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<td>?, Kevin</td>
<td>I care about the Chattahoochee National Forest. I demand: 1. No cutting north of Duncan Ridge! 2. No cutting on steep sloops! 3. 200 acres plus for no clear cuts on old cuts!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Alan, Barnes</td>
<td>I object to USFS plans for the Cooper Creek Watershed. Mother Nature knows best. Let the forest heal itself by natural process...it's been doing it very well for millions of years. It never fails that man messes up forests, but so to man's attempt to correct the damage. It takes a long time to heal naturally, but that's the best way. When man tries to hurry up the healing process, it never ends well.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>ambersnap, Anon</td>
<td>As a voter and very concerned citizen of Georgia, I wish to protest VERY STRONGLY about the proposal to allow logging in a fragile forest area which will be damaged and not helped at all if done. This would be a tragic error and a great disturbance to a natural area which is valuable as it is, and not for profit by lumber companies.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Archbold, Annie</td>
<td>Please DO NOT DO THIS! Aside from a serious environmental disturbance, this is the type of project that impacts entire communities a most negative way. The project is not only unnecessary, but demonstrates how the increasingly fragile environment should be left alone. Just the damage of one of the few true forests left (which include trees that we desperately need), but also removes other native species of plants, animals and eliminates a pure trout fishing area.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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The natural secession of this forest should be studied and enjoyed, not "improved" by cutting.

We have already lost too many forests in the south.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Hello I am a mountain sportsman that grew up and currently live in the area (White Co. GA) I hunt in the mountains and have for over 30yrs now. Our mountains and the wildlife that live there are suffering from the lack of management ie.. timber cutting, some clear cutting and use of control burns. I appreciate the effort you guys are making with this project on Coopers Creek. I will also say that it is not enough, we need more management of the NF lands here in North GA. Chattahoochee, Swallow Creek, Chestatee, Warwoman and all the others could use some of the same treatment as well. Please continue the efforts your pursuing now on other North Ga properties. I mean the grouse and deer are almost nonexistent in the mountains because of the years of neglected forests. I realize all the city slickers think that old growth forest are wonderful and pretty to look at, but the wildlife suffer if all the forest is this way. Anyways, thanks for the effort you guys have put in with this project and keep up the good work.

Thank-you for your Support
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<tr>
<td>Bagus, Anon</td>
<td>This project should be aligned with the Chattahoochee Forest Land and Resource Management Plan and Georgia Forestry Commission Best Practices by eliminating cutting north of Duncan Ridge and on all steep slopes and in all &quot;Dispersed Recreation Areas,&quot; which the forest plan describes as unsuitable for timber production.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Bagus, Anon</td>
<td>Further, the Forest Service should strictly adhere to all requirements applicable to riparian areas and should preserve old growth trees.</td>
<td>All federal and state BMPs will be implemented during implementation. Management of old growth is outlined in section 3.9 of the EA.</td>
</tr>
<tr>
<td>Baker, JB</td>
<td>I have lived part time in Fannin county for 25 years and have seen the natural change and growth of the forest. It's amazing the rejuvenative power of the forest including man induced change s/a clearing old growth. I support the FS plan.</td>
<td>Thank-you for your Support</td>
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The objections of the GA. Forest Watch and related fellow travelers is pathetic. They dredge up questionable specifics (s/a sand/silt/roads/discharge/strip trails/absence of wildlife/ presence of wildlife/ stump spouts/steepness/ flatness/rain events/ and so on)

only to present numerous obstacles to the decision process.
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<td>They refer to &quot;cutting it all down&quot;  yet this is not what is in the plan.</td>
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<td>The obsession with saving the oldest and &quot;best&quot; trees is a laughable. Do they think the old trees grow eternally? And why are &quot;old trees&quot; considered by the GFW the best? Just because they are the tallest? Last, and most ridiculous, is the concern of this guy Walker about the effect of climate change. What does he think has occurred during the last 1 - 5 million years?</td>
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<td>My guess is that they are far more concerned about their influence and egos than &quot;future generations.&quot;</td>
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<tr>
<td>Barbre, Ned</td>
<td>This area is home to one of the most popular trout streams in North Georgia</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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Barbre, Ned

This area is home to one of the most popular trout streams in North Georgia

We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).
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<tr>
<td>Barbre, Ned</td>
<td>It has one of the best old growth forest in the state.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Barbre, Ned</td>
<td>The cutting out of this much timber will cause too much runoff and silt will envelop these tributaries of Cooper Creek.</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
</tr>
<tr>
<td>Barker, Geraldine</td>
<td>This is not a good idea. Now, when clean water awareness is at a peak, how can you think of eliminating this natural watershed?</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats).</td>
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<tr>
<td>Barker, Geraldine</td>
<td>You know better. Let's see some integrity and refusal of the commercial pressure</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Barrett, Mitchel</td>
<td>The time has come to provide the early growth our forest is so much in need of. Please cut some timber.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Barrett, Mitchell</td>
<td>Young growth forest</td>
<td>This is a chance to help the recovery of all wildlife that needs young forest. I see very little help in this plan for those species.</td>
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<tr>
<td>Baugus, John</td>
<td>strongly support the proposal to enrich the forest through regulated thinning and controlled burns for the benefit of wildlife, and would encourage this practice to be continued throughout Chattahoochee National Forest.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Beaver, Jeffery</td>
<td>We need more study. I object to this proposal</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Beebe, Larry</td>
<td>I would like to comment on the Cooper Creek Watershed Project #44385-I just read the report &quot;Increasing the Pace of Restoration and Job Creation on Our National Forests&quot;-I was disturbed by the amount of emphasis put on timber sales- i.e.&quot;3 billion board feet up from 2.4 billion board in 2011&quot; etc.- as often happens in our capitalistic society good intentions become overshadowed by a desire to make more money-As a very concerned &quot;Shareholder&quot; I ask you to give the &quot;Take No Action&quot; option your every consideration and ask yourselves if &quot;timber sales&quot; was not included in this project-would there even be a &quot;Cooper Creek Watershed Project#44385-</td>
<td></td>
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<tr>
<td>begner, dennis</td>
<td>As a native resident and active conservator of Ga forests, the project for &quot;thinning&quot; large tracts of old hardwoods curdles my blood to think the forest service would allow this heinous activity. I highly urge you to oppose this plan and leave the forests to nature ....not the timber companies!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and Non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.
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<td>Belinfante, Johan and Irene</td>
<td>We are disturbed by the Cooper Creek Watershed Project to thin the North Georgia forest. Among the many objections we have is that the deadline for comments is only February 5th. Georgia Forest Watch and the Southern Environmental Law Center have already voiced their objections to the project. We would like to know what some of the other major environmental groups such as Audubon, of which we are members both locally and nationally, and The Nature Conservancy, of which we are members, have to say about the project.</td>
<td>Thank you for your comments. The deadline for comment was published in the newspaper of record for the Blue Ridge Ranger District. Also, The Nature Conservancy commented in this project.</td>
</tr>
<tr>
<td>Belinfante, Johan and Irene</td>
<td>The extraordinarily high rainfall Georgia has had recently and its usually high levels of rainfall make our mountains especially prone to erosion.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Belinfante, Johan and Irene</td>
<td>Many bird species have dramatically declined in numbers. Perhaps more research should be done as to why Ruffed Grouse numbers are declining and maybe hunting of Ruffed Grouse should be more restricted.</td>
<td>The Georgia Department of Natural Resources has the responsibility for changes to hunting regulations and the stocking of wildlife and is outside the scope of this project.</td>
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<td>Belinfante, Johan and Irene</td>
<td>Lastly the net income for the state from this project is miniscule. On the other hand, the possible damage to our forest is great. Please reconsider this plan.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and Non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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| bennett, brent              | Please add my voice to those who support the prescribed thinning of Cooper's Creek watershed.  
Our song birds and wild game need the younger growth forests to survive. | Thank-you for your Support                                                                                                                                                                                                                                                                                                                                                                           |
<p>| Bertasi, Ron                | I would like to register my support of the plan to improve wildlife habitat in the Coopers Creek Watershed. I regularly make use of the Chattahoochee National Forest for hiking, camping and hunting, and I believe active management of the forest is needed to improve habitat for wildlife. | Thank-you for your Support                                                                                                                                                                                                                                                                                                                                                                           |
|                           | I fully support the plan developed for the Coopers Creek Watershed.      |                                                                                                                                                                                                                                                                                                                                                                                                       |</p>
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<td>Bill, Mary</td>
<td>HAVE READ YOUR PLANS, BUT WITHOUT SOME CLEARCUTS WITHIN THIS AREA CONTROLLED BURNING ISN'T GOING TO SOLVE ALL THE PROBLEMS. YOU NEED TO HAVE SOME YOUNG GROWTH TIMBER TO HAVE A DIVERSE WILDLIFE HABITAT TO SUPPORT GAME SPECIES AS WELL AS NON-GAME SPECIES. I AM VERY TIRED OF THE USFS TURNING ALL OF OUR PUBLIC LANDS INTO TREE MUSEUMS AND WALKING TRAILS. I HAVE SPENT MY WHOLE LIFE ROAMING AROUND IN THE NORTH GEORGIA MTNS AND WE HAVE TODAY LESS WILDLIFE IN THESE MOUNTAINS TODAY THAN WE HAD 30 YEARS AGO AND THE REASON FOR THIS IS A LACK OF TIMBER CUTTING. PUTTING MORE OF OUR PUBLIC LANDS UNDER WILDERNESS STATUS AND NOT CUTTING ANY TIMBER has caused a drastic decline in GROUSE TURKEY DEER AND CERTAIN SONG BIRD SPECIES within our North Georgia Mountains. IT IS TIME THE USFS GETS OFF ITS ASS AND STANDS UP TO THESE TREE HUGGER GROUPS AND GO BACK TO DOING SOME TIMBER AND WILDLIFE MANAGEMENT trees are a renewable resource. thank retired GAME WARDEN BILL BUNCH</td>
<td>Thank-you for your Support</td>
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<td>Bivins, Michael</td>
<td>I wanted to express support for the plan as detailed in the project description. Successional forest habitat is needed to maintain all wildlife. Old growth forest is more pretty to look at for the public, but is not what is needed for a healthy ecosystem. I feel that this plan is a great compromise to represent the interests of all parties.</td>
<td>Thank-you for your Support</td>
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<td>Booher, Sam</td>
<td>Not only will the large hard-mast tress of Bryant Creek and Pretty Branch watersheds be destroyed</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<tr>
<td>Booher, Sam</td>
<td>but so will the public hiking experience and public drinking water. We are doing all of this when the timber is not needed and America has a drinking water shortages as well as a world wide water crisis issue. It appears the Forest Service fail to realize the primary purposes of our National Forests should be drinking water and public recreation. For some reason the Forests Service seem to think providing low cost timber that undercuts Tree Farmer timber prices is their mission</td>
<td>The effects of the proposed activities on recreational opportunities and water quality and quantity are disclosed in Sections 3.16 (Recreation and Scenery) and 3.4 (Water), respectively. The analysis states that best management practices would me followed as required by Georgia EPD to meet water quality objectives. By meeting these water quality objectives, downstream beneficial uses such as drinking water supply should not be affected. Project design features and mitigation for resource protection is described in section 2.4 of the EA.</td>
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<tr>
<td>Booher, Sam</td>
<td>Mature oak forests provide both food and deep canopy cover for wildlife. As soon as you destroy the mature oaks you are removing the food and cover for wildlife. Even if left alone, it will be many years before the hard-mast oak return.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>Booher, Sam</td>
<td>My concern is USDA will want to come in and plant pine. Then we will never see Giant Oak trees and a &quot;mystical fairy-land&quot; in Cooper Creek Watershed</td>
<td>No planting of pines is proposed in this project. The only tree planting proposed is the planting of native oaks in some of the stands currently dominated by whitepines.</td>
</tr>
<tr>
<td>Booher, Sam</td>
<td>What you will not find on Public Land are old hard-mast Oak trees that feed wildlife and provide canopy cover to raise their young. The Forest Service should first look outside Public lands to see if there are not already young forest habitat available. If not sufficient then yes find areas that have already been clear-cut in the past then make what you need. But please do not cut large hard-mast Oak trees to make young forests. It just takes too many &quot;life times&quot; to make Old Hard-Mast Oak forests and too many people can only think Pine.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>Booher, Sam</td>
<td>Last, please make every effort to remember the primary purpose of all of America's National Forests is public drinking water. The Forest Service should not be using the National Forests as a way to spread herbicides into the public drinking water. It is bad enough that private farmers use chemicals that ends up polluting our drinking water but the Forests Service should not be trying to prevent oak tree growth but encouraging it and protecting drinking water coming off our Public Lands.</td>
<td>Project design features and mitigation measures for herbicides use are listed in 2.4 and Appendix H of the Environmental Assessment. The effects of herbicide use on water quality are disclosed in section 3.4 (Water) and Appendix F (Risk Assessment).</td>
</tr>
<tr>
<td>Borochoff, Jody</td>
<td>This is to Urge you not to go ahead with the Cooper Creek Watershed Project which looks like a destructive and wasteful project of nature. Please don't use my tax money to destroy nature. I would like my future grandchildren to hike and fish and enjoy the forest and streams. Please rethink this plan and do the right thing for our country. Be a true patriot and protect our beautiful state. Please don't go ahead with this destruction</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Borzilleri, Joan</td>
<td>Please reconsider the draconian measures the Coopers Creek deforestation project entails. I have been a member of Georgia ForestWatch for 18 years and trust their judgment to safeguard the forests and streams in North Georgia.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Boudreau, Carla</td>
<td>I frequently hike in the Cooper Creek area and am concerned about what happens there as well as in the Chattahoochee Forest as a whole. Some of the elements in the EA seemed to be based on commercial interests rather than environmental conservation, especially as most of the goals, such as improving the health of the forest, will be achieved by already approved burning.</td>
<td>This project was based on the ecological needs of the area, extensive modeling and ground examinations were conducted to produce an ecologically appropriate management plan. Timber sales are merely the ground tool that we can use to accomplish the objectives.</td>
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<td>Boudreau, Carla</td>
<td>Some of the areas are too steep for logging, especially the proposed stands near Duncan Ridge</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Boudreau, Carla</td>
<td>The argument to create 300 acres of woodlands to &quot;restore historic stand structure and composition&quot; doesn't make sense - this area has changed dramatically over recent years so not clear what history is the source</td>
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<tr>
<td>Boudreau, Carla</td>
<td>The proposed cutting near Bryant Creek has a high risk of causing serious ecological damage to this native trout stream, which if it could be reversed would be very costly.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1). Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail: Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial</td>
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logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.

**Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands.** The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

**Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes.** Given appropriate site conditions, cable logging can be a very efficient and
environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.

Although the Plan mentions numerous times that the Forest Service will follow best practices, overall it doesn't seem to be in line with the Chattahoochee Forest Land and Resource Management Plan. Any plan should attempt to preserve old growth stands, which the EA admits are better as a carbon sink, which will mitigate the effects of climate change. The focus should be to limit carbon emissions and preserve ability of forest to absorb pollution already present rather than reduce forest capacity. The Forest Service should also invest in equipment to monitor particulates and ozone due to prescribed burns, as the EA indicated there is a disturbing current lack of this equipment in the area.

The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation's CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine
Boudreau, Carla  
For the last point, it seems a waste of taxpayer money to build temporary roads solely for the purpose of implementing this flawed plan and which then have to be re-vegetated.
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<td>Boudreau, Carla</td>
<td>The project as currently described will also limit access to and reduce citizen use of the affected area for years</td>
<td>The effects of the proposed road management action on recreation are disclosed in Section 3.16.2 Effects on Recreation and Scenery. Proposed year-round and seasonal road closures would have minimal impact on recreational users. The two year-round road closures, Duncan Ridge Branch (FDR 39B) and Mark Helton Branch (FDR 33B), are dead-end roads with minimal vehicular use that would continue to provide walk-in access upon closure. The seasonal road closures only impact vehicular use from January through mid-March when recreational use is at a minimum.</td>
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<td>Boudreau, Carla</td>
<td>The Forest Service should do what's best for the ecosystem and protect the ability of the public to enjoy the national forest, which is put science-based restoration ahead of timber sales. The Forest Service should review previously submitted comments by experts as well as the general public to develop a more reasonable and ultimately more effective plan to manage the Cooper Creek Watershed in a way that benefits both the forest and the people who use and enjoy it.</td>
<td>The purpose of the this project is to meet the ecological restoration goals outlined in the Forest Land and Management Plan of the Chattahoochee - Oconee National Forest. Commercial timber sales are only one tool to accomplish those goals and they produce some revenue to fund non-commercial tools to help meet those goals.</td>
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<td>Bowen, P</td>
<td>The Impact of Past Clear-cutting: The major clear-cutting in the area during the 1970's created very large openings that have not been managed in any meaningful way since. New roads were cut into these areas for logging vehicles. These old clear-cuts are grown up in white pine and offer very limited wildlife diversity, but the roads opened up increased recreational access into these areas to hunters and other users. Has your office considered re-cutting these old impacted areas to create successional forests for wildlife? The roads already exist and the tracts would certainly benefit from better management. White pine is stated as one of the species to be thinned or eliminated in your plan so it seems logical to begin with these dense stands that were created when the Forest Service decided that clear-cutting was a good idea for Duncan Ridge and Cooper Creek Watershed. Was there no long-term plan in place and approved at the time to manage these clear-cuts for forest health and wildlife diversity?</td>
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Response

