong part of the equestrian trail maintenance activities. Forest Districts initiate active recruitment programs for volunteers on a daily basis. While volunteer recruitment targets are not a Forest accountable target, Districts are encouraged to develop and constantly evaluate their volunteer programs.

5-72. Public Concern: The Forest Service should allow flexibility for the local Forest Service managers to adapt agency equestrian standards to local situations. (O)

Response: Plan is written specifically to provide for this decision space. District Rangers are afforded the opportunity to provide trails, trail sections, and associated recreation facilities. These opportunities by design govern recreational use. The established standards in the plan do provide an avenue for the development of the equestrian opportunities.

5-73. Public Concern: The Forest Service should provide adequate opportunities for equestrian activities on National Forest System lands. (O)(S)

INCLUDING THE APPROPRIATE INFRASTRUCTURE AND DESIGNATED TRAIL SYSTEMS (O)

BECAUSE TRENDS ARE SHOWING INCREASED DEMAND FOR EQUESTRIAN ACTIVITIES (O)

BY CHARGING RIDERS ACCORDINGLY (O)

Response: Standards and objectives were developed to afford equestrian activities within the realm of the specific management prescriptions. While there are limitations with respect to some management prescriptions to the extent of complete exclusion of equestrian based activities, overall the potential for horse development has been identified within the plan content.

A recreation trails strategy plan to be developed separate from the land management plan will identify additional potential equestrian opportunities.

5-74. Public Concern: The Forest Service should allow up to ten years for the analysis and implementation of the proposed changes to equestrian uses on National Forest System lands. (O)(S)

AND ACTIVELY SEEK GRANTS TO FUND EQUESTRIAN INFRASTRUCTURE (O)

Response: A recreation trails strategy plan, to be developed separate from the land management plan, will involve outreach to user groups, i.e. equestrian user groups. Recommendations will be phased in over a year's time.

5-75. Public Concern: The Forest Service should not restrict camping with horses to only 300 feet on either side of a designated trail. (O)

Response: Wording of standard was changed to restrict horses and pack stock to designated and posted equestrian camping areas. Riparian corridor reference was referred to for additional guidance.

5-76. Public Concern: The Forest Service should not restrict equestrian use in permanent wildlife openings (FW-105). (C)(O)(S)

Response: Permanent wildlife openings are established to provide a high quality food source for a variety of wildlife species. The acreage of existing openings on the Forest is limited due to the significant expense and manpower required to create these openings. Recreational uses such as camping, ATV's, horses, and mountain bikes can cause damage to these established openings and reduce their value to wildlife. Therefore, management of these uses is necessary to prevent damage to the planted food plots and thereby protect the investment made to establish them. Under the revised plan, OHV, horse, pack stock, and bike use will be allowed on designated routes only. However, where designated routes go through or around the edge of wildlife openings, continued will be permitted. In addition, use of linear wildlife openings will be permitted when they are part of a designated route.

5-77. Public Concern: The Forest Service should consider the impact of equestrian regulations on individuals living adjacent to National Forest System lands. (C)(O)(S)

Response: Regulations apply equally to all individuals regardless of proximity to National Forest System lands.

5-78. Public Concern: The Forest Service should not limit equestrian use to only designated trails. (A)(C)(O)(J)(S)

BECAUSE THIS WILL CROWD EQUESTRIAN USAGE ONTO A SMALL NUMBER OF TRAILS (C)(O)(J)(S)

UNLESS THE EQUESTRIAN USE IS ADVERSELY IMPACTING THE TRAIL (O)(S)

BUT SHOULD INVOLVE LOCAL EQUESTRIANS TO CREATE SAFE AND NATURAL TRAILS FOR PUBLIC USE (O)(S)

BECAUSE THE FOREST SERVICE HAS NOT PROVIDED ADEQUATE DESIGNATED TRAIL RIDING OPPORTUNITIES FOR EQUESTRIANS (O)

BUT SHOULD ONLY LIMIT USE IN AREAS THAT HAVE BEEN DAMAGED OR ARE IN NEED OF PROTECTION (A)(C)(O)(J)

BECAUSE MANY PEOPLE ENJOY HORESEBACK RIDING ON NATIONAL FOREST SYSTEM LANDS (J)

BECAUSE THIS POLICY DISCRIMINATES AGAINIST THE DISABLED (C)(O)(J)(S)

BECAUSE RESTRICTIVE USE OF ROUTES OR TRAILS WILL LEAD TO OVER-CROWDING, SOIL CONSERVATION PROBLEMS, POSSIBLE ACCIDENTS AND LACK OF USE OF TRAILS (O)(S)

BECAUSE CURRENT REGULATIONS ADEQUATELY PROTECT RESOURCES FROM DAMAGE DUE TO OFF-TRAIL RIDING (A)(C)(O)(S)

BECAUSE THERE IS A LIMITED NUMBER OF EQUESTRIAN TRAILS (O)(S)

BUT SHOULD PROVIDE EDUCATION AND TRAIL ETIQUETTE CLASSES FOR EQUESTRIAN USERS (O)

BECAUSE THESE LIMITATIONS HAVE NO BASIS IN SCIENCE (O)

FOR ECONOMIC REASONS (C)(O)(S)

Response: Plan will provide only for equestrian use on designated trails. There are 126 miles of trails with a native base along with 1358 miles of open and closed development roads where equestrian use may be allowed. Also refer to response to PC 5.69.

5-79. Public Concern: The Forest Service should modify the wording of FW-116. (O)

Response: Wording of standard was changed to restrict horses and pack stock to designated and posted equestrian camping areas. Riparian corridor reference was referred to for additional guidance.

5-80. Public Concern: The Forest Service should ensure that recreation areas have sufficient water resources available to equestrians. (O)

Response: The Riparian Corridor prescription does not prohibit watering of horses within the Corridor. It does prohibit the overnight tethering or corralling within 100 feet of streams.

Chattooga River–Boating/Fishing Concerns

5-81. Public Concern: The Forest Service should use wilderness river rangers to help manage the Chattooga River watershed. (O)(S)

Response: While this comment has merit it is outside the scope of the Forest Plan to make personnel determinations.

Campgrounds and Picnic Areas

5-82. Public Concern: The Forest Service should continue to manage the three drive-in dispersed campsites in the proposed Ellicott Rock Wilderness expansion outside of the 1.B, Recommended Wilderness Study, Management Prescription. (O)

Response: The roadless area will be evaluated further during the wilderness study phase. This will occur after the plan is finalized. The study will determine where the boundaries are to be located. Existing access (roads and trails), camping, and stream improvements are considered in the final outcome.

Other Developed Facilities

5-83. Public Concern: The Forest Service should ensure bear-proof food storage systems and garbage containers are provided in concentrated use areas (C)(O)

Response: We agree this a good idea, and it has been implemented to some degree. However, it is outside the scope of the Plan and is a decision left to individual site-specific situations.

Fee Demonstration Project and User Fees

5-84. Public Concern: The Forest Service should implement trail user fees to support trails. (C)(O)(S)

INCLUDING FEES FOR EQUESTRIAN USE (C)(O)(S)

Response: User fees are currently being implemented at the larger more developed trailheads—a comprehensive trails analysis study (outside of the land management plan) is currently being performed. Trail use, maintenance, and projected use trends will be analyzed. This study may provide insights into the need to implement a more structured fee system to a varying degree to all trail systems—not just the more popular settings.

Scenery and Visual Resources Management (Aesthetics)

5-85. Public Concern: The Forest Service should address visual resources. (O)

Response: Goals, objectives and standards for scenery management and aesthetics are found in Chapter 2 of the revised CONF Plan.

5-86. Public Concern: The Forest Service should establish a visual corridor for the Benton Mackaye, Bartram, and Pinhoti Trails. (A)(C)(O)(J)(S)

Response: In mapping the inventory of the scenic resource, primary trails, which the Benton Mackaye, Bartram, and Pinhoti Trails would be, are assigned high concern levels and the trails are used to map the seen areas from these trails. The foreground, middle ground, and background area that is viewed from these trails would be assigned a higher scenic value than areas not having a high concern level, thus establishing a greater need for visual protection. A matrix is then used to assign Scenic Classes or their relative scenic value to the public to these areas. The Forest Plans use this inventory along with the other resource management inventories to assign the scenic management direction, Scenic Integrity Objectives, for the trails and surrounding areas. This process allows for the scenic protection of these trails.

5-87. Public Concern: The Forest Service should ensure that scenic integrity objectives are compatible with forest health and wildlife management initiatives. (O)

Response: The compatibility of scenic integrity objectives and forest health and wildlife management initiatives will be monitored through evaluation of project implementation. Any need for change would be brought to the attention of management and could be addressed at that time through a forest plan amendment.

Recreational Gold Collecting

5-88. Public Concern: The Forest Service should not encourage gold panning on National Forest System lands. (O)(S)

Response: Recreational level gold panning on the Forest is a minor use. Chapter 2 of the Forest Plan specifies that this recreational activity is a legitimate use of National Forest lands and is allowed unless it is conducted in an area that otherwise prohibits it. Management Prescription 11 (Riparian Corridors) in Chapter 3 of the Forest Plan identifies the gold panning standards.

5-89. Public Concern: The Forest Service should clarify how recreational gold collecting will be authorized on the Chattahoochee National Forest. (O)

Response: The Forest standard for gold panning has been changed to read: "Recreational gold panning is allowed on the Forest, provided that neither hand nor power digging tools are used, collection does not conflict with existing mineral rights, and collection is not prohibited elsewhere in the Plan."

Chapter 6
Special Designations/Lands

Special Designations

Special Designations (General)

Roadless Areas

6-1. Public Concern: The Forest Service should comply with its own documentation of which prescriptions are compatible with maintaining roadless character. (A)(C)(O)(J)(S)

Response: The prescriptions that protect the roadless character vary by Forest Plan. Each forest could add additional restrictions that would restrict certain actions to a generic prescription that would protect roadless character where the generic prescription would not. As a result one prescription that will protect roadless character in one Forest Plan may not protect it in another Forest Plan. While all Forest Plans or EISs do not list which prescriptions are compatible, the Plan or EIS does show acres or percent of acres that have their roadless character protected.

6-2. Public Concern: The Forest Service should list prescriptions considered roadless compatible. (A)(C)(O)(J)(S)

Response: All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

6-3. Public Concern: The Forest Service should ensure that management direction is consistent with the Roadless Area Conservation Rule. (A)(C)(O)(J)(S)

Response: On July 14, 2003, a Federal District Court Judge permanently enjoined the 2000 Roadless Area Conservation Rule. Should this decision be overturned through further court proceedings, and the RACR go into effect, then the direction from this Rule would supercede Forest Plan direction. Additionally, should the RACR go into effect, it would not require an amendment or revision of the Forest Plan (36 CFR 294.14(b)).

In terms of the Forest Plan being consistent with the RACR, in the selected alternative, the inventoried roadless areas would have their

roadless characteristics maintained regardless of the management prescription to which it is assigned.

6-4. Public Concern: The Forest Service should follow regional guidance regarding roadless inventories. (A)(C)(O)(J)(S)

Response: The Regional guidance on developing a roadless area inventory, dated May 19, 1995; and the guidance on evaluating the roadless areas, dated July 22, 1997; both outline processes to identify and evaluate all the areas that meet the criteria for potential wilderness and not just those areas adjacent or contiguous to existing wilderness areas. The "design criteria" for the "rolling alternative" (Alternative I) did include a statement to start the development of this alternative with the "wilderness additions" being recommended for wilderness. However, this was only to be a "starting off point" for further discussions/deliberations on which areas to include for wilderness recommendations within this particular alternative. It was these discussions/deliberations with the public, along with the information applicable to each roadless area that led to the ultimate decision on which areas to recommend for wilderness in Alternative I.

The Record of Decision then provides the rationale for why roadless areas were recommended or not recommended for wilderness designation within the Selected Alternative.

6-5. Public Concern: The Forest Service should more adequately protect roadless areas. (A)(C)(O)(J)(S)

WITH 1.B, 12.B, OR 12.C MANAGEMENT PRESCRIPTIONS (A)(O)

BECAUSE THE NINTH CIRCUIT COURT HAS REAFFIRMED THE LEGALITY OF THE ROADLESS AREA CONSERVATION RULE (A)(O)(J)(S)

Response: All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

6-6. Public Concern: The Forest Service should provide more information on roadless areas under consideration for wilderness as required by NEPA. (A)(C)(O)(J)(S)

Response: Appendix C of the EIS provides information about each roadless area. Chapter 3 of the EIS, under the section on Roadless Areas provides information about how each roadless area will be managed in each alternative. Chapter 2, in the Comparisons of Alternatives, section provides a table that compares the acres recommended for wilderness designation by each alternative and the acres that would maintain their roadless

characteristics by alternative, along with a table that identifies which roadless areas are recommended for wilderness designation by each alternative. Lastly, the Record of Decision provides the rationale for why the roadless areas were or were not recommended for wilderness designation in the selected alternative.

6-7. Public Concern: The Forest Service **should act in accordance with the roadless policy. (A)(C)(O)(J)(S)**

Response: All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

6-8. Public Concern: The Forest Service should place all unroaded areas into protective management. (A)(C)(O)(J)(S)

Response: There is no requirement to place all unroaded areas into protective management. See PC 1.022, 1.124, and 6.007. For some roadless acres, it may be determined that there are some resource management needs that are not compatible with "protective management".

FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, CHAPTER 7 - WILDERNESS EVALUATION, 7.2

EVALUATION OF POTENTIAL WILDERNESS gives direction to carefully evaluate the potential addition of roadless areas to the National Wilderness Preservation System to determine the mix of land and resource uses that best meet public needs. Some areas are allotted status as a roadless area some are not.

6-9. Public Concern: The Forest Service should not use a standard of 2,500 core acres for protecting roadless values. (A)(C)(O)(J)(S)

Response: One of the critical issues identified during individual forest reviews of their roadless inventories concerned the criterion from Forest Service Handbook 1909.12 (7.11b) requiring that a roadless area be "conducive to the perpetuation of wilderness values." The 1964 Wilderness Act defines a number of wilderness values. Among these values, Section 2 of the Act states that wildernesses must have "outstanding opportunities for solitude and a primitive and unconfined type of recreation."

In an attempt to quantify this criterion, use of the Recreation Opportunity Spectrum (ROS) and the semi-primitive class of lands is recommended. As defined in the 1986 ROS Book, recreationists in areas inventoried as semi-primitive have a high to moderate "probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature,

tranquility, and self-reliance…in an environment that offers challenge and risk." Based on this definition, semi-primitive lands were identified as the lands that best satisfied the solitude qualities of roadless areas. Therefore, it is desirable for the "core" of a roadless area to meet the conditions of a semi-primitive non-motorized or semi-primitive motorized ROS classification. (Generally, there are very few areas in the Southern U.S. that qualify under the "primitive" ROS classification.)

Since the ROS Book states that semi-primitive areas contain at least 2,500 acres (unless they are contiguous to primitive class lands) this 2,500-acre minimum size can be used as a screen to evaluate areas identified and mapped by either the forest or the public. This 2,500-acre screen does not apply to additions to existing wildernesses.

However, it is important to recognize that this 2,500-acre semi-primitive "core" size is not an absolute minimum. It is only a screen and as such is only used as a guide.

Some areas above or below this size may or may not provide solitude. For these areas, look closely at topography, proximity to type and use of roads, population centers and other sights and sounds of human activity to determine if solitude and primitive and unconfined recreation could be experienced. This is a professional judgment based on knowledge of the area.

6-10. Public Concern: The Forest Service should not exceed the intended purposes and limits of "semi-primitive core" in eliminating areas from roadless protection. (A)(C)(O)(J)(S)

Response: The Recreation Opportunity Spectrum (ROS) in defining its remoteness criteria establishes criteria for semi-primitive recreation settings. Areas that are at least ½ mile but not further than 3 miles from all roads quality as Semi-primitive Non-Motorized Areas and areas that are within ½ mile of primitive roads but not closer than ½ mile from better than primitive roads qualify as Semi-Primitive Motorized Areas. This was used as a guide in delineating the areas that have outstanding opportunities for solitude and a primitive and unconfined type of recreation and thus would be considered as a roadless area.

6-11. Public Concern: The Forest Service should not recommend additional Roadless Areas. (C)(O)(J)(S)

Response: Only inventoried roadless areas will be recommended by the Regional Forester in the Record of Decision. No other areas will be considered.

Inventories

6-12. Public Concern: The Forest Service should use proper criteria and methods in conducting roadless area inventories. (A)(C)(O)(J)(S)

Response: The evaluation process for the Roadless Inventory followed FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation, and the July 22, 1997, letter on the Southern Region's Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation. This guidance was developed at the request of the Forests to define terms in the FSH 1909.12, Chapter 7 and Chapter 4.19c that were vague so that evaluations would be consistent in evaluating roadless areas.

6-13. Public Concern: The Forest Service should eliminate the "sights and sounds" criteria in determining areas suitable for the roadless inventory. (A)(C)(O)(J)(S)

Response: Forest Land and Resource Management Plans followed direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, which gives direction on evaluation of potential wilderness. One of the items given to consider is the ability to manage the area as wilderness. This is described as the degree to which the area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness. One of the principal wilderness characteristics given to consider is Manageability and to specifically evaluate how boundaries affect manageability of an area. Boundaries, to the extent practicable, act as a shield to protect the wilderness environment inside the boundary from the sights and sounds of civilization outside the wilderness. If the sights and sounds of civilization are determined to be important, they must be described. It is proper to not consider lands that do not meet the test for capability.

6-14. Public Concern: The Forest Service should inventory qualified roadless areas. (O)(J)(S)

Response: Refer to response to PC 6-13.

6-15. Public Concern: The Forest Service should remove regionally added restrictions on roadless inventory. (A)(C)(O)(J)(S)

Response: The evaluation process for the Roadless Inventory followed FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2,

Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation, and the July 22, 1997, letter on the Southern Region's Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation. This guidance was developed at the request of the Forests to define terms in the FSH 1909.12, Chapter 7 and Chapter 4.19c that were vague so that evaluations would be consistent in evaluating roadless areas.

Wilderness

6-16. Public Concern: The Forest Service should clearly define "wilderness." (O)

Response: Refer to the glossary portion of the plan.

6-17. Public Concern: The Forest Service should designate Wilderness or Wilderness Study Areas in all ecological units on the forest. (A)(C)(O)(J)(S)

Response: Forest Land and Resource Management Plans followed direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, 7.23 – Need, 7.23b – Factors, 6. in determining which ecosystem unit to recommend for wilderness. The July 22, 1997, letter on the Southern Region's Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation, stated that the discussions of ecosystem section and subsections should be included. Appendix C of the EIS discloses the ecosystem section and subsection where each roadless area is located and if it would fill any void in representation. This is used to help determine the need for an area to be allocated to wilderness. Some sections or subsections had no lands that qualified for wilderness study.

6-18. Public Concern: The Forest Service should document the relative wilderness representation by ecological province, section and subsection. (A)(C)(O)(J)(S)

Response: Appendix C, Evaluation of Roadless Areas, of the EIS discloses the section and subsection of each roadless area in each individual roadless write-up under the heading: Geography, Topography, and Vegetation. All the forests fall under the Central Appalachian Broadleaf Forest - Coniferous Forest - Meadow Province (M221), as is mentioned in the lead in summary that is located before all the write-ups.

6-19. Public Concern: The Forest Service should make critical wilderness information more accessible. (A)(C)(O)(J)(S)

Response: Issue 8**,** in the Roadless Areas and Wilderness Management section of the Environmental Impact Statement, tables display acres of recommended areas for Designation as Wilderness Study Areas and which areas are recommended for wilderness.

6-20. Public Concern: The Forest Service should ensure compliance with the Wilderness Act. (O)

Response: The Southern Appalachian Forests all conducted a roadless area analysis and subsequent wilderness evaluations on these areas according to FSH 1909.12,7.

The first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act (chapter. 9). Section 2(c) defines wilderness as, "(…in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." The wilderness areas recommended within each of the forest plans are based on analysis and discussion of the demand and need for additional wilderness areas.

6-21. Public Concern: The Forest Service should provide Congress with a sufficient array of wilderness options to achieve Wilderness Act goals. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-20.

6-22. Public Concern: The Forest Service should address wilderness recommendations on a regional basis. (A)(C)(O)(J)(S)

Response: Lands are evaluated from a regional perspective as part of the evaluation for recommendation for wilderness study as part of the Southern

Appalachian Assessment. The study was done at the same time by all forests. Also the criteria that is used for assessment directs the Forest Service to use a regional perspective. For example, rare community types, total lands allocated to ecosystem section and subsection, wilderness proximity to population centers are evaluated. See PC 6.028 for additional comments.

6-23. Public Concern: The Forest Service should better document wilderness supply versus demand. (A)(C)(O)(J)(S)

RELATIVE TO OTHER FOREST USES (O)

Response: Many comments were received throughout the planning process concerning the 1997 guidance from the Region on methodologies for calculating recreational supply and demand for wilderness. This included a calculation of the "practical maximum capacity" of roadless and wilderness areas. The Region recognized the concerns with this methodology and issued a letter on March 8, 2002 which emphasized that these calculations are "theoretical" and that the "rationale for the wilderness recommendations should be based on the merits of each roadless area and the sustainability of wilderness values".

As a result, the calculations from this methodology are not included anywhere in the EIS, and they were not a determining factor in making wilderness recommendations. What were determining factors were the factors identified in the Forest Service Handbook at FSH 1909.12, Chapter 7.23b. These factors are:

- The location, size, and type of other wildernesses in the general vicinity and their distance from the proposed area,
- Present visitor pressure on other wildernesses,
- The extent to which non-wilderness lands provide opportunities for unconfined outdoor recreation experiences,
- The habitat needs of certain biotic species (those that need "protected areas" or those that cannot survive in "primitive surroundings"), and
- An area's ability to provide for preservation of identifiable landform types and ecosystems.

The answers to some of these factors are in the individual roadless area descriptions found in Appendix C. However, for some of the other factors within a particular National Forest, the answers were essentially the same for each roadless area. In these cases, an overall assessment of the "need" for wilderness on a National Forest was summarized in the EIS. The Record of Decision then provides the rationale for why certain roadless areas were or were not recommended for wilderness designation.

6-24. Public Concern: The Forest Service should include a wilderness supply and demand analysis in the DEIS. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-23.

6-25. Public Concern: The Forest Service should determine the need for wilderness through an analysis of the local and national distribution of wilderness. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-23.

6-26. Public Concern: The Forest Service should analyze wilderness capability, availability, and need as specified in the National Forest Management Act regulations. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-23.

6-27. Public Concern: The Forest Service should adequately explain the rationale for not recommending areas for wilderness. (A)(C)(O)(J)(S)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions.

6-28. Public Concern: The Forest Service should clarify the criteria used in determining wilderness recommendations. (A)(C)(O)(J)(S)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions.

6-29. Public Concern: The Forest Service should gather accurate wilderness demand baseline data. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-23.

6-30. Public Concern: The Forest Service should not use a formulaic process in evaluating potential wilderness areas. (A)(C)(O)(J)(S)

Response: The Forest Service Handbook at FSH 1909.12, Chapter 4.19c and Chapter 7.2 identify the factors to use in evaluating potential wilderness areas. The Region also issued guidance in 1997 to provide some consistency on how to interpret the direction in FSH 1909.12, Chapter 7.2 and 4.19c. The Forests then used this direction and guidance for their evaluations.

6-31. Public Concern: The Forest Service should not use regional guidance as rigid proclamations when recommending wilderness. (A)(C)(O)(J)(S)

Response: The Forest Service Handbook at FSH 1909.12, Chapter 4.19c and Chapter 7.2 identify the factors to use in evaluating potential wilderness areas. The Region also issued guidance in 1997 to provide some consistency on how to interpret the direction in FSH 1909.12, Chapter 7.2 and 4.19c. The Forests then used this direction and guidance for their evaluations.

6-32. Public Concern: The Forest Service should clarify the use of "solitude" as a definitive criterion in the delineation of potential wilderness areas. (A)(C)(O)(J)(S)

Response: Comments were made that the criterion of "solitude or primitive and unconfined recreation" should not be used in the determination of which lands should be included in the roadless inventory. However, FSH 1909.12, Chapter 7.1 states that, "The first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act." Section 2(c) of the 1964 Wilderness Act states that "An area of wilderness is further defined to mean in this Act an area ..." that "(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation."

6-33. Public Concern: The Forest Service should better communicate the basis for recommending areas for wilderness study. (A)(C)(O)(J)(S)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions.

6-34. Public Concern: The Forest Service should not interpret Congress's use of "challenge" to create extreme sport wilderness areas. (A)(C)(O)(J)(S)

Response: Forest Land and Resource Management Plans followed direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, which gives direction on evaluation of potential wilderness. The characteristic of "Challenge" is one of the characteristics in determining the quality of the wilderness resource that is included in the analysis.

6-35. Public Concern: The Forest Service should not follow regional guidance for the definition of "challenge" in wilderness areas. (A)(C)(O)(J)(S)

Response: Refer to response to PC 6-34.

6-36. Public Concern: The Forest Service should remove bias against consideration of stand-alone wilderness areas. (A)(C)(O)(J)(S)

Response: The Regional guidance on developing a roadless area inventory, dated May 19, 1995; and the guidance on evaluating the roadless areas, dated July 22, 1997; both outline processes to identify and evaluate all the areas that meet the criteria for potential wilderness and not just those areas adjacent or contiguous to existing wilderness areas. The "design criteria" for the "rolling alternative" (Alternative I) did include a statement to start the development of this alternative with the "wilderness additions" being recommended for wilderness. However, this was only to be a "starting off point" for further discussions/deliberations on which areas to include for wilderness recommendations within this particular alternative. It was these discussions/deliberations with the public, along with the information applicable to each roadless area, that led to the ultimate decision on which areas to recommend for wilderness in Alternative I.

The Record of Decision then provides the rationale for why roadless areas were recommended or not recommended for wilderness designation within the Selected Alternative.

6-37. Public Concern: The Forest Service should recommend suggested areas for wilderness study. (C)(O)(J)(S)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions. Kelly Ridge, Mountain Town and Cohutta Wilderness extensions were all considered. Plum Orchard is a location on the Appalachian Trail and not within any inventories roadless area and would not be considered for wilderness study.

6-38. Public Concern: The Forest Service should reduce wilderness acreage. (O)

Response: Congress designates Wilderness after an evaluation process. Existing wilderness acres cannot be reduced. It is not a Forest Plan decision.

6-39. Public Concern: The Forest Service should not decrease wilderness acreage. (O)

Response: Congress designates Wilderness after an evaluation process. Existing wilderness acres cannot be reduced. It is not a Forest Plan decision.

6-40. Public Concern: The Forest Service should be consistent when eliminating wilderness area recommendations. (A)(C)(O)(J)(S)

Response: Determining the inventory of wilderness is a straight forward account of what wildernesses are available in the area.

The evaluation process for recommending roadless areas to the National Wilderness system is defined in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT, PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, CHAPTER 7 - WILDERNESS EVALUATION. Each Forest used this process for recommending and eliming potential areas for wilderness recommendations. The recommendations responded to the management emphysis of each alternative.

The Forest Plans followed direction in FSH 1909.12 - Land And Resource Management, Planning Handbook, Amendment 1909.12-92-1, Chapter 7.23 for determining need for an area to be designated as wilderness.

6-41. Public Concern: The Forest Service should not recommend additional wilderness areas. (C)(O)(J)(S)

BECAUSE WILDERNESS LIMITS MANAGEMENT OPTIONS (O)(J)

BECAUSE THERE MAY BE ADVERSE IMPACTS TO ADJACENT PRIVATE LANDS (O)

WITHIN UNION COUNTY (O)

INCLUDING MOUNTAIN TOWN CREEK (O)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions.

6-42. Public Concern: The Forest Service should require those interested in increasing wilderness acreage and trail buffers to fund those increases. (O)

Response: Partnerships exist with the Forest Service and wilderness groups to conduct work activities within wilderness areas. Additionally, there are grants where Forest Service grant approval is contingent on partnerships which are dependent on percentage labor or financial backing through wilderness organizations and or wilderness minded individuals.

6-43. Public Concern: The Forest Service should protect all of the land that qualifies for wilderness. (A)(C)(O)(J)(S)

INCLUDING THE TURNER CREEK, INDIAN GROVE GAP, BOGGS CREEK, KELLY RIDGE, PATTERSON GAP, RABUN BALD, THREE FORKS ROADLESS AREAS, AND MOUNTAINTOWN AREAS (O)

INCLUDING EXTENSIONS IN RICH MOUNTAIN AND RAVEN CLIFFS (O)

TO ENSURE PROPER STEWARDSHIP OF FOREST RESOURCES (O)

Response: All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

6-44. Public Concern: The Forest Service should consider non-inventoried roadless areas for possible wilderness recommendations. (A)(C)(O)(J)(S)

Response: Inventoried roadless areas must meet certain criteria that allow those areas to be considered for recommendation for wilderness study. Many areas have been considered but only the 23 areas in Appendix C and the EIS qualified for evaluation as potential wilderness.