The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.
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<td>Bowen, P</td>
<td>The Impact of the Hemlock Woolly Adelgid: As you are well aware, the Cooper Creek Watershed has suffered greatly from the impact of the Hemlock Woolly Adelgid. The loss of mature hemlock stands have severely impacted the areas along Cooper Creek and its tributaries. The loss of these very large conifers has increased the amount of direct sunlight in areas that have been densely shaded for decades and has raised the temperature of streams. These new openings will result in changes in the types of plants and animals that thrive under these new conditions and those that suffer as a result. Has your office conducted research on the long-term implications for the forest and animal life as a result of the hemlock die-off? Does it create openings for warblers, grouse, turkey and deer? Does the logging activity required in your proposed plan further impact these changes to the point where they cause harm? Will the loss of hemlocks along the streams you propose to log increase the chance of erosion and sedimentation of streams?</td>
<td>The potential effects of HWA across the Forest as well as the Forest's strategy to control Hemlock Woolly Adelgid (HWA) is covered in a separate Environmental Assessment. Within the Cooper Creek project area, the potential effects of hemlock mortality is disclosed for a number of resources areas including water (Section 3.4), Snags, Dens, and Downed Wood (Section 3.10), Aquatic Habits (Section 3.11), Management Indicator Species (Section 3.14) and Recreation and Scenery (Section 3.16).</td>
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<tr>
<td>Bowen, P</td>
<td>I am a proponent of using controlled burns as a way to manage forests. I have visited Tall Timbers, several long-leaf pine plantations in Southwest Georgia, and have visited sustainable forestry sites in New Mexico. I understand and support the benefits of controlled burns.</td>
<td>Thank-you for your Support</td>
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<td>Bowen, P</td>
<td>do not support cutting mature hardwood and some old growth hardwood in an experiment to &quot;open&quot; the forest and then use controlled burns as a way to manage them. The project you propose will impact more than one thousand acres of hardwood forest in a National Forest that has suffered from clear-cutting, hemlock die-off and increased human activity in the past 55 years.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Bowen, P</td>
<td>Streams: Allowing for only a 25' stream buffer for this project is unacceptable. That is the minimum distance permitted under Georgia law and your agency's biologists know that is not ideal in areas with slopes as steep as those in the Cooper Creek Watershed. You should be ashamed of even proposing this. I would have thought you would at least be bright enough to provide our mountain trout streams with a 100' stream buffer. The Cooper Creek Watershed is one of the very last remaining tracts of mature hardwood and home to endangered and threatened species. The streams in the proposed plan contain Hellbenders and other rare aquatic life that are losing habitat elsewhere in Georgia and should be protected in our National Forests.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25' of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
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Bowen, P | Game vs. Non-game: It is a well-know fact in Georgia that management for game species gets more attention because it brings in more revenues, via hunting and fishing licenses, than do non-game species. That fact does not lessen the importance of properly managing for non-game species. Many non-game species are threatened or endangered and require special care and consideration in order to thrive or even survive. Hellbenders deserve the same consideration and protection in responsible, ethical forest management as white-tail deer, turkey or grouse. Please try to remember that fact when pursuing this plan. I live in South Georgia where private landowners do a very good job of managing for deer and turkey. Perhaps large property owners in North Georgia might consider doing the same thing to relieve some of the pressure on our public forests. I could truly care less if weekend hunters from Metro Atlanta bag a ruffed grouse in the Cooper Creek Watershed and I bet there are plenty of trout fishers who agree. | As disclosed in the Environmental Assessment, the proposed activities in the Cooper Creek Watershed project will enhance habitat conditions for a wide-variety of wildlife species, including both game and non-game species. Many non-game species such as prairie warblers, scarlet tanagers, hooded warblers, chestnut sided warblers, pine warblers, and field sparrows with benefit from the proposed thinning and burning activities (see section 3.14 Management Indicator species in the EA). It will also create open stand conditions favored by many forest bats (see section 3.13 Threatened, Endangered, Proposed, Sensitive and Locally rare Species). The effects on aquatic non-game species such as hellbenders is disclosed in Section 3.11 Aquatic Species. |
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<td>Bowen, P</td>
<td>Long-term Management: Is your office confident or have any type of guarantee that it will receive the funding that is required to manage this large project for the decades that would be required for its success? Federal funding for public lands management and staffing have been severely reduced in the last 20 years and I see no indication that it will significantly improve in the near future. What a shame it would be to log a large area of the Cooper Creek Watershed only to be unable to properly manage it in the future. It would be a waste of resources, both natural and financial and the forest would suffer just as it has with the scars of old clear-cuts and other bad management ideas in the past. Recommendation: I recommend you scale back your proposed plan for the Cooper Creek Watershed Project to focus only on previously clear-cut areas and their boarders/immediate perimeters. Conduct an experiment using these areas for at least 25 years and evaluate its progress. Work to create healthy successional forests in these areas before logging mature hardwoods in other areas of the watershed and impacting trout streams.</td>
<td>To address your concern regarding program budgeting from Washington, that is difficult to call because as you stated several shifts have occurred. However, we have also seen a shift upward to certain programs within the Forest Service. Our plan is based on the ecological needs, funding and budget will decide if they truly are implemented on the ground. This largely answers why we as the Forest Service are planning work in the hardwoods and not simply in the 20 - 30 yr old cuts as well.</td>
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<td>BOWEN, PATRICIA</td>
<td>I am writing to OPPOSE the Cooper Creek Watershed Project. Nothing good will come from this. God created this earth without man's help and it is does not need man to tear it down or weed it out because you think it will make it better. Nature can take care of itself! And to tear down trees to encourage two species of birds is ridiculous. They will find another home. Consider the creatures that will be homeless and disrupted when you start chopping down trees and tearing up the landscape. Once you start making roads for equipment and ruining streams it will no longer be the pristine beautiful forest for the creatures and for us to enjoy.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Bradley, Andrew</td>
<td>I was just emailing support and encouragement for the planned burns and thinning of Cooper's creek and other areas. This will be very beneficial for the timber and wildlife. I am glad to see that clear cutting is not being used since it does look terrible for a couple of years afterwards. Aggressive thinning and burning accomplishes much of the same without leaving the land as &quot;ugly&quot;.</td>
<td>Thank-you for your Support</td>
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<td>Bradley, Steve</td>
<td>I'm writing to support the plan for Cooper's Creek. This sounds like a great project and long overdue. In all the years I've hunted and hiked the mountains, I've noticed a gradual decline in animals. Please keep these new management practices up and also in others areas of the mountains such as Cohutta. Thank you, Steve Bradley.</td>
<td>Thank-you for your Support</td>
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<td>Brannon, Michael</td>
<td>As an avid hiker in this area I strongly oppose the project due to the wanton damage caused by logging companies accessing areas to be timbered and the destruction to surrounding areas to &quot;thin&quot; trees. In order to cut one tree several others will be destroyed by machinery getting to the tree and hauling it out. The Duncan Ridge Trail is one of the most remote trails in the state and an absolute treasure to hikers who seek true wilderness areas in which to hike.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Brinson, Lew</td>
<td>Much needed! If done as proposed should be a win-win-win situation for all!</td>
<td>Thank-you for your Support</td>
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<td>Brown, David</td>
<td>The Cooper Creek WMA is a wonderful wild area and should not be treated as a source of commercial timber. At a time when the North Georgia Mountains are being decimated and ruined by Atlanta-fication and real estate development of the worst kind, un-damaged areas like the Cooper Creek WMA should be treated like the precious habitats they are. Don't cut timber on Cooper Creek WMA!! Leave it be!!! Leave it be!!!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Brown, Scott</td>
<td>I think that this is a very worthwhile program and in my opinion - much needed for the Coopers Creek ecosystem. Wildlife and folks like myself would benefit from this plan.</td>
<td>Thank-you for your Support</td>
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<td>Brown, Scott</td>
<td>One item that I would like to know more about is why the road plan is increasing seasonal and annual closures? Is this due to safety or environmental impact? I may have missed the note, but what are the months that define seasonal?</td>
<td>The rational for seasonal and annual road closures and what are the months that define seasonal are described in Section 2.2.2 Alternative 2: The Proposed Action of the EA. The roads proposed for year-round closure all are dead-end roads that receive limited use. The closure of these roads to vehicular traffic would reduce maintenance requirements down to basic custodial care. The road segments proposed for seasonal closures would be closed to public use from approximately January 1 to March 15 - the exact dates will be weather dependent. These roads would be closed during this time period of unfavorable weather where a combination of conditions and use results in the rapid deterioration of the road template, resulting in a public safety hazard as well as significant resource damage.</td>
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<td>BS, Anon</td>
<td>I know this area and disagree that logging and cutting roads to facilitate that logging would improve the forest or increase hunted species</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>BS, Anon</td>
<td>Also, this is a public space. According to an article by the AJC, the Forest Service (meaning the taxpayers) purchased tracks of land to be preserved for the American public. Logging companies already own large forested areas that they have all the rights to cut down. It is not right for them to also have access to public land, specially at the price they pay for that.</td>
<td>The Cooper Creek project area does not proposed to acquire any new track of land.</td>
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<td>Burgess, Claudia</td>
<td>The Cooper Creek Project not based on current science and denies the terrible impact that removal of old growth along steep slopes and removal of forest along banks will have on this important watershed.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25' of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature. Thank you for your comments. This comment is beyond the scope of the project.</td>
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<td>Burgess, Claudia</td>
<td>The science needs to be reevaluated regarding evolving climate change data.</td>
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<td>Burgess, Claudia</td>
<td>Also, investigate the accounting and bidding process; market valuable old growth trees and easy destructive road clearing is not being accounted for in this project. This is not an appropriate process and needs more oversight!!</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Burgess, Claudia</td>
<td>Preservation of this important area is needed, not logging and disruption to a ecology that is working will without interference. Reinvestigate the result on Brawley Mt a similar project w/ devastating loss of woods and stream erosion; which had open areas present before the logging. Cooper Creek is one of the remaining pristine forests in North Georgia. Learn from experience and protect not &quot;project.&quot;</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Busch, David</td>
<td>Please leave the Chattahoochee National Forest alone. It is managing itself quite well as is without your commercial logging.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>BUTCHER, GENE</td>
<td>It is of utmost importance that the Cooper Creek project NOT touch our beautiful trout streams. As fishermen and naturalists these pristine brook streams should NOT be disturbed.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
</tr>
<tr>
<td>BUTCHER, GENE</td>
<td>Please do not let anyone touch these majestic mature trees.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Nothing is more beautiful than what God has created, no one needs to touch this natural setting.</td>
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<tr>
<td>BUTCHER, GENE</td>
<td>The wildlife need to be left alone</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>BUTCHER, GENE</td>
<td>Herbicides are harmful to nature</td>
<td>Project design features and mitigation measures for herbicides use are listed in section 2.4, and Appendix H of the Environmental Assessment. The effects of herbicide use on water quality are disclosed in section 3.4 (Water) and Appendix F (Risk Assessment).</td>
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<tr>
<td>C FOSTER, JOEL</td>
<td>Absolutely NOT ... Cooper's Creek IS BEAUTIFUL .. If you TEAR it up it will take it 50yrs to get anywhere near what it looks like today and the Creek WILL be destroyed .. Cutting down 100 yr old trees is NOT the way to do that ... LEAVE IT ALONE ..</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Callahan, Rebecca</td>
<td>Please do not log this beautiful area. I have walked the trails there and cannot imagine destroying this magnificent place by removing some of the old growth forest. It is a treasure that all should be able to enjoy. We have so few places left of this caliber. Rebecca Callahan</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Carnes, Jerry</td>
<td>I object to the FS cutting the proposed timber in the Cooper Creek area as proposed.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Carolyn, Kearns</td>
<td>I am a trained biologist and forest property owner in Georgia. I beg you to please step back from the plans to manage this forest and examine all the possibilities. This is a priceless resource for Georgia and one that cannot be replaced in our lifetime. We, as scientists, are discovering new information every day about the delicate balance of a mature forest. It truly is a living organism much larger than just the trees themselves. It affects our air and water and the health of our children. It is a rapidly vanishing resource. If this is coming from Washington, please stand firm, and don't allow them to ride roughshod over our health and the beauty of our surroundings. We have been given intelligence and power, and are charged with the stewardship of life on this precious earth.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Cash, Ben</td>
<td>Commercial logging activity proposed in the Bryant Creek watershed has no merit as far as the aquatic species are concerned. There is no situation where building a road is good for either the invertebrates or any of the more popular vertebrate species that depend on them for food. Maintaining existing FS roads to reduce sediment discharge would be more beneficial to the stream health than anything in the CCWP. And there isn't any situation where cutting and removing a tree from the forest is good for aquatic life. Sites prone to natural fire are so far up on the ridges from any trout stream and so small that fire that occurs naturally probably has very little if any effect on the streams but certainly no herbicide is beneficial to any aquatic species. Every component of the CCWP appears to be potentially detrimental to stream health.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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### Author(s) | Comment | Response
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Cash, Ben | ESH has occurred and will continue to occur naturally due to thunderstorms, tornadoes and lightning which produce a mosaic of ESH and don't require road construction, introduce undesirable species and, most important, they don't remove nutrients from the forest. Another way ESH occurred until recently is from normal death of trees, when senescent trees were scattered all through the forest. Logging virtually destroyed this natural cycle of nutrients but without logging it can improve functioning although it will obviously take several years. In that time interval you may be compelled to create some ESH and alter some site composition by noncommercial cutting or hack-and-squirt. Without the regular annual mast of the American chestnut, every remaining mast-producing tree is more important. Cutting them to create ESH or alter species composition appears to be a poor choice while even-aged stands of pines remain in the project area as a result of recent poor choices. | Historically, natural forces such as wind events, fire, and tree death through insect and disease outbreaks, and senescence did create early successional habitat across the landscape. However, these natural processes have been altered through fire suppression, past land management practices, and ownership patterns. Much of the forests in the Cooper Creek Watershed are mid-successional and are too young to experience significant age-related tree mortality. As a result, the availability of early successional forest habitat is very limited (see section 3.8 Successional Stage Forests and Habitats in the EA). The proposed activities will provide much needed habitat for the numerous species of wildlife that use young forests. Several of the areas proposed to be cut to create ESH are existing even-aged white pine stands.