6-45. Public Concern: The Forest Service should include suggested areas for recommended wilderness and wilderness expansions. (A)(C)(O)(J)(S)

BECAUSE OF ECONOMIC AND ECOLOGICAL BENEFITS (O)(J)

BECAUSE DEMAND FOR WILDERNESS IS INCREASING (A)(C)(O)(J)(S)

BECAUSE WILDERNESS PROVIDES MIGRATORY SONGBIRD HABITAT (O)(J)

TO PROTECT WATER QUALITY (O)(S)

TO GAUGE THE EFFECTS OF LAND UNDER VARIOUS ACTIVE MANAGEMENT REGIMES (A)(C)(O)(J)(S)

Response: Inventoried roadless areas must meet certain criteria that allow those areas to be considered for recommendation for wilderness study. Many areas have been considered but only the 23 areas in Appendix C and the EIS qualified for evaluation as potential wilderness. The demand for wilderness is among several factors considered at the time of recommendation.

In regard to songbirds, some songbirds do require uninterrupted forest for nesting. Many species do not. A mix of different habitats and successional stages are often required by the same species in relation to its roosting, nesting or foraging preferences. A diversity of late, mid and early successional habitats will provide for a greater diversity of songbirds occurring on the Chattahoochee-Oconee National Forest. Forested openings are not found on adjacent private lands as often stated. Maintained cow pastures and lawns are poor habitats for most forest songbirds.

All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

At present there are 117,000 + acres of existing wilderness on the Chattahoochee National Forest. That is a significant area for baseline "control". Forest health and other biological methods are tested against them yearly.

6-46. Public Concern: The Forest Service should reinstate the wilderness protections included in the August 2002 Chattahoochee-Oconee draft forest plan revision. (O)

Response: The Regional Forester explains the rationale for recommending or not recommending for wilderness, various inventoried roadless areas within the Record of Decision. Appendix C of the EIS helps give the basis for these decisions.

All inventoried roadless areas will have their roadless character maintained (this is according to the roadless area conservation rule), regardless of the management prescription they may be allocated. This is true even for these areas not allocated to wilderness study (MRx 1.b).

6-47. Public Concern: The Forest Service should leave higher elevation areas in wilderness and remove 25,000 acres at lower elevation from wilderness protection. (O)

Response: The change (referred to in the comment) from recommended wilderness was an accumulation of concerns about the supply relative to demand, the Forest proportion of all wilderness in the Southern Appalachians, the lack of diverse support, and – most of all – analysis results that demonstrated the need for management flexibility to create and maintain wildlife habitats in the higher elevations most affected by recommended wilderness blocks.

The 7.E.2 prescription was chosen in large part because it is very similar in direction and allowed management intensity to 9.A.3 and differs primarily in emphasis. The 7.E.2 prescription is also consistent with current uses of the area. Regarding wilderness, we continue to constrain activities within inventoried roadless areas such that, recommended or not, the roadless character is maintained.

Designated Wilderness

6-48. Public Concern: The Forest Service should develop a new management plan for the Ellicott Rock Wilderness Area. (O)(S)

Response: The Sumter National Forest has the lead management of the Ellicott Rock Wilderness Area. They would be the responsible Forest for the development of a management plan for this wilderness.

6-49. Public Concern: The Forest Service should correct the error in 1.A, Designated Wilderness, regarding the inventory and monitoring of threatened and endangered species. (O)(S)

Response: The comment concerned a statement in the desired future condition text of management prescription 1.A Designated Wilderness. The specific idea was that there would be no periodic; that is, regular, scheduled inventory of streams, unless for monitoring of known T & E species. The statement has been modified between Draft and Final to be inclusive of periodic inventory and monitoring for baseline condition and reference information, as well as monitoring T&E.

Heritage and Cultural Resource Management

6-50. Public Concern: The Forest Service should expand the 4.E.1, Cultural/Heritage Areas, allocation in the Trackrock Gap area. (O)

Response: The Forest agrees and the allocation was expanded between Draft and Final. However, expansion of the Trackrock Gap area would include only areas adjacent to the Trackrock Gap area known to contain, or possibly contain associated archeological features based on past research of the area.

6-51. Public Concern: The Forest Service should encourage interest in interpretable heritage resources. (O)

Response: We agree. Interpretation of heritage resources is addressed in the goals and objectives in Chapter 2 for management of heritage resources on the Forest.

Special Management Prescriptions

6-52. Public Concern: The Forest Service should have prescription definitions that allow managers to fulfill their responsibilities. (O)

Response: Our analysis supports the conclusion that Alternative I is a good compromise among the many interests, and will respond reasonably well to this concern.

6-53. Public Concern: The Forest Service should allocate the Management Prescription 4.D, Botanical Area, to several areas. (A)(O)

Response: We considered each of the areas suggested individually. The recommendations apparently were being sought as a means of greater protections and without specific information about botanic composition. It is our judgment that the protections sought are already provided by Forest-wide standards. We also checked for ecological uniqueness of the areas and found little reason to believe they would prove to be significantly more diverse or unique botanically than other comparable locations.

6-54. Public Concern: The Forest Service should allocate the Management Prescription 4.H, Outstandingly Remarkable Stream, to several streams. (O)

Response: The streams mentioned in the comment were ones that were in the eligible WSR category. The streams were either put into 2B1, 2,3, or 4H. The ones that do not get selected for 2B in the selected alternative are automatically put into 4H to protect them from ORVs. So several streams will be allocated to 4H.

6-55. Public Concern: The Forest Service should change the fisheries management statement of the Management Prescription 4.H, Outstandingly Remarkable Stream, to allow for the stocking of rainbow and brown trout. (O)

6-56. Public Concern: The Forest Service should allocate the Management Prescription 4.I, Natural Areas – Few Open Roads, to several areas. (O)

INCLUDING THE LANDS ADJOINING THE OVERFLOW CREEK CORRIDOR (O)

Response: The 4.I. allocation will not preclude the parking area for the access road to that area. When the final boundaries are drawn up for the WSR corridors, these, and other improvements do get taken into consideration.

INCLUDING HALE RIDGE (O)

Response: The 9.H. MRx in the Hale Ridge location is due to the existence of Table Mountain Pine (Pinus pungens). 9.H. is a restoration management prescription. Table Mountain pine is a forest type/species identified for ecological restoration.

6-57. Public Concern: The Forest Service should change the management prescription of several areas to 7.E.1, Dispersed Recreation. (A)(C)(O)(J)(S)

Response: Prescriptions are allocated to different areas in order to achieve management objectives for many resources. Prescription 7.E.1 is generally

described as management emphasis for Dispersed Recreation Areas and is unsuitable for timber management. Prescription 7.E.2 is generally described as management emphasis for Dispersed Recreation Areas and is suitable for timber management. Prescription 8.B is generally described as management emphasis for Early-Successional Habitat and is suitable for timber management. Where Dispersed Recreation emphasis areas have been assigned a prescription that is suitable for timber management, timber management is compatible with the recreation management objectives of the areas.

The ID Team considered the suggested changes in finalizing land allocations for the final Plan.

6-58. Public Concern: The Forest Service should overlay bear habitat with wilderness candidates. (A)(C)(O)(J)(S)

Response: As part of the roadless areas evaluations, the evaluations considered any species habitat associates or individual species with habitat needs within the roadless areas. This includes bear habitat. However, it should be noted that wilderness designations are not needed to maintain bear habitat.

6-59. Public Concern: The Forest Service should not combine the 9.G and 9.H Management Prescriptions. (O)

Response: We agree that the distinction between Piedmont and Mountains needs to be maintained in restoration. Our experience was that splitting the restoration emphasis into component communities caused more confusion than clarity and was not helpful in developing management direction. The 9.H prescription was written broadly but directs a focus into the ecological context within which it is applied. Implementation guidance will focus into restoration of individual communities and their processes specific to their ecological context.

6-60. Public Concern: The Forest Service should allocate Management Prescriptions 12.A, 8.A.1, and 8.A.2 to several areas within the Kelly Ridge Roadless Area. (O)

Response: The 12.A prescription is the largest single allocation within the Kelly Ridge inventoried roadless area in the final plan. The AT Corridor is second. These twp prescriptions make up almost the entire area. There is a small area of 8.A.1 prescription.

6-61. Public Concern: The Forest Service should properly protect Cedar Cliffs. (O)

Response: The recognition of the Cedar Cliffs area as a Botanic Area in the 1985 Plan has been continued and strengthened with an allocation to a 9.F Rare Community prescription. This includes additional area acquired since the 1985 plan.

6-62. Public Concern: The Forest Service should change the management prescriptions for several areas. (C)(O)

Response: Each of the numerous recommendations was considered individually. We considered all the resource data we have used in analysis for each recommendation, personal knowledge of the area, and our reasons for the allocations to the reasons given – if any – for re-allocations. We made the changes that would improve the final overall. However, we did not use these recommendations to re-create other alternatives.

6-63. Public Concern: The Forest Service should allocate protective management prescriptions to several areas. (O)(J)

Response: The information referred to has been considered in the allocations of the alternatives. However we have to consider additional factors either not considered in that proposal or not considered to the same degree. The request to allocate as shown in a 'Conservation Alternative' is essentially a request for a new alternative. But Alternative E or G are similar in concept and effect.

6-64. Public Concern: The Forest Service should try to achieve Goals 58, 61, and 62 and Objective 58-1. (O)

Response: The Forest will work toward achieving these and all the stated goals.

Other Special Designations

Wild, Scenic, and Recreational Rivers

6-65. Public Concern: The Forest Service should protect several rivers as candidates for designation as Wild and Scenic Rivers. (O)(S)

Response: The Regional Forester makes the final determination on the various streams recommended for designation into the wild and scenic river system. They are allocated into the 2.B MRx.

6-66. Public Concern: The Forest Service should increase the length of river being recommended for Wild and Scenic designation. (O)

Response: All streams must go through a screening process called eligibility. At that time all streams within a given 'region' of the state were compared against each other to determine their various outstandingly remarkable values. All streams started out average. With a process such as

this, average streams 'drop out' while streams with more outstanding features step up in ranking. That is how the 5 streams recommended for designation ended up on the final list. All other streams that were found to be eligible but did not measure up to the remaining 5 were placed or 'allocated' into the 4.H. management prescription that will protect those streams outstandingly remarkable values. That is why only 38 miles of the 112 eligible miles were selected.

6-67. Public Concern: The Forest Service should institute identical prescriptions for the Chattooga River in both the Chattahoochee-Oconee and Sumter National Forests. (O)(S)

REGARDING DESIGNATED WILD AND SCENIC RIVERS (O)(S)

REGARDING CLASSIFIED SCENIC RIVER SEGMENTS (O)(S)

REGARDING DESIGNATED WILD RIVER SEGMENTS (O)(S)

REGARDING DESIGNATED RECREATIONAL RIVER SEGMENTS (O)(S)

REGARDING RECOMMENDED WILDERNESS STUDY AREAS (O)(S)

Response: The management prescription has been revised to be consistent with the Sumter's.

6-68. Public Concern: The Forest Service should recommend several rivers for designation as a Wild and Scenic River. (A)(O)(S)

Response: All streams must go through a screening process called eligibility. At that time all streams within a given 'region' of the state were compared against each other to determine their various outstandingly remarkable values. All streams started out average. With a process such as this, average streams 'drop out' while streams with more outstanding features step up in ranking. That is how the 5 streams recommended for designation ended up on the final list. All other streams that were found to be eligible but did not measure up to the remaining 5 were placed or 'allocated' into the 4.H. management prescription that will protect those streams outstandingly remarkable values. That is why only 38 miles of the 112 eligible miles were selected.

6-69. Public Concern: The Forest Service should allocate the Management Prescriptions 2.B.1, Wild Rivers, and 2.B.2, Scenic Rivers, to the Upper Chattahoochee River. (O)

Response: The Regional Forester will make the final determination on the Chattahoochee River and this will be included in the Record of Decision. In the Draft EIS, it was recommended for designation into the wild and scenic river system.

6-70. Public Concern: The Forest Service should allocate the Management Prescription 2.B.1, Recommended Classified Wild Rivers, to Overflow Creek. (O)

Response: The Regional Forester will make the final determination on Overflow Creek. In the Draft EIS, it was recommended for designation into the wild and scenic river system. The road that crosses Overflow Creek (Billingsly Creek –FS road #86B) is not to be removed from the forest's road system. It will not be opened past where it is presently closed except occasionally for administrative purposes. The road is allowed under the scenic classification.

6-71. Public Concern: The Forest Service should protect several rivers while waiting for Wild and Scenic River designation. (O)(S)

Response: The streams that the Regional Forester recommends for designation into the wild and scenic river system will be protected by allocation to the 2.B MRx (recommended WSR). Other streams that were eligible but not recommended will be allocated into the 4.H MRx (Chattahoochee-Oconee Outstandingly Remarkable Streams). All other streams on the forest will be protected by the 11 MRx – Riparian Corridors. These three allocations will assure the best water quality to all streams.

6-72. Public Concern: The Forest Service should properly evaluate all rivers that qualify under the Wild and Scenic Rivers Act. (A)(C)(O)(J)(S)

Response: This concern statement was coded as if it referred to the Chattahoochee-Oconee NF. However, none of the named streams are on the Forest. But should the question arise later, we did a through and proper evaluation of our streams for eligibility under the WSRA.

Scenic Areas, 4.F

6-73. Public Concern: The Forest Service should allocate the Management Prescription 4.F, Scenic Areas, to several areas. (C)(O)(J)

INCLUDING AREAS WITHIN THE CHESTATEE RIVER WATERSHED (O)

INCLUDING COOPERS CREEK DRAINAGE AREA LICKLOG MOUNTAIN, CASS MOUNTAIN, AND THE SHALLOW CREEK/HEMLOCK FALLS AREA (O)

Response: The commenter recommended different allocations for each of the listed areas. None of them were recommended for 4.F. We considered each of the recommended changes compared to our reasoning for the allocation at Draft. We found that either the concern had been addressed

outside of allocations or the recommended allocation was not appropriate to the specific conditions.

6-74. Public Concern: The Forest Service should allocate the Management Prescription 4.F.1, Regional Forester Scenic and Wildlife Management, to several areas. (O)

Response: This comment was a statement of support for the allocations of the Draft plan. Thank you.

6-75. Public Concern: The Forest Service should allocate the Management Prescription 4.F.2, Regional Forester Designated Scenic Areas, to several areas. (O)

INCLUDING THE AREA SURROUNDING FROGTOWN CREEK (O)

INCLUDING THE AREA BETWEEN HELTON CREEK AND FS ROAD 118 (O)

INCLUDING THE LOWER COLEMAN RIVER (O)

Response: Each of these was a statement of support for the allocations of the Draft. Thank you.

6-76. Public Concern: The Forest Service should give the same management emphasis and standards to 4.F.2 as to 4.F.1. (O)

Response: The 4.F.2 (Regional Forester Scenic Areas) MRx standards will reflect the 3.A MRx (Coosa Bald Scenic Area) standards.

The standards for 4.H MRx have been changed to reflect MRx 2.B.3.

Special Interest Areas

6-77. Public Concern: Some prescription allocations for WSRs should change to ensure fisheries management flexibility. (O)

Response: Fisheries management is not well documented within separate WSR management prescriptions, but is already reflected in other regulations which are not reproduced in the forest plan. Management of aquatics (fisheries) is given broad flexibility in the WSR regulations that the plan must follow.

Research Natural Areas

6-78. Public Concern: The Forest Service should designate the Chattooga River watershed as a Research Natural Area. (O)(S)

Response: Research Natural Areas designation is done by the Chief and is an historic program with most activity in designation – at least in the South East - having occurred in the 1960's. Various acts since that time have largely superseded the need for additional designations. In addition, the Blue Valley Experimental Forest in North Carolina occurs within the watershed. And the Coweta Hydrologic Laboratory at Otto, North Carolina is in the adjacent Little Tennessee basin. The goal of unfragmented habitats and restoration are each achieved within the Alternative I allocations in the watershed.

6-79. Public Concern: The Forest Service should include the Lance Creek Roadless Area as part of the Ed Jenkins National Recreation Area. (O)

Response: The Lance Creek inventoried roadless area is part of the Ed Jenkins NRA which was congressionally designated. Lance creek, while not being considered for wilderness study, will have its roadless characteristics protected.

Lands

Landownership (General)

Lands Acquisition by Agency

6-80. Public Concern: The Forest Service should purchase more inholdings and adjacent lands from willing sellers. (O)(J)

Response: The Forest submits Land and Water Conservation Fund (LWCF) proposals each Fiscal Year. Competition for these dollars is very stiff both Regionally and Nationally among the various Forests. Purchases depend on yearly appropriations from these funds. The Forest only acquires tracts that landowners are willing to sell. Third parties such as The Nature Conservancy, Trust for Public Lands, and the Conservation Fund work closely with the Forest to help secure funding and purchase and hold key tracts until funding is secured. Prices of land in the North Georgia Mountains have escalated sharply in the last few years resulting in smaller tracts being purchased. Costs exclusive of the raw land and pro-rated taxes(i.e. title search, surveys, administrative costs, etc.) are similar for large and small tracts of land. Buying large tracts when dollars are available is more cost effective.

Purchases outside the current purchase or proclamation boundaries are not allowed unless the proper avenues for these changes occur (i.e. notification in the Federal Register or legislation).

Land Exchanges and Disposal

6-81. Public Concern: The Forest Service should ensure that land exchanges will not lead to degradation or coal mining. (A)(C)(O)(J)(S)

Response:
Land exchange cases must comply with agency policy and direction, forest land management plans and applicable laws including the National Environmental Policy Act. The land exchange decision is a determination by the authorized officer if the public interest is well served by exchanging federal and private interests in land, not to approve or disallow specific activities following completion of the exchange. Although reasonably foreseeable actions and cumulative effects are considered in the analysis to come to a reasoned decision on public interest, once the exchange is completed, the federal lands are managed under private ownership in accordance with their highest and best use and in accordance with local zoning, municipal code and state and federal regulations. Private lands are managed in accordance with forest land management plans. Coal mining is an acceptable form of energy extraction in all states and its methods and impacts are highly regulated by multiple state and federal agencies both on federal lands and on private lands. Forest Service policies, practice and procedure is to avoid regulating private property use through the use of reservations except where clearly shown to be in the public interest or required under federal law. Outstanding mineral rights on federal lands are fully recognized in the conveyance deed to the private exchange party and are beyond the control of the federal agency.

Chapter 7
Natural Resources Management

Resource Management Guiding Philosophy

Management Philosophy General

7-1. Public Concern: The Forest Service should manage lands for environmental preservation, protection, and restoration. (A)(C)(O)(J)(S)

Response: Many commenters expressed a desire to see national forests managed for maintenance and restoration of "natural conditions" to support healthy ecosystems, clean water, and abundant wildlife, as opposed to an emphasis on resource extraction. We feel the revised plan is in line with these priorities. Within the Southern Appalachian region, vegetation management will be driven by the need to create desired ecological conditions, not to meet resource extraction goals. These plans clearly focus on the ecological conditions left on the ground, not on resources removed. Although timber production emphasis prescriptions were defined during planning, none have been included under the preferred alternative. All prescriptions used emphasize ecological restoration, recreation, or special area protection.

This emphasis does not mean that there will be no commercial timber sales implemented under the revised plan. Timber sales are one of the most important and efficient tools we have for creating desired conditions on the ground. To use this tool effectively, in most cases we designate individually which trees are to be cut and which are to be retained, and carefully administer the sale to ensure disturbance to soil, water, and remaining trees is within specified limits. This approach is not only effective, it is efficient: by selling cut trees, we generate revenue rather than paying for the service. An added benefit is that sold material is used and generates economic activity within surrounding communities. However, to repeat, any proposed timber sales must make sense in terms of the on-the-ground condition created as a result.

7-2. Public Concern: The Forest Service should manage forests first for watershed protection, and secondly for recreation. (O)(S)

Response: Watershed protection and recreation are two of the multiple uses of National Forests spelled out in the Multiple-Use Sustained-Yield Act of 1960. The other resources specifically mentioned in the Act are range, timber, wildlife, and fish. In the revised CONF Plan, there is emphasis on wildlife habitat and restoration of natural communities as well as watershed protection and recreation. Harvest of wood products is expected to be an

outcome of managing habitat and restoring natural communities, but no land is allocated to a management prescription that emphasizes timber production.

7-3. Public Concern: The Forest Service should acknowledge that the purpose of the plan is to engage in restoration forestry and to protect watersheds. (O)

Response: We agree there is a focus on restoration and watershed protection and a strong emphasis on these is a major feature of the Plan. However, there are over twenty broad sets of goals, objectives, and standards listed in the plan designed to establish guidance for all multiple-uses and types of management. The three broad areas with the most associated goals are: "Terrestrials Plants and Animals and Their Associated Habitats," " Fire Management," and "Recreation Opportunities/ Public Concern:

7-4. The Forest Service should allow management flexibility for wildlife and tree management. (O)

Response: The revised CONF Plan contains goals, objectives, and standards designed to move areas of the forest toward particular desired conditions, often to benefit wildlife habitat and/or native ecosystems. Over time, project monitoring should indicate whether an appropriate amount of flexibility was designed into the plan, or whether changes need to be made through plan amendments.

7-5. Public Concern: The Forest Service should actively manage natural resources rather than preserve them. (O)

Response: The revised CONF Plan contains goals, objectives, and standards designed to move areas of the forest toward particular desired conditions. Active forest management is a key factor in achieving these desired outcomes in the future.

7-6. Public Concern: The Forest Service should actively manage resources in order to preserve them. (O)

Response: The revised CONF Plan contains goals, objectives, and standards designed to move areas of the forest toward particular desired conditions. Active forest management is a key factor in achieving these desired outcomes in the future.

7-7. Public Concern: The Forest Service should manage forests in a manner better than that suggested by best management practices. (O)

Response: Best Management Practices for water quality, mandated by the Federal Clean Water Act, are recognized as minimum practices to be applied

during operations to keep non-point source pollution in check and minimize impacts to water quality and associated resources. They are intended to be a "menu", not a must-do list and to be supplemented by site-specific decisions to apply the necessary measures needed to manage resources.

The Forest Plan indicates that Forest all projects will meet the current *Georgia Rules and Regulations for Water Quality Control. Georgia's Best Management Practices for Forestry* (*BMPs*) will be met or exceeded to meet water quality objectives for silviculture and related treatments. Georgia's *Best Management Practices* were first developed in 1981 by a Forestry Non-point Source Technical Task Force as required by the Federal Water Pollution Control Act. The Act mandates that the State of Georgia develop a program to protect and improve the physical, chemical, and biological integrity of the nation's waters so that they remain fishable and swimable for today's and future generations. The BMPs were revised in 1997 by a task force and incorporated 1989 wetland BMPs into one document. Sample monitoring conducted throughout the state of Georgia on private, federal, and industrial lands by the Georgia Forestry Commission indicates that the revised BMPs (1999) are providing adequate standards and guidelines to assure water resource protection. The Forest feels the BMPs are adequate and mitigate potential resource problems associated with forestry practices.

7-8. Public Concern: The Forest Service should be commended for the proposed forest management plan. (C)(O)(J)

Response: Thanks you for your support. We, too, hope that future generations will have an opportunity to enjoy multiple-uses on the National Forest just as have past and present generations.

Multiple Use Management

7-9. Public Concern: The Forest Service should actively manage National Forest System lands in a manner that provides multiple use benefits for all Americans. (A)(C)(O)(J)(S)

Response: Forest Health is, indeed, a major theme of the alternative chosen to be the plans for the Southern Appalachian Forests. Management Prescriptions allocated to the Forests reflect a theme of ecosystem restoration and maintenance, which will, in turn promote the most healthy forest conditions possible.

7-10. Public Concern: The Forest Service should maintain a balanced approach of managing the forest's resources and providing quality-of-life opportunities. (C)(O)(J)

TO INCLUDE RECREATIONAL USES (C)(O)(J)

Response: Such a "balanced approach" is important to this plan. The Record of Decision speaks to that balance when it addresses the Rationale for the Decision and in other parts. The selection of an alternative for management of the forest is complex and requires examination of many factors, comments, and impacts. We feel that this was done.

7-11. Public Concern: The Forest Service should manage National Forest System lands in a combination that achieves specific forest management goals. (O)

Response: The commenter suggests specific percentages of the forest be in specific conditions. The outcomes from implementing the revised CONF Plan are likely to result in more variety of habitat conditions that those listed. However there is a great deal of emphasis on providing for wildlife habitat through various silvicultural treatments, as the commenter suggests.

Monitoring and Evaluation

7-12. Public Concern: The Forest Service should ensure that monitoring is linked to specific goals and objectives in the plan. (O)

Response: Appendix G contains a table that crosswalks the monitoring activities with the goals in the plan.

7-13. Public Concern: The Forest Service should clarify the monitoring and evaluation of rare communities. (A)(C)(O)(J)(S)

Response: Please see response to Public Concern 3-178. Additional details on monitoring of rare communities are included on the associated Monitoring Task sheet, which is available on request. Additional details will need to be worked out during implementation.

7-14. Public Concern: The Forest Service should ensure adequate monitoring and evaluation. (A)(C)(O)(J)(S)

FOR OLD GROWTH (A)(C)(O)(J)(S)

FOR SENSITIVE SPECIES (O)

FOR SPECIAL AREAS (A)(C)(O)(J)(S)

Response: Many public comments reflect an interest in rigorously exploring cause and effect relationships as they may relate to planned practices, much as would be done in research studies. Forest plan monitoring is distinguishable from rigorous research studies in that it builds information to be used through the more routine observations that are part of the programs and actions required during implementation. Measurements and observations are planned, but from a more strategic and with less rigor basis than would be required for research studies.

It is agency policy to use the management review system as the primary process to ensure evaluation and documentation of the results of forest plan monitoring are accomplished. Plan implementation will be accomplished through projects, which must comply with the plan. Project planning and monitoring is done to assure that work is accomplished in compliance with the plan. Periodic reviews of projects assure that these requirements are being met.

7-15. Public Concern: The Forest Service should seek additional funding to conduct monitoring. (A)(C)(O)(J)(S)

OF TIMBER STANDS (O)

Response: Funding is clearly a limiting factor for monitoring as well as any other activity of forest management. Funding needs for the monitoring of this plan will be assessed and planned on the Forest in the initial year of implementation and for each subsequent year. Funding needs will be reported to the President for agency budget formulation. Funding levels ultimately are the purview of Congress and the President.

Additional actions that are being taken and continually explored to stretch available funds and provide for monitoring needs include:

- Application of remote sensing, geographic information systems and expanded data analysis capacity
- Utilization of information provided by other agencies
- Partnerships with agencies, universities and professional organizations
- Utilizing qualified volunteers to supplement the agency workforce

Monitoring Task Sheets will be developed to utilize these resources to extend the agency capacity to monitor the effectiveness of the plan. Annual review and adjustment to the Monitoring Task Sheets will provide for changes needed due to technological advances, shifts in funding and priorities, workforce changes, and new opportunities for cooperation. Research needs will be identified and updated each year for additional effectiveness and validation needs that exceed the monitoring program itself.

7-16. Public Concern: The Forest Service should provide clear language and detail to describe monitoring and monitoring practices and develop clear standards for monitoring. (O)(J)

Response: Appendix G, which outlines the monitoring activities to be conducted by the CONF, has been rewritten to address the need to provide a

more clear description of monitoring elements and methods of data collection.

7-17. Public Concern: The Forest Service should require appropriate monitoring and record maintenance. (A)(C)(O)(J)(S)

Response: Agency information systems will be utilized for tracking monitoring data. Most monitoring records will be available for public review. Locations of heritage resources and data obtained from other organizations may be protected from release.

7-18. Public Concern: The Forest Service should develop better develop the Monitoring and Evaluation Plan in Chapter 5 of the PRLMP. (A)(C)(O)(J)(S)

Response: NFMA regulations specify that monitoring requirements identified in the forest plan shall provide for:

(1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan;
(2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and
(3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan.
(4) A description of the following monitoring activities:
(i) The actions, effects, or resources to be measured, and the frequency of measurements;
(ii) Expected precision and reliability of the monitoring process; and
(iii) The time when evaluation will be reported.
(5) A determination of compliance with the following standards:
(i) Lands are adequately restocked as specified in the forest plan;
(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production

Public concern expressed seems to focus on the adequacy of the Monitoring Plan in meeting provisions 2 and 4 above. The Monitoring Summary Table provides a matrix that relates the measured goals and objectives described in detail in earlier chapters of the plan to the monitoring activities described as monitoring questions, elements, general methods, duration/frequency, reporting intervals, precision, reliability and responsibility. More specific protocols, methods, sampling intensities and locations to be applied in completing the described monitoring activities, which are frequently questioned in public comments, are covered in Monitoring Task Sheets outside the plan.

Plan implementation will be accomplished through projects, which must comply with the plan. Project planning and monitoring is done to assure that work is accomplished in compliance with the plan. Periodic reviews of projects assure that these requirements are being met.

Natural Resources Management

Natural Resources Management General

7-19. Public Concern: The Forest Service should end commercial resource development activities. (A)(C)(O)(J)(S)

Response: The revised CONF Plan des not make direct decisions about whether or not commercial resource activities, per se, will or will not exist on National Forest lands. Rather, these plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC.