Cash, Ben | I believe that you are envisioning too much open woodland in the CCWP. Brawley is a good example of how difficult it is to establish the appearance of open woodland especially in a location that quite likely hasn't had the experience in the past. Granted, restoring an open woodland would not occur quickly either but until you have demonstrated that instead of producing maple stump sprouts and recruiting more white pine that you can restore or create, whatever the case, an open woodland community, I think it is irresponsible to continue experimenting on the scale proposed in the CCWP, |
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<tr>
<td>Cash, Ben</td>
<td>Open woodland treatment should at least be restricted to more appropriate sites, scattered on ridge tops, and not running down the steep slopes and without removing the organic matter from the sites and exposing mineral soil. This won't require any road construction and will greatly reduce the area requiring controlled burns. And if any herbicide is applied, preferably it won't be wasted by inappropriate application.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Cash, Ben</td>
<td>The scale has made the CCWP project a challenge to analyze and ground-truth for the public and apparently for the district as well. But proposing to remove organic material from the system instead of replacing what has been lost is a strange oversight. For decades nutrients have been taken out of the forest for charcoal production, tanning bark, railroad ties, construction material and groundwood pulp. The loss can't be resolved by more removal. Whether it appears to be a &quot;thinning&quot; or a &quot;clearcut&quot; isn't the point, only the scale.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>CASON-SHERFIELD, JULIA</td>
<td>We need to stop the madness and leave these majestic forests alone, the Cooper Creek area is an oasis that is much needed by us city folk when we can get out of the city and enjoy such a pristine setting.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Caster, Susan</td>
<td>Cutting much of the forest in the Bryant Creek watershed will threaten native trout. Please don't do this</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
</tr>
<tr>
<td>Caster, Susan</td>
<td>Building roads will cause soil erosion and destroy this beautiful area. Please protect it.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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</table>
Caster, Susan

Why has the Forest Service flipped - first the land is not suitable for timber and now over 300 acres are? This land was designated for dispersed recreation and should be protected for that purpose.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Caster, Susan

I thought the forest service didn't cut (or tried not to cut) old-growth trees and yet this proposal includes cutting some of the best examples of mature, healthy oak forests and white pines.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Caster, Susan

This forest is home to a diverse ecosystem. Please do not cut this mature oak forest.