7-20. Public Concern: The Forest Service should not open more areas to development. (O)

Response: The comment refers specifically to logging opportunities and ATV trails. In the revised CONF Plan logging would occur primarily to benefit wildlife or native ecosystems and is expected to be less than what was called for in the original forest plan. For ATV trails the plan establishes criteria to evaluate the suitability of areas for ATV use and limits their use to designated trails. In neither case should there be an overall increase in development.

7-21. Public Concern: The Forest Service should provide adequate direction for management areas. (O)

Response: The Forest followed the process of developing watershed-based direction, using Regional protocols, prior to release of the Draft Forest Plan. Subsequent work on Plan management direction has established a priority framework for watershed-based activities focused on identifying and correcting unacceptable aquatic conditions. Consultation with USFWS since has identified watershed-specific standards for aquatic T & E species and these have been included. Monitoring tasks have also been developed specific to watersheds identified with federally listed T&E species. The outcome of the process did not identify any additional watershed specific direction that was not addressed through Forest-wide direction.

National Forest System resource allocation and management decisions are made in two stages. The first stage is the Forest Plan, which allocates lands and resources to various uses or conditions by establishing management areas and management prescriptions for the land and resources within the plan area. The second stage is approval of project decisions.

Management Areas on the Forest were delineated by watershed and hydrologic units (HUCs) as defined by the U.S. Geologic Survey and represent natural boundaries for surface-water runoff. Chapter 4 identifies the Management Prescriptions allocated to each watershed, identifying the specific desired conditions of prescriptions and the associated direction or standards.

7-22. Public Concern: The Forest Service should prohibit clearcutting, development, and road building. (C)(O)

BECAUSE ADDITIONAL ROADS AND NOISE WILL NEGATIVELY IMPACT THE ECOSYSTEM (O)

Response: Refer to response to Public Concern 7-1.

7-23. Public Concern: The Forest Service should prohibit road building and timber harvesting. (C)(O)(S)

IN MOUNTAINTOWN CREEK WATERSHED AND RABUN BALD (O)

Response: These are inventoried roadless areas and will be managed to retain their roadless character.

7-24. Public Concern: The Forest Service should not allow timber harvest and ATV use on national forests. (A)(O)(J)

INCLUDING MOTORCYCLE USE (O)

BECAUSE SUCH USE ONLY BENEFITS ATV USERS AND INDUSTRY AT THE FOREST'S EXPENSE (O)

BECAUSE SUCH USE DEPRIVES OTHER USERS FROM SPIRITUAL AND RECREATIONAL PLEASURES (O)

BECAUSE THE FORESTS SHOULD BE PRESERVED (A)(O)

TO AVOID ECOLOGICAL HARM AND NOISE (A)(O)(J)

ON THE CHATTAHOOCHEE NATIONAL FOREST (O)

Response: Legislation has repeatedly endorsed timber production as one of the legitimate uses of National Forest System lands and this use continues to be authorized and funded annually by Congress. The revised CONF Plan uses timber harvest primarily as a tool for managing a variety of wildlife habitats and for restoring native ecosystems.

Regulations implementing the 1976 National Forest Management Act, 36 C.F.R. 219.21, require that "off-road vehicle use shall be planned and implemented to protect land and other resources, promote public safety, and minimize conflicts with other uses of the National Forest System lands." In the revised CONF Plan, ATV use is permitted only on specific trails designated as appropriate for this use.

Restoration

7-25. Public Concern: The Forest Service should restore natural processes and native forest communities. (A)(C)(O)(J)(S)

AND CLARIFY HOW THE AGENCY WILL MEET RESTORATION OBJECTIVES (C)(O)(S)

Response: Restoration, as a management issue, was developed as several management prescriptions (depending on which ecosystem attribute needed restoration) that were allocated to Forest areas where the need was of high potential. Each restoration prescription does define desired future condition in terms of native species composition. There are some restoration needs that will involve the removal of loblolly pine, where it is growing off site, and restoring the site to longleaf pine, for example (Management prescription 9.D.).

7-26. Public Concern: The Forest Service should consider an alternative to restore forests to their natural dynamics. (O)

Response: This comment concerned the Forest implementation of the Regional old growth guidance. In particular the question was raised as to whether young or very young stands, rather than stands of potential old growth age or beyond, were allocated as old growth blocks. How areas were identified for old growth allocations is described in detail in Appendix D of the Plan but the general answer is that where it was feasible old growth areas were allocated using groups of stands at, near, (within 20 years), or beyond the minimum old growth age. Another portion of the same comment concerned maps and the FEIS and Plan will include a black and white old growth 'network' map for the preferred alternative.

7-27. Public Concern: The Forest Service should conduct watershed restoration via passive restoration. (O)

Response: We agree with a focus on restoration and a strong emphasis on it is a major feature of the Plan. Our concept of restoration includes the restoration of environmental conditions that would allow vegetation communities to sustain themselves without the need for intensive treatments. When the full range of vegetation management tools and techniques are considered, including those in common use in the private sector, Forest Service management is predominantly on the low to moderate intensity side.

However, we know that control or eradication of non-native invasive species will sometimes require extraordinary measures to be effective and that relatively intensive treatments will be necessary to restore some species onto areas where they once did occur, or had a high probability of occurring.

7-28. Public Concern: The Forest Service should focus management efforts on restoration. (O)(S)

Response: We agree with a focus on restoration and a strong emphasis on it is a major feature of the Plan. Our concept of restoration includes the restoration of environmental conditions that would allow vegetation communities to sustain themselves without the need for intensive treatments. When the full range of vegetation management tools and techniques are considered, including those in common use in the private sector, Forest Service management is predominantly on the low to moderate intensity side. However, we know that control or eradication of non-native invasive species will sometimes require extraordinary measures to be effective and that relatively intensive treatments will be necessary to restore some species onto areas where they once did occur, or had a high probability of occurring.

7-29. Public Concern: The Forest Service should conduct restoration based on "best value." (O)

Response: The 2003 Appropriations Act authorized the Forest Service to implement Stewardship End Result Contracting. This allows the Forest Service to enter into stewardship contracting projects with private persons or public or private entities through a contract or agreement to perform services to achieve land management goals for national forests or public lands. These projects must meet local and rural community needs. These contracts may be selected on a "best value basis" as long as they best meet the goals and objectives of the project. In addition to considering the cost or price of doing the job, the Forest Service may consider the contractor's past performance, work quality, existing public or private agreements or contracts, on-time delivery, and experience. It is anticipated that some of the restoration activities associated with the implementation of the Plan will be accomplished through Stewardship contracting based on "best value" principles.

Standards, Goals, Objectives, and Guidelines

7-30. Public Concern: The Forest Service should provide clear, concise, and unambiguous management objectives. (A)(C)(O)(J)(S)

TO MAXIMIZE MANAGEMENT EFFICIENCY(A)(C)(O)(J)(S)

Response: We agree that objectives are a key component of the Forest Plans. Goals and desired condition statements describe where we want to end up, but it is the objectives that define the actions/activities needed to meet

those goals/desired conditions. Sometimes there is a fine line between goals, objectives, and standards, but we have made every attempt to develop objectives that are clear, understandable, and measurable. The Forest Plan has also been organized to have goals and objectives presented together, so that one can see the objectives that are being used to show the achievement toward reaching a particular goal.

7-31. Public Concern: The Forest Service should revise Objective 3.3 to increase target acreages and develop a maintenance plan for restoration goals. (O)

Response: This objective was developed based on GIS analysis and a combination of other analysis products, which indicated that this is what we can produce on the forest over the next ten years. This is not the only habitat that will be created that will host the species mentioned. Specific objectives can be found in the Plan that will provide habitats throughout the forest for RCW, Bachman's sparrow as well as Coneflower, Georgia aster, Cerulean and Golden-winged warbler.

Natural Resource Management – Specific Resources

Timber Resource Management (General)

Timber Resources Management General Considerations

7-32. Public Concern: The Forest Service should harvest timber from National Forest System lands. (A)(C)(O)(J)(S)

Response: The selected alternative for the revised CONF plan does contain goals and objectives that will be accomplished by the activity of timber harvesting.

7-33. Public Concern: The Forest Service should cut the maximum allowable acreage of timber. (C)(O)

BECAUSE WOOD IS A RENEWABLE RESOURCE (O)

TO BENEFIT WILDLIFE AND CREATE A PRODUCTIVE FOREST (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of commercial timber harvesting. The planning process for the Southern Appalachians included analysis of a range of alternative management themes. Within these alternatives was a range of levels of timber harvest volumes. The selected alternative does not have the highest level of timber harvest, but addresses the spectrum of significant issues best in its combination of resource activities and emphases.

7-34. Public Concern: The Forest Service should develop alternatives and management prescriptions that emphasize timber management. (A)(C)(O)(J)

TO FULFILL AGENCY MANDATES AND AVOID SETTING A PRECEDENT FOR RESOURCE PLANNING (A)(O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of commercial timber harvesting. The planning process for the Southern Appalachians included analysis of a range of alternative management themes. Within these alternatives was a range of levels of timber harvest volumes. The selected alternative does not have the highest level of timber harvest, but addresses the spectrum of significant issues best in its combination of resource activities and emphases.

7-35. Public Concern: The Forest Service should include creation of wildlife habitat as a justification for timber harvest. (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of commercial timber harvesting. Many wildlife habitat objectives will be accomplished through active management including timber harvest designed to achieve those particular objectives.

7-36. Public Concern: The Forest Service should leave riparian areas in the timber base. (O)

BECAUSE FISHERIES AND WILDLIFE BUDGETS ARE NOT ENOUGH FOR NECESSARY IMPROVEMENTS (O)

Response: Active resource management within the riparian areas will generally be limited to activities that improve riparian function or provide wildlife and fishery habitat improvements. Budgets in wildlife and fisheries have been increasing over the years and out year budgeting processes continue to emphasize wildlife and fishery dollars. This change in budget focus will tend to offset the loss of timber revenue dollars that were available for wildlife projects through KV (Knutson-Vandenburg Act) dollars. There are no plans to place riparian areas into the timber base.

7-37. Public Concern: The Forest Service should conduct some commercial timber harvest. (C)(O)

Response: The selected alternative for the revised CONF plan does contain goals and objectives that will be accomplished by the activity of timber harvesting.

7-38. Public Concern: The Forest Service should not harvest timber from National Forest System lands for various reasons. (A)(C)(O)(J)(S)

BECAUSE THIS ACTIVITY ADVERSELY AFFECTS WILDLIFE AND HABITAT (A)(O)(S)

FOR AESTHETIC REASONS (O)(J)(S)

BECAUSE THE FOREST BELONGS TO THE PEOPLE, NOT SPECIAL INTERESTS (O)

BECAUSE TIMBER SHOULD BE SUPPLIED BY PRIVATE LANDOWNERS (A)(O)(S)

BECAUSE THERE IS PLENTY OF WOOD AVAILABLE ELSEWHERE (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "…. provide for multiple use and sustained yield of goods and services from the National Forest System…" (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-39. Public Concern: The Forest Service should not harvest timber from National Forest System lands in various locations. (A)(C)(O)(J)(S)

Response: Prior to any timber harvest activity project level NEPA analysis must take place. This includes scoping to inform interested parties and gather input, and an appropriate level of analysis consistent with the complexity of the project. The Plan does not make decisions regarding whether or not timber harvest will occur on any particular location.

7-40. Public Concern: The Forest Service should not conduct commercial timber harvest on National Forest System lands. (A)(C)(O)(J)(S)

ON THE CHATTAHOOCHEE NATIONAL FOREST (O)

IN WILDERNESS AREAS ON THE CHATTAHOOCHEE NATIONAL FOREST (O)

TO PROTECT WATERSHEDS (O)

Response: The selected alternative for the revised CONF Plan does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "….provide for multiple use and sustained yield of goods and services from the National Forest System……" (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

Prior to any timber harvest activity project level NEPA analysis must take place. This includes scoping to inform interested parties and gather input, and an appropriate level of analysis consistent with the complexity of the project. The Plan does not make decisions regarding whether or not timber harvest will occur on any particular location.

Commercial timber harvest will not occur in designated wilderness. Management activities in inventoried roadless areas will not impact the roadless character.

7-41. Public Concern: The Forest Service should not manage National Forest System lands as tree plantations and tree farms. (A)(C)(O)(S)

BECAUSE THERE ARE PLENTY OF MONOCULTURE PINE FORESTS (C)(O)(S)

Response: There is no direction in the Plan that either directly requires or indirectly results in 'tree farms'. Rather, only a diverse forest can meet the wide-ranging goals, objectives, standards, management prescriptions, and desired future conditions of the plan. However, there remains a niche within overall diversity for forest cover that is predominantly pine and restoration will require planting of pines in some cases. These plantings are at lower densities than would maximize wood volume production and forest-wide standards direct the retention of hardwoods within them.

7-42. Public Concern: The Forest Service should subject all timber sales to public review and appeal. (O)

Response: Public review and appeal of timber related decisions are not forest plan decisions. Regulations require that we provide interested parties the opportunity to comment on a proposed action implementing the land and resource management plan. Currently, timber-related projects documented in an Environmental Assessment (EA) and Decision Notice are subjected to a 30-day notice and comment period in addition to the requirement for scoping. EAs for timber related projects are also subject to administrative appeals. Projects documented in Categorical Exclusions and Decision Memos are subject to scoping but cannot be administratively appealed.

7-43. Public Concern: The Forest Service should not increase timber harvest. (A)(C)(O)(J)(S)

TO COMPLY WITH REGIONAL POLICY TO MANAGE FORESTS FOR ECOLOGICAL INTEGRITY (C)(O)

Response: A major emphasis of the revised Plan is to provide for the habitat needs of wildlife and to restore native ecosystems. The selected alternative for the revised CONF Plan does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "….provide for multiple use and sustained yield of goods and

services from the National Forest System……" (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-44. Public Concern: The Forest Service should analyze alternatives to timber harvest and wood products. (C)(O)(S)

BECAUSE PEOPLE ARE WILLING TO USE ALTERNATIVE PRODUCTS AND PAY MORE TO PROTECT FORESTS (O)

Response: The revised CONF Plan was created using the process mandated by the NFMA and NEPA regulations. The plan revision process for the Forest included a look at a broad range of alternatives, each having a different intensity and management theme. Included in the range is an alternative that called for minimal (custodial) management of the National Forest's resources.

7-45. Public Concern: The Forest Service should promote timber production in the coastal plain instead of national forests. (O)(S)

BECAUSE THERE WOULD BE LESS ENVIRONMENTAL EFFECTS (O)

Response: Timber production is one of the legitimate multiple-uses of National Forest System lands as spelled in the Multiple-Use Sustained-Yield Act, National Forest Management Act, and other laws. Timber production already occurs on the coastal plain. Timber from both private and public lands contributes to the supply of wood products used by Americans each year. Since the U.S. is a net importer of wood, increasing coastal plain production would not necessarily replace the need for timber coming from National Forest System lands.

7-46. Public Concern: The Forest Service should clarify the timber sale process. (O)(C)

Response: This concern dealt with a series of specific questions about the economic analysis of timber production required by the National Forest Management Act. Appendix B of the EIS has been edited to respond to this and a variety of similar concerns.

7-47. Public Concern: The Forest Service should adequately examine the effects of the timber harvest program. (A)(C)(O)(J)

Response: The effects of all proposed activities, including timber harvesting, are examined for each alternative in the Final Environmental Impact Statement for each of the Southern Appalachian plans.

7-48. Public Concern: The Forest Service should keep up with modern forest management practices and manage Eastern forests based on natural ecological processes and gap dynamics. (C)(O)

Response: The 'Forest Cover' topic of the EIS presents detailed information about the species composition and structure of the Forests and relates this composition to the sustainability of vegetation communities. Appendix F of the Plan discusses the role of gap dynamics in sustaining forested ecosystems of the Chattahoochee and Oconee. There is no single type of disturbance regime that is suitable to sustain all of our vegetation communities.

7-49. Public Concern: The Forest Service should manage forests under conservation timber management. (O)

Response: The conservation of vegetation communities and wildlife habitats is the emphasis of the Plan. Timber harvest is being used only as a tool to achieve non-timber objectives.

7-50. Public Concern: The Forest Service should focus on restoration and less intensive silviculture methods. (O)(S)

Response: We agree with a focus on restoration and a strong emphasis on it is a major feature of the Plan. Our concept of restoration includes the restoration of environmental conditions that would allow vegetation communities to sustain themselves without the need for intensive treatments. When the full range of vegetation management tools and techniques are considered, including those in common use in the private sector, Forest Service management is predominantly on the low to moderate intensity side. However, we know that control or eradication of non-native invasive species will sometimes require extraordinary measures to be effective and that relatively intensive treatments will be necessary to restore some species onto areas where they once did occur, or had a high probability of occurring.

7-51. Public Concern: The Forest Service should not inconvenience adjacent property owners nor damage their property in conducting timber sales. (O)

Response: Prior to any timber harvest activity project level NEPA analysis must take place. This includes scoping to inform interested parties and gather input, and an appropriate level of analysis consistent with the complexity of the project. The commenter should keep informed of proposed activities through the quarterly schedule of proposed actions and make sure to provide input to any project in the vicinity of the commenter's home.

7-52. Public Concern: The Forest Service should change the planned rotations. (O)

Response: 'Rotation age' was used in the planning effort for two reasons; (1) to comply with National Forest Management Act requirements, and (2) to vary estimated timber output by alternatives in response to the 'wood products' issue. It was not a driver in reaching a timber product output objective because there was none. In timber modeling, the rotation age was the earliest age at which any portion of a timber analysis area could be regeneration harvested. In the preferred alternative, these ages varied by old growth type and were chosen to be at advanced physiological age for the tree species. A complete explanation may be found in Appendix B of the EIS.

7-53. Public Concern: The Forest Service should acknowledge that modern forest management has changed forest structure and composition. (C)(O)

Response: The commenter cites a number of disturbance events prior to and unrelated to what would be recognized as "modern forest management." This list of events, including farming, grazing, and urban sprawl, certainly influenced forest composition and structure. However, the most significant change-producing event across the Southern Appalachians in the last 150 years was the loss of the American chestnut due to a ubiquitous fungal disease. We agree that even-aged management can change forest structure and composition. The revised CONF Plan is not focused on even-aged management. Rather, its emphasis is on maintaining and restoring an array of wildlife habitats.

7-54. Public Concern: The Forest Service should clarify how silvicultural activities intended for ecological management can provide a stable supply of wood products. (A)(O)(S)

Response: Stability in supply derives from wildlife habitat, forest health and community restoration treatments of an approximately equal land area each year. In practice, 'stability' will not be a single unvarying amount but be relative stability; that is, within a range of wood product output as acres treated and the amount of wood volume per treated acre varies.

Forest Composition

Forest Composition General

7-55. Public Concern: The Forest Service should manage forests to create a diversity of successional stages, stand structures, and species. (A)(C)(O)(J)(S)

TO PROVIDE ECONOMIC BENEFITS (C)(O)(J)

Response: Management of these Forests as ecosystems is a major theme under which the management prescriptions were developed. The emphasis

and desired future condition for each management prescription took into consideration the successional and structural diversity needs of the landscape.

Forest Species Classification and Distribution

7-56. Public Concern: The Forest Service should use both natural and artificial methods for regeneration. (O)

TO BENEFIT WILDLIFE (O)

Response: We agree with the commenter that both methods can be used to enhance wildlife habitat. Since restoration is a major feature of the plan, both natural and artificial methods will be needed.

7-57. Public Concern: The Forest Service should remove seed trees following seedling establishment. (O)

TO PREVENT CROWDING AND OVERSTOCKED STEM CONDITIONS (O)

Response: We expect there will be a mixture of seed tree removal and seed tree retention in practice. Though being called 'seed trees', the trees used to provide seed have other values beyond just being a seed source. We agree that overstocking is a concern in the seedlings thus established, especially in loblolly pine. There are plan objectives to deal with this as well.

7-58. Public Concern: The Forest Service should not use seed tree selection or shelterwood cutting. (O)

Response: The commenter wanted the plan to 'outlaw' these two methods. Our reasoning for using these methods is fully disclosed in the EIS, the EIS Appendices including the Response to Comments, the Plan, and the Plan Appendices. It would be unwise to so curtail our options in such a categorical fashion given the great complexity of environmental, biological, and social conditions that we face.

7-59. Public Concern: The Forest Service should specify goals for the direct regeneration of oak through even-age management. (O)

Response: The choice of the specific type, timing, and intensity of vegetation treatments designed to secure regeneration is being left to projects implementing the plan. Goal statements of the plan do include the maintenance of oak as a native community. The choice of regeneration methods is guided by the plan management direction and the specific purpose and need of the individual project. In addition, Plan Appendix F specifically addresses the regeneration of

oaks and the methods of achieving it. Finally, the Forest Service must certify stand restocking to the Secretary of Agriculture within 5 years of final removal harvest.

7-60. Public Concern: The Forest Service should acknowledge that there are few contiguous shortleaf pine stands on the Oconee National Forest. (O)

Response: The criticism that objective 9.2 in the draft was in error because of the actual acres of shortleaf on the Oconee was a valid one. The objective has been corrected in the final. Thank you.

7-61. Public Concern: The Forest Service should, after timber harvest, replant with a diversity of tree species. (O)

Response: Regeneration following timber harvest occurs in several ways. In many stands in the southern Appalachians, natural regeneration takes place and no tree planting is required to establish a new stand. Naturally regenerated stands are naturally stocked with a diversity of species. Some stands, such as certain pine stands, are regenerated through planting single species. It depends on the site specific objectives and stand conditions.

7-62. Public Concern: The Forest Service should define 'restoration' of native species and take action to remove loblolly pines. (A)(O)(S)

Response: Restoration, as a management issue, was developed as several management prescriptions (depending on which ecosystem attribute needed restoration) that were allocated to Forest areas where the need was of high potential. Each restoration prescription does define desired future condition in terms of native species composition. There are some restoration needs that will involve the removal of loblolly pine, where it is growing off site, and restoring the site to longleaf pine, for example (Management prescription 9.D.).

7-63. Public Concern: The Forest Service should, after timber harvest, plant tree species identical to those removed. (C)(O)

Response: We agree with the concept that what 'ought' to be growing at a location can often be indicated by what is already growing there. For many species, our management uses the fact that they do replace themselves on the same site from which they were cut. For those that won't, we plant them back. But with the emphasis in the plan on restoration, there will often be the need to 'put back' a species onto a location where it either once occurred or had a high probability of historically occurring. One of the clearest examples is valley bottoms originally covered in hardwood cleared for agriculture and recaptured by forests of pine. On a broader scale, forests are not replaced

with an identical composition following disturbance but may be with a similar one.

7-64. Public Concern: The Forest Service should restore shortleaf pine only in the proper sites to avoid creating a potential southern pine beetle problem. (O)

Response: We agree. A standard was added between draft and final to avoid reforestation of shortleaf pine on littleleaf hazard soils.

7-65. Public Concern: The Forest Service should reduce the yellow pine reforestation stocking standards (except for longleaf), and standardize levels for all species reflective of levels set for longleaf pine. (O)

Response: This has been done.

Late Successional/Old Growth

7-66. Public Concern: The Forest Service should actively manage old growth forests. (A)(C)(O)(J)(S)

BECAUSE THE TERM "OLD GROWTH" IS VAGUE AND A HUMAN VALUE ISSUE (O)

BECAUSE MANAGING FOR OLD GROWTH WILL CREATE HEALTH PROBLEMS IN THE FUTURE (A)(C)(O)

BECAUSE THE SOCIOLOGICAL ARGUMENT FOR OLD GROWTH SHOULD BE PROVIDED FOR EVERY HABITAT TYPE AND RECREATIONAL PURSUIT (O)

BECAUSE OVEREMPHASIS ON OLD GROWTH WILL LEAD TO UNDESIRED FOREST CHANGES (O)(S)

Response: The regional guidance for conserving and restoring old growth forest communities outlines different approaches for managing old growth, which includes options from "doing nothing" to active management regimes of extended forest rotations designed to sustain a flow of replacement old growth stands over time. These options are reflected in Management Prescriptions 6.A. through 6.E. The forest management teams and interdisciplinary teams considered these options in determining which approaches would best address the old growth management issue. In addition to those areas allocated to a Management Prescription 6 Category, other areas allocated to other Management Prescriptions will also provide future old growth stands.

The regional guidance for conserving and restoring old growth was developed with the assistance of numerous researchers and up to eight different criteria were established for identifying existing old growth stands within each old growth forest community. The question of "how much old growth should we

manage for" is very much a social issue, and different old growth allocations were considered in the different alternatives.

7-67. Public Concern: The Forest Service should protect old growth forests. (A)(C)(O)(J)(S)

FOR BIODIVERSITY AND DIVERSE ECOSYSTEMS (A)(C)(O)(J)(S)

TO BENEFIT BEES, BIRDS, AND OTHER WILDLIFE, PLANTS, AND VALUED ELEMENTS (A)(C)(O)

BECAUSE THE VALUE OF OLD GROWTH FAR OUTWEIGHS ECONOMIC GAINS FROM TIMBER HARVEST (C)(O)

FOR SOCIOECONOMIC REASONS (O)

BY ESTABLISHING STANDARDS TO IDENTIFY AND PROTECT OLD GROWTH PATCHES (A)(C)(O)(J)(S)

BECAUSE WE NEED AREAS SET ASIDE THAT DO NOT PROVIDE EASY ACCESS (O)

BECAUSE ROADS AND THE HARVEST OF OLD GROWTH TIMBER WILL DISRUPT NATURE'S BALANCE (O)

Response: The revised CONF plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). The Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size.

7-68. Public Concern: The Forest Service should manage and return all areas to old growth. (C)(O)(J)(S)

BECAUSE OLD GROWTH PROVIDES LABORATORIES FOR COMPARISON TO OTHER FOREST AREAS (O)

Response: The revised CONF Plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). The Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size. The selected alternative addresses many significant issues that preclude allocating the entirety of the Forest to old growth.

7-69. Public Concern: The Forest Service should provide buffer zones around old growth communities. (O)(J)

Response: The revised CONF Plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). Each Forest's Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size. The old growth patches will exist within a matrix of predominantly mature forest, largely ensuring connectivity across the landscape.

There is simply not enough National Forest land in Georgia to allocate blocks to near-single emphasis and then buffer them with very wide buffers. The major objection seemed to be with those old growth prescriptions that allowed some timber management. The selected alternative has nearly all old growth allocations in 6.B., which permits the use of timber harvest as a tool to maintain or restore the community. Timber harvest does not occur on a planned, periodic basis but on a case-by-case basis .

7-70. Public Concern: The Forest Service should promote alternatives to wood harvested from old growth trees. (O)

Response: The revised CONF Plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). Each Forest's Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size. Promotion of alternatives to wood is beyond the scope of Forest Plan decisions.

7-71. Public Concern: The Forest Service should publish data for old growth forests and specify how this data will be used to manage these areas. (O)

Response: The commenter requested that old growth data be included in the plan. The plan itself does not include much material that qualifies as data. Inventory data is typically summarized and interpreted in the EIS. Existing old growth data was considered and this consideration is documented in Appendix D of the Plan. Over time, data collected for old growth will be used to first validate and then refine the old growth operational definitions.

7-72. Public Concern: The Forest Service should document and analyze relationships between existing old growth, possible old growth, and future old growth. (O)

TO DEVELOP A NETWORK OF OLD GROWTH AREAS (O)

BECAUSE SOME AREAS MAY NOT BE CANDIDATES FOR OLD GROWTH (O)

Response: Goals, objectives, and standards for old growth management are found in Chapter 2 of the Plan. How areas were identified for old growth allocations is described in detail in Appendix D of the Plan but the general answer is that where it was feasible old growth areas were allocated using groups of stands at, near, (within 20 years), or beyond the minimum old growth age. Another portion of the same comment concerned maps and the FEIS and Plan will include a black and white old growth 'network' map for the preferred alternative.

7-73. Public Concern: The Forest Service should specify desired future conditions, objectives, and standards for all old growth in management prescriptions. (A)(O)

TO COMPLY WITH REGIONAL GUIDANCE (O)

Response: The specific comments dealt with old growth allocation by management area, not management prescription as coded. Old growth desired future conditions and objectives have been supplemented since the draft. As requested, allocation of additional small blocks of old growth is based on watersheds. Specifically, plan direction calls for old growth allocation within each 6th level hydrologic unit.

7-74. Public Concern: The Forest Service should follow regional guidance regarding old growth. (A)(C)(O)(J)(S)

Response: The regional old growth guidance provides information on how to identify existing old growth areas, different options for managing old growth, and an overall approach for addressing old growth during forest planning. The Forests have followed this guidance by conducting an inventory of possible old growth and using this as a guide in the development of the different alternatives. The Forest Plans include a standard that any stands identified as "existing old growth" will be protected, and the Plans provide a network of old growth areas across the forest. This "network" does not have to consist only of areas allocated to a Management Prescription 6. There are many management prescriptions that will allow stands to eventually provide old growth conditions and these areas are a part of the overall "network".

The revised CONF Plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). The Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size.

7-75. Public Concern: The Forest Service should specify that the classification of forest community types is a generalization. (O)

BECAUSE THE CLASSIFICATION IS OF LITTLE USE FOR VIABILITY OF SPECIES (O)

Response: One commenter suggests that we make clear that the classification of major forest communities used in the terrestrial species viability evaluation is a generalization so that the limitations of the classification are apparent, and that the classification used is of little use as a screen for viability concern species. All classification systems are generalizations. To plan for habitats, the continuum of conditions on the ground must be generalized into a classification system so that they may be analyzed. For the terrestrial species viability evaluation, we looked at a variety

of forest community classification systems, including the Forest Services CISC data classification, NatureServe's vegetation classification, and the classification system developed for old growth planning. While each of these has its advantages, none exactly matched the habitat association groupings that were most apparent when we looked at the full set of habitat needs for each species of potential viability concern. To facilitate and simplify species viability analysis, we lumped some forest communities together, where keeping them separate did not add appreciably to our ability to focus management direction or analysis. Major forest communities used in the viability analysis are defined and cross-walked to other classification systems at the beginning of each associated forest community section in the FEIS. The crosswalk tables illustrate that the major forest communities are a broad grouping of many more specific forest community types. The commenter does not specify where they feel this lumping has resulted in erroneous or misleading conclusions.

These major forest communities are only a small subset of the habitat elements considered in the Forest Plan and represent the broad, coarse filter scale of management. The Forest Plan also provides direction for the management of many additional habitat elements relevant to species of viability concern. These include rare communities, successional habitats, riparian areas, and stand-level habitat elements such as canopy gaps, snags, den trees, downed wood, and hard mast. In addition to this habitat-based direction, the plan also provides species-based for Federally-listed threatened and endangered species and species of viability concern which represent the fine-filter scale of management.

7-76. Public Concern: The Forest Service should accurately describe the historic dynamics of the Southern Appalachian forests as naturally uneven-aged. (A)(C)(O)(J)(S)

AND CONSIDER AN ALTERNATIVE TO RESTORE THE SOUTHERN APPALACHIAN FORESTS TO THEIR NATURAL DYNAMICS (A)(O)

Response: Refer to response to PC 3-73.

7-77. Public Concern: The Forest Service should explain why it has chosen not to use old growth data supplied by Georgia Forest Watch. (O)

Response: This data has been used. How it was used is explained in Appendix D of the Plan.

7-78. Public Concern: The Forest Service should inventory and map old growth. (A)(C)(O)(J)(S)

TO MANAGE AREAS AS OLD GROWTH (O)

BY WORKING WITH NONGOVERNMENTAL ORGANIZATIONS AND COMPLYING WITH REGIONAL POLICY (O)

Response: There is no requirement in the R8 old growth guidance for the conduct of a Forest wide old growth inventory to have been done before a forest plan can be done. Rather the guidance is clear that what is intended is progress over a long period of time before old growth inventory is complete. In the meantime, the plan establishes the representation and distribution in a network required by the guidance and requirements for additional small block allocations.

7-79. Public Concern: The Forest Service should adequately map and display the networks of large, medium, and small old growth patches. (A)(C)(O)(J)(S)

Response: Black and white maps of the old growth network in each alternative and in each ecological section will be included in the FEIS. Throughout the entire plan revision effort, the IDT has been planning for and working toward the implementation of the plan. Project planners will know where areas allocated to old growth are.

7-80. Public Concern: The Forest Service should protect specific recommended old growth communities. (O)

Response: Each of the recommended areas was considered individually. One of the areas was identified as already being in wilderness and needed no further protection. One was re-allocated to old growth protection.

One was not identified by location. One was not reallocated because of potential conflict with early successional habitat creation above 3000 feet in an area where most of the potential is already in wilderness.

7-81. Public Concern: The Forest Service should explain why only the Jefferson National Forest documents "existing old growth." (A)(C)(O)(J)(S)

Response: The Forests in the Southern Appalachians are in different situations in terms of their old growth inventories of "existing old growth", with some further along than others. Inventories from other groups/organizations can be presented to the Forests, but they still need to be verified that they meet the criteria for old growth as spelled out in the regional old growth guidance.

Since these inventories are generally at the stand level, they are not allocated to specific management prescriptions in the Forest Plan. Instead it is recognized that these stands could occur in any management prescription allocation, and in order to protect those stands of existing old growth, a forestwide standard is included in the Forest Plan to provide that protection. This standard applies to both those stands currently identified as existing old growth, as well as any stands that may be identified in the future as meeting the criteria for "existing old growth". So even though a Forest may not have a completed inventory now, any project level evaluation will have to see if any of the stands proposed for management activities meet the old growth definition.

The Chattahoochee-Oconee did not identify existing old growth because we have not inventoried extensively using the old growth guidance defining criteria. Though we know of areas on the forest we expect will meet all criteria, we will not say they are existing old growth until we have truly representative sample data that confirms it. An inventory of existing old growth is not required by the guidance before a plan can be done.

7-82. Public Concern: The Forest Service should describe the desired future conditions for old growth on the forest. (A)(C)(O)(J)(S)

Response: Desired conditions for old growth can be found in Chapter 3 of the revised CONF Plan, in the "Desired Condition" section of information regarding management prescriptions 6B and 6D. Additional information on this topic is located in Appendix D of the Plan, "Old Growth Strategy."

7-83. Public Concern: The Forest Service should explain why Management Prescription 6X is not better utilized on the Southern Appalachian National Forests. (A)(C)(O)

Response: The commenter notes that the Chattahoochee-Oconee did use the MRX '6' series extensively. We did not use it more because three legislative withdrawals and previous Chief and Regional Forester withdrawals provide large amounts of old growth compatible management

7-84. Public Concern: The Forest Service should follow agency directives concerning old growth inventories. (O)

Response: The revised CONF Plan reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" (June 1997). The Plan provides for present and future representation of old growth community types, their distribution, and variety of patch size.

7-85. Public Concern: The Forest Service should better develop a network of old growth areas of various sizes and develop management prescriptions for these areas. (C)(O)(S)

Response: The comments focused on the Chattooga River Gorge and are answered in that context. Regarding representation, the scale stipulated by the old growth guidance is the ecological section. For the Chattooga, that is the Blue Ridge Mountains. Regarding Carlson's inventory, we did consider his findings. See Appendix D of the Plan. The EIS and Plan Appendix D identify that linkage is provided by old growth occurring in a matrix of primarily late successional forest composition and that old growth blocks are thus networked by this matrix.

7-86. Public Concern: The Forest Service should provide for the identification and evaluation of additional old growth patches on National Forest System lands. (A)(C)(O)(J)

Response: Information regarding the characteristics of old growth that will be used in identification of old growth can be found in Appendix D, "Old Growth Strategy."

7-87. Public Concern: The Forest Service should better explain the old growth network on the Southern Appalachian forests. (A)(C)(O)(J)(S)

Response: There are a number of ways to meet the regional old growth guidance for having a "network" of large, medium and small old growth patches. These "patches" do not need to be specifically allocated to a Management Prescription 6. Old growth management can be met in other management prescriptions as well. When all the compatible prescriptions were mapped out, along with the forestwide standard to protect any stand that meets the criteria for "existing old growth" (which can include either stands currently inventoried or stands identified sometime in the future), a determination was made as to whether or not this "old growth network" was adequate, or if other specific old growth allocations were needed to fill in any "gaps" in the "network". In most cases, it was determined that the combination of the allocations of all the old growth compatible management prescriptions, along with the forestwide standard on "existing old growth", that the resultant "old growth network" was sufficient to address the old growth issue.

7-88. Public Concern: The Forest Service should incorporate the Georgia Forest Watch Old Growth Inventory into the new forest plan. (O)

Response: This data has been used. How it was used is explained in Appendix D of the Plan.

7-89. Public Concern: The Forest Service should provide a connection between existing old growth, possible old growth, and future old growth. (A)(C)(O)(J)(S)

Response: "Possible Old Growth" is simply an initial inventory, to give planners an indication of where "existing old growth" stands might be found; and to give planners some information on where it would make sense to allocate management prescriptions for the purposes of managing/maintaining old growth. This initial inventory is essentially nothing more than a query of the CISC data base to find stands older than a certain age.

"Existing Old Growth", however, are those stands that meet all the criteria for being classified as "existing old growth" as determined by the Regional "Guidance for Conserving and Restoring Old Growth Forest Communities". This regional guidance identifies up to eight criteria for making that determination. Whether or not a stand will meet these criteria is usually only determined by a field inventory.

"Future Old Growth" includes acres in management prescription allocations where stands will likely meet the definition for "old growth" at some point in the future.

"Existing old growth" stands may be found in old growth compatible management prescriptions ("future old growth") and relatively isolated stands of "existing old growth" may also be found in other management prescription allocations. The "old growth network" is provided for through a combination of the lands allocated to the old growth compatible management prescriptions, and a forestwide standard that protects the "existing old growth" found in the other management prescriptions.

7-90. Public Concern: The Forest Service should better address the overall old growth strategy. (A)(C)(O)(J)(S)

Response: Appendix D of the Plan 'Old Growth' strategy has been edited to address more specifically the concerns identified.

7-91. Public Concern: The Forest Service should protect old growth sites on the Chattahoochee National Forest. (O)

Response: Each of the recommended areas was considered individually. One of the areas was identified as already being in wilderness and needed no further protection. One was re-allocated to old growth protection.

One was not identified by location. One was not reallocated because of potential conflict with early successional habitat creation above 3000 feet in an area where most of the potential is already in wilderness.

7-92. Public Concern: The Forest Service should recognize that the plans are inconsistent both across forests and within forests in the prescriptions that are considered old growth compatible. (C)(O)(J)(S)

Response: The lists of management prescriptions that are considered "old growth compatible" vary between Forests because of two reasons. One is that different Forests use different subsets of the total list of possible management prescriptions. For instance, one Forest may have some lands allocated to a Management Prescription 12.C., while another Forest may have no lands allocated to that particular prescription. Another reason is that while there is a regional set of "generic" Management Prescriptions, the Forest could "localize" these prescriptions to meet their local needs. As a part of this "localization", some aspects of the prescription could be changed so that it would no longer be considered "old growth compatible". For instance in some cases, it was a Forest determination as to if a particular management prescription could contain lands "suited for timber production". In these situations, if that particular prescription had "suited" acres, then it could be viewed as not being "old growth compatible". But if another Forest made the determination the same management prescription would be "not suited for timber production", then it could be viewed as being "old growth compatible".

7-93. Public Concern: The Forest Service should recognize that the information and analysis of old growth is insufficient. (A)(O)

Response: We disagree with this interpretation of the data we presented in the draft. The information we provided is sufficient for the responsible official to select an alternative for a strategic plan. In addition, we are in compliance with regional old growth guidance. Further consideration of old growth may occur at project level decision making before the commitment of resources. However, we did additional work to make existing, possible, and future old growth more distinct in the analysis.

7-94. Public Concern: The Forest Service should specify adequate old growth goals, objectives, and management prescriptions for the Southern Appalachian forests. (A)(C)(O)(J)(S)

Response: Many of the comments on this topic relate to questions about following the regional guidance for old growth. There are a number of ways to meet the regional old growth guidance for having a "network" of large, medium and small old growth patches. These "patches" do not need to be specifically allocated to a Management Prescription 6. Old growth management can be met in other management prescriptions as well. When all the compatible prescriptions were mapped out, along with the forestwide standard to protect any stand that meets the criteria for "existing old growth" (which can include either stands currently inventoried or stands identified sometime in the future), a determination was made as to whether or not this

"old growth network" was adequate, or if other specific old growth allocations were needed to fill in any "gaps" in the "network". In most cases, it was determined that the combination of the allocations of all the old growth compatible management prescriptions, along with the forestwide standard on "existing old growth", that the resultant "old growth network" was sufficient to address the old growth issue.

Early Successional

7-95. Public Concern: The Forest Service should not create and expand early successional objectives. (C)(O)(J)(S)

Response: Early-successional habitat was one of the topics most frequently raised by commenters. However, some commenters did not appear to recognize distinctions among types of early-successional habitat that we have made in the Revised Plan and EIS. Understanding these distinctions is important because early-successional habitats are not all the same in their value to wildlife and in strategies for their management. Types of early-successional habitat that we have addressed include early-successional forests, open woodlands, improved pastures, permanent wildlife openings, old fields, maintained rights-of-way, and balds.

Percentage objectives within prescriptions, which were the focus of many comments, are for *early-successional forest* only, and are calculated on the basis of the amount of forested land within a prescription block. Other types of early-successional habitat within the block are treated as non-forest and, therefore, are not included in percentage calculations. Presence of these other types is meant to supplement early-successional forest objectives in determining overall abundance of early-successional habitats. Objectives for some of the other early-successional types have also been set in the Plan. Other types are acknowledged as present, but their abundance was not deemed enough of an issue for specific objectives to be set in the Revised Plan.

Comments calling for both higher and lower objectives for early-successional forest were common. Commenters in favor of higher objectives included state wildlife management agencies, wildlife professional organizations, hunting and game species conservation organizations, and bird conservationists. In some cases, these commenters suggested specific objective levels, generally ranging from 5 to 15 percent forest-wide. Commenters in favor of lower objectives included environmental organizations and those interested in low intensity management strategies and undisturbed mature forest conditions. These commenters frequently pointed to openings created by natural disturbances and canopy gaps from natural tree fall, along with private lands, as habitat sources that reduce the need for creation of early-successional forest on national forest lands.

In a recent review paper by disturbance ecologist Craig Lorimer (Historical and ecological roles of disturbance in eastern North American forests: 9,000 years of change. Wildlife Society Bulletin 2001, 29(2):425-439), Lorimer concludes: "Deciding on the optimal amount of early successional habitat on public lands is a complex ecological and social issue that can be guided only in part by scientific evidence." The diversity of perspectives expressed in comments reflects the complexity of this as a social issue. To provide for this diversity of views, as well as a for a diversity of habitats, we defined four mixes or "options" of successional forest conditions to be assigned to specific portions of the national forest landscape. These options were allocated to the landscape through prescription assignments after considering a variety of factors, including successional habitat abundance and distribution across the forest, settings for other multiple uses, and legal and logistical constraints on management opportunity. We have allocated successional forest options in the Revised Plan in a mix that we feel provides the best balance in meeting the wide range of public desires evident in the comments.

Option 1, which has no early-successional forest objective, was defined to recognize there are many portions of the national forest where creation of early-successional forest through management is not legal, feasible, or desirable. Such areas include Wilderness, areas of rugged terrain, and areas sensitive because of other resource uses and values. Forests in these areas will predominately move toward old growth conditions and provide optimal habitat for late-successional forest species.

Option 2, which also has no early-successional forest objective, but which may include up to 4 percent in early-successional forest, was defined to recognize there are portions of the forest where early-successional forest is not a priority, but may be desirable at low levels to increase habitat diversity and meet other multiple-use needs. Such areas may include recreational, aesthetic, or late-successional forest wildlife emphasis areas. As with Option 1, these areas will be dominated by late-successional and old growth forests

Option 3 has an early-successional forest objective of 4 to 10 percent of forested acreage. It was defined to provide an intermediate mix of successional forest habitats, as well as to allow diversification of forest age classes for forest health, conversion of forest types for ecological restoration, and provision for other related multiple uses. If implemented in a fully regulated way, this objective would result in forests growing to 100 to 250 years before being regenerated (however, in reality some may be regenerated earlier and some may be maintained as old growth). This mix still provides for a general increase of older forests relative to current conditions. Both early- and late-successional forest species would find habitat in these areas.

Option 4 has an early-successional forest objective of 10 to 17 percent of forested acreage. It was defined to provide areas that are optimal for early-successional forest dependent wildlife based on recommendations in the

scientific literature. It also will allow accelerated diversification of forest age classes and restoration of desired forest types. If implemented in a fully regulated way, this objective would result in forests growing to 60 to 100 years before being regenerated (however, in reality some may be regenerated earlier and some may be maintained as old growth).

7-96. Public Concern: The Forest Service should account for naturally occurring canopy openings in the analysis of early successional habitat, and implement management based on natural processes. (A)(C)(O)(J)(S)

Response: Some commenters expressed dissatisfaction with our approach of not counting early-successional forest patches of less than two acres towards early-successional forest objectives. This approach was adopted for two primary reasons. First, some species, such as prairie warblers and golden-winged warblers, are restricted to, or prefer, larger habitat patches. Meeting early-successional forest objectives through provision of many small patches would not meet their habitat requirements. Second, there is a limit to the size of patches that can be efficiently tracked in inventories and analyzed for habitat availability. Two acres was the smallest unit deemed practical to try to map and track in inventories, and is considerably smaller than current inventories typically track. It is also typically the largest size of opening created during group selection treatments; larger openings are generally considered even-aged or two-aged patches. We fully recognize that openings and canopy gaps that are less than two acres, whether created by management or of natural origin, provide a habitat condition with some early-successional characteristics that are important to some species (see further response related to "gap-phase dynamics" below). Our recognition of the need for these conditions is reflected in both canopy gap objectives and old growth objectives. To provide for all species, however, it is necessary to provide the full spectrum of successional forest habitats: larger patches of early-successional forest, late-successional mature forest with canopy gaps, and mid- and late-successional forest with relatively closed canopies.

Some commenters feel that analysis of need for early-successional forest habitat was deficient because we didn't make more effort to predict or account for the amount of early-successional forest created by natural disturbance. Natural disturbances that create early-successional forest patches of desired structure and size will be counted toward objectives for this habitat. Where natural disturbances create enough habitat by themselves, management efforts to create these conditions will not be needed.

In the review paper cited above, Lorimer states that predicting frequency of more severe natural disturbances (the kind that would created desired early-successional forest patches) is difficult because they are highly episodic and spatially heterogeneous. Lorimer goes on to state: "…the episodic nature of

large natural disturbances creates a sort of 'feast or famine' environment that may subject early successional animal populations to erratic fluctuations..." Such feasts and famines may be especially extreme when looking at the smaller natural landscapes represented by national forests, surrounded by private lands that may be converted to non-forest. Successional forest objectives are designed to reduce the feast and famine swings for early-successional forest species, while providing ample habitat for mature forest species.

Some commenters suggested that early-successional forest on private lands be used to meet objectives for such habitat. The presence of quality early-successional habitat on surrounding private land should be part of project-level analysis, and may lead to decisions to provide lower levels of this habitat on national forest lands. However, at this strategic planning level, private lands cannot be counted upon with certainty to provide these habitat conditions, nor will they be available to support the full spectrum of multiple uses associated with these conditions. In addition, regulations require that habitat be provided to support viable populations on lands covered by the plan, which does not include private lands. Despite the Revised Plan's recognition of the importance of early-successional forest habitat, the Chattahoochee-Oconee National Forest is expected to continue to provide a successional forest mix dominated by late-successional, especially when compared to the mix found on private lands.

7-97. Public Concern: The Forest Service should provide sufficient early successional habitat. (A)(C)(O)(J)(S)

BOTH IN QUANTITY AND PERCENTAGE (O)(S)

TO PREVENT DECLINE AND EXTIRPATION OF FLORA AND FAUNA (O)

TO BENEFIT WILDLIFE (A)(C)(O)(J)(S)

TO BENEFIT AVIAN SPECIES AND RARE AND COMMON SPECIES (O)(J)

IN STANDS 0-10 YEARS OF AGE (C)(O)(J)

Response: See response to Public Concern 7-95.

7-98. Public Concern: The Forest Service should specify that 10-15 percent of acreage will be maintained as early successional forest. (A)(O)

TO BENEFIT WILDLIFE (O)

Response: In the EIS, the Forest developed and analyzed a series of alternatives that provided a wide range in levels of early successional habitat. To provide for a diversity of habitats, we defined four mixes or "options" of successional forest conditions to be assigned to specific portions of the national forest landscape (see definitions of options in the Successional Forests section of the EIS). A wide variety of multiple resources

considerations influenced the development of the alternatives, including successional habitat abundance and distribution across the forest, settings for other multiple uses, and legal and logistical constraints on management opportunity, some of which (such as acres of existing Wilderness) constrained the levels of early successional habitat. The preferred alternative is expected to maintain approximately 3-4% of the Chattahoochee National Forest and 5-6% of the Oconee National Forest in early successional forests. While these levels will not maximize habitat conditions for early successional species, it does provide a mix of habitat conditions suitable for the wide variety of wildlife found on the Forest as well as meeting other resource considerations and the range of public desires.

7-99. Public Concern: The Forest Service should modify language in desired conditions by restricting the range of habitat percentages. (A)(O)

TO MINIMIZE DISCRETION THAT FAVORS MINIMUM HABITAT LEVELS (A)(O)

Response: The range of desired early successional levels for each prescription was developed in order to maintain management flexibility at project level. It is expected that for many projects, the upper level of early successional habitat permitted by a particular prescription will be achieved. However on other projects, something less than the upper limit may be all that is possible due to other resources considerations. Constraining the desired early successional habitat conditions to too narrow of a range will greatly reduce management flexibility and result in greater resource conflicts.

7-100. Public Concern: The Forest Service should clarify text and tables describing quantities of high elevation early-successional habitat, and maintain all current acreage or increase acreage. (C)(O)

Response: High-elevational habitats (111,345) are about 12% of the total forest acres. You are correct that early successional constitutes less than 5% of the total high elevational acreage. That text change has been made.

7-101. Public Concern: The Forest Service should not create 4-5 percent of early successional habitat within forests. (A)(C)(O)(J)(S)

BECAUSE UNNATURAL CONDITIONS WILL REQUIRE CONTINUOUS MANAGEMENT (A)(C)(O)(J)(S)

Response: In the EIS, the Forest developed and analyzed a series of alternatives that provided a wide range in levels of early successional habitat. To provide for a diversity of habitats, we defined four mixes or “options” of successional forest conditions to be assigned to specific portions of the national forest landscape (see definitions of options in the Successional Forests section of the EIS).

A wide variety of multiple resources considerations influenced the development of the alternatives, including successional habitat abundance and distribution across the forest, settings for other multiple uses, and legal and logistical constraints on management opportunity, some of which (such as acres of existing Wilderness) constrained the levels of early successional habitat. The preferred alternative is expected to maintain approximately 3-4% of the Chattahoochee National Forest and 5-6% of the Oconee National Forest in early successional forests. While these levels will not maximize habitat conditions for early successional species, it does provide a mix of habitat conditions suitable for the wide variety of wildlife found on the Forest as well as meeting other resource considerations and the range of public desires.

The revised forest plan also has a number of objectives related to maintenance and restoration of mature oak forest. These include objectives for thinning and burning in existing oak forest to create suitable conditions for oak regeneration, and objectives for restoration of oak forest on appropriate sites currently occupies by pine plantations or other hardwood species such as gum and maple. These objectives will insure that hard mast will continue to be abundant on the forest.

7-102. Public Concern: The Forest Service should specify how the amounts of early successional habitat were determined and the reasoning used. (A)(C)(O)(J)(S)

Response: See response to Public Concern 7-95.

7-103. Public Concern: The Forest Service should add Hurricane Opal to the list of disturbances. (O)

Response: Hurricane Opal has been added to the list of disturbances as requested.

7-104. Public Concern: The Forest Service should not include utility rights-of-way in high elevation early successional habitat quantification. (O)

Response: Balds and right-of–ways have been removed as components of high-elevation early successional habitat. The definition of early successional habitat is included in the glossary. Some examples of what contributes to the early successional forests are given in several places in the Forest Plan (see plan index).

7-105. Public Concern: The Forest Service should clarify text and tables in the proposed alternatives and provide a rationale for departure from the current plan. (C)(O)

BECAUSE THE PROPOSED LEVEL APPEARS TO BE AN ARBITRARY DECISION (C)(O)

Response: Departure from the current plan is the purpose of the National Forest Management Act. All quantities are based on data and are not arbitrary. Comments received have been used, in part, to identify where and how people did not understand what we meant and edits have been made to correct those problems thus identified.

7-106. Public Concern: The Forest Service should create early successional habit via clearcuts of 15-40 acre tracts on a rotation basis. (O)

BECAUSE CLEARCUTS ARE COST-EFFECTIVE AND NOT DETRIMENTAL TO THE ENVIRONMENT (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct).

7-107. Public Concern: The Forest Service should allow timber harvest in riparian corridors to support early successional habitat. (C)(O)

Response: Active resource management within the riparian areas will generally be limited to activities that improve riparian function or provide wildlife and fishery habitat improvements. There is an objective to maintain 1to 2 percent of the riparian corridor in early-successional forest conditions.

7-108. Public Concern: The Forest Service should ensure that early successional habitat is maintained at a level of 5-10 percent. (O)

Response: See response to Public Concern 7-95.

7-109. Public Concern: The Forest Service should increase early succession goals in less restrictive prescriptions. (A)(C)(O)(J)(S)

Response: See response to Public Concern 7-95.

7-110. Public Concern: The Forest Service should describe habitat condition by its key characteristic (e.g., ground cover). (O)

Response: References to woodland communities based on forest age class and successional stage is not intended and will be edited in the document if those references are made. Woodlands have components that may attract species associated with various forest successional stages.

7-111. Public Concern: The Forest Service should acknowledge that the shift towards woodland complexes will take time and should promote early successional forests that are available in a shifting mosaic. (O)

Response: Woodland habitats and the dynamics involved to reach woodland conditions will be considered. With animal species viability as one of the focuses of this plan the appropriate forest communities, forest age classes and animal species composition using those communities will remain as a priority. Representation and distribution of the vegetative communities on the forest will reflect terrestrial species viability requirements.

7-112. Public Concern: The Forest Service should not allow early successional habitat to drop to 2.5 percent in the fifth decade. (O)

Response: The display of a projected decline in early successional habitat in the decade of 2050 to 2060 should be considered informational. It is not a constraint. In addition, there should have been between three and five more cycles of planning before that date. It is unlikely that thinking about early successional habitat will have remained unchanged in that time. Much more critical is our effectiveness at providing early successional in the life of this plan revision.

7-113. Public Concern: The Forest Service should increase the amount of early successional habitat. (C)(O)

BECAUSE QUALITY EARLY SUCCESSIONAL HABITAT IS ALMOST NON-EXISTENT (O)

Response: The plan has 4 options (see glossary in the Forest Plan for option ranges) to assure that early successional habitats and the associated species that occupy these habitats are provided for. Depending of what option is chosen the forest would allow from 1% to 17% of an allocation to be managed for early successional habitat.

7-114. Public Concern: The Forest Service should not increase high elevation, early successional habitat to benefit non-game species. (O)

Response: The Forest Service and the FWRBE team have developed a viability assessment that recognizes species using all successional stages of the forest. There is no attempt to focus on just one forest successional stage to support the great diversity of species occurring on the forest. High elevation early successional habitat just happens to be one of several communities that have very low representation on the forest.

In regard to other migrant and resident birds occurring on the Chattahoochee-Oconee National Forest some songbirds do require uninterrupted forest for

nesting, several species do not. A mix of different habitats and successional stages are often required by the same species in relation to its roosting, nesting or foraging preferences. A diversity of late, mid and early successional habitats will provide for a greater diversity of songbirds and other native and desirable non-native species occurring on the Chattahoochee-Oconee National Forest

7-115. Public Concern: The Forest Service should not create high-elevation, early-successional habitat to benefit golden-winged warblers. (O)

BECAUSE THESE AREAS INCLUDE OLD GROWTH THAT SUPPORT MANY DECLINING SPECIES (O)

Response: The Forest Service and the FWRBE team have developed a viability assessment that recognizes species using all successional stages of the forest. There is no attempt to focus on just one forest successional stage to support the great diversity of migratory and resident landbirds occurring on the forest. High elevation early successional habitats just happen to be one of several communities that have very low representation on the forest.

Suitability Determinations

7-116. Public Concern: The Forest Service should complete an analysis of relative resource values in allocating lands suitable for timber production. (A)(C)(O)(J)(S)

Response: Refer to response to PC 7-139.

Adequacy of Analysis

7-117. Public Concern: The Forest Service should not base management decisions on a successional forest model. (A)(C)(O)(J)(S)

BECAUSE IT FAILS TO ACCURATELY MODEL THE DYNAMICS OF SOUTHERN APPALACHIAN FORESTS (A)(C)(O)(J)(S)

Response: Several commenters questioned the appropriateness of the even-aged successional model inherent in the Successional Forest Options incorporated in the Revised Plan. They frequently cited materials raised by Quentin Bass, Cherokee National Forest Archaeologist, in a whistleblower complaint that contend that Southern Appalachian forests are naturally uneven-aged, and regenerate predominately through “gap-phase dynamics” rather than by larger, more severe disturbances. Some commenters fault the Forest Service for not considering this information.

Contrary to assertions made by some commenters, information compiled by Bass was considered during planning. It was distributed to staffs of all

Southern Appalachian forests undergoing revision, and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. There are many points of agreement, which are corroborated by a predominance of mainstream scientific literature. We agree that *some* major forest types in the Southern Appalachians are low disturbance systems that commonly regenerate through natural development of relatively small canopy gaps, and that frequent fire in these systems is not desirable. These areas of agreement are incorporated in the Revised Plan and EIS through direction and analysis for mesic deciduous forests, which include cove, riparian, mixed mesophytic and northern hardwood forests. This direction and analysis considers the amount of these forests allocated to Forest Successional Options 1 and 2 (which should be dominated by gap-phase processes), the need for canopy gaps within these forests, and the limited role of fire (See Mesic Deciduous Forest section of FEIS and appropriate objectives and standards from the Revised Forest Plan for the Chattahoochee-Oconee National Forest). There are, however, some of Bass' conclusions with which we disagree, as do some members of the academic and research communities with whom we have consulted.