The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.
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<tr>
<td>Caster, Susan</td>
<td>Above all please do not use herbicides to supposedly restore woodlands. Where is your evidence that this was woodland? If it is the trees will age and naturally create openings when they fall. What is the hurry? Let the forest recover naturally.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Chafin, Linda</td>
<td>I understand that there is an ecological role for younger forests and semi-open woodlands within the National Forest, but there are many, many sites in the Chattahoochee National Forest and even in Union County that could be altered to provide that sort of habitat. Many acres of land that were clearcut in the 1960s - 1980s could be managed to provide semi-open habitat. It is my understanding that well over half of the stands proposed for logging are more than 90 years old. There can be no justification whatsoever for logging mature hardwood forests when so much early and mid-successional forest is available for conversion to early successional and woodland habitat.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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<td>Chafin, Linda</td>
<td>It was shocking to me to learn that this project has been based largely on computer modeling with very little on-the-ground survey. I have been a field botanist for more than 30 years and know absolutely that computer models and aerial surveys do not provide the level of detail needed to make informed environmental decisions. The Cooper Creek forests harbor rare plants, high quality forest, diverse fauna, and near-pristine trout streams. Logging will destroy understory and herb layer species that will take many decades to recover, if ever. Detailed field surveys of all sites must be conducted before this project gets underway.</td>
<td>As disclosed in section 3.13 of the EA, site-specific inventories for Threatened, Endangered, Proposed, Sensitive Species, and Locally-Rare Species were conducted during the 2014 and 2015 field seasons. All stands with ground-disturbance proposed received a thorough botanical survey.</td>
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<td>Chafin, Linda</td>
<td>It is also shocking that the project does not follow the Forest Service's own management plan. As you know, almost 2000 acres of the project fall within the management prescription described as &quot;unsuitable for timber production.&quot; What is the point and value of developing forest management plans if they are so readily ignored?</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Chafin, Linda</td>
<td>Fishing in particular is likely to be impacted since logging is proposed for riparian areas. Even the best efforts at controlling erosion and sedimentation are only partially successful. There will undoubtedly be impacts to stream quality.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td>Chafin, Linda</td>
<td>I am also an avid hiker and dread the effect of this project on the trails and forests that I love and visit frequently. That part of Union County is dependent on the dollars of outdoors recreation. The proposed project will have a very negative impact on recreation values of the area.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Chatham, Josh</td>
<td>Thank you so much for this plan to thin the timber on Coopers Creek WMA. I am a hunter and fisherman and use this WMA on a regular basis. Our wildlife is suffering because there has been no logging/thinning in our mountains for a long time. I am 32 years old and have hunted the mountains my entire life and have seen a drastic drop in both large and small game since I was a child. Please go through with this plan regardless of what some environmentalist groups may say on the matter.</td>
<td>Thank-you for your Support</td>
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<td>Chattahoochee, FS-Mailroom</td>
<td>Glad to see the proposal for coopers creek controlled burn. Keep up the good work. Would like to see a push for more timber cutting in the northeast ga mountains also. A lot of old growth pine timber was lost from the beetles 10 or so years ago. Hated to see a lot of it go to waste but it has helped open up the woods</td>
<td>Thank-you for your Support</td>
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<td>Cheek, John</td>
<td>I fully support the conservation vs preservation of public lands. While the wilderness areas sound like a good idea it is detrimental to the overall health of the Forrest and wildlife. Not to mention limited or no access. A recent example would be the failure of the acorn mast production in the mountain regions of north ga. Two years in a row. Due to a lack of diversity of habitat wildlife populations have been severely impacted. When I was younger, you could always hear the drumming of grouse all over the hills. Now they are virtually gone due to lack of suitable habitat. Please use science and sound Forrest management principals when making decisions instead sentimental sounds good policies that please fringe groups.</td>
<td>Thank-you for your Support</td>
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<td>Chima, Karl</td>
<td>we should be taking more steps to improve the forest and preserve it, not demolish it. The forest is the reason this area of Georgia thrives.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Chism, Billy</td>
<td>I am writing to voice my concern over the proposed timber cut of old-growth forest in the Cooper Creek Watershed of the National Forest. I understand the need for open cuts for wildlife, but this could be accomplished without massive clear-cutting of the old-growth forest. My main concern is clean air and clean water, which are directly related to our Northeast Georgia Forests. Nothing is more important than what these old-growth forests provide—clean streams and thousands of trees that clear the air. These needs are so great, that it really is inconceivable to me that a timber cut will yield a little money could ever counter-balance all the good that these old-growth forests provide. I am 64 years old and have lived in Toccoa for 42 years. I have seen the mass devastation of clear-cuts, which literally take hundreds and hundreds of years to restore the forest the way it was. Thank you for your time and consideration.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Collins, Erin</td>
<td>I have read about this project and I am shocked at the amount of &quot;thinning&quot; that will be done. Old, healthy forests don't need to be cleaned, cleared or thinned if they are doing fine on their own, which it looks like they are. This sounds like yet another excuse for getting some really nice timber to sell. If the Forest Service wants something to restore, how about using the young forests that were cleared in the 70's and 80's and might could use management now. Make those into good wildlife habitat and leave the mature stands alone. They already provide what wildlife needs.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Collins, Mark</td>
<td>Improvement project for Cooper Creek. I've spent plenty of time there fishing, hiking and driving through and to me I don't think you can improve the area by cutting all the trees. This really looks like a plan to get the wood out. I've been following this for a while as I live in Suches and I appreciate the chance to comment on this. Don't screw it up by letting this go through.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Collins, Randy</td>
<td>Pleas do what you all do best. And that is by using your knowledge to make this a better fisheries!!! We are just plain old fishermen that love the outdoors. I would like to see better fish habitat not just the same status quo that have hurt our stream over the years. I want you all to have the authority to do cool stuff again!!!! Thank for your all's hard work and dedication to our precious resource &quot;TROUT STREAMS&quot;!!!! Please feel free to contact me if I need to speak to someone in person and I will be glad to.</td>
<td>District Ranger Andy Baker made a decision not to propose aquatic habitat improvement projects under this Environmental Assessment. However, in recent years the Chattahoochee-Oconee National Forests has worked with GA DNR and the Georgia Council of Trout Unlimited to improve habitat not just in streams in the Cooper Creek watershed, but also other trout streams across the National Forest. In recent years the Forest Service also replaced a perched culvert on Bryant Creek and there are plans to replace culverts on Pretty Branch and Dixon Creek (EA pg. 111). GA DNR has also headed up an extensive monitoring program of our habitat improvement work and this monitoring indicates our efforts have been successful.</td>
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<td>Coogle, Sharon</td>
<td>As a resident living close to the Cooper Creek Watershed I protest the present plans as unnecessary and detrimental to the quality of life for all denizens of the region.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Coogle, Sharon</td>
<td>As a resident living close to the Cooper Creek Watershed I protest the present plans as unnecessary and detrimental to the quality of life for all denizens of the region.</td>
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<td>Cosgrove, Debbie</td>
<td>Dear Forest Service, Please reconsider the proposed cutting of the 90 year old forest in Union County. This forest has a riparian zone, and the cutting of this forest will effect an entire ecosystem. It will also remove a great forest of receptors for CO2. We have so few mature forests.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Counter, George</td>
<td>My family and I are strongly opposed to the cutting of virgin forestland in north Georgia. We have seen the effects of the bypass in Cleveland. 4 members of a North Georgia family say no! Thank you.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Cowan, Van</td>
<td>potential destruction of wildlife habitat.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>Coyne, Jan</td>
<td>Your focus on managing the forest for large animal wildlife habitat ignores a vast segment of life that scientists are just recently learning about. The fact that mature forests don’t seem to support the deer, ruffed grouse, etc. that you mention does not mean that they aren’t vitally important to other organisms. We are finding out constantly how important are fungal networks, bacteria, and insects that we previously knew little or nothing about. Forcing the landscape into some ideal of diversity to fit a classification scheme that doesn’t take into account the actual diversity of life in the forest seems irresponsible to me.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Coyne, Jan</td>
<td>I’ve seen a lot of open space left in areas once dominated by hemlocks. I would be very sad to see even more of the forest opened up. What relatively few acres of mature forest there are ought to be left to manage itself.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Coyne, Jan</td>
<td>Your stated objective is to return the land to a historical level of diversity, but that looks to me as though you are trying to shoehorn the entire Appalachian region’s diversity into one relatively small area. Diversity of habitat is a good thing, but there are far too many areas across the Southeast that fit the description “young forest.” Mature forest areas are few, fragmented, and far too small compared to the extent they once were. Historically, the eastern part of the country was mostly mature forest until Europeans felled trees to sell and to clear land for farming. There is evidence that pre-historically, or pre-European contact, the land was managed by the people living here, but we don’t have any idea what that forest management looked like. It could well have included large areas of mature, closed-canopy forest.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>D., Janice</td>
<td>Dear Mr. Baker, I own a cabin up in Ellijay and love the woods and nature. I would like to go on record as completely opposed to the timbering, logging, and brush burning operation being proposed for the Cooper Creek Watershed Project. This proposal is an unjustifiable solution to a non-existing problem. Surely your office can develop a much more restrictive and much more selective forest thinning plan—even assuming that there is a need for any action. I know of no environmentally sound rationale for the planned destruction of so much beautiful old forest land. Thank you for your immediate attention to this matter. I hope you will listen to local residents and nature lovers and avoid this draconian and ill-advised deforestation action. Janice</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Davis, Donald</td>
<td>I am now FULLY supportive of the Coopers Creek Project. And, I am embarrassed at having been successfully mislead until this late date!</td>
<td>Thank-you for your Support</td>
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<td>Davis, Donald</td>
<td>I'm on board! Fish, game, and BSA. Hell yeah!</td>
<td>Thank-you for your Support</td>
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<td>Davis, Kim</td>
<td>The Cooper Creek water shed project plans to cut timber sounds like a very bad idea to me. Why can't you just leave nature alone in some places?? Let the forest progress as nature intended!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Day, Lindy</td>
<td>It is time for &quot;mankind&quot; to stop interfering with nature. A forest gets rejuvenated through natural means - fires, diseases, etc. It doesn't need any more &quot;help&quot; from us. In addition to the clearing of the trees, there will be a negative impact on the biodiversity of the waters and the forest itself. The argument that some of the wildlife is dying out due to the lack of young forest - well, this is how true evolution occurs. Again, something &quot;mankind&quot; has no role in.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>DeLaigle, Aaron</td>
<td>I would like to say that I stand in favor of the proposed plan.</td>
<td>Thank-you for your Support</td>
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<td>Denton, Zachary</td>
<td>While I understand the (stated) rationale for doing this -- to remove much of the old growth and establish a &quot;younger forest&quot; -- I, and many other Georgians <a href="https://www.addup.org/campaigns/stop-the-massive-clear-cutting-in-the-chattahoochee-national-forest">https://www.addup.org/campaigns/stop-the-massive-clear-cutting-in-the-chattahoochee-national-forest</a>, do not believe this is in the best interest for this land.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Denton, Zachary</td>
<td>As I have read, the current plans will allow for cutting timber on steep slopes, which could lead to erosion. The construction and use of new roads is also likely to increase sedimentation, which could affect the health of streams.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)</td>
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<td>Denton, Zachary</td>
<td>The proposed use of herbicides, after cutting, also seems very questionable, considering the risk of damage to the habitats of pollinators, as well as the potential risk to humans.</td>
<td>During all phases of project implementation, Federal BMPs along with GA state BMPs will be followed. In addition, the potential effects are discussed in the EA, sections 3.4 Water and 3.19 Public Health and Safety.</td>
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<tr>
<td>Denton, Zachary</td>
<td>Additionally, such plans would visibly and irreversibly alter this landscape, including existing animal habitats.</td>
<td>The effects of project activities on visual quality are disclosed in Section 3.16 Recreation and Scenery. The project includes several site-specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to the scenic quality of the area.</td>
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<td>deVelasco, Ed</td>
<td>harvesting timber</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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<td>Diamond, Gerry</td>
<td>I support the US Forest Service and trust that the Service will exercise wisdom and sound environmental judgement in administering the Cooper Creek watershed Project plans. Foresight and clarity of purpose to serve the best interests of the forested lands are critical for long term sustainability of our natural heritage. Please consider the lands, the animals and the people of the region in both formulating policy and executing that policy. Do not succumb to special interests whose vision may lack the perspective of your mission. On the other hand you must not wield power in a way that is inconsistent with good stewardship just because you can.</td>
<td>Thank-you for your Support</td>
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<td><a href="mailto:dldevlin@comcast.net">dldevlin@comcast.net</a>, Anon</td>
<td>I'm against the proposed logging. I can think of any occurrence in nature that is similar to logging. The proposal is similar to the Viet Nam era thinking: &quot;We had to destroy the village to save it.&quot; In addition to the trees, what about the animals?</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>doe, john</td>
<td>If you honestly think that Northeast Georgia has natural woodlands, you are sorely mistaken. The fact that you would even say that to try to get people to support you is heinous. I cant believe that there is corruption even in the Forest Service. The land you're planning on &quot;making better&quot; is amazing and has some of the best trees in the area, and you're going to tear them all down because it will make it &quot;better&quot;. Why doesn't the Forest Service just pave the entire state so the people know what you actually care about.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats.</td>
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<td>Doll, Theodore</td>
<td>Logging is also proposed near waterways, which would pollute those streams and degrade water quality in streams that are home to native brook.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Doll, Theodore</td>
<td>The agency says that it wants to create young forest stands as habitat for wildlife by cutting healthy mature forests. But this type of habitat occurs naturally - from blow-downs during storms and tornadoes. And some species of wildlife depend on mature trees. Old pine trees provide nesting sites for bald eagles and ospreys. Woodpeckers and 39 species of songbirds are more frequent in older forests than younger stands. Most troubling is the Forest Service proposal to create sparsely forested areas called &quot;open woodlands&quot; (essentially pasture land with a few trees). These are typical in parts of the semi-arid west, but not in our moist southeastern forests. This proposal would require cutting 12,000 acres of beautiful, mature trees to thin the forest. Maintaining those areas and preventing natural regrowth of dense southeastern forest would require repeated burning and application of dangerous herbicides year after year for the foreseeable future.</td>
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<td>Doll, Theodore</td>
<td>I am writing to oppose the Cooper Creek Project. Cutting mature old growth and hardwoods for so-called &quot;woodland&quot; is fool-hardy and destructive.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Doll, Theodore</td>
<td>One can only conclude from this project that the Forest Service is collaborating with timber interests</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Doll, Theodore</td>
<td>Cutting for wildlife openings is also not needed, as such openings occur naturally as the forest ages.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative. The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Doug.riddle2, Anon</td>
<td>I am not in favor; I do not support; I do not see any benefit to the forest itself for the proposed timber sale of sections of forest in the Cooper Creek Watershed. I say No to this proposed timber sale. The Cooper Creek Watershed and these acres designated for a timber sale are more valuable to the state of GA. and to the United States to be left as forest. The Cooper Creek Watershed Project is a timber sale. It is a business transaction where trees are removed from the forest. This mountainous area of the Chattahoochee National Forest will be damaged far more than any perceived improvement by this timber sale.</td>
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<td>Doug.riddle2, Anon</td>
<td>5 plus miles of temporary roads&quot;. All trees within the avenue designated as a temporary road will be cut. What will remain after the timber is removed and the vehicles are gone is a narrow clear cut and the alteration of topography of land due to use of bulldozers to carve a roadway thru the forest. i.e. a scar to the forest</td>
<td>As stated in the EA (page 17), most of the 5 miles of temporary road construction needed for the timber harvest would utilize existing templates (cuts) across the project.</td>
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<td>Doug.riddle2, Anon</td>
<td>The use of phrases and what results within the forest: &quot;Restoration to a woodlands habitat&quot;. There will be fewer trees per acre remaining. &quot;Thinned to improve forest habitat&quot;. There will be fewer trees per acre remaining. &quot;Use of herbicides&quot;. That does not bode well for an existing forest.</td>
<td>We have taken a hard look at where to apply herbicides. This should be evident in Alternative 3 where the treatments were reduced in particular where herbicide would be utilized. Herbicides will be used a tool to help promote desired natural oak regeneration and planted oaks to help them establish themselves rather than be overrun by off site white pine and yellow poplar.</td>
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<td>Doug.riddle2, Anon</td>
<td>The &quot;damage&quot; to the Cooper Creek watershed by the temporary roads, removal of trees, erosion by rainfall of topsoil will ALL be permanent scars of the landscape for anyone who hikes, hunts, fishes in this area for their LIFETIME. If anyone (US Forest Service personnel, hiker, fisherman, or any Georgia resident) is curious to know what this Whole watershed used to looked like; go hike thru the approximate 12 acres of old growth designated as part of this timber sale Before the trees are cut.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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Doug.riddle2, Anon  
Regarding the significance of 12 acres of old growth included in this timber sale:  
With less than 1% of our forest East of the Mississippi River being OldGrowth; it makes no sense to cut trees or alter nature's plan in any way for these few remaining acres. They are precious just because so few acres remain. It takes a forest several human lifetimes before it reaches maturity as Old Growth. This doesn't mean that an Old Growth area becomes static rather that the balance of leaf litter, herbaceous layer, understory trees, and canopy trees are coexisting in a balance established by nature.......and it works without man's interference.

Drummond, John  
After reviewing the conservation plan I fully support the Forest Services Cooper Creek Project to restore balance to the forest and benefit the wildlife of the area.

Drury, Meredith  
I was appalled when I heard about the Forest Service's plan to cut forty acres of old growth trees in the Cooper Creek watershed. I urge you to abandon this plan no matter how appealing the timber money might be. There are scarce old growth forests along the east coast and our Chattahoochee Forest is a huge draw for tourists and locals. Also, there are bird species that thrive in old growth habitats and would struggle to find ideal habitats nearby. To interfere with the ecosystem's natural process would be too great a loss for our beautiful state.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Thank-you for your Support
Duke, John

use of herbicides. The science behind the use of herbicides to control woolly adelgid is lacking. I think the better approach would be to focus on the use of predatory beetles and to preserve relic isolated stands of hemlock trees that could be used to develop resistant strains.

Duke, John

buffering of streams. Since the entire watershed is essentially a trout ecosystem, there should be a 50-foot buffered area on each side of every intermittent and perennial stream in the watershed per state erosion control laws. I think some buffered areas may need some limited management but tree thinning should be kept to a minimum and fires should be of the lowest intensity.

Duke, John

steep hillsides and tree thinning. You have stated in the plan that the goal is to leave 20 - 60 trees per acre. I think that this should be revised upward somewhat. I am not familiar enough with the science to offer an opinion on guidelines. However, I believe that any amount of thinning, even very minimal, would open the canopy enough, along with prescribe fire, to accomplish your goals. The steeper hillsides should be subjected to the least intense cutting to reduce erosion risks.

Response to Comment (By Comment Author)

The Forest's strategy to control Hemlock Woolly Adelgid (HWA) is covered in a separate Environmental Assessment and is outside the scope of this project. The HWA EA evaluated the various treatment methods and the decision include a combination of biological and chemical treatment methods.

Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25’ of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.