Bass' presentation of forest conditions in the late 1800s and early 1900s depends heavily upon the Ashe and Ayers Report and descriptions contained in the field notes and maps of the tracts of land that were acquired for inclusion in the National Forests. Bass also has provided substantive literature (bibliography) to support his views. However, he rejects or ignores the substantial body of scientific literature (much of it published in the last 10 years) that contradicts his conclusions regarding the role of fire and other disturbance in maintaining upland oak and pine forest types.

Unlike the scientific literature used and cited during planning, Bass' analysis has not been through the rigorous process of peer review, critique, and publication in mainstream scientific journals. Prior to filing of the whistleblower complaint, the Forest Service contracted review of Bass' analysis by Paul and Hazel Delcourt of the University of Tennessee, who have published widely on historical disturbance ecology. Their written review indicates areas of agreement and disagreement similar to those identified by forest planning teams. It also is important to note that Bass is an archaeologist and not an ecologist or forester, professions that are educated and trained to make ecological interpretations of forest condition data. In his paper, use of terms, lack of reference to the most current scientific literature, and resulting conclusions often do not reflect the best available science. Based on these considerations, we believe Bass' analysis was given an appropriate level of consideration during planning.

Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement. In most cases,

too much has changed for this restoration to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.

Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement for plan revision. In most cases, ecological conditions have changed too much for this to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.

Based on synthesis of the scientific literature, our understanding is that Southern Appalachian forests historically have been subject to highly variable disturbance regimes across the landscape. This variation resulted from the interaction of fire, wind, and other disturbance factors with the highly variable topography and edaphic conditions of the mountains. We disagree with Bass, and follow most current scientific literature, in recognizing that fire, primarily of Native American origin, played an important role in maintenance of upland pine and oak forests, and open woodlands, savannas, and grasslands. Compared to today, forest structure was likely more open on upland sites, due to the influence of fire, and more heterogeneous on lower slopes and coves, due to gap-phase dynamics of older forests. Overall, within-stand structures were likely variable due to the variable effects of natural disturbance factors. Many areas would not easily be categorized as either even-aged or uneven-aged, but some level and pattern of older residual overstory trees would almost always be present, even in areas providing important early-successional habitat. This variable structure can be approximated with uneven-aged, two-aged, and even traditional even-aged management systems, all of which involve retention of varying levels of overstory structure. A patchwork of uniform even-aged stands established by clean clearcuts is clearly outside the historical range of variation of forest structure and is also clearly not the desired condition for any portion of the national forest.

Although the Revised Plan includes objectives for restoration of native fire-maintained habitats, we recognize that we will not be able to restore the influence of fire to the landscape to historical levels due to a variety of logistical and social reasons. Creation of early-successional forests can compensate for the loss of open fire-maintained habitats for some species. So, although we recognize that the mix of types of early-successional habitats maintained under the Revised Plan cannot reflect historical conditions, we have considered the overall abundance of these habitats within an historical ecological context to arrive at objective levels. As some of these fire-maintained habitats are restored, need for early-successional forest as habitat for some species will decline. However, the need will not disappear; other species, such as ruffed grouse, depend upon the dense woody growth

found in early-successional forests. In addition, other multiple-use considerations, such as need for habitat to support game species for recreation, ecological restoration of native forests, forest health considerations, will continue to make creation of some level of early-successional forest desirable.

7-118. Public Concern: The Forest Service should address the adequacy of interpretation of the Spectrum modeling. (C)(O)

Response: This involves responding to a number of questions specific to the SPECTRUM model:

Question - What are the linear programming (LP) decision variables used in the SPECTRUM model formulations?

Response – The SPECTRUM model is comprised of analysis units (areas of land) and different silvicultural management options are available to each analysis unit, including the option of "doing nothing". These silvicultural options include different combinations of thinnings, final harvest methods (e.g., clearcutting, shelterwoods, group selection), and different rotation ages. These different options comprise the "decision variables" in the model.

Question - What is the LP solution algorithm? Does SPECTRUM use the Simplex method, an integer programming solution or a heuristic solution algorithm?

Response – SPECTRUM actually uses a linear program software program called C-WHIZ, which in turn uses the Simplex method.

Question - In the SPECTRUM LP solutions, will any specific forest analysis unit drop out of the timber harvest solution if it has a negative NPV? In other words, does the LP solution retain analysis units in the harvest solution that are themselves unprofitable to harvest?

Response – This depends on the objective function and the set of constraints being used. In determining suited acres, lands can have a negative NPV and still be a part of the suited land base. There are three "stages" to determining suitability, and a part of that analysis is based on meeting plan objectives. If some lands with a negative NPV are needed to meet a particular objective (which would be entered into the SPECTRUM model as a constraint), then they could become a part of the suited land base.

Question - In the SPECTRUM model how are costs and benefits (revenues) determined / derived?

Response – The different costs and benefits are derived from different sources. These are documented in Appendix B of the EIS and in the process records.

Question - Appendix B discloses that it uses timber values derived from SPECTRUM for lands suited for timber. But values for timber from unsuited lands are also included. It's unclear how these values are derived. What factors cause the values to be different? Do greater harvesting costs play a role?

Response – The SPECTRUM model was used to estimate timber volumes and value from the "suited acres", where entries would be on a "scheduled" basis. On "unsuited" lands, since entries would be made on an "as needed" basis and are not "planned" or "scheduled", a different methodology was used to make an estimate of what these volumes might be in the future. On the suited acres, the timber value is dependent upon the mix of species for a particular site. Different species are in different "appraisal groups", with each "appraisal group" having a different value. So each timber yield table would have different volumes in the different appraisal groups, and therefore different values. From these suited land calculations, an average value per MCF was calculated by dividing total timber value by total volume. This average value per MCF was then applied to the estimated volume that would come from the "unsuited acres".

Question - In SPECTRUM, what is the difference between long-term sustained yield and perpetual timber harvest constraints? Davis and Johnson in Forest Management (McGraw-Hill, p. 542) describe long-term sustained yield and perpetual timber harvest as the same concept.

Response – In terms of a definition, these two terms basically mean the same thing. But different modeling constraints are needed to accomplish the concept. The long-term sustained-yield (LTSY) constraint is used to make sure the harvest in any particular decade does not exceed the LTSY. The perpetual timber harvest constraint is used to make sure there is enough inventory at the end of the planning horizon in the model to continue producing the LTSY into the future.

Question - In SPECTRUM, what is meant when Appendix B says land allocated to timber harvesting is "hardwired"?

Response – In developing the alternatives, management prescriptions were allocated to different parts of the Forests. These management prescriptions determined the desired conditions to be achieved. Also, for some management prescriptions all the lands are classified as "not suited for timber production", while other management prescriptions could have lands classified as "suited for timber production" (depending on further analysis). It is these "desired conditions" and "suitability"

classifications that were "hardwired" into the SPECTRUM model. The SPECTRUM model was not used to make the allocation decisions, only to make an estimate of what would happen within an alternative with its particular mix of management prescription allocations.

Question - Do the costs in SPECTRUM include both the fixed and variable costs of Forest Service timber management and harvesting? It appears from reading the documentation provided that fixed costs were left out of the equation due to their effects on the per unit cost. How many miles of improved roads and acres of steep slope were found in determining the cumulative effect to forested acres in setting Spectrum analysis units? What criteria were used to determine that this reduction in timber yields was an accurate method of dealing with the problem? How much were yields reduced as a result of roads? Steep slopes? What statistical criteria were used to determine the reduction percentages or amounts?

Response – The costs in SPECTRUM only included variable costs, because the fixed costs are essentially a "given". Fixed costs continue regardless of the alternative level of output. They constitute Forest Service overhead costs that would not vary by alternative. SPECTRUM is used to compare the estimated costs and benefits associated with implementing various activities in order to determine the best mix to meet to objectives and constraints. 36 CFR 219.14 also specifies that "direct" benefits be compared with "direct" costs. The fixed costs are included in the calculations of the present net value of each alternative.

Distances from roads and slope categories were used in determining the analysis units in SPECTRUM. This way different roading costs could be assigned to the different analysis units, and differences in operating costs could be assigned to acres in different slope categories. The timber yields in SPECTRUM are on a per acre basis and these per acre yields were not reduced simply because of the distance from a road or the slope they were located on.

Question - In alternatives B and I, where timber production is a byproduct of management to restore and maintain resources, forest structure, processes, habitats, etc., it is unclear how the SPECTRUM model can spit out a given output per decade. More specifically, in alternative I, how can silvicultural activities intended for ecological management necessarily provide a "stable supply of wood products"? Why would "some of the best sites that are currently accessible" need to be managed to provide high-quality sawtimber if this isn't the purpose of the alternative? In addition, it seems odd that given the substantial difference in emphases between the alternatives, that land classified as suitable for timber production would vary so little between alternatives. Please explain how this came to be.

Response – SPECTRUM was used to estimate what kind of outputs would result from meeting the desired conditions of the management prescription allocations. Some of these desired conditions specified that certain percentages be maintained in certain age classes or "structural" conditions. In order to maintain these conditions, silvicultural activity would need to occur on a regular basis, and this is what would provide a "stable supply" of products.

In terms of the differences between alternatives, each alternative had an overall "theme". This "theme" was then used as a "guide" to determining the allocations of the management prescriptions. However, land managed under, say, Management Prescription 4.F. in Alternative A, is the same as land managed under Management Prescription 4.F. in Alterative G. It is the land allocation of the management prescriptions that makes up the differences between the alternatives, not the management activities within a particular management prescription.

Question - What percentage of total regional forested land is made up of national forest timber-producing acres? What percentage of total forested land in the state do national forest system acres represent?

Response – Government agencies hold 20.8 percent of the 4.9-million timberland acres in the Southern Appalachian region ("Southern Appalachian Assessment; Social, Cultural, Economic Technical Report", p. 86, July 1996). The Chattahoochee-Oconee National Forests represent 3 percent of the forest land in the state of Georgia.

Question - Gross receipts for the purchase of National Forest timber are broken down into four categories: 1) the money paid to the Forest Service for trees standing in the woods (stumpage); 2) the value determined by the Forest Service for "purchaser credit" roads accepted as a payment in kind; 3) "associated charges" (primarily road maintenance) which the purchaser is required to pay in addition to stumpage; and 4) interest and penalties paid by the purchaser through the life of a sale. What are the dollar values associated with each category over the timber price time series (especially category 4 - interest and penalties)?

Response – "Purchaser road credits" and the "interest and penalties paid by the purchaser through the life of a sale" were not included in the estimates of the timber revenues used in the SPECTRUM model or the present net value calculations.

Question - When and where are the environmental effects of timber harvesting included in the analysis?

Response – The environmental effects of timber harvesting are described in Chapter 3 of the EIS.

Question - It is not clear in the DEIS how purchaser road credits were dealt with. Were they treated as a cost or revenue? Why?

Response – The Forest Service no longer uses purchaser road credits and therefore they were not a part of the analysis. The total costs of constructing and re-constructing timber roads were included as a cost in the SPECTRUM analysis.

Question - What statistical methods / software were used to "trend" the timber price time series? Why were these methods / software used?

Response – In order to derive an "average value" per MCF for the different appraisal groups, stumpage prices were converted to 2000 dollars by the Gross Domestic Price Deflator Index. The SPECTRUM model used these 2000 prices to provide a constant 2000 dollar value estimate in the future.

Question - The timber price time series, 1985 to 1996, is a very short time series to use for a 200-year trend projection. Was this thought to be a typical timber price time series? Why?

Response – When we started the process to determine "average" timber values, the years 1985 to 1996 were simply the years where we had some historical data available to analyze.

Question - Were National Finance Center records or TSPIRS data used as the basis for timber production and management costs? The documentation suggests both were used. How were they combined? It appears that an ad hoc procedure was used to determine timber production and management costs. Please disclose the instructions and rationale for the data collection direction given on the Forest to address this issue.

Response – Response: Forest Service estimates of revenues and expenses are achieved by analyzing historical data. These estimates are for activities that have not happened. We looked at timber harvesting and timber sale planning costs from sales that occurred in the 1990's. The methodology explaining how we derived timber costs and revenues is explained in the Process Record. Generally speaking, most modeling, and data estimation techniques are not explained in detail in the EIS.

The Southern Appalachian forests used historical data secured from TSPIRS for 1992-1998. Region 8 forests looked data concerning Harvest Administration costs (and various subsets of this cost category), Sale Preparation costs, and Inventory and NEPA costs (and various subsets of this cost category). From these data an average was taken for each year. Then, we took a simple average by year for each forest to arrive at an average cost in each timber sale cost category. These data were used in SPECTRUM.

Each individual forest calculated Reforestation and Timber Stand Improvement costs (and their related subsets of costs, e.g. types of site preparation under Reforestation; species of trees under Reforestation planting; types of Release, Pre-commercial Thin, Road construction under Timber Stand Improvement) from available forest data. Costs were taken from each forest and placed in a category of forest of either Piedmont or Mountain forest. Costs were adjusted to a common year (1996) and a simple average for each region was taken. These costs were also used in the SPECTRUM model after adjusting to 2000 dollars.

The Timber Data Company in Eugene, Oregon collects timber sale data stumpage prices from FS 2400-17 reports, puts this data in a database, and is able to report data out in customized fashions. We purchased this data from hundreds of sales over several years in the 1990 decade. A time series of these years of historical stumpage was analyzed for an estimate of an "average" value for forest stumpage via a regression analysis spreadsheet in Microsoft Excel. This average price was adjusted to 2000 dollars and used in the SPECTRUM model.

Purchaser road credits are no longer used by Region 8 forests. The category of "interest and penalties" is a cost, which is a rare and insignificant amount to the total. These costs are considered exceptions to the typical costs experienced in the timber program. Such future costs are not considered a significant cost category.

Estimated costs and revenues within SPECTRUM can be increased by an inflation factor for future years by the forest analyst.

7-119. Public Concern: The Forest Service should not use Continuous Inventory of Stand Conditions data to determine the current composition of the National Forest System lands. (A)(O)

Response: CISC data is the best available data. It includes data on approximately 28,000 stand polygons, averaging about thirty acres each. Qualified personnel collected it using standard data elements and procedures. Complaints about the adequacy of CISC data typically stem from it being used for something it was not intended to do or to using it without recognition of its limitations for that use. For the uses made of it, our judgment is that actual, rather than alleged, inaccuracy in CISC data is insignificant to the decisions made in a forest plan. The currency of the data, the source of error, the degree of error, and the significance of error to plan decisions was carefully considered all along the way. Adjustments were made to the modeled timber volume outputs for the 1999-2002 southern pine beetle epidemic. We disagree that the mortality caused by southern pine

beetle automatically created early successional habitat. The reason we say this is dealt with in detail in the Forest Cover topic of the EIS.

7-120. Public Concern: The Forest Service analyses in Appendix F should better reflect natural processes, operability standards, and budget constraints. (A)(C)(O)(J)(S)

Response: The suitable acres, sale program, silvicultural selections shown in Plan Appendix F are estimates of the actions/activities needed to meet the desired conditions established in the Forest Plan.

Environmental Considerations

7-121. Public Concern: The Forest Service should conduct timber harvest for environmental reasons. (A)(C)(O)(J)(S)

BECAUSE TIMBER HARVEST IS COMPATIBLE WITH THE MANAGEMENT OF OTHER RESOURCES (O)

BECAUSE ENVIRONMENTAL EFFECTS ARE NONSIGNIFICANT WITH REASONABLE IMPLEMENTATION METHODS (O)

BECAUSE RESTRICTING TIMBER HARVEST DUE TO SEDIMENT IS NOT SCIENTIFICALLY JUSTIFIED (O)

BECAUSE SEDIMENT DEPOSITION CAN BE MINIMIZED WITHOUT FOREGOING TIMBER HARVEST (O)

BECAUSE MOST EROSION ORIGINATES FROM THE TRANSPORTATION SYSTEM (O)

BECAUSE NUTRIENT EXPORT HAS LITTLE EFFECT AND MAY PROVIDE BENEFITS (O)

Response: The plan provides a framework for the use of timber harvest as a permissible tool in accomplishing resource goals and objectives. The points raised about environmental effects are addressed in various topics of the EIS. Not stated here by commenters, but important to the use of timber harvest is that the plan includes objectives for activities designed to reduce risk of mortality to specific forest pests. In many cases, reduced risk will best be achieved by using timber harvest as the means to improve tree vigor and thus increase resistance. This relationship is identified and described in the 'Forest Health' topic of the EIS.

7-122. Public Concern: The Forest Service should consider allowing logical regeneration boundaries for areas being managed for red-cockaded woodpeckers. (O)

AND SHOULD RECONSIDER THE DESCRIPTION OF PERMANENT OPENINGS. (O)

Response: The Forest Service has and will consider logical boundaries for prescribed burning plow-lines.

The use of woodlands and savannas as RCW habitat will only be considered if species composition, age class composition and stand density meet those outlined in the RCW Recovery plan.

7-123. Public Concern: The Forest Service should not conduct timber harvest within 300 feet of threatened, endangered, and sensitive species. (O)

Response: TES species are protected from adverse impacts of any activities through project-level analysis and consultation with USFWS as needed. Falsification of records as a criminal offense is not addressed in the Forest Plan.

7-124. Public Concern: The Forest Service should not harvest timber. (A)(O)(J)(S)

ALONG THE BLUE RIDGE ESCARPMENT (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-125. Public Concern: The Forest Service should treat mesic deciduous forests to create structural diversity. (O)

Response: This comment was to show agreement with the specific plan objective for structural diversity in mesic hardwood forests. Thank you.

7-126. Public Concern: The Forest Service should not conduct clearcuts to benefit deer populations. (O)

BECAUSE CLEARCUTS DO NOT PROVIDE ENOUGH NUTRITION FOR DEER (O)

Response: The University of Georgia research noted by the commenter is summarized in the white-tailed deer Section of the FEIS. Although it did show that use of clearcuts was low in winter, in the spring and summer, regeneration areas provide an abundance of food and are heavily utilized. Young regenerating stands contain substantial quantities of woody browse, herbs, fungi, and soft mast, all of which are limited in older forests. Deer use a variety of forest types and successional stage to meet their year-round needs. The preferred

alternative will provide both abundant late successional habitat, which provides hard mast, and adequate early successional forests, which are important sources of browse, soft mast and herbaceous plants. The preferred alternative is expected to maintain approximately 3-4 percent of the Chattahoochee National Forest and 5-6 percent of the Oconee National Forest in early successional forest (0-10 year class). The majority of both forests will be in mid and late successional forest conditions.

7-127. Public Concern: The Forest Service should not conduct commercial timber harvest because of environmental impacts. (A)(C)(O)(J)(S)

TO WATERSHEDS AND ECOSYSTEMS (O)

TO SPECIES UNDER PRESSURE DUE TO HABITAT LOSS (O)

TO ANIMAL SPECIES AND HABITAT (O)(S)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

Recreation Considerations

7-128. Public Concern: The Forest Service should actively manage forestlands. (C)(O)

FOR RECREATION (O)

TO PROVIDE RECREATION OPPORTUNITIES AND ECONOMIC BENEFITS (O)

Response: The revised CONF Plan contains numerous goals, objectives and standards for actively managing National Forest System lands for recreation. These are located in Chapter 2 of the final Plan.

7-129. Public Concern: The Forest Service should focus forest management on recreation and environmental protection resource activities. (C)(O)(J)(S)

Response: The revised CONF Plan contains numerous goals, objectives and standards for actively managing National Forest System lands for recreation

and environmental protection. These are located in Chapter 2 of the final Plan.

7-130. Public Concern: The Forest Service should conduct timber harvest. (C)(O)(J)

BECAUSE AESTHETICS SHOULD NOT BE THE DECISION CRITERIA FOR TIMBER HARVEST (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). The Forest Plan also contains goals, objectives, and standards concerning aesthetics, and this is also an area of required analysis to comply with NEPA. The Forest considers aesthetics an important consideration in project design and will monitor the interaction of scenery objectives and habitat objectives during plan implementation.

7-131. Public Concern: The Forest Service should not harvest timber. (A)(C)(O)(J)(S)

BECAUSE RECREATION GENERATES GREATER INCOME THAN TIMBER-BASED ECONOMIES (A)(C)(O)(J)(S)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-132. Public Concern: The Forest Service should set timber harvest guidelines in the prescription narratives and standards that clearly authorize timber harvest instead of designating land as unsuitable. (O)

TO ELIMINATE CONFUSION ABOUT WHETHER TIMBER HARVEST CAN OCCUR (O)

BECAUSE THE DEFINITION OF "UNSUITABLE" LAND WILL LEAD TO SUCCESSFUL LITIGATION (O)

Response: We understand that the suitability classifications used in forest planning are confusing. The process for determining lands "suitable for timber production" is defined in the regulations at 36 CFR 219.14 and is explained in Appendix B of the EIS. However, the regulations also specify that some harvesting activities can occur on lands classified as "not suitable for timber

production". 36 CFR 219.27(c)(1) states that "No timber harvesting shall occur on lands classified as not suited for timber production ... except for salvage sales, sales necessary to protect other multiple-use values or activities that meet other objectives on such lands if the forest plan establishes that such actions are appropriate." A standard has been added to the Forest Plan to recognize that these activities may occur on lands classified as not suited for timber production. The primary difference between lands classified as "suited" versus "not suited" for timber production has to do with whether or not the lands will be managed on a "regulated" (or scheduled) basis. (The definition for "timber production" is "the purposeful growing, tending, harvesting, and regeneration of *regulated* crops of trees ... (36 CFR 219.3).) However, regardless of whether lands are classified as suited or not suited for timber production, any harvesting activities would still need to meet the forest-wide and management prescription standards.

7-133. Public Concern: The Forest Service should restrict the use of timber harvest and prescribed burns for creating wildlife openings in the Chattooga Wild and Scenic River corridor. (O)(S)

BECAUSE IT VIOLATES THE WILD AND SCENIC RIVER ACT AND WILL RESULT IN LITIGATION (O)(S)

Response: The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287) or as Public Law 90-542 of October 2, 1968 and amendments, does not preclude timber harvesting, wildlife openings or prescribe burning by themselves as silvicultural practices, or in any combination.

In FSH1909.12, chapter 8.2 #1 Standards for wild rivers it states for (a) Timber Production: the cutting of trees will not be permitted except when needed in association with a primitive recreation experience (such as clearing for trails and protection of users) or to protect the environment (such as control of fire). Timber outside the boundary but within the visual corridors will be managed and harvested in a manner to provide special emphasis to visual quality.

Wildlife openings, while not specifically singled out in #g- Agriculture, it does say agriculture is restricted to a limited amount of domestic livestock grazing and hay production to the extent currently practiced. Row crops are prohibited. This has been to mean any openings there at the time of designation could remain so long as they are not maintained for food plots, only as an opening.

8.2 # 2 Standards for scenic rivers it states for (a) Timber Production: A wide range of silvicultural practices could be allowed provided that such practices are carried on in such a way that there is no substantial adverse effect on the river and its immediate environment. Timber outside the boundary but within the visual scene area should be managed and harvested in a manner that provides special emphasis on visual quality. In this case a wide range of

silvicultural practices does include Prescribed Burning although it is not mentioned by name or practice.

Wildlife openings, while not specifically singled out in #g- Agriculture, it does say a wider range of agricultural uses is permitted to the extent currently practiced. Wildlife food plots within openings would not be considered an intrusion of the "largely primitive" nature of scenic corridors as long as there is not a substantial adverse effect on the natural-like appearance of the river area.

1909.12, chapter 8.2 #3 Standards for recreational rivers it states for (a) Timber Production: Timber harvesting would be allowed under standard restrictions to protect the immediate river environment, water quality, scenic, fish and wildlife and other values. Again, In this case Prescribed Burning would be allowed although it is not mentioned by name or practice.

Wildlife openings, while not again specifically singled out in #g- Agriculture: it does say lands may be managed for a full range of agricultural uses, to the extent currently practiced. Wildlife openings with food plots fall under this category.

Socioeconomic Considerations

7-134. Public Concern: The Forest Service should harvest timber for economic benefits. (A)(O)(J)(S)

TO BENEFIT FUTURE GENERATIONS AND WILDLIFE (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting.

7-135. Public Concern: The Forest Service should conduct commercial timber harvest for economic benefits. (A)(C)(O)

TO FISH AND WILDLIFE HABITAT AND PROGRAMS (O)

TO FOREST INFRASTRUCTURE, PROGRAMS, AND STAFFING (O)

BECAUSE THERE IS NO EVIDENCE THAT REVENUE GENERATING TIMBER PROGRAMS CREATE ADVERSE EFFECTS ON FOREST RESOURCES (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting.

7-136. Public Concern: The Forest Service should not harvest timber for economic reasons. (A)(C)(O)(J)(S)

BECAUSE IT IS NOT A PROFITABLE BUSINESS (O)

BECAUSE TIMBER HARVEST WILL NEGATIVELY AFFECT TOURISM-BASED BUSINESSES (A)(C)(O)(J)(S)

BECAUSE IT CREATES NEGATIVE EFFECTS ON PRIVATE TIMBER PRODUCTION (A)(C)(O)(J)(S)

BECAUSE TIMBER FROM PUBLIC LANDS PROVIDE A SMALL PERCENT OF THE NATION'S TIMBER (O)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-137. Public Concern: The Forest Service should not allow commercial timber harvest for economic benefits. (A)(C)(O)(J)(S)

BECAUSE THE TIMBER INDUSTRY DOES NOT NEED NATIONAL FOREST LAND (O)(S)

Response: The selected alternative for the Southern Appalachian plans does contain goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "....provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.

7-138. Public Concern: The Forest Service should evaluate the impacts of national forest timber on local markets and pricing. (A)(C)(O)(J)(S)

BECAUSE OF PSYCHOLOGICAL EFFECTS ON PROPERTY OWNERS (O)

BECAUSE OF ECONOMIC EFFECTS ON PROPERTY OWNERS (O)

Response: Local timber market conditions are analyzed in the Forest's Timber Supply and Demand Analysis that is done during the Analysis of the Management Situation (AMS). This document is part of the Process Record and gives the Forest a background for their role in the local market and possible effects on pricing. Such characteristics as growing stock, the Forest's relative share of the total market area of all ownerships, growth-drain ratios to understand if growth exceeds harvest, and Forest Service dependent mills are some of the things this analysis discusses. A

summary of the Chattahoochee-Oconee timber analysis is in Appendix B for the FEIS.

7-139. Public Concern: The Forest Service should utilize the best available science in determining to what extent monetary values can be assigned to non-market goods and services. (A)(C)(O)(J)(S)

Response: 36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during the planning period. It suggests use of outputs, which include marketable goods and services as well as non-market items, such as recreation, and wilderness use, wildlife and fish, protection and enhancement of soil, water, and air, and preservation of aesthetic and cultural resource values. These are the resources the forest DEIS has undertaken to show a present net value as required by 36 CFR 219.

The CONF has presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forest has discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals, range) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits.

Many of the “ecosystem services” provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be effects remote from resource management on the CONF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.

Contrary to what the commenter claims, logging does not necessarily cause most ecosystem services to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all national forest lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some ecosystem services – e.g., wildlife habitat – may

actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.

Lastly, the Forest Service does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative inputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative that maximizes public net benefits is left to the judgment of the decision maker.

U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.

Therefore, it is the U.S. Forest Service's policy to fully enumerate the dollar values of all market and non-market benefits and costs in the planning process that can *reasonably* be expected to occur in an attempt to provide as much **relevant** information as possible to aid in making good planning decisions.

7-140. Public Concern: The Forest Service should disclose the instructions and rationale for the data collection direction given to address timber production and management costs. (A)(C)(O)(J)(S)

Response: Refer to response to PC 7-118.

7-141. Public Concern: The Forest Service should require commercial timber companies to pay for all costs to support timber harvest and correct environmental effects. (O)

Response: When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Costs for area regeneration are set aside from timber revenues; road construction costs are a part of Forest Service expenditures of the sale; and erosion control is funded by either a "cooperative credit" whereby the timber purchaser deposits monies with the Forest Service to accomplish the control or the purchaser directly does

the control. While all costs are not born by the timber purchaser, Timber program expected revenues and expected costs are analyzed via SPECTRUM across the forest to determine the financial efficiency of program. Likewise a present net value analysis is done for the Timber program over the entire 50 year planning horizon.

7-142. Public Concern: The Forest Service should increase the price of timber harvested on public land. (O)

Response: Forest Service timber sales compete in the timber demand market. The Forest Service can only set a minimum amount that we must have before we will consider a bid. That minimum price is determined through analysis of timber market behavior in prior quarters as adjusted up or down for non-comparable conditions for each sale. The price actually paid is then determined through the market competition of our free enterprise economic system by sealed bidding. The Forest Service does not have the latitude to not use this system. It is intended to capture fair market value for the benefit of the American taxpayer that pays for the existence of a National Forest system.