The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.
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<tr>
<td>Duke, John</td>
<td>I think that there are some very good points in the plan, most importantly the use of prescribed fire to bring the forest back to its historic condition. Management of southern pine beetle infestation through thinning of susceptible trees and creating distance between trees to mitigate the spread of disease is also an important part of the plan. On the other hand, leaving some snags for dependent wildlife, such as woodpeckers who depend on them for foraging habitat, must also be balanced with the goal of reducing SPB risks.</td>
<td>Thank-you for your Support</td>
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<td>Eads, David</td>
<td>Cooper creek watershed</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Eberhart, John</td>
<td>Logging, burning, biocide spraying, road building/maintenance for haulage, post-timber-sale scarifying/seeding of roads, and dozing berms both in Cooper Creek Wildlife Management Area and to its north (known collectively as &quot;Cooper Creek Watershed Project&quot;) would be unnecessary, environmentally destructive, indefensible scientifically, and phony make-work done to satisfy the demands of hunters, a shrinking minority of citizens. The proposed plan hides behind euphemisms (e.g., &quot;mechanical treatments,&quot; &quot;early successional&quot;) to obfuscate intent to create burnt, broken brushland in order to increase population density of already-abundant whitetail deer for shooters. A depleted habitat type and rich biota (old mixed mesophytic forest) would be artificially disturbed to please the Service's political constituency of wildlife killers. Nonhunting Georgians outnumber hunters 31 to 1. Please SCRAP the Cooper Creek Watershed Boondoggle.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Eckert, Keith</td>
<td>This email is in response to the proposed forest thinning project in North Georgia. I want to say that I am very disappointed in hearing of this potential project being put into place. There is a reason why we have national parks in America: so that we can retain nature's beauty here on Earth so that we can learn, explore, and marvel at its beauty for future generations to come. As a hiker, backpacker, and lover of the outdoors, I do not want this deforestation to occur in our North Georgia forests. As a Georgia resident since 1993, my hope is that you do not take the industrial hand of our chainsaws and try and play God. I am proud to have called Georgia for over 90% of my life; however, if you cut down our forests claiming that it will preserve a few birds, that is unacceptable and will actually endanger many more species (such as the fish, insects, plant life, etc.).</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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</table>
I have seen the Amazon. I have been to the Rockies and the Galápagos Islands of Ecuador. I have been to Yellowstone National Park and have seen the beauty of nature that has been untouched by machinery and the human hand. The reason why we have these places in America and around the world is because we can learn and understand how to preserve life that is precious and beautiful. Scientists study our Earth in order to better our lives and those future lives to come.

Why have national parks when you come in and try to play Mother Nature? What purpose does a designated state park serve if you destroy a part of its life? America has preserved most of its beauty because of our national park system. We should not destroy our parks by cutting down our forests and clearing out underlying growth, even though it may or may not save specific species.

This email serves to let Georgia legislators and park rangers know of my disapproval of this action. I hope you will make the right decision by not touching our North Georgia forests. If you decide to pursue this action of deforestation, you will likely lose a long time resident and public contributor of Georgia.

Egeland, Bill

I am in support of the USFS’ stance to improve the forest as described and am in favor of the plan.

Thank-you for your Support
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<th><strong>Author(s)</strong></th>
<th><strong>Comment</strong></th>
<th><strong>Response</strong></th>
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<tr>
<td>Elder, Josh</td>
<td>I believe it will ruin the habitat of the animals and trout of the area. I have not seen logging do any area good. I am a hunter and an angler and understand that the deer need cutover to thrive, but they lived since the beginning of time in forest Mother Nature has taken care of. I don't believe man needs to &quot;rejuvanate the forest&quot;. Leave it to Mother Nature. Leave the forest's alone.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
</tr>
<tr>
<td><a href="mailto:elviea@prodigy.net">elviea@prodigy.net</a>, Anon</td>
<td>I am against the proposed forest thinning at Cooper Creek - and all thinning. Let Mother Nature take her course - she handled it long before the US Forest Service existed. The forest is going to get healthier and age better if left alone. It can take care of itself.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td><a href="mailto:emelyn@comcast.net">emelyn@comcast.net</a>, Anon</td>
<td>I am against the plan the U.S. Forest Service is proposing to rejuvenate the Cooper Creek watershed region. The article in the January 29th AJC explained the positives and the negatives of the plan in detail. Based on the information presented, I believe the short term harm done to the forest will out weigh any long term benefits. I always thought the role of the U.S. Forest Service was to protect and to preserve and not to do historical restorations based on what the region might have looked like in the 1800's.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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I have hiked the area around Copper Creek several times, and had the pleasure of walking through the woods with hobby botanist who shouted with delight at some of the species of wildflowers they saw during my hikes. Recently, as I walked along Duncan Ridge and the surrounding areas, I thought of the current proposal and several things really worried me.

One of the things is the 700 acre stands north of the Duncan Ridge trail. These acres are too steep for logging. The equipment needed for that would be very destructive to the area and erosion and runoff would become an issue.

Another thing that concerns me is the 300 acres of Woodland treatments. No evidence has been presented to justify the created of these woodlands. It is not logical to disrupt the habitat and ecology that has been in place for a very long time to create one for something you cannot prove ever existed in the area.

The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.
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<tr>
<td>English, Loretta</td>
<td>Finally, too much cutting is planned near Bryant Creek. This area is a native trout stream and any damage to the environment could be detrimental to the trout.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<tr>
<td>English, Loretta</td>
<td>Again, I want to express how much I enjoy spending time in the Cooper Creek area, and I enjoy introducing this area to others. It will not be such an enjoyable place if there are service roads and massive amounts of equipment all around. Nor will it be inspiring to walk along Duncan Ridge and see deforested areas all around.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<tr>
<td>English, Loretta</td>
<td>Please make your decisions based on ecological restoration and not on commercial viability. The effects of logging and herbicide use on the wildlife in that area are unknown. There is no need for this excessive logging in the proposal. The goals in the proposal will occur with already approved burning.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>English, Loretta</td>
<td>An alternative should be developed, consistent with prior public comments and using the best available science, that focuses on ecological restoration as defined by Forest Service regulations and directives including the agency's Restoration handbook</td>
<td>Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail: Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.</td>
</tr>
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### Author(s) | Comment | Response
--- | --- | ---
Etheridge, Jack | I am not opposed to smart management of our public resources, but do not support attempts to alter one of the few wild places that remain. I hope my grandchildren will have the opportunity I've had to experience this special ecosystem intact and unaltered. I am not convinced that we can improve on the natural successional processes that will occur over time. | **Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands.** The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

**Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes.** Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.

The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.
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| Ettari, Paul | I agree with the plan outlined here:  
<http://www.fs.usda.gov/detail/conf/news-events/?cid=FSEPRD486937>  
http://www.fs.usda.gov/detail/conf/news-events/?cid=FSEPRD486937  

I feel like additional logging/thinning could be beneficial but  
I'll leave those decisions up to the foresters. | Thank-you for your Support |
| Ettari, Paul | Also, the State, DNR and USFS need to do everything in their  
power to protect the two City of Atlanta tracts from being  
sold/developed or otherwise used for activities other than  
those now. They should also be used for selective timber  
cutting which generates money and helps the forest and the  
animals providing greater hunting and recreation activities. | The Forest Service (FS) have been working closely with the  
American Chestnut Association and when seedlings become  
available the FS will look for places where we can use  
American Chestnut as the speciefor reforestation. |
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<td>Eulberg, Susan</td>
<td>I was alarmed to hear of the plans for this area. Please leave the old growth forest in the Cooper Creek Watershed area alone. I do not think your judgement is wise in the venture.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Eulberg, Susan</td>
<td>Please reconsider and leave this area for future generations to have.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Author(s)</td>
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<tr>
<td>Family, Brown</td>
<td>Hello. Is this project based on sound science, that is my question. Who profits from the timber sales and is this what is truly driving the project.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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About this logging the Nat'l Forest thing. If you want to see what it will look like afterwards, go to the corner of 75 S. & True Love Road. It looks like a war zone from Serbia. They just drive over all, knocking down the smaller trees and various vegetation, to get the older larger trees. It will take 3 years before this will look half way decent. I know, because the same thing occurred years before the road dept. moved in. Look across the street at Walmart, that's been a few years. It doesn't look that great yet. Look at what happened when the tornado came thru Helen. Nobody came to collect all that lumber.

But this area at Truelove is left as stumps, scrap branches, broken memosa's, magnolia, pine, and oak trees. This was a set of woods that the deer would hide and forage in as they crossed over Truelove to the other woods. I've seen large flocks of birds, crows & starlings use these woods.

This is also one of the beginning streams of Blue Creek. I don't see any silt fence being put up anyway, I digress, leave the forest alone unless you can harvest with a helicopter.

The effects of project activities on visual quality are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to the scenic quality of the area.
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<tr>
<td>Fjallstrom, Roland</td>
<td>I can not see any justification to harvest this forest. Its not for</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Floyd, Lee</td>
<td>am very much in favor of this project. Habitat improvement is long</td>
<td>Thank-you for your Support</td>
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<td></td>
<td>overdue for this area.</td>
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<td>fortenberry,</td>
<td>As you know, these mountains get a lot of rain. Runoff from erosion</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>sandra</td>
<td>created by clearing has the potential to ruin this beautiful place for</td>
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<td></td>
<td>fishing and recreation. The impact to this fragile animal habitat could</td>
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<td>be devastating. We just can't take a chance on ruining this area.</td>
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<tr>
<td>fortenberry,</td>
<td>In addition, the noise that would result from clearing for temporary</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>sandra</td>
<td>logging roads, removing trees, logging trucks, and heavy equipment,</td>
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<td></td>
<td>etc. would disrupt the peaceful environment for which this area is</td>
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<td></td>
<td>known.</td>
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<tr>
<td>fortenberry,</td>
<td>Moreover, the current roads would undoubtedly sustain wear and tear</td>
<td>Part of the cost of logging to maintain/restore the roads to a condition that is equal to or greater than the condition when the hauling began, unless changing the maintenance level of the road (high clearance roads). Revenue from the timber removed will replace gravel and provide additional grading and road maintenance during implementation.</td>
</tr>
<tr>
<td>sandra</td>
<td>damage due to the movement of trucks and heavy equipment.</td>
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<td>Author(s)</td>
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<tr>
<td>fortenberry, sandra</td>
<td>In this situation, the risk is too great, and the benefits unknown. Let's not take the risk of damaging this pristine area.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<tr>
<td>Fox, Elizabeth</td>
<td>. The only justification I see for the extensive clear cutting you have proposed is that someone is going to benefit financially from harvesting the timber. The large, mature trees of Cooper Creek are THE greatest attraction to this area. The idea that you would decimate the very thing that makes the area attractive is totally beyond my comprehension.</td>
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Fox, Liz

I have been following the proposals to harvest timber from the mature forests of Cooper Creek and am very alarmed that this project has not been dialed back in the face of comments and objections from knowledgeable sources. As a member of Georgia Forest Watch, I have a great deal of respect for Jess Riddle and other members of this organization who have presented rational arguments against the radical proposal that will decimate the most beautiful parts of this area. I spend part of almost every week of the year hiking and exploring the mountains of North Georgia, North Carolina, and South Carolina. The beautiful, mature forests of Cooper Creek are among the most magnificent that I see in any area. The very idea that you are going to "open the canopy" by eliminating giant old trees is beyond my comprehension as that is the greatest draw to this beautiful area. Georgia Forest Watch sees your plan as flawed and, I must say, so do I. I do hope that you will scale back the proposals to cut the most mature trees in this area. If you need to create wildlife habitat, why not do that in the areas that have been more recently logged.