7-143. Public Concern: The Forest Service should ensure that forests are financially sustainable. (O)(J)(S)

AND SHOULD ENSURE THAT INCOME FROM TIMBER SALES AND USER FEES MEET EXPENDITURES (J)(S)

BECAUSE HONEST ACCOUNTING WOULD REQUIRE ROAD EXPENDITURES TO BE CONSIDERED AS COSTS AND NOT INVESTMENTS (O)

Response: The various legislation authorizing the Forest Service to manage the National Forest System land for multiple-use does not require or infer that financial sustainability is a goal of national forest management.

7-144. Public Concern: The Forest Service should not use tax dollars to subsidize timber harvesting. (A)(C)(O)(J)(S)

BECAUSE OF ENVIRONMENTAL EFFECTS (O)(S)

Response: The premise of the commenter's statement is flawed. There is an assumption of the future timber or mineral programs on this forest will incorporate a subsidy across all alternatives. The economic analysis is found in Chapter 3 of the EIS estimates that across all alternatives the Timber program is expected to meet its hurdle rate of 4 percent *real* return to the federal treasury. Clearly, discounted revenues are expected to cover discounted costs over the planning period.

Individual timber sales are analyzed before a project is undertaken. Discounted costs and benefits are considered to see if the project will be economically efficient. Sale analyses include costs for roads. If a proposed sale alternative does show a negative return, the decision maker will

justify the reason for commencing with the project. Because there are often positive effects on other resource values such as habitat and access for recreation opportunities, there is no mandate for projects to be profitable. Timber sale projects are put out for competitive bid of what the market will bear for a given quality of timber. Bidders must bid above a "floor" appraised price before a contract will be awarded. Therefore, construction of roads and timber sales on national forests do not amount to a "subsidy".

7-145. Public Concern: The Forest Service should redirect timber subsidies to restoration or sustainability programs. (O)

Response: Timber sale projects are put out for competitive bid of what the market will bear for a given quality of timber. Bidders must bid above a "floor" appraised price before a contract will be awarded. Therefore, construction of roads and timber sales on national forests do not amount to a "subsidy". Likewise, timber projects are required to occur within a sustainable level determined through analysis. Congress appropriates funds for various national forest management functions such as activities that may be classified as "restoration." Whether of not a particular restoration project involves timber harvest is determined through project-level analysis.

7-146. Public Concern: The Forest Service should conduct NEPA analysis on a range of alternative to providing subsidies to industry. (A)(C)(O)(S)

Response: The premise of the commenter's statement is flawed. There is an assumption of the future timber program on this forest incorporates a subsidy across all alternatives. The economic analysis found in Chapter 3 of the EIS estimates that across all alternatives the Timber program is expected to meet its hurdle rate of 4 percent *real* return to the federal treasury. Clearly, discounted revenues are expected to cover discounted costs over the planning period. When individual projects are planned, a discounted cash flow analysis of that proposed sale is also conducted in an Environmental Analysis to show the efficiency of that sale.

Allowable Sale Quantity

7-147. Public Concern: The Forest Service should reconsider the time frame for allowable sale quantity. (O)

Response: The interpretation that having the allowable sale quantity expressed as a decadal value allows excessive cutting in any given year within that decade is a misunderstanding. It assumes an intention on the part of the Forest Service to find any and every reason to cut and no such intention exists. In addition, regeneration harvest levels are limited by each management prescription and additional standards.

7-148. Public Concern: The Forest Service should explain in the EIS why the allowable sale quantity for timber harvest has been increased. (O)

Response: The allowable sale quantity is less than 60-percent of the 1985 plan allowable sale quantity, not an increase. This information, along with where the allowable sale quantity came from and why is thoroughly explained within the EIS and its appendices

7-149. Public Concern: The Forest Service should increase the annual timber harvest volume. (A)(C)(O)(J)(S)

TO PROVIDE GREATER ACCESS AND OPPORTUNITIES FOR RECREATION (O)(J)

Response: The planning process for the revised CONF Plan included analysis of a range of alternative management themes. Within these alternatives was a range of levels of timber harvest volumes. The selected alternative does not have the highest level of timber harvest, but addresses the spectrum of significant issues best in its combination of resource activities and emphases.

7-150. Public Concern: The Forest Service should lower the allowable sale quantity of timber. (A)(C)(O)(J)(S)

TO LEVELS BELOW THE QUANTITY CURRENTLY BEING HARVESTED (A)(C)(O)(J)(S)

BY HALF (O)(S)

Response: The planning process for the revised CONF Plan included analysis of a range of alternative management themes. Within these alternatives was a range of levels of timber harvest volumes, and acres of 'suitable for timber production'. The selected alternative does not have the highest level of timber harvest, or suitable acres, but addresses the spectrum of significant issues best in its combination of resource activities and emphases.

7-151. Public Concern: The Forest Service should reduce the amount of forest designated as "suitable" for timber production. (A)(C)(O)(J)(S)

TO AN ENVIRONMENTALLY SOUND LEVEL (O)

AND INSTEAD FOCUS ON FOREST RESTORATION (O)

WITH WOOD PRODUCTS HARVESTED ONLY AS BY-PRODUCTS OF RESTORATION (O)

BECAUSE OF THE ENVIRONMENTAL EFFECTS (A)(C)(O)(J)(S)

FOR MULTIPLE REASONS (O) (J)

TO ENSURE "CONSISTENCY" WITH DIRECTION STATED IN THE PLAN (O)

BECAUSE TIMBER NEEDS WILL BE MET BY THE PRIVATE SECTOR (O)

BECAUSE LOCAL FORESTERS SHOULD DIRECT RESTORATION AND TIMBER HARVEST (O)

BECAUSE THE REMOVAL OF QUOTAS WILL IMPROVE NATIONAL FOREST MANAGEMENT (O)

BECAUSE THE REMOVAL OF QUOTAS WILL PROMOTE PROTECTION OF PLANTS, ANIMALS, AND NATURAL RESOURCES (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. Restoration of native habitats and protection of plants and animals are important emphasis areas. There are no timber production quotas, only objectives based on restoration and provision of habitat for species viability. Designation of lands as suitable will provide the necessary flexibility to manage the habitats for plants and animals and to do the necessary restoration work.

Harvest Methods

7-152. Public Concern: The Forest Service should consider the ecological benefits of the cut-to-length harvest method. (O)

Response: The type of harvest method is a project-level decision. We agree that CTL does have merit for consideration in the planning of projects for Plan implementation. However, expecting loggers to buy expensive equipment solely or even primarily for use on National Forest is unrealistic since we have not for several years offered them the program stability to make this a wise business decision. Program instability is due to factors currently outside Forest Service control.

7-153. Public Concern: The Forest Service should use clearcutting and cable systems for timber harvest. (O)

BECAUSE CABLE SYSTEMS AND CLEARCUTTING REDUCE THE NUMBER OF ENTRIES, ROADS, AND SITE DISTURBANCES (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land.

7-154. Public Concern: The Forest Service should limit timber harvest to small diameter trees. (A)(C)(O)(J)(S)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land.

7-155. Public Concern: The Forest Service should specify standards requiring that timber harvest be conducted using scientifically sound methods, and that on-site monitoring be conducted by Forest Service staff. (A)(O)

Response: The Forest does utilize scientifically sound harvest methods. For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land. Chapter 5 and Appendix G of the Plan contain information regarding the monitoring program.

7-156. Public Concern: The Forest Service should only conduct selective timber harvest methods of uneven age, single trees, with specified diameter requirements. (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land.

7-157. Public Concern: The Forest Service should be very selective in determining when and how to harvest timber, and leave more trees unharvested to help rehabilitation. (O)

BECAUSE PROBLEMS EXIST WITH WHAT AREAS ARE HARVESTED AND THE METHODS USED (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land.

Even-aged Timber Management

7-158. Public Concern: The Forest Service should clearcut National Forest System lands. (C)(O)(J)

BECAUSE ENVIRONMENTAL EFFECTS FROM CLEARCUTS ARE NOT SIGNIFICANT (O)

BECAUSE CLEARCUTS HAVE LITTLE EFFECT ON THE TEMPERATURE OF MOST STREAMS (O)

BECAUSE CLEARCUTS PRODUCE LITTLE EROSION (O)

BECAUSE ADDITIONAL STREAM FLOW IS INSIGNIFICANT AND MAY BE AN ENHANCEMENT (O)

BECAUSE STREAM FLOWS RETURN TO NORMAL WITHIN 7-10 YEARS (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land.

7-159. Public Concern: The Forest Service should not clearcut National Forest System lands. (A)(C)(O)(J)(S)

BECAUSE OF ENVIRONMENTAL EFFECTS (O)(S)

FOR PUBLIC SAFETY AND ENVIRONMENTAL PROTECTION (O)

TO PROTECT WATERSHEDS, WATER QUALITY, AND HABITAT (O)(S)

BECAUSE THE PUBLIC DOES NOT CONDONE CLEARCUTTING (O)

Response: For the revised CONF Plan, timber harvesting will be used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest implemented, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of National Forest land. Numerous standards are included in the Plan to protect forest resources in association with timber harvest.

7-160. Public Concern: The Forest Service should limit the size of clearcuts to 60-80 acre tracts. (O

Response: Harvest unit size limits are a requirement of the National Forest Management Act. Our plan limits regeneration harvests to 40 acres.

Fire Management

7-161. Public Concern: The Forest Service should remove specific areas from sites proposed for prescribed burns. (O)

Response: The beaver wetlands and the Monticello Glades referred to in this comment are in management prescription 4.D. Botanic/Zoologic Area or prescription 9.F. Rare Community. Burning in these prescriptions, if done, will be for the purpose of sustaining the vegetation community

7-162. Public Concern: The Forest Service should recognize that lightning-ignited fires play a limited role on dry ridges and south slopes. (O)

Response: It is recognized that the majority of lightning caused fires occur on ridge tops and the majority of sustained fires, caused by lightning are due to drier fuels and or wind effects that occur more often on exposed slopes. It

is not the intent, nor legal requirement of this plan to limit fire use and effects to those assumed commensurate with fires caused by lightning strikes.

7-163. Public Concern: The Forest Service should recognize that Native Americans' use of fire did not significantly alter the Southern Appalachian forest ecosystem. (O)

Response: Although historical context may provide an understanding of many aspects of the environment, current context is more pertinent when defining measures to reach a specific goal. Plan direction represents a decision on multiple-use management, informed by the best and most current science on disturbance ecology, not an attempt to recreate historical conditions.

Fire Management Standards and Guidelines

7-164. Public Concern: The Forest Service should accurately describe basic fire ecology in specific forest wide standards. (O)(S)

Response: Forest Wide Standards are the rules by which the Forest Service manages the land outlined in the Forest LRMP. The Standards are intended to be simple and implementable. The Fire Management section of the EIS outlines the fire ecology that pertains to the primary concerns brought forward at this level of planning. The remaining resource areas also provide descriptions of the local ecology associated with the Forest(s). The EIS is meant to be read and digested in its entirety to provide an understanding of the complex interrelationships of all the different parts and pieces that interact to create the ecology of an environment.

7-165. Public Concern: The Forest Service should provide a standard for initiation of consultation in the event of a fire potentially affecting listed species. (O)

Response: A standard addressing emergency situations (such as wildfire) potentially affecting known locations of federally listed species, has been added to the revised Plan.

Role of Fire in Ecosystems

7-166. Public Concern: The Forest Service should address the conflict between the proposed prescribed burn program and the natural role of fire in the Southern Appalachians. (A)(O)

Response: Several commenters questioned the appropriateness of the even-aged successional model inherent in the Successional Forest Options incorporated in the Revised Plan. They frequently cited materials raised by

Quentin Bass, Cherokee National Forest Archaeologist, in a whistleblower complaint that contend that Southern Appalachian forests are naturally uneven-aged, and regenerate predominately through "gap-phase dynamics" rather than by larger, more severe disturbances. Some commenters fault the Forest Service for not considering this information.

Contrary to assertions made by some commenters, information compiled by Bass was considered during planning. It was distributed to staffs of all Southern Appalachian forests undergoing revision, and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. There are many points of agreement, which are corroborated by a predominance of mainstream scientific literature. We agree that ***some*** major forest types in the Southern Appalachians are low disturbance systems that commonly regenerate through natural development of relatively small canopy gaps, and that frequent fire in these systems is not desirable. These areas of agreement are incorporated in the Revised Plan and EIS through direction and analysis for mesic deciduous forests, which include cove, riparian, mixed mesophytic and northern hardwood forests. This direction and analysis considers the amount of these forests allocated to Forest Successional Options 1 and 2 (which should be dominated by gap-phase processes), the need for canopy gaps within these forests, and the limited role of (See Mesic Deciduous Forest Section of FEIS and appropriate objectives and standards from the Revised Forest Plan for the Chattahoochee-Oconee National Forest). There are, however, some of Bass' conclusions with which we disagree, as do some members of the academic and research communities with whom we have consulted.

Bass' presentation of forest conditions in the late 1800s and early 1900s depends heavily upon the Ashe and Ayers Report and descriptions contained in the field notes and maps of the tracts of land that were acquired for inclusion in the National Forests. Bass also has provided substantive literature (bibliography) to support his views. However, he rejects or ignores the substantial body of scientific literature (much of it published in the last 10 years) that contradicts his conclusions regarding the role of fire and other disturbance in maintaining upland oak and pine forest types.

Unlike the scientific literature used and cited during planning, Bass' analysis has not been through the rigorous process of peer review, critique, and publication in mainstream scientific journals. Prior to filing of the whistleblower complaint, the Forest Service contracted review of Bass' analysis by Paul and Hazel Delcourt of the University of Tennessee, who have published widely on historical disturbance ecology. Their written review indicates areas of agreement and disagreement similar to those identified by forest planning teams. It also is important to note that Bass is an archaeologist and not an ecologist or forester, professions that are educated and trained to make ecological interpretations of forest condition data. In his

paper, use of terms, lack of reference to the most current scientific literature, and resulting conclusions often do not reflect the best available science. Based on these considerations, we believe Bass' analysis was given an appropriate level of consideration during planning.

Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement for plan revision. In most cases, ecological conditions have changed too much for this to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.

Based on synthesis of the scientific literature, our understanding is that Southern Appalachian forests historically have been subject to highly variable disturbance regimes across the landscape. This variation resulted from the interaction of fire, wind, and other disturbance factors with the highly variable topography and edaphic conditions of the mountains. We disagree with Bass, and follow most current scientific literature, in recognizing that fire, primarily of Native American origin, played an important role in maintenance of upland pine and oak forests, and open woodlands, savannas, and grasslands. Compared to today, forest structure was likely more open on upland sites, due to the influence of fire, and more heterogeneous on lower slopes and coves, due to gap-phase dynamics of older forests. Overall, within-stand structures were likely variable due to the variable effects of natural disturbance factors. Many areas would not easily be categorized as either even-aged or uneven-aged, but some level and pattern of older residual overstory trees would almost always be present, even in areas providing important early-successional habitat. This variable structure can be approximated with uneven-aged, two-aged, and even traditional even-aged management systems, all of which involve retention of varying levels of overstory structure. A patchwork of uniform even-aged stands established by clean clearcuts is clearly outside the historical range of variation of forest structure and is also clearly not the desired condition for any portion of the national forest.

Although the Revised Plan includes objectives for restoration of native fire-maintained habitats, we recognize that we will not be able to restore the influence of fire to the landscape to historical levels due to a variety of logistical and social reasons. Creation of early-successional forests can compensate for the loss of open fire-maintained habitats for some species. So, although we recognize that the mix of types of early-successional habitats maintained under the Revised Plan cannot reflect historical conditions, we have considered the overall abundance of these habitats within an historical ecological context to arrive at objective levels. As some of these fire-maintained habitats are restored, need for early-successional forest as habitat for some species will decline. However, the need will not disappear; other species, such as ruffed grouse, depend upon the dense woody growth

found in early-successional forests. In addition, other multiple-use considerations, such as need for habitat to support game species for recreation, ecological restoration of native forests, forest health considerations, will continue to make creation of some level of early-successional forest desirable.

Fire Plans

7-167. Public Concern: The Forest Service should clarify objectives for fire plans. (C)(O)(J)

AND PRIORITIZE BURN OBJECTIVES TO TARGET DIFFERENT NEEDS (O)

Response: Specific prescribed burn objectives have been incorporated into the Plan including burning objectives for red-cockaded woodpecker habitat management on the Oconee and for rare communities such as table mountain pine forests on the Chattahoochee and canebrakes on both forests. In addition, the Plan contains restoration objectives for a number of forest communities. For communities such as pitch pine, shortleaf pine, mountain longleaf pine, and oak and oak-pine forests, and woodlands, grasslands and savannas, prescribed fire will be one of the primary tools used to meet these objectives. Achieving these restoration objectives will be one of the principal factors considered in setting priorities for the prescribed burning program across the forest.

7-168. Public Concern: The Forest Service should create fire plans that are appropriate for Southern Appalachian forests. (O)(S)

AND MINIMIZE FIRE IN COMMUNITIES THAT ARE NOT FIRE DEPENDENT (O)

Response: The Fire Management section of the EIS more thoroughly distinguishes the role of Fire Management Plans (FMP). Any FMP, as an operational plan, will be in concurrence with the LRMPs desired goals and objectives. Fire management strategies and tactics will be legally limited by the Standards of the LRMP. This guidance will include the desired future condition and impact limitations of the covered community types.

Fuels Management

Prescribed Fire

7-169. Public Concern: The Forest Service should reintroduce fire as a management tool. (A)(C)(O)(J)(S)

FOR MULTIPLE REASONS (O)

Response: We agree. Land and Resource Management Plans provide direction for desired future conditions of ecosystems. In many cases, fire is a necessary tool to meet those desired conditions.

7-170. Public Concern: The Forest Service should not use prescribed fire in Southern Appalachian forests. (A)(C)(O)(J)(S)

BECAUSE IT WILL CAUSE IRREPARABLE EFFECTS TO THE FORESTS AND SPECIES (A)(C)(O)(J)(S)

BECAUSE THERE ARE NO LONG-LEAF PINE-WIREGRASS ECOSYSTEMS OR HIGH FUEL LOADINGS (O)

Response: Refer to response to PC 7-166. Land and Resource Management Plans provide direction for desired future conditions of ecosystems. In many cases, fire is a necessary tool to meet those desired conditions.

Objectives in Forest Service Manual 5140 are to use fire from either management ignitions or natural ignitions in a safe, carefully planned, and cost effective manner to benefit, protect, maintain, and enhance National Forest System resources; to reduce future fire suppression costs; and, to the extent possible, to restore natural ecological processes and achieve management objectives adopted in approved forest land and resource management plans.

Several comments appear to be associated with the Healthy Forests Initiative. Forests used local research that discussed how in the southern Appalachian Mountains, the upland pine and oak communities evolved under a short return interval, low intensity fire regime. Key points to the Healthy Forests Initiative are:

- Improving procedures for developing and implementing fuels treatment and forest restoration projects in priority forests and rangelands, in collaboration with local governments.
- Reducing the number of overlapping environmental reviews by combining project analysis and establishing a process for concurrent project clearance by federal agencies.
- Developing guidance for weighing the short-term risks against the long-term benefits of fuels treatment and restoration projects.
- Developing guidance to ensure consistent NEPA procedures for fuels treatment activities and restoration activities, including development of a model Environmental Assessment for these types of projects.

7-171. Public Concern: The Forest Service should reduce the use of prescribed fire. (C)(O)(J)(S)

Response: Refer to responses to PC 7-166 and PC 7-170.

7-172. Public Concern: The Forest Service should adequately address the effects of prescribed burning. (C)(O)

IN RIPARIAN AREAS (O)

Response: Chapter 3 of the Final Environmental Impact Statement discusses the affected environment and the effects of fire on both the soil and water resources. This section also includes a discussion on the role of fire from a historical and future context. While the FEIS summarizes the effects, it does reference a more detailed effects analysis in *Vegetation Management in the Appalachian Mountains, Volume II, Appendix B –Effects of Fire on Soil and Water in Southern National Forests (USDA Forest Service, Southern Region, 1989).* The use of prescribed fire will be an integral part in the implementation of the Forest Plan and will include some burning within riparian areas. There will be no construction of firelines with heavy mechanized equipment in wetlands or riparian corridors except to stop a wildfire or escaped prescribed fire. Chapter 2 of the Plan indicates "when preparing for prescribed fire, use hand lines, black lines or wet lines within the ephemeral stream zone and across ephemeral streams to minimize soil disturbance**.** Use water diversions to keep sediment out of the stream channel. Firelines will not be constructed in ephemeral streams, but ephemeral streams may be used as natural breaks." In addition prescribed burning in riparian corridors will only be conducted in accordance with an approved prescribed burn plan that identifies the parameters in which the fire can be conducted. These parameters are designed to meet resource objectives and to minimize detrimental effects to the resources, such as soil and water.

7-173. Public Concern: The Forest Service should not conduct prescribed burns during pine beetle infestation. (O)(C)

BECAUSE PINE BEETLES DESTROY MATERIAL THAT HOLDS MOISTURE AND INSULATES THE EARTH (O) BECAUSE FIRE PROBABLY ASSISTS THE BEETLES (O)

Response: Prescribed burning is considered an important management tool for maintaining and improving the health of the southern pine ecosystems within the Southern Appalachians. All prescribed burns conducted by the U.S. Forest Service are required to meet a specific set of weather-related parameters before a burn can be implemented, including factors such as fuel moisture, temperature, and wind speed. By adhering to these parameters, the "mantle of leaves and humus material" is rarely "destroyed". Typical prescribed burns only result in the top layer of leaves and litter being consumed, leaving the primary layer of leaf litter and humus undamaged and thereby maintaining the moisture and insulating properties of the humus material. Although there are several conditions, including drought, that contribute to the increased susceptibility of pine trees to southern pine beetle attack, there is no evidence that prescribed burns "assist" southern pine beetles. On the contrary, prescribed fire has long been considered an effective

and traditional tool for improving the health of pine stands by reducing losses from insects and disease.

7-174. Public Concern: The Forest Service should not use prescribed fire after March 1. (O)

Response: We understand that burning after March 1 has effects that have traditionally been considered 'damage'. But some of our objectives for wildlife habitats and community restoration can best be met with growing season burning. 'Growing season' burns are much more effective at controlling hardwood encroachment and in favoring herbaceous vegetation than dormant season burns. Burning is also the most cost-effective tool we have. In addition, there is a need to manage lightening ignition fires. These are typically in summer. Due to a variety of factors, however, dormant season burning will continue to be the primary use of prescribed fire.

7-175. Public Concern: The Forest Service should clarify how and where the agency will conduct prescribed burns. (O)

Response: This comment equates the appropriate prescribed fire program level to historic lightening ignitions. The prescribed fire program examined in effects analysis is not intended to be the restoration of a lightening-only fire regime but the level needed to meet stated objectives of the plan, for example the maintenance of red-cockaded woodpecker habitat, the creation of woodland, and the maintenance of Table Mountain pine. The 'Forest Cover' and the 'Forest Health' topics of the EIS, among others, address the present conditions relative to fire effects.

7-176. Public Concern: The Forest Service should conduct additional research and environmental analysis on the role of fire prior to its use. (O)(J)

BECAUSE FIRE CAN RESULT IN THE SEED BANK SPROUTING PREMATURELY (O)

BECAUSE FIRE CAN AFFECT SOFT MAST PRODUCTION (O)

BECAUSE FIRE CAN CAUSE LARGE TREES TO SCAR AND DECAY (O)

BECAUSE FIRE IN THE UNDERSTORY CAN CAUSE CATASTROPHIC CROWN FIRES (O)

Response: A substantial amount of peer reviewed, published scientific literature supports the use of fire within many of the ecosystems analyzed by this LRMP. Within those ecosystem types more susceptible to negative impacts, the LRMP has placed restrictions on the use of fire. The further understanding of fire effects requires continued research, which requires fire use, most particularly in those environs least understood. All projects using fire as a tool will have clear and measurable goals stated with in the operational plan. All fire operational plans will include a monitoring plan relative to the goals of the project. Concurrent with formal research projects

ongoing in the federal and private sector, the use of fire will be guided by adaptive management strategies.

7-177. Public Concern: The Forest Service should re-evaluate the use of prescribed burns and consider the Quentin Bass studies. (O)(C)

BECAUSE DOZER LINES AND ROADS CAN CREATE LONG-TERM NEGATIVE EFFECTS (O)

Response: Refer to response to PC 7-166.

7-178. Public Concern: The Forest Service should not conduct prescribed burns in beaver wetlands and areas with unusual plants and soils. (O)

Response: Beaver wetlands are included in the rare community descriptions. Standards in the Rare Community Prescription 9F, as well as other standards and objectives throughout the plan, ensure protection of rare plants and communities during implementation of Forest activities, including prescribed fire. Any prescribed burning will be further analyzed at the project level and steps taken to ensure rare plants and communities are not adversely impacted.

Wildland Fire

7-179. Public Concern: The Forest Service should spend budget funds on the designated forest and not use that money to fight fires elsewhere; firefighting should be funded by Congress. (C)(O)

Response: The funding mechanisms of the USDA Forest Service are at the congressional level. Ultimately the ability to fund particular operations or priorities is outside of the scope of a Forest Level LRMP.

Smoke Management

7-180. Public Concern: The Forest Service should update data for PM 2.5 and continue to address PM 2.5 emissions from prescribed burns. (O)(J)

Response: The Chattahoochee-Oconee reported the most recent available data. Plan direction addresses the monitoring of our effects on air quality.

Forest Health Management

7-181. Public Concern: The Forest Service should actively manage forests for forest health. (A)(C)(O)(S)

Response: The plan does include specific objectives for forest health management and numerous others that are supportive of forest health. Disagreements exist and are likely to continue on just what is 'healthy' and the scale at which health should be judged. Our management is already constrained regardless of the plan such that tree mortality without any attempt to prevent it will occur in some areas. It is true that a tradeoff has been made between forest health in the long term and some public issues.

7-182. Public Concern: The Forest Service should manage forests for forest health and diversity of native animal and plant species. (O)

Response: The plan does include specific objectives for forest health management and numerous others that are supportive of forest health. Disagreements exist and are likely to continue on just what is 'healthy' and the scale at which health should be judged. Our management is already constrained regardless of the plan such that tree mortality without any attempt to prevent it will occur in some areas. It is true that a tradeoff has been made between forest health in the long term and some public issues.

7-183. Public Concern: The Forest Service should harvest trees for forest health. (O)

BECAUSE TIMBER HARVEST REJUVENATES FORESTS AND GENERATES GREATER CARBON SEQUESTRATION (O)

Response: We agree that timber harvest is a valuable tool to maintain tree resistance to environmental stressors of many kinds. The allocation of management prescriptions was made to allow management flexibility to respond to the greatest forest health threats. However, our operational definition of forest health also recognizes that dead, dying, and damaged trees have ecological values and that timber harvest is not appropriate everywhere.

7-184. Public Concern: The Forest Service should include findings by Quentin R. Bass II in the forest plans, which indicates that Southern Appalachian forests are self-maintained by single tree falls or smaller disturbances. (O)

TO COMPLY WITH LAWS AND MANAGE THE FORESTS IN A MORE FAVORABLE WAY (O)

Response: The 'Forest Cover' topic of the EIS presents detailed information about the species composition and structure of the Forests and relates this composition to the sustainability of vegetation communities. Appendix F of the Plan discusses the role of gap dynamics in sustaining forested ecosystems of the Chattahoochee and Oconee. There is no single type of disturbance regime that is suitable to sustain all of our vegetation communities. Refer to PC 7-6=166.

7-185. Public Concern: The Forest Service should not conduct timber harvest or prescribed burns in Southern Appalachian forests. (A)(C)(O)(J)(S)

BECAUSE BASS' DATA SHOWS THAT MANAGEMENT ACTIONS ARE UNNECESSARY (A)(C)(O)(J)(S)

BECAUSE BASS' DATA SHOWS THAT SOUTHERN APPALACHIAN FORESTS WERE DOMINATED BY TALL, OLD TREES AS A STABLE ECOSYSTEM (A)(C)(O)(J)(S)

BECAUSE THE PLANS ARE BASED ON AN EARLY SUCCESSIONAL MODEL (A)(C)(O)(J)(S)

Response: Refer to response to PC 7-166.

Forest Health Management Activities

Forest Health Management Activities General

7-186. Public Concern: The Forest Service should implement on-the-ground management activities to restore forest health and ensure the sustainability of National Forest System lands. (A)(C)(O)

Response: Forest Health is, indeed, a major theme of the alternative chosen to be the plan for the CONF. Management Prescriptions allocated by the Forest reflects a theme of ecosystem restoration and maintenance, which will, in turn promote the most healthy forest conditions possible.

7-187. Public Concern: The Forest Service should increase management actions to restore and maintain forest health. (O)(J)

BECAUSE THE BENEFITS OF ACTIVE MANAGEMENT TO FOREST HEALTH MAY OUTWEIGH COSTS TO PERCEIVED PUBLIC VALUES (O)

BECAUSE APPROACHES TO MANAGING PINE BEETLE AND GYPSY MOTH MAY BE TOO CONSERVATIVE (O)

Response: We agree that, at Forest scale, the management flexibility to deal with forest health concerns is too conservative to maintain specific pest host types on all acres where they currently occur. The preferred alternative focuses efforts onto areas of greatest risk and greatest concern while recognizing that mortality will occur in other areas. Given the Forest Service legal framework of management, the next cycle of Plan implementation needs to, as the commenter recommended, show success stories to build public support for more intensive efforts.

7-188. Public Concern: The Forest Service should thin National Forest System lands for forest health. (O)

Response: We agree. The Plan contains numerous objectives for 'reduction in stem density' without specifying the means to do so. These objectives are for wildlife habitat quality and to improve resistance to insects or disease.

7-189. Public Concern: The Forest Service should not conduct management activities for forest health. (C)(O)

BECAUSE FORESTS WILL THRIVE IF LEFT IN A NATURAL STATE (C)(O)

BECAUSE COMPLEX NATURAL CYCLES CANNOT BE IMITATED BY MANAGEMENT ACTIONS (C)(O)

Response: The premise that forests would thrive if humans were not here as self-evident proof that we need do nothing is appealing but too simple and easy. It fails to recognize that existing forest cover developed after the last glaciation concurrently with human occupation. It assumes that the species we have are unaffected by 12,000 years of human occupation (and are thus in a natural state). It assumes that there is societal consensus for natural change only. It assumes that we as a society are willing to forego the use of wood products. And it assumes that we can safely and legally allow natural change only. Indeed the Forest Service is obligated by law to manage the National Forests for multiple-uses.

Salvage Timber Harvest

7-190. Public Concern: The Forest Service should allow salvage timber harvest. (A)(C)(O)(J)(S)

TO REDUCE FIRE HAZARD AND WASTE (O)

Response: The selected alternative for the revised CONF plan does contain goals and objectives that will be accomplished by the activity of timber harvesting, and this includes salvage timber harvesting where compatible with those goals and objectives.

7-191. Public Concern: The Forest Service should evaluate the use of salvage timber harvest, and implement its use only when the benefits outweigh the costs. (O)

Response: Where, when, and under what specific conditions salvage logging would occur is a project-level decision. In making that decision, the tradeoff between values would be considered. There are no plan objectives that drive the production of a timber quantity.

7-192. Public Concern: The Forest Service should not provide additional acreage of trees for harvest as part of salvage harvest projects. (O)(J)

Response: This comment apparently refers to 'add scale' or additional volume sold to a timber purchaser to clear road locations, log landings, or other approved activities in the conduct of a timber sale contract. These volumes are small, incidental, and are not a 'gift' to the purchaser. They are paid for at the same rates as comparable timber in the sale contract and the amount, price, and the purpose for which it was sold is in the public record. Field reviews of sale contracts ensure that no volume is removed without being designated, billed, and paid for.

Insect and Disease Management

7-193. Public Concern: The Forest Service should actively manage threats from insects and disease (O)

Response: The Forest Health Protection Unit of the State and Private Forestry arm of the Forest Service has the lead in forest health. Public and private, state and federal, and interagency Federal cooperation are all part of the Forest Health standard method of operation. The present survey of hemlock wooly adelgid was a joint Forest Service and Georgia Forestry Commission effort. Study of methods of control is also being done cooperatively.

7-194. Public Concern: The Forest Service should analyze both the effects of insects and disease and the effects of suppression activities. (A)(C)(O)(J)(S)

ON GROWTH AND YIELD AND ON REVENUE ESTIMATIONS. (A)(C)(O)(J)(S)

Response: It was decided to not include insect and disease infestations projections into the growth and yield estimates because of the uncertainty with which to make projections in the long run over what those level of infestations might be. We do have insect and disease simulators that we considered, but these were determined to be useful for only a 10-20 year projection. The growth and yield estimates used in the SPECTRUM analysis used projections over 100 and sometimes 200 years. Therefore, it was decided to address this on the CONF with a reduction in estimated harvest volumes in decade 1 of all alternatives for the effects of the 1999-2003 southern pine beetle mortality. That process is fully explained in Appendix B of the FEIS. We did not reduce revenues because beetle-killed stands are no longer merchantable. We also explain in the 'Forest Products' topic of the FEIS that what we modeled is a non-salvage program and that events causing salvage on lands modeled for sustained yield would be used as an opportunity to meet objectives. We also explain that reaction to natural events would likely be a part of annual programs and present an estimate of volumes expected to derive from salvage. We further identify that such volume would be in lieu of and not in addition to estimated 'green' harvest amounts.

7-195. Public Concern: The Forest Service should work to develop goals and objectives to combat the hemlock wooly adelgid, and work with counterparts. (O)(S)

Response: The Forest Health Protection Unit of the State and Private Forestry arm of the Forest Service has the lead in forest health. Public and private, state and federal, and interagency Federal cooperation are all part of the Forest Health standard method of operation. The present survey of hemlock wooly adelgid was a joint Forest Service and Georgia Forestry Commission effort. Study of methods of control is also being done cooperatively.

7-196. Public Concern: The Forest Service should control the pine beetle. (O)(S)

AND HEMLOCK ADELGID (O)(S)

Response: We agree. The best way to do so is to practice prevention first and suppression second. Projects are underway to do each of these. The Plan contains objectives whose purpose is in part the increase of resistance to the southern pine beetle. Prescription allocations were made with forethought about current and anticipated future forest health conditions so as to provide the management flexibility to deal with them in the most critical locations.

The Forest Health Protection Unit of the State and Private Forestry arm of the Forest Service has the lead in forest health. Public and private, state and federal, and interagency Federal cooperation are all part of the Forest Health standard method of operation. The present survey of hemlock wooly adelgid was a joint Forest Service and Georgia Forestry Commission effort. Study of methods of control is also being done cooperatively.

Noxious Weed Management

7-197. Public Concern: The Forest Service should work on strategies to eliminate invasive species that have been planted in wildlife openings such as autumn olive. (C)(O)(S)

Response: General goals and objectives related to invasive species are included in the Forest Plan (See the Chattahoochee-Oconee Revised Forest Plan) The EIS includes discussion of general programmatic effects of plan revision on this issue (See the FEIS for the Chattahoochee-Oconee National Forest). Much of the direction on invasive plants is covered under the regional Noxious Weed Management Strategy, which will be followed during plan implementation. This strategy includes a list of invasive non-native species and guidelines for their use.

Herbicides and Pesticides

7-198. Public Concern: The Forest Service should not use herbicides and pesticides. (O)

Response: The commenter speaks of '*poisoning trees, streams, and animals.*' Forest Service pesticide use is focused on using the least amount at the lowest effective application rate. Use is tightly controlled by numerous requirements. Some problems, such as eradication of non-native invasive species, can be dealt with best using pesticides.

7-199. Public Concern: The Forest Service should modify 9.A.3-007 to be less restrictive regarding the use of herbicides. (O)

Response: Only broadcast herbicide use is being prohibited. Broadcast means applied across an area, without selecting the species to be controlled. Selective treatment of individual plants or species, which uses much less pesticide, is still permitted. We feel this is a reasonable compromise between no pesticide and broadcast application.

Mineral Resource Management

7-200. Public Concern: The Forest Service should initiate early consultation with the U.S. Fish and Wildlife Service when processing energy-related leases. (O)

Response: The 90-day processing of energy-related leases is an objective, to be met when there are no extraordinary circumstances. If such circumstances exist, e.g. presence of federally listed species, the Forest Service would initiate consultation with USFWS as appropriate, and final processing of the lease would wait until after consultation was completed.

7-201. Public Concern: The Forest Service should prohibit the uses of suction dredges and sluice boxes to mine gold. (O)

BECAUSE THE ACTIVITY AND NOISE WILL DISRUPT HABITAT AND SPECIES (O)

Response: The Forest standard for gold panning has been changed to read: "Recreational gold panning is allowed on the Forest, provided that neither hand nor power digging tools are used, collection does not conflict with existing mineral rights, and collection is not prohibited elsewhere in the Plan." This standard prohibits the use of suction dredges or sluice boxes.

7-202. Public Concern: The Forest Service should provide high standards of protection and mitigation for recreational gold collecting. (O)

Response: The Forest standard for gold panning has been changed to read: "Collection of small amounts of surface mineral materials, such as in rockhounding, is allowed on the Forest, unless or until unacceptable resource damage occurs and provided that specimens are for personal non-commercial uses, neither hand nor power digging tools are used, collection does not conflict with existing mineral rights, and collection is not constrained by a more stringent standard at the specific location."

Utility and Communication Infrastructure — General

7-203. Public Concern: The Forest Service should require a plan amendment and full environmental impact statement for any pipeline, electric power line, or communication site. (O)

Response: The National Environmental Policy Act (NEPA) is implemented using agency policy that has been established by the Chief with a public comment period. Granting a pipeline, power line, or communication site special use authorization on the National Forest would require compliance with agency NEPA policy. The Plan is structured such that some management prescriptions do not allow these types of special uses. Should any proposal be made to study a right-of-way through one of these prescriptions, a Plan amendment would be required. A plan amendment would require its own form of NEPA compliance documentation. The exact nature of the specific special use proposal would also require an appropriate type of documentation as well. However, it is not appropriate for a Forest plan to either attempt to preclude all pipeline, power line, or communication site special uses or to attempt to stipulate the exact nature of NEPA compliance when such a use is proposed.

7-204. Public Concern: The Forest Service should revise Standard 4.A-022 to require that no net loss of trail values and resources occur from new utilities and rights-of-way. (O)

Response: During the collaborative effort to develop the AT corridor prescription, considerable time and discussion was spent on the concept of 'no net loss.' It was agreed that the concept was too vague and subjective to actually provide meaningful direction. Conversely, it would give everyone who chose to be contentious a 'blank check' to say it had not been met.

7-205. Public Concern: The Forest Service should specify height restrictions and masking requirements, and should require a plan amendment for any telecommunication tower or power line. (O)(S)

Response: The Plan does specific a height restriction for towers. It also addresses co-ordination with USFWS for mitigation to avoid migratory bird strikes. Masking requirements are implied in the Forest-wide direction for

complying with the scenery Management System but their exact nature is a project decision. The National Environmental Policy Act (NEPA) is implemented using agency policy that has been established by the Chief with a public comment period. It is not appropriate for a Forest plan to either attempt to preclude telecommunication tower or power line special uses or to attempt to stipulate the exact nature of NEPA compliance when such a use is proposed.

Utility Corridors

7-206. Public Concern: The Forest Service should require a plan amendment and full environmental impact statement for utility corridors. (O)(S)

Response: The National Environmental Policy Act (NEPA) is implemented using agency policy that has been established by the Chief with a public comment period. Granting a pipeline, power line, or communication site special use authorization on the National Forest would require compliance with agency NEPA policy. It is not appropriate for a Forest plan to attempt to stipulate the exact nature of NEPA compliance when such a use is proposed.

7-207. Public Concern: The Forest Service should not approve any new utility corridors in specified management prescription areas, or any prescriptions that would be incompatible. (O)(S)

Response: The Plan is structured such that some management prescriptions do not allow these types of special uses. Specific cases are when; (a) the area was designated by an authority higher than the Regional Forester and the designating language precludes such consideration or the presence of that type of facility would clearly conflict with the intent, or (b) the Regional Forester is, by his decision, allocating the land to a management emphasis for which that type of use would conflict with the intent. Should any proposal be made to study a right-of-way through one of these prescriptions, a Plan amendment would be required. A plan amendment would require its own form of NEPA compliance documentation. The exact nature of the specific special use proposal would also require an appropriate type of documentation as well. However, it is not appropriate for a Forest plan to either attempt to preclude all utility corridor special uses or to attempt to stipulate the exact nature of NEPA compliance when such a use is proposed.

7-208. Public Concern: The Forest Service should prohibit utility development when alternatives exist for placement on private property or alternatives exist for use of existing utility corridors, and the use of pesticides or herbicides should be prohibited. (O)

Response: The Plan requires that those requesting a special use permit for the use of NF land demonstrate consideration of alternative locations on private land. The Plan also requires as possible the re-use of existing utility corridors rather than the creation of new corridors. The level of analysis done for a strategic document would not support a blanket attempt to preclude pesticides – which is inclusive of herbicides – at the Plan level. Project level analysis would be where alternative methods to accomplish the same purpose would be evaluated.

7-209. Public Concern: The Forest Service should specify that old growth areas will be expanded for any utility corridors sited in such areas, or be spanned to minimize negative effects. (O)

TO COMPENSATE FOR LOST HABITAT AND FRAGMENTATION (O)

Response: Both of the actions mentioned; that is, making up for lost acres and spanning old growth areas, are project level mitigations that would be identified in a decision to permit utility construction. The plan provides the strategic framework to meet the Regional old growth guidance.

Communication and Alternative Energy Sites/Facilities

7-210. Public Concern: The Forest Service should specify provisions regarding the placement of communication towers and windmills, and conduct research on migratory bird interactions with cell towers and wind turbines. (C)(O)(S)

Response: The Forest Service is required by the National Environmental Policy Act (NEPA)to evaluate the effects of proposed tower sitings and/or impacts on migratory birds in coordination with the Fish and Wildlife Service. The Fish and Wildlife Service has been charged with regulation of migratory species in the Migratory Bird Treaty Act (16 U.S.C. 703-712).

A Communication Tower Working Group (lead by the Fish and Wildlife Service) composed of government agencies, industry, and academic researchers was formed to develop and implement a research protocol to determine the best ways to construct and operate towers to prevent bird strikes. From this working group, voluntary guidelines were established. These guidelines are to be used in conjunction with Federal Aviation Administration requirements and local community concerns where necessary.

In addition, the Fish and Wildlife Service is required by the Endangered Species Act to assist other Federal agencies, such as the Forest Service, in ensuring that any action they authorize through concurrence of NEPA will not jeopardize the continued existence of any Federally-endangered or threatened species.

Chapter 8
Social and Economic Values

Social Values (General)

Social Values

8-1. Public Concern: The Forest Service should preserve National Forest System lands. (A)(C)(O)(J)(S)

BECAUSE THESE LANDS PROVIDE QUALITY OF LIFE BENEFITS (C)(O)(J)

Response: The Revised Forest Plans address 12 common issues and other local issues that include the wide range of desires, wants, needs, and concerns that have been expressed by the users of the national forests. Often times, meeting one set of needs/concerns is in conflict with meeting other needs/concerns. The challenge is to try to find the appropriate level of management that will best address all these issues. The Record of Decision explains how the Selected Alternative is the alternative that does the best job of trying to meet the public's demands while protecting the resources.

8-2. Public Concern: The Forest Service should provide more law enforcement. (O)(J)(S)

TO STOP ILLEGAL OHV USE (O)

Response: We typically operate in an environment of fiscal constraint with not enough money to pay for the people and the time to do all that people would like us to do. We must often prioritize for the greatest need. The OHV problem is a particularly difficult one because every boundary of the National Forest on suitable terrain and every road is a potential entry point. The resources that would be necessary to stop entry based on an enforcement approach alone would be prohibitive and is not likely to be appropriated. Law enforcement has a role but cannot be the sole, or even the primary, means of meeting the challenge.
The Plan puts priority on fixing existing problems before developing additional facilities.

Economic Values

Contribution/Role of Agency-Administered Lands and Resources to Economy

8-3. Public Concern: The Forest Service should help local communities understand the value of preserving the forest. (O)

Response: The commenter refers to implementing a Costa Rican model for eco-tourism as a way of financing the Forest Service. The Multiple-use Sustained-yield act listed outdoor recreation, range, timber, water, wildlife and fish as legitimate uses for National Forest System lands. Americans continue to be huge consumers of timber as well as users of recreation (a.k.a. eco-tourism), and the national forests can be managed to provide both. The local communities are well aware of the values of the national forests.

8-4. Public Concern: The Forest Service should better explain the use of the IMPLAN model and the employment and income impacts of the separate alternatives. (A)(C)(O)(J)(S)

Response: Regional economics models dealing with input-output analysis are very complex. Their use involves a number of assumptions and judgment factors that may make the findings by two different analysts somewhat different. The IMPLAN model takes a considerable amount of time to learn and to become proficient. Forest Service users have invested considerable amounts of time in training in model building. Therefore, replication and validation by another source may not be likely for a novice user. Important assumptions have been documented in the FEAST spreadsheet, which is part of the Process Records. Data sources have been described in Appendix B of the EIS.

Appendix B gives a general overview of how the impact results were generated for each resource or activity on the CONF. Because it is not expected that someone who is unfamiliar with IMPLAN could readily perform input-output analysis, a detailed explanation of every step in building the model and constructing individual resource and activity impact files was not made a part of Appendix B. If the commenter wants to know the procedural process for running IMPLAN, we refer them to “IMPLAN Professional User’s, Analysis Guide and Data Guide”, Minnesota IMPLAN Group, Inc., 1997, which is part of the Process Records of each forest. The Minnesota IMPLAN Group also offers training classes for model usage.

The various Forest Service resources and activities are discussed Appendix B. Resource and budget impacts from the IMPLAN model and

FEAST spreadsheet are presented and discussed in the FEIS. We feel this is an adequate description.

Net Public Benefit and Agency Accounting

8-5. Public Concern: The Forest Service should identify and consider economic issues and impacts. (A)(C)(O)(J)(S)

Response: The EIS analysis of the economics of the forest analysis area was constructed to comply with 36 CFR 219.12 and the Forest Service Manual and Handbooks, FSM 1970 and FSH 1909.17, respectively. These directives suggest that the Forest conduct an impact analysis showing expected jobs and income associated with the consumption of resources and expenditures from a forest (an equity analysis that shows how a dollar of expected demand for a resource is divided among the various sectors of an economy). The impact tables presented in Chapter 3 of the EIS satisfies this requirement. Secondly, the directives provide for a present net valuation (an efficiency analysis to show how well expected revenues cover expected costs) of the resource programs showing a discounted value for the estimates of benefits and the costs for conducting these programs over the planning horizon. The present net value tables are likewise shown in Chapter 3 of the EIS.

Any economic issues that develop in our dialog with the public will also be addressed. For these forests no additional issues specific to a given forest were raised from the public.

The EIS presents a mix of goods and service outputs from its SPECTRUM model, which has been fully documented in Appendix B.

Output valuations are given in tables of Appendix. These tables have been revised to better reflect the sources of the valuations.

Demand-Supply analyses are presented as part of the “Analysis of the Management Situation (AMS) which is not automatically made part of the EIS. Attention to the supply and demand for Wildlife is a part of the AMS and should be found in the forests’ “Process Records”.

Because of the vast uncertainty of prices and inflation in future years, most prices used in these forests analyses were in constant 2000 prices. When estimates of real price increases were available for historical data before 2000, real price adjustments were made to year 2000. Future prices were not increased. This is theoretically acceptable when a present net value analysis is discounted in real terms as was done in this analysis.

Timber and some recreation impacts in these analyses are qualified with the term that the resulting jobs are "associated" with the resource consumption rather than the jobs are caused by the consumption because there may be other landowners who would satisfy local timber demand if the Forest Service did not offer timber for sale; or local Forest Service recreation users may spend their recreation dollars on other non-wild-land recreation events if they did not visit a local forest. Therefore, impacts would be similar for both these resources even if they were not consumed on national forest lands. Impact estimates are given to show the decision maker the relative importance of the Forests' resource consumption in the local community and have no other purpose, as you seem to intimate with your comment that a "social efficient" policy would be to log no government timber.

All resources whether valued or not are considered in "maximizing net public benefits" to the public. The decision maker has a quantification of those resources that can be priced whether market based or non-marker based of an assigned value. The "weight" of resources is the result of SPECTRUM analyses. Some non-market, non-priced resources such as visual or water quality may be a subjective factor in the maximization of net public benefits. Ultimately, the choice of the preferred alternative is up to that the forest and the Regional Forester. When the Record of Decision is released, the rationale for choosing a given alternative will be addressed.

The efficiency analysis requirements explained in FSH 1909.17 combines market and non-market resources. The Forest Service defines and economic efficiency analysis as containing these two components. A financial analysis required for project timber sales is solely a market commodity resource analysis.

The various expected effects of the Forest's programs are presented in Chapter 3. Where adverse circumstances are found, mitigation measures are discussed. The expenses for these measures are incorporated into the program expense that is accounted for in the Forest budget. We therefore believe that we have accounted for what is expected for an economic analysis that is explained in our Handbook.

8-6. Public Concern: The Forest Service should better determine the combination of forest resources that will maximize net public benefit. (A)(C)(O)(J)(S)

Response: One of the contentions in this comment is that the DEIS failed to include all benefits and costs in the economic efficiency analysis for the understanding of the maximization on net public benefits. Because these items were omitted the Forest Service had not complied with the guidelines of 36 CFR 219.

The Forest Service does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative outputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that **maximizes net public benefits**. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative which maximizes public net benefits is left to the judgment of the decision maker. Rationale for the selected alternative is given in the Record of Decision.

In regard to accuracy of the CISC data, this remains the best available data. It includes data on approximately 28,000 stand polygons, averaging thirty acres each. Qualified personnel collected it using standard data elements and procedures. Complaints about the adequacy of CISC data typically stem from it being used for something it was not intended to do or to using it without recognition of its limitations for that use. For the uses made of it, our judgment is that actual, rather than alleged, inaccuracy in CISC data is insignificant to the decisions made in a forest plan. The currency of the data, the source of error, the degree of error, and the significance of error to plan decisions was carefully considered all along the way. Adjustments were made to the modeled timber volume outputs for the 1999-2002 southern pine beetle epidemic. We disagree that the mortality caused by southern pine beetle automatically created early successional habitat. The reason we say this is dealt with in detail in the Forest Cover topic of the EIS.

The EIS analysis of the economics of the forest analysis area was constructed to comply with 36 CFR 219.12 and the Forest Service Manual and Handbooks FSH 1909.17 and FSM 1970, respectively. These directives suggest that the Forest conduct an impact analysis showing expected jobs and income associated with the consumption of resources and expenditures from a forest (an equity analysis of how a dollar of expected demand for a resource is divided among the various sectors of an economy). The impact tables presented in Chapter 3 of the EIS satisfies this requirement.

The “weight” of resources is the result of SPECTRUM analyses. Some non-market, non-priced resources such as visual or water quality may be a subjective factor in the maximization of net public benefits. Ultimately, the choice of the preferred alternative is up to that the Forest and the Regional Forester. When the Record of Decision is released, the rationale for choosing a given alternative will be addressed.

The efficiency analysis requirements explained in FSH 1909.17 combines market and non-market resources. The Forest Service defines and economic efficiency analysis as containing these two components. A financial analysis required for project timber sale is solely a market commodity resource analysis.

Another issue under this comment is that public and non-public timber is not a perfect substitute because the public prefers environmental values to commodity production and therefore there is a cost to the public of "timbering" on NF lands that does not occur on private lands, and the net benefits from timber production are overstated in the present net value analysis: Contrary to what the commenter claims, logging does not necessarily cause most environmental values to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all national forest lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some environmental values – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs

8-7. Public Concern: The Forest Service should use mathematical modeling techniques to identify the most economically efficient solution to meet the goals and objectives of any alternative. (A)(C)(O)(J)(S)

Response: This involves responding to a number of questions specific to the SPECTRUM model:

Question - Where were the resource dollar values obtained? Please provide references. Why were these values deemed appropriate for the Forest? Do the values represent measures of consumer willingness-to-pay? If not, why not?
Response – See the table presenting the Economic Benefits and Financial Revenue Values of the DEIS for these Southern Appalachian forests. The values presented in this table represent market values for Timber and Minerals and assigned values from benefit transfer studies of willingness to pay used by NFS Research for Recreation and Wildlife.

Question - Where was the resource physical output units used for the cost benefit analysis obtained? We can find no reference to them in the DEIS, appendices or draft plan.

Response – The timber product estimates were taken from the SPECTRUM model and the recreation/wildlife/fish estimates were derived from NVUM (National Visitor Use Monitoring) results. The full procedure for estimating the recreation/wildlife/fish estimates can be found in the process records.

Question - Did the cost benefit analysis include the amount and value of the environmental impacts (e.g. the value of social losses) due to forest harvesting? If not, please provide an explanation for this oversight.
Response – These Southern Appalachian forests have presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forests have discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits. Such an economic efficiency analysis is prescribed in the Forest Service Handbook FSH 1009.17, Chapter 10. The discussion of how the selected alternative maximizes net public benefits can be found in the Record of Decision.
Many of the "ecosystem services" or "social losses" that you refer to are considered to be effects remote from resource management of these forests. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219. Resource effects on other resources are discussed in Chapter 3 of the EIS.

Question - Why was a 4% discount rate used when everything is in real terms? The rate probably should be closer to 2%.
Response – Agency policy makes provision for using a 4 percent real discount rate for long term resource program analyses in the FSH 1909.17, 15.42.

Question - Why wasn't a more recent price for an RVD used? How does this value compare to travel cost and contingent valuation study values?
Response – The most recent information available at the time of our analysis are prices expressed in 1989 dollars and estimated from 1989 to 2040, which are found in the FS publication "Resource Pricing and Valuation Procedures for the Recommended 1990 RPA Program". We estimated the real price growth to year 2000 and adjusted the values to reflect 2000 prices. Forest Service non-market valuations for forest planning are provided by Forest Service Research and Forest Service Strategic Planning and Resource Assessment in the Washington Office, and they are working on updating these values, but that information is not yet available. The values used are found in Appendix B in the table presenting the Economic Benefits and Financial Revenue Values of the DEIS.

Question - Are recreation and wildlife/fish really a constant throughout all alternatives? This seems very odd, particularly given that the nature of these experiences will vary substantially between alternatives. Dis-aggregation of visitor days/expenditures by recreation type, and dis-aggregation of visitor days by recreation type for each alternative appears called for. This type of analysis certainly isn't visible in the employment and labor income tables.

Response – The recreation and wildlife/fish estimates are not constant by alternative. A dis-aggregation of visitor days by recreation type was developed. This was needed to determine the present net value of the alternatives and the economic impact of the alternatives since different recreation activities have different values, and different recreation activities have different expenditures in the local economy. These estimates can be found in the process records.

Question - The DEIS states, "For each decade, an average annual resource value was estimated, multiplied by 10 years, and discounted from the mid-point of each decade." The Forest uses 2000 timber and resource prices, and all values are stated in 2000 prices. Are estimated changes in real prices over time accounted for? Are effects of technology accounted for? Is income growth accounted for?

Response – All resources were assumed to be priced in 2000 constant dollars in order to be conservative with the analysis, hence technology and income growth are not accounted for in price estimations. Having a conservative Present Net Value analysis that is still positive indicates a good certainty in your program objectives of achieving the Forest Service hurdle rate of 4 percent. Predicting income growth and technology changes for the Forest Service planning horizon (50 years) would be pure speculation.

Question - There is a reasonably good discussion of prices used (except for timber), but too little discussion of the assumptions in the analysis and the issues raised by it. For instance, trends in real prices should be taken into account. There is every reason to believe that the value of various natural experiences will rise over time as population and income rise while less and less natural areas are available to the public either through development or posting. This should be accounted for. Water production increasingly is an issue in the southeast as clean water becomes relatively scarcer. That price per unit should be rising in real terms also.

Response – Because of the vast uncertainty of prices and inflation in future years, most prices used in these forests' analyses were in constant 2000 prices. When estimates of real price increases were available for historical data before 2000, real price adjustments were made to year 2000. Future prices were not increased. This is theoretically acceptable when a present net value analysis is discounted in real terms as was done

in this analysis. Forest Service planning horizons are 50 years. Trying to estimate expected real price increase over this time period is pure speculation. A more conservative method is to use constant 2000 prices and costs to see if expected program benefits will satisfactorily cover expected program costs.

Question - Note that, since timber is coming off of NF land, where the public prefers environmental values to commodity production (see above), there is a cost to the public of timbering on NF lands that does not exist when the timbering occurs on private lands. I.e., NF timbering and NIPF timbering are not perfect substitutes from a public perspective. As a result, net benefits from timber production are overstated in the present net value of the alternatives. What about non-consumptive values, such as existence and option values (the willingness of the public to pay for knowing that something exists, even though they never intend to see or use it, and the willingness to pay to have the option of sometime using the resource)?
Response – The U.S. Forest Service's does not attempt to fully enumerate the dollar values of all non-market, non-priced benefits and costs in the planning process that may be of a speculative nature. The agency does, however, attempt to provide as much **relevant** information as possible to aid in making good planning decisions, and this information may sometimes take the form of monetary estimates of non-commodity values as presented in the Present Net Value tables. U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.

36 CFR 219.12(g) (1) instructs forest plan development by requiring an analysis of expected outputs during various planning periods. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, and wildlife and fish. These are the resources the forests' DEIS has undertaken to show a present net value as required by 36 CFR 219.

All the Southern Appalachian forests have presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). These forests have discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods and have a significant part in the selected alternative, we

will discuss them in a narrative fashion in the Record of Decision as part of the consideration for maximizing net public benefits.

Many of the "environmental values" that you allude to that are provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be either effects remote from resource management or mitigation measures have been discussed in Chapter 3 of the DEIS to prevent many adverse consequences of logging on these forests. For those items we consider speculative and unforeseen, their consideration in the efficiency analysis required by 36 CFR 219 is not warranted.

Option values and existence values are not items required to be discussed under 36 CFR 219. These are highly controversial methodologies that can be of a contentious nature with many publics. The Forest Service has chosen not to use values based on questionable and controversial methodologies and values not specifically required by Forest Service directives.

The consequences of the forests' programs on the water and wildlife resources are discussed in Chapter 3 of the DEIS. These discussions have offered mitigation measures where the resource may be affected by the timber program. Therefore, adverse effects are believed to be minimal.

Question - Finally, the analysis fails to discuss the weights placed on non-priced goods and services produced by the Forest and, as such, fails to inform the reader how Alternative I came to be the preferred alternative. Please provide an explanation as to how this was determined.
Response – The rationale for the selected alternative is documented in the Record of Decision. This rationale explains how the selected alternative maximizes "net public benefits" which is not to be confused with "present net value". "Net public benefits" includes considering those "benefits" and "costs" that cannot be quantified.

8-8. Public Concern: The Forest Service should clarify the meaning of the SPECTRUM linear programming solution. (A)(C)(O)(J)(S)

Response: Refer to response to PC 8-7.

Cost Benefit Analysis (General)

8-9. Public Concern: The Forest Service should further develop an analysis of average annual cash flows and non-cash benefits. (A)(C)(O)(J)(S)

Response: Table 03 of 1909.12, 4.13 has not been included in the EIS. A similar table is part of the Process Records; showing undiscounted as well as discounted decade costs and revenues by alternative and by program.

Non-Market Products and Services (Valuation/Externalities)

8-10. Public Concern: The Forest Service should use tax dollars to restore the forests. (O)

Response: Activities related to forest restoration are some of the activities funded by Congress using tax dollars. The revised CONF Plan sets the vision for the next decade of forest management and projects will be developed achieve the goals set forth in the Plan. Some of these goals are related to forest restoration.

8-11. Public Concern: The Forest Service should include an analysis of externalities in the DEIS. (A)(C)(O)(J)(S)

Response: The expected physical effects of resource program implementation of the Forest are discussed in Chapter 3 of the DEIS. Where adverse effects may occur, mitigation measures are prescribed to ameliorate those possibilities.

Your contention that timber harvests develop costs that occur to the environment ("externalities") such as:

1. Costs take the form of lost jobs and lost revenues to businesses such as those engaged in wilderness recreation outfitting or the gathering of non-timber forest products.
2. Costs that take the form of increased expenditures for environmental quality. For instance, when water quality is degraded, municipalities, businesses, and residents downstream are forced to incur higher costs of filtering water.
3. Extractive activities on national forests create additional costs, as well, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development. Such uses also contribute to increased fire risk on national forests, not only due to adverse

changes in vegetation structure and composition, but due to increased human access.

Many of the "externalized" costs that you enumerate are considered to be effects remote from resource management on the CONF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.

When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption is only temporary. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.

The CONF believes it has analyzed the *expected* costs and benefits of its resource programs in accordance with 36 CFR 219.12.

8-12. Public Concern: The Forest Service should develop quantified monetary values for ecosystem services and incorporate these values into the DEIS. (A)(C)(O)(J)(S)

Response: 36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during the planning period. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, wildlife and fish, protection and enhancement of soil, water, and air, and preservation of aesthetic and cultural resource values. These are the resources the forest EIS has undertaken to show a present net value as required by 36 CFR 219.

The CONF has presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forest has discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals, range) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits.

Many of the "ecosystem services" provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource

use and development, are considered to be effects remote from resource management on the CONF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.

Contrary to what the commenter claims, logging does not necessarily cause most ecosystem services to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all national forest lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some ecosystem services – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.

Lastly, the Forest Service does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative inputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative that maximizes public net benefits is left to the judgment of the decision maker.

U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.

Therefore, it is the U.S. Forest Service's policy to fully enumerate the dollar values of all market and non-market benefits and costs in the planning process that can *reasonably* be expected to occur in an attempt to provide as much relevant information as possible to aid in making good planning decisions.

Summary of Comment From The Environmental Protection Agency

Planning Process and Development

1. Public Concern: The Forest Service should provide sufficient information in the DIES to allow the Environmental Protection Agency to assess the impacts of the preferred alternative. (A)(C)(O)(S)

Response: The EIS, in Chapter III, contains the assessment environmental consequences (impacts) of the alternatives, including the preferred alternative. While we feel that there is sufficient information provided to fully assess the impacts of the preferred alternative, we are interested in finding what, specifically, the EPA would like to see in a Forest Plan revision EIS to better assess impacts. A Forest Plan is a decision that does not have direct impacts due to its nature. Project level decisions, on the other hand, are where actual ground-disturbing activities are permitted.

2. Public Concern: The Forest Service should more effectively avoid or mitigate potential environmental impacts. (A)(C)(O)(J)(S)

Response: NEPA does not require that all impacts be avoided or mitigated. The twin aims of NEPA are to consider alternatives to the proposed action and inform the public of the estimated effects of the alternatives and decision. The EIS adequately describes the entire NEPA process for developing a revised LMP for the Chattahoochee-Oconee NF. The range of alternatives described in FEIS Chapter 2, along with the comparison of alternatives in FEIS, Chapter 3 is the result of nine years of working openly to meet the requirements set forth in NEPA and NFMA. Public involvement is summarized in Appendix A of the EIS.

3. Public Concern: The Forest Service should acknowledge that the preferred alternative appears to strike a balance between various multiple use activities. (A)(C)(O)(J)(S)

Response: The specific comment was a statement of support for the choice of Alternative I as being one that 'appears to attempt to strike a balance between the multiple-use activities.' That is indeed what Alternative I is about. Thank you.

4. Public Concern: The Forest Service should place greater emphasis on ecosystem restoration/enhancement, watershed protection, and recreation. (A)(C)(O)(S)

Response: The ROD discloses the reasons that Alternative I is the selected alternative. The alternatives considered in the EIS range from "minimal human intervention" theme to a high commodity production theme. Restoration is a theme mentioned in Alternatives A, B, G and I. Watershed protection and maintenance of water quality is emphasized in all alternatives, however, Alternative F, the no action alternative continues the watershed protection currently provided. All other alternatives use a more extensive riparian prescription for water quality protection. Recreation remote, roadless, motorized or developed, is emphasized in all alternatives.

The specific items named are in fact emphasis items in Alt. I. No specifics were suggested as to how the emphasis could or should be 'greater' and support had already been expressed for Alt I. for its balance. Other responses to other concern statements will address specific points related to each of these three so that in the aggregate, a fully response to 'greater emphasis' will be clear.

Environmental Values

Watersheds and Water Resources

Watershed Management

6. Public Concern: The Forest Service should provide specific management strategies and measures to protect and restore watersheds and aquatic habitats. (C)(O)(S)

Response: The watershed ranking is based on data for 5th level watersheds and builds upon the East-Wide Watershed Assessment Process (EWAP) completed during the draft planning period. The Watershed Condition Ranking was developed as a tool to estimate cumulative effects (using sediment yield estimates) for comparison of alternatives. The EWAP was developed to compare watershed health and condition on a broad 5th level watershed basis to provide information during planning to evaluate

prescriptions, alternatives and prioritize future work. Since the 5th level watersheds often encompass a greater percentage of private lands, the results of the EWAP and Watershed Condition rankings will be used to further evaluate protection needs and watershed restoration opportunities at the project level. Furthermore, forest standards and prescription 11 (developed specifically for Riparian management) will provide the necessary protection for all future projects.

Objectives under Goals 23 and 25 in the Final Forest Plan provide direction to work collaboratively with private landowners and other federal, state, and local agencies to address mutual watershed concerns at a broader level of analysis. In addition, there are numerous Forest-wide objectives that, in their implementation, will require a watershed-based approach. Several of these are specifically aimed at improving watershed conditions and are focused on giving priority to those watersheds with aquatic T & E or those listed as sediment impaired. We avoided creating a reference structure of; for example, named streams or watersheds because it would make the plan too static in a dynamic ecological and social environment. We are very confident that, considered in its entirety, the Plan does provide the requested strategy. Specific measures; that is, methods, are a project-level decision in carrying out the strategy.

7. Public Concern: The Forest Service should include additional standards, goals, and objectives for watershed management as recommended by the Environmental Protection Agency. (A)(C)(O)(S)

Response: Federal, State and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. Forest plans protect aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level.

The objectives identified in the Public Concern have been modified in the Final Plan to be responsive to needed collaboration with other agencies on TMDL implementation; and watershed assessments on streams identified in state 305(b) reports.

8. Public Concern: The Forest Service should re-examine specific management prescriptions and re-designate certain specific areas for Watershed Restoration. (A)(C)(O)(S)

AND SHOULD PARTNER WITH STATE AND LOCAL AGENCIES TO ASSIST WITH RESTORATION (A)(C)(O)(S)

Response: Watersheds identified with streams on the 303D list included as a data layer in the Eastwide Watershed Assessment Process. This information, along with the results of the cumulative effects analysis, will be considered as the forest develops restoration projects during plan implementation. The

State, local agencies, and partners will be included in the development of watershed restoration projects as appropriate.

On the Chattahoochee-Oconee, stream segments identified on the Georgia EPD 303(d) listing as impaired were allocated to Management Prescription 9A3 in the Draft Forest Plan. The watershed area contributing to these stream segments is included in the allocation, typically at the scale of the named stream(s). Restoration activities will be proposed at a project level with analysis of potential pollution sources addressed through analysis at a site-specific level.

9. Public Concern: The Forest Service should provide specific measures to address water quality problems in the Chattooga River watersheds and re-designate specific areas for Watershed Restoration. (S)

Response: The 75,000 acres of the Chattooga River watershed located on the Chattahoochee NF have been allocated to fifteen management prescriptions to identify a range of ecological conditions, needed resource actions, and continue to restore watershed health and water quality. A large-scale watershed project has been addressing site-specific problems associated with roads, trails and recreation impacts over the past five years in Georgia, North Carolina, and South Carolina. One feature of the watershed project has been the actions undertaken by the stakeholders involved in the Stekoa Creek watershed group to identify and implement watershed treatments on private ownerships. This work, and other projects to address impaired conditions, will continue under the revised Forest Plan with the allocations as they appear in the selected alternative.

10. Public Concern: The Forest Service should re-designate certain areas of the Conasauga River watershed for Watershed Restoration. (C)(O)

Response: The Conasauga River watershed is allocated to prescriptions that along with forest-wide standards and the Riparian Corridor prescription will protect water quality and aquatic habitat on National Forest lands. Conditions of the lands on the Chattahoochee National Forest within this watershed do not meet the intent and purpose of Management Prescription 9.A.3. The Forest has consulted extensively with the U.S. Fish and Wildlife Service on addressing watershed conditions related to the habitats of federally listed T & E species. These conditions will continue to be evaluated at the appropriate watershed scale, while also evaluating the contributions of on-going Forest Service activities that may impair habitat functions. Within this watershed the Conasauga River Alliance, a coalition of agencies and private citizens, has been and will continue to be an emphasis on collaboration and coordination to prioritize watershed improvements and achieve ecosystem restoration needs.

11. Public Concern: The Forest Service should provide a table that includes actual acreages of Forest Service System lands contained in each of the 5th level HUCs. (C)(O)(S)

Response: This information is found in Forest Plan Chapter 4 – Watershed Management Areas. Each of the Management Prescriptions allocated in the watershed is displayed.

Ephemeral Streams and Riparian Areas

14. Public Concern: The Forest Service should include a discussion of what additional protections are afforded by riparian corridors as opposed to Streamside Management Zones (SMZs). (A)(C)(O)(S)

AND EXPLAIN WHY IT WILL ESTABLISH RIPARIAN CORRIDORS RATHER THAN USING SMZS AS PRESCRIBED BY THE STATE OF GEORGIA'S BEST MANAGEMENT PRACTICES (O)

Response: The Riparian Corridor prescription widths for the Chattahoochee are the same as those recommended for streamside management zones (SMZs) on trout streams in Georgia's Best Management Practices for Forestry, 100 feet. The widths on the Oconee are from the same handbook, for SMZs on warm water streams such as those found in the Piedmont. All other BMPs in the handbook are incorporated by reference into the Forest Plan, Riparian Corridor standard 11-025.

15. Public Concern: The Forest Service should set minimum riparian corridor widths. (A)C)(O)(S)

AND SHOULD USE SITE SPECIFIC EXAMINATION ONLY WHEN IT IS APPROPRIATE TO EXPAND THEM (A)C)(O)(S)

AND SHOULD INCLUDE INTERMITTENT STREAMS (A)(C)(O)(S)

AND SHOULD EXPAND CORRIDOR WIDTHS TO REFLECT THE ADJACENT SLOPE AND SOIL EROSION HAZARDS(A)(C)(O)(S)

AND SHOULD REQUIRE A PLAN AMENDMENT IN ORDER TO REDUCE MINIMUM WIDTHS (A)(C)(O)(S)

Response: The Riparian Corridor prescription has been revised in the Final Forest Plan to assign minimum corridor widths on perennial and intermittent streams. The widths used were taken from Georgia's Best Management Practices for Forestry; specifically the section on streamside management zones. These widths reflect the ecological differences in the two stream types, and the aquatic habitat needs of cold water habitats versus warm water habitats. In addition, ephemeral streams receive protection in Forest-wide standards in Chapter 2 of the Forest plan.

16. Public Concern: The Forest Service should include additional standards that will establish the importance of riparian corridors as buffers for protection of water bodies. (A)(O)(S)

Response: All perennial and intermittent streams are allocated to the Riparian Corridor management prescription, # 11. The desired conditions and protections afforded by implementation of the standards of this prescription are described. Management protections afforded by streamside management zones, the term used in the Georgia BMP handbook used to describe buffer strips, are found in Prescription #11 along with the requirement to be in compliance with the BMPs of the Georgia handbook.

Water Quality

17. Public Concern: The Forest Service should coordinate with the State to update its list of impaired water bodies in order to develop appropriate land management prescriptions. (A)(C)(O)(S)

Response: Table 3-13 in Chapter 3 of the DEIS provided a current listing of impaired streams on the Georgia 303(d) report, and specifically identified the miles occurring on National Forest lands. Of the 32 miles identified approximately one-half are on the Chattahoochee and have been allocated to Management Prescription 9.A.3.Watershed Restoration. The remaining miles are located on the Oconee National Forest, and are allocated to prescriptions that permit restoration activities. Forest-wide objective 25.5 directs the completion of watershed assessments on each stream or segment within the Forest planning area on the 303(d) impaired list. These assessments will support the proposal of management actions to reduce impairments. In addition, management direction of the plan was specifically written to effectively deal with additional listings in the future

18. Public Concern: The Forest Service should include in its tables a list of specific impaired water bodies. (A)(C)(O)(S)

IN ADDITION TO THOSE LISTED IN TABLE 3-12 (O)

Response: Streams or stream segments listed in DEIS Table 3-12 identify those occurring on National Forest lands. These are streams where the Forest Service can be in the lead to implement restoration activities. Streams off-Forest are typically downstream in locations where the Forest Service will be a partner in efforts to address impairment situations. Several of the streams identified in the Public Comment are in watersheds where Forest Service ownership is low, or the pollutant identified is a result of private land uses that cannot be addressed by Forest Service actions.

19. Public Concern: The Forest Service should prepare a list to identify miles of streams not supporting beneficial uses. (A)(C)(O)(S)

Response: The EIS addresses the actions of the Forest Service on resources and conditions such as water quality and streams. Table 3-12 identifies those streams on National Forest lands where activities can be implemented to restore healthy conditions. The Forest coordinates with the Georgia EPD and other cooperating agencies working on TMDLs and other water quality issues.

A listing of impaired streams is available on EPD's website. As aquatic monitoring data is collected on the forest more detailed information concerning supporting beneficial uses will be evaluated and used in the development of improvement projects.

20. Public Concern: The Forest Service should identify critical water supply watersheds and designate them for water supply management prescriptions. (A)(C)(O)(S)

ON THE CHATTAHOOCHEE-OCONEE NATIONAL FOREST (O)

AND SHOULD DESIGNATE SPECIFIC WATERSHEDS AS KEY WATER SUPPLY AREAS (O)

Response: Chapter 3 of the FEIS includes a section added since the draft under the 'watersheds' topic discussing public water supply areas relative to the Forest Planning area. Two public supply water intakes occur on the Forest under special use permit, with a third watershed designated as source water for the intake occurring downstream. These three watersheds are allocated to Prescription 9.A.1. As additional communities downstream from the Forests complete their source water assessment plans the Forest will consider reallocation where appropriate to protect water intakes or reservoirs. Other management prescriptions already allocated also meet the objectives of source water protection.

24. Public Concern: The Forest Service should comply with the State of Georgia's Best Management Practices for protecting water quality and institute riparian corridors as a management prescription. (O)

AND SHOULD REWRITE FW-1 TO COMPLY WITH THE STATE'S RULES AND REGULATIONS FOR WATER QUALITY CONTROL (O)

Response: Forest-wide standard FW-051 (Oct 2003) states: Implement current Georgia Rules and Regulations for Water Quality Control (Chapter 391-3-6) for all projects as a minimum to meet water quality objectives. Georgia's Best Management Practices for Forestry (BMPs) will be met or exceeded to meet water quality objectives for silviculture or related treatments.

26. Public Concern: The Forest Service should provide water quality monitoring data for use in watershed assessments. (A)(C)(O)(S)

TO THE STATE OF GEORGIA (O)

Response: The Chattahoochee-Oconee National Forests has a Memorandum of Understanding with the Georgia Environmental Protection Division and the Georgia Forestry Commission that outlines the responsibilities of each agency in application of Clean Water Act (CWA) direction on the National Forests. The Forest Service provides monitoring results to the EPD relative to the implementation of BMPs under this agreement. Other applicable water quality monitoring data that meets data acquisition standards and generated by the

Forest Service is reported in the annual monitoring and inventory report, available on the website.

Stream Erosion and Sediment Control

29. Public Concern: The Forest Service should provide an explanation for the excessive amount of stream scouring reported in the DEIS. (O)

Response: The statements referenced in the Public Concern could not be located in the Chattahoochee-Oconee DEIS. The Forests have approximately 3,000 total perennial stream miles on National Forest lands. No discussion of scouring was mentioned in the DEIS.

Wildlife

Threatened, Endangered, Sensitive, Rare

31. Public Concern: The Forest Service should designate one or more aquatic species as management indicator species. (A)(C)(O)(S)

Response: Rationale for not selecting individual aquatic species as management indicators is documented in the Management Indicator Species Selection Process Record (available upon request). The use of MIS is controversial because it is based on the assumption that suitable habitat for the indicator is also suitable for other associated species. For a species to be a good indicator of changes in habitat, it has to be: (a) well distributed throughout all the habitat, (b) one of the most sensitive members of the community to the particular management-induced stressor being monitored by its use, *but (c) not similarly sensitive to other natural stressors*. Species with all of these characteristics are often rare and/or difficult to monitor. The Forest Service chose to monitor aquatic communities rather than MIS. This rationale centers on the fact that monitoring data for individual species may be highly variable over space and time for reasons that may be difficult to tie to watershed health and management effects. Scientifically, it is much more meaningful to look at whole fish communities for trends in composition. This monitoring involves collecting data on all species in the community, but is not set up to make inferences based solely on the trends of one or a few species. This approach provides more power for assessing conditions, and reflects use of the best current science. Monitoring questions can be found in Chapter 5 of the land management plans. The revised plan (Monitoring Summary Table, Plan Appendix G) indicates our intent to monitor fish communities and aquatic macro-invertebrates as part of monitoring watershed condition. The revised plan also indicates our intent to monitor aquatic threatened and endangered species (Monitoring Summary Table, Plan Appendix G).

32. Public Concern: The Forest Service should provide priority management attention for key aquatic species. (C)(O)

SIMILAR TO THE PRIORITY ATTENTION RED-COCKADED WOODPECKERS RECEIVE (O)

Response: See the response to the preceding comment for an overview of aquatic species monitoring. Aquatic T & E species have been given the priority attention requested. Discussion is now within the plan of all aquatic PETS (fish, mussel, crayfish and aquatic insects).

33. Public Concern: The Forest Service should provide more information and discussion of Proposed, Endangered, Threatened, or Sensitive aquatic species; and impacts and recovery plans for them. (A)(C)(O)(S)

Response: Effects to all proposed, endangered, threatened, and sensitive aquatic species have been analyzed and documented. All have been included in species viability analysis. See the 'Aquatic Habitats' topic of the 'Biological Elements' section of Chapter 3 of the FEIS and also Appendix F of the FEIS, Aquatic Species Viability. In addition, all federally listed species have been addressed in a Biological Assessment that is being coordinated through the US Fish and Wildlife Service, which is responsible for coordinating species recovery. They will have concurred with final conclusions of this assessment prior to our signing a decision on the revised plan. Sensitive species have been the subject of additional analysis, which is documented in the Biological Evaluation. Additional analysis of specific impacts to these species will be conducted as part of site-specific project planning.

Standards have been added for watershed assessments as well as assessments of road crossings as priority within watersheds where federally listed species occur on the forest. The Aquatic Habitat section describes the occurrence of PETS on the forests, with an Appendix describing all PETS by watershed and if they occur on or off public lands.

Natural Resources Management

Fire Management

37. Public Concern: The Forest Service should include an additional goal to require that prescribed fires and wildfire controls should be conducted to minimize pollution of surface waters. (A)(C)(O)(S)

AND SHOULD INCLUDE STANDARDS OR OBJECTIVES TO ACCOMPLISH THE GOAL (A)(C)(O)(S)

Response: Goals in a Forest plan are not required compliance direction. Additionally, the goal of healthy aquatic ecosystems overarches all program areas and is therefore not repeated at each topic. Rather it is woven

throughout the entire plan at all levels. Forest-wide standards in Chapter 2 of the Plan, 'Fire Management' are designed to minimize impacts to soil and water resources. These include FW-197, 198, 199, 203, 204, and 205. The forest also complies with the vegetation management EIS for the Southern Appalachians. Wildfire control measures always consider effects to the resources, including surface waters and aquatic habitat. Wildfire burn rehabilitation measures are also developed to restore aquatic habitats where necessary.

40. Public Concern: The Forest Service should rewrite two forest wide standards for herbicide use to protect water resources. (O)

Response: We did edit the standard about the distance from water that herbicides could be used as recommended. We did not edit the standard about a buffer distance from sinkholes because; (a) due to geology the probability of sinkholes is very low on NF, and (b) an inflexible distance could prevent us from controlling non-native species for example. We prefer to have the restriction regarding sinkholes in place and use site-specific determination of buffer distances at the project level as being a better balance between permission and constraint.

Mining and Minerals Development

Mineral Management

43. Public Concern: The Forest Service should prohibit suction dredging because of the damage to streams banks and habitat. (O)

OR AT LEAST EXPLAIN CRITERIA FOR ISSUING PERMITS ON A CASE-BY-CASE BASIS (O)

Response: In the final plan suction dredging is not permitted.

46. Public Concern: The Forest Service should include an additional standard to limit utility corridors and communication sites in certain management prescriptions. (A)(C)(O)(S)

Response: Since the draft, language in each management prescription regarding utility corridor or communication site special uses has been reviewed and improved where needed. We did not attempt to summarize this body of text as a Forestwide standard, as we believed, based on our experience implementing the current forest plan, that this would prove to be more confusing rather than less.

Lands and Special Designations

Wilderness and Wilderness Study Areas

Wilderness Recommendations

47. Public Concern: The Forest Service should correct the discrepancy between the table in Chapter 2 and the one in Chapter 3 for acres allocated to wilderness study. (C)(O)

Response: This discrepancy has been noted and corrected.

48. Public Concern: The Forest Service should recommend more acreage for wilderness study areas because of the growth in demand. (C)(O)(S)

OR AT LEAST AS REMOTE BACKCOUNTRY NON-MOTORIZED (C)(O)(S)

Response: The forest is recommending approximately 8,100 more acres for wilderness study and 56,000 acres for backcountry/primitive/natural area/roadless recreation. Only this amount met Forest Service criteria for inventoried roadless areas. Only inventoried roadless areas are recommended to Congress for Wilderness designation.

Wild and Scenic Rivers

51. Public Concern: The Forest Service should correct the discrepancy between the tables 2.B.1 & 2 and tables 2-23 & 24 on acres of watersheds to be recommended as wild and scenic rivers. (O)

Response: This discrepancy has been noted and corrected.

52. Public Concern: The Forest Service should rewrite a wild and scenic rivers objective to develop a management plan for each wild and scenic river by 2010. (A)(C)(O)

Response: Each river recommended that is designated by Congress will have a management plan developed. Once a river study is submitted to Congress, there is a 3 year period of protection for the river. If within that time period Congress acts to designate it to the WSR system, then a management plan is written. If no action is taken within the 3 year period, then the river is allocated into the 4.H. management prescription and managed according to that management prescription. No management plan will be written specifically (separately) for that stream or others allocated to the 4.H management prescription. A date such as 2010 is premature when Congress may or may not act on the rivers.

Other Special Designations or Management Prescriptions

54. Public Concern: The Forest Service should include detailed discussions of why certain management prescriptions were developed, what were their goals, and why they were not included in the preferred alternative. (A)(C)(O)(S)

Response: Management prescriptions were developed in a coordinated way across all 5 forests in revision to include the needs of all. Individual Forests selected from this full set depending on their unique resource and socioeconomic situations. The Alternatives, early on in the process, were designed from the ground up. Working with the public, some thematic outlines were developed and then, the prescriptions built and applied in logical groupings that matched the alternative themes. The resulting alternatives are displayed in the EIS. Rationale for the determination of the selected alternative in the Final EIS is contained in the Record of Decision. Here is where the decision for the Revised Plan to be implemented is explained in terms that tell the reader why one alternative is favored over others. The Preferred Alternative could not include all of the prescriptions, nor did we want it to. The Desired Condition; however, is to be created by application of the prescriptions chosen. Since the Plan is the implementing document of the selected alternative, only those prescriptions appear in it. Fully developing the other prescriptions would have amounted to writing 7 or 8 Forest Plans, only one of which would ultimately be needed.

Special Uses

55. Public Concern: The Forest Service should provide more complete information and analysis of impacts for special uses on the national forest. (O)

Response: The Forest Plan does not make a decision about continuing existing special use authorizations but the direction it sets becomes the framework for re-evaluating them for re-authorization, including needed additional mitigations as terms of the authorization. The great majority of special uses are for very small land areas and low-intensity activities. In addition, they are typically widely dispersed. The specific instance cited of the Camp Merrill Army Ranger Camp is not within the decision authority of the Regional Forester and is therefore not within the scope of the plan revision. The comment that Camp Merrill is within a source water watershed is because the water is for Camp Merrill's use.

Transportation

Road and Trail Management

Road Construction, Reconstruction, and Removal

56. Public Concern: The Forest Service should provide additional information and analysis of the extent to which current and planned roads impact forest resources. (A)(C)(O)(S)

AND SHOULD IMPROVE MANAGEMENT GOALS AND OBJECTIVES TO ADDRESS THE ISSUE (A)(C)(O)(S)

Response: The Forest has completed the required forest-wide roads analysis that is a programmatic level of analysis. Specific roads are not considered in the forest-wide analysis. Specific roads and their impacts on forest resources are considered in a subsequent watershed or project level roads analysis.

57. Public Concern: The Forest Service should consider using Maryland Department of Transportation's floodplain culverts to create more stable stream crossings. (A)(C)(O)(S)

Response: Specific design criteria and alternative designs are developed on a project specific basis. Protection of water quality is an emphasis of road design, construction, reconstruction and maintenance actions. Several stream crossings installed on the Forest in the past 10 years have addressed passage of aquatic organisms and normal function and flow of streams.

59. Public Concern: The Forest Service should rewrite Objective 58-1 to inventory for all roads and trails affecting aquatic habitat and plan what to do with them. (O)

Response: Objective 58-1 reads as follows in the Final (Oct 2003) Forest Plan –

OBJECTIVE 48.1 Complete condition surveys for those specified road segments that are within Forest Service jurisdiction and that are also within the riparian corridor. Prioritize those that are adversely affecting soil and water resources, and correct those situations in the following order of priority:

1. The approximately 20 miles in watersheds where federally-listed aquatic species occur on or within one stream mile of the lowest watershed occurrence of National Forest ownership within three years of Plan implementation.

2. The approximately 10 miles in watersheds where federally-listed aquatic species occur within five stream miles of the lowest watershed occurrence of National Forest ownership within five years of Plan implementation.

3. The approximately 123 remaining miles within ten years of Plan implementation.

63. Public Concern: The Forest Service should delete Goal 62 because it is the same as Goal 58. (O)

Response: Thank you. We did.

Motorized Trails

64. Public Concern: The Forest Service should work to repair OHV trails and control sedimentation from ground disturbing activities. (A)(C)(O)(S)

Response: We agree. The plan has provisions that call for trail maintenance and repair of designated OHV trails. Wherever there are ground disturbing activities, such as excessive OHV use, the forest plan requires that the Forest monitor, evaluate, and restore the ground and prevent sedimentation. The Plan has abundant direction in goals, objectives, and standards directed at finding and fixing erosion problems from any source and at preventing their recurrence. Actual work is done based on priorities and on amount of available funding. The Plan contains forest-wide and riparian standards to control sediment related to ground-disturbing activities.

67. Public Concern: The Forest Service should provide appendix referred to in the DEIS for new criteria for OHV screening systems. (O)

Response: We agree. The missing Appendix J was a mistake at the draft. The final includes that Appendix material, though no longer in Appendix J but rather in Appendix I.

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