I, for one, am terribly disturbed that timber harvesting has become a priority over watershed protection and the preservation of mature forests that create an environment found in relatively few locations across our beautiful mountains.

The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.
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<tr>
<td>Fran, Lawrence</td>
<td>I'm writing to oppose any thinning of trees as proposed in the Cooper Creek Watershed Plan. Old-growth forests should not be thinned which only results in pockets of grassland and erosion. The erosion then muddies nearby trout streams. In addition, no logging roads should be cut into the forest. All of this man-made activity degrades the quality of the forest. Mother Nature can take care of forest health on her own.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>frank, james</td>
<td>I'm writing to oppose any thinning of trees as proposed in the Cooper Creek Watershed Plan. The thinning of old-growth forests only results in pockets of grassland and erosion and this erosion then muddies nearby trout streams. In addition, no logging roads should be cut into the forest. All of this man-made activity degrades the quality of the forest. Mother Nature can take care of forest health on her own.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Franklin, Sharon</td>
<td>The Cooper Creek proposal should be modified to put science-based ecological restoration and access to low impact recreation ahead of destructive timber sales. In the draft EA, the Forest Service admits to making decisions based on the commercial viability of trees to be cut while dismissing scientifically supported ecological restoration. The Forest Service seems to have its priorities backwards and should take a harder look at the consequences of this massive project in a way that considers the health of the entire ecosystem.</td>
<td>The purpose of the this project is to meet the ecological restoration goals outlined in the Forest Land and Management Plan of the Chattahoochee - Oconee National Forest. Commercial timber sales are only one tool to accomplish those goals and they produce some revenue to fund non-commercial tools to help meet those goals.</td>
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<tr>
<td>Franklin, Sharon</td>
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<td>Public comments received in response to the Proposed Action</td>
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An alternative should be developed, consistent with prior public comments and using the best available science, that focuses on ecological restoration as defined by Forest Service regulations and directives including the agency's Restoration handbook.

provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:

Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.

Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1)
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| Franklin, Sharon | The Forest Service should also undertake a more thorough analysis of the impacts this project will have on climate change. The Forest Service admits that this project will increase carbon emissions while reducing an important carbon sink and notes that one of the greatest threats to water resources in the project area is climate change, but then the Forest Service dismisses concerns about the climate impacts of this project by saying, among other things, that emissions from this project don’t matter because they will be small when viewed globally. Such reasoning is out of step with the spirit of the climate agreement recently signed in Paris and ill advised given the severe weather and record warmth North Georgia has experienced this winter. The Forest Service should acknowledge that all emissions matter and should modify this project so as to reduce carbon emissions as much as possible while maximizing the ability of the forest to absorb greenhouse gases already present in the atmosphere. The best way to ensure a resilient forest is to stop taking actions that cause climate disruption. | the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.  

**Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes.** Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.  

Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon "sink," with carbon storage gains exceeding carbon losses (U.S. EPA 2012).  

The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation’s CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant...
The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).

Franklin, Sharon

Further, this project should be aligned with the Chattahoochee Forest Land and Resource Management Plan and Georgia Forestry Commission Best Practices by eliminating cutting north of Duncan Ridge and on all steep slopes and in all "Dispersed Recreation Areas," which the forest plan describes as unsuitable for timber production. Further, the Forest Service should strictly adhere to all requirements applicable to riparian areas and should preserve old growth trees.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<tr>
<td>Franklin, Sharon</td>
<td>The runoff generated by cutting on steep slopes and road construction would choke pristine streams, dramatically altering their ecology and jeopardizing the clean water that millions rely on daily.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4.3. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25’ of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square feet of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
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<tr>
<td>Franklin, Sharon</td>
<td>and old growth forests provide important habitat and a critical food source for song birds and other wildlife.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Franklin, Sharon</td>
<td>The National Forests belong to everyone, but a project as large as the Cooper Creek proposal would cut too many Georgians off from their public lands.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<tr>
<td>Fuerstenberg, Patrick</td>
<td>There does not appear to be a good reason for moving forward with this Forest Service proposal. Our forest lands need to be preserved in their current state for habitat, controlling climate change, and recreational use. I urge the Forest Service to reconsider moving forward with this project. Thank you.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Garrett, Wesley</td>
<td>As a sportsman who was raised in the mountains of Union County, hunting and fishing is part of my heritage. Over the past 4 decades, I've seen management practices change, in my opinion, for the worse. Wild game was more abundant in our forests when logging was practiced and the forests were in various stages of regrowth. In the absence of logging, the forests have grown old, and sportsmen know what this means. Fewer animals occupy old growth forests. Ruffed grouse are almost non-existent here now.</td>
<td>Thank-you for your Support</td>
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<td></td>
<td>I have reviewed the proposed Cooper Creek Watershed Project and I am in full support of it. It's about time! It appears fair to all parties involved, particularly sportsmen and environmentalists. There's something to placate everyone.</td>
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<td>There is an abundance of misinformation being spread online. I'm sure you've had many complaints from people that are really uneducated and misinformed about the project. Know this, the sportsmen of Union and the surrounding counties are in full support of this project, whether they voice their opinions or not.</td>
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<td>Thank you for managing our resources.</td>
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<tr>
<td>Garrett, Wesley</td>
<td>It's clear from reading other responses that virtually no one is actually reading the proposal. There will be NO CLEAR CUTTING. No one is cutting virgin timber. The aging forests in north Georgia are becoming dead zones to wildlife. The forests NEED this project, and many more just like it. I fully support this project, and hope it is only the beginning of the USFS actually taking a role in MANAGING the forests instead of neglecting them at the Sierra Club's behest. I encourage all of those in opposition of this project, to stop reading Sierra club notices or Georgia Forest Watch emails and actually read the USFS proposal. A startling fact should jump off the page at you. &quot;Less than one percent of the project area has the young forest essential for deer, wild turkey, many songbirds and ruffed grouse.&quot; This is because of the lack of management over the last 3 decades. It's about time the USFS stepped up and did what was right, instead of what was demanded by environmentalists.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td><a href="mailto:genisejoy@earthlink.net">genisejoy@earthlink.net</a>, Anon</td>
<td>Logging a 40-acre stand does nor &quot;rejuvenate&quot; the woods; it is just an excuse to make money by logging. Cutting one of every five trees along the steep slope below Duncan Ridge, a popular hiking trail, does not benefit the health of slope; it increases erosion chances and again is an excuse to log for profit. This is a heavily hiked area by nature starved city folks; this area needs to be retained as a recreational sight. Targeting old-growth forest where trees more than 100 years old soar skyward does not benefit the health and beauty of the area. Logging allowed near pristine trout streams is not beneficial. More than five miles of temporary roads gouged from the forest floor is not beneficial; nor are Skidders and logging trucks, which mar the landscape.</td>
<td>The commercial harvest in this project is merely the tool used to help accomplish the project goal of habitat and ecological restoration. It will also help by generating some of the funds to accomplish other, non-commercial treatments within the project area.</td>
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<td><a href="mailto:genisejoy@earthlink.net">genisejoy@earthlink.net</a>, Anon</td>
<td>I do approve of periodic burns to open up the forest floor to light and increase of biodiversity, although that will happen naturally as well through lightening and natural death of trees.</td>
<td>Prescribed fire is an approved silviculture practice to help mimic the natural causes for areas were wildfire has been excluded or suppressed.</td>
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<tr>
<td>Gentry, Wayne</td>
<td>I fully support this project. The project seems to be well planned and would benefit our North Georgia mountain environments tremendously.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Ghosh, Connie</td>
<td>I say that your plan to log old-growth areas is wrong-headed and should not be implemented.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Ghosh, Connie</td>
<td>One of the Forest Service’s primary functions is to manage timber resources, and to do this effectively it should be keeping large blocks of undisturbed forest intact so that we can have working models of what a forest should be like and how it should function. But if you log these areas, then you will have eliminated yet another section of this region’s intact forest ecosystem, and will be contributing to the habitat and species loss that we all are so concerned about.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Ghosh, Connie</td>
<td>Instead of disrupting still more undisturbed areas, the Forest Service should be aggressively pursuing reforestation of many areas that have already been logged --- even areas that now serve as agricultural and urbanized areas.</td>
<td>The Forest Service (FS) have been working closely with the American Chestnut Association and when seedlings become available the FS will look for places where we can use American Chestnut as the species for reforestation.</td>
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<tr>
<td>Giles, Ed</td>
<td>I appreciate the document you sent me on the Cooper Creek Watershed Project. Sounds like a well thought out plan. Thank you for your service.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Giles, Ed</td>
<td>I would like to make a brief comment on Georgia's managed forest as it relates to Wildlife Management and the recreational opportunities you provide for us fellow Georgians. I realize the hunting and fishing license, as well, as park user fees help contribute to your finances required to manage and protect our public forest. I quit buying Georgia WMA and hunting license due to the crowds of people during managed hunts. Last WMA hunt I went on at Berry College there were so many people I packed up and went home on the first day of the hunt. As I am sure you know, many hunters stay away from WMA’s for this reason and discourage their children from participating in the activity. Here is my thought. It is not a question of money. Many Georgia outdoorsmen would gladly pay 10 times or more the price of a license and a stamp for an opportunity to have a quality hunting or fishing adventure free of crowds of human activity. How about setting aside a WMA for those willing to pay you more for a little solitude similar to what one would pay for a quality hunting lease. Many Georgia outdoorsmen support higher salaries for forest rangers and game wardens. Find a way to make this happen by giving hunters and fishermen who are willing to pay more more places to hunt and fish with less human pressure.</td>
<td>Thank you for your interest in the project. This comment is outside of the scope of this project. License fees in the state of Georgia are set by Georgia DNR.</td>
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<td>godfrey, suzanne</td>
<td>Regarding the above project, please leave the National Forest as it is. Let Mother Nature manage the forest as it has for 1000 of years before us and all seems to have made it this far.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Goebeler, Lynne</td>
<td>We can't denude our mountains and pollute our waterways any more!</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)</td>
</tr>
<tr>
<td>Goebeler, Lynne</td>
<td>We need to preserve as many older growth forests within our public lands to offset the massive amounts of logging occurring on private and corporate owned land.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Goodwin, Warren</td>
<td>It is a terrible idea to thin and cut down any of our precious remaining old growth forest.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Goodwin, Warren</td>
<td>But it is grossly irresponsible to destroy mature <em>public</em> forests and threaten streams in the manner proposed in the plan.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats</td>
</tr>
<tr>
<td>Goodwin, Warren</td>
<td>And spraying Herbicidal poisons in a pristine forest? That seems even crazier</td>
<td>We have taken a hard look at where to apply herbicides. This should be evident in Alternative 3 where the treatments were reduced in particular where herbicide would be utilized. Herbicides will be used a tool to help promote desired natural oak regeneration and planted oaks to help them establish themselves rather than be overrun by off site white pine and yellow poplar.</td>
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<td>Goodyear, Nancy</td>
<td>Clearing the forest will exacerbate flooding and water pollution</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
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<tr>
<td>Goodyear, Nancy</td>
<td>in addition to destroying the habitat for many animals and plants.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
</tr>
<tr>
<td>Goodyear, Nancy</td>
<td>Many of us like to hike and observe nature and that's why we live in N. Georgia. Don't destroy our natural heritage.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
</tr>
<tr>
<td>Graham, Cheryl</td>
<td>Opposed to the logging in the Chattahoochee Cooper Creek area due to the destruction of potential wildlife habitat and excessive logging roads.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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### Author(s) | Comment | Response
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Graham, Lee | I have hiked in the Cooper Creek area, and I can't understand (other than timber interests), why the forest needs to be cut, burned and poisoned with the plan that has been proposed. The area is more of an asset as forest than as a multi-year "reshape the forest" project that hasn't yet worked at Brawley Mtn. I would oppose the current plan being proposed as too destructive, and very likely to fail in the goal of creating woodlands. | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004). |
Greear, Patricia | The logging will include healthy mature trees. There are no health problems to existing trees | The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative. |
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<tr>
<td>Greear, Patricia</td>
<td>The proposed logging is near waterways which could be polluted and degrade water quality in tributary streams. Our native brook trout is fighting for survival and could be at risk.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25' of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
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<td>Greear, Patricia</td>
<td>We experienced heavy logging in the 1920's which decimated our chestnut trees making the weaker trees susceptible to disease that led to disappearance of our native chestnuts. Our hemlocks are dying from adelgid. Our scenic vistas already look barren. Why would your proposal include an open woodland which is not native to our area! These trees serve a purpose for tourism, recreation and animal life habitat.</td>
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<td>Green, James</td>
<td>The The Cooper Creek Watershed Project is a really bad idea. It sounds like a logging proposal and not a ecologically sound proposal. We do NOT need our beautiful wilderness to be &quot;managed&quot; in this way. Please don't do it!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>hall, Mary</td>
<td>Please let nature do its work at Cooper Creek! Trust me I live in the woods and trees continually die becoming a habitat for creatures to live in, then they eventually fall opening up the canopy ...it is a continual process!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Hall, Anne</td>
<td>I am strongly opposed to the proposal to commercially log in the Cooper Creek watershed.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Hall, Lynda</td>
<td>I also believe that Mother Nature takes care of itself. It has for thousands of years &amp; it will continue to do so without our help! I think the idea of cutting down trees is a bad one especially considering compromising the creeks &amp; streams nearby w/mud &amp; debris when we get a heavy rain. And burning 12,000 acres is not necessary...if you let lightening &amp; Mother Nature take it's course...it is a far better situation! So I say NO to the roads, the logging, the burning, the herbicides. STOP. Leave this natural area to God &amp; Mother Nature...they are far better stewards than we humans. The forest can take care of itself. I am opposed to the logging of the 40 acre tract near Duncan Ridge mentioned in the AJC article!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>handte, charles</td>
<td>it is destructive to the wild life in the area that depend on the mask crop to survive</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<tr>
<td>handte, charles</td>
<td>it is destructive to the native trout in the area due to water warming, excessive water run off caused by logging operation.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25’ of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
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The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and moves the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health.

Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<th>Author(s)</th>
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<th>Response</th>
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<tr>
<td>Harris, Jimmy</td>
<td>I want to express my support for the Forest Service’s Coopers Creek Project in Union County. This is a well thought out plan that will improve the health of this section of forest and provide more wildlife habitat while fulfilling the mandate to the Forest Service to manage for multiple use.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Hartzell, Denise</td>
<td>It is imperative that our forests be preserved, that wildlife be protected against the ravages of deforestation, that our watersheds not be compromised by human activity, and that the beauty of our forests be preserved for the enrichment of generations to come.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Hawkins, Charles</td>
<td>I am writing to urge you not to carry out the proposed massive timber cut in the Cooper Creek watershed, which would degrade water quality in Cooper Creek and tributary streams.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)</td>
</tr>
<tr>
<td>Hawkins, Charles</td>
<td>The old trees provide nesting sites for bald eagles and ospreys, with woodpeckers and songbirds more frequent in older forests than in younger stands. I urge you not to create open woodlands, but rather to leave the trees to go through their natural cycle which provides wildlife habitat naturally.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<tr>
<td>Headrick, Phyllis</td>
<td>This is one of the forestry projects that I wholly support.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Hays, Brad</td>
<td></td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Headrick, Phyllis</td>
<td></td>
<td>Thank-you for your Support</td>
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I would like someone to explain to me why we must take action to make them ugly by destroying mature forests, muddying creeks, killing off fish, and more

We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public’s ability to utilize this area for recreational purposes.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).
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<td><a href="mailto:heidi@heididavison.com">heidi@heididavison.com</a>, Anon</td>
<td>Please do not cut the 1,500 acres in and around Bryant Creek and Pretty Branch as this would threaten some of the best native brook trout streams in Georgia.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.</td>
</tr>
<tr>
<td>Henderson, Sheldon</td>
<td>Andy, I would like to see the Cooper Creek Watershed Project implemented as planned by the U.S. Forest Service. Early successional habitat is direly needed for ruffed grouse and other species of wildlife. I sincerely hope this project is implemented.</td>
<td>Thank-you for your Support</td>
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| Hiers, Lee | I am writing in support of the USFS project proposal. I have the confidence that the professionals of the USFS have diligently studied the area and made the proper assessment of the needed activities to improve the forest's health.  

There are a number of groups that are pandering to the public's desire to allow the land to go unmanaged, stating that this is a better treatment of the land vs. the USFS plan that includes prescribed burns and thinning of trees. These groups maintain that there will be "clear cutting", when in fact, the USFS proposal specifically notes that there will be no clear cutting. Either these groups do not understand the meaning of the phrase, or they are deliberately distorting the USFS proposal in furtherance of their own agenda.  

My concern is that these groups' publicity result in an uninformed vocal minority - a "squeaky wheel" as it were. I fear that these groups, because of their apparent numbers and indignation, may be appeased, when in my opinion, after studying the issue and reading the proposal and the EA, the USFS proposal is the proper course of action to take for the greater public good. | Thank-you for your Support |
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<tr>
<td>Hill, Diane</td>
<td>I have hiked and fished in this area since I was a child. It is beautiful and needs to be preserved. Some things can't be replaced. There aren't many old forests left and we need to preserve what we have. I would hope that my grandchildren would be able to enjoy this special area with their families one day.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Hinton, Doug</td>
<td>Please DO some timbering on these areas.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Hirschi Hubbard, Lori</td>
<td>I do not agree with the Cooper Creek Watershed project. Please shut it down NOW!!! Nature can handle its self!! Clear cutting is UGLY!!! Burning is UGLY!!! The smoke coming down to my house from the burning is unhealthy for my family!!! #stopblowingourtaxdollars</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Hirschi Hubbard, Lori</td>
<td>I do not agree with the Cooper Creek Watershed project. Please shut it down NOW!!! Nature can handle its self!! Clear cutting is UGLY!!! Burning is UGLY!!! The smoke coming down to my house from the burning is unhealthy for my family!!! #stopblowingourtaxdollars</td>
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<td>Hodges, Malcolm</td>
<td>Oak/Oak-Pine Thinning (Goal 3, Obj. 3.7): We support this action. Dense mixed matrix forests are low in biodiversity, and more heterogeneity in canopy closure, combined with prescribed fire, will greatly increase biodiversity on the forest floor. We think this action has been adequately planned.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Hodges, Malcolm</td>
<td>Pine/Pine-Oak Thinning (White Pine Removal) (Goal 3, Obj. 3.6): We are mostly in support of this action. White pines are invading (or were planted in) areas of the forest where they are not a natural component of the canopy. We think this could be a very useful action in reducing their dominance in targeted areas, and with fire controlling their reproduction, might resume their usual distribution in the forest. In addition to reducing white pine, thinning will serve to create habitat heterogeneity in upland forests, increase light on the forest floor, and likely greatly increase biodiversity in treated forests, in combination with prescribed fire.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>In some areas, we think this action may be misapplied. In particular, riparian and low-slope forests of white pine and hemlock, with rhododendron understory, along Bryant Creek are proposed for thinning. This mostly applies to portions of Stand 28, but also to portions of stands 12, 23 and 16. We cannot see that thinning these stands will achieve the stated goals to &quot;improve the health and vigor of the stands&quot; and &quot;release desirable oak species, thus restoring oak to its native sites,&quot; or &quot;allow sunlight to reach the forest floor stimulating oak regeneration over time.&quot; Low-slope and riparian areas of white pine and hemlock with rhododendron understory are natural in these situations, appear to have a natural composition and structure (albeit with too many canopy gaps created by dead and dying hemlocks), and already have a dense and thriving understory that would naturally suppress oak reproduction. Thinning should mostly be planned to work in concert with prescribed fire to increase understory biodiversity, but fire would not likely penetrate this plant community.</td>
<td>Treatment boundary layout would likely limit treatments in much of the lower slopes area around Bryant Creek and other riparian areas where hemlock and white pine stands occupy the ground with rhododendron.</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>We prefer that such areas be left out of the harvest so that they could provide a buffer for Bryant Creek against sedimentation, especially in light of the large portion of that watershed to be harvested in the proposed project. Applying a strict buffering system would be inadequate to protect the entirety of this forest type, so we think an ecological stricture should be in place, rather than buffering by fixed distances from the stream.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats).</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>Canopy Gap Thinning (Goal 7, Obj. 7.1): As a variant of the canopy thinning action, we think this will be as valuable at opening the canopy and providing light to the forest floor, with the additional benefit of more structural heterogeneity. We support this action.</td>
<td>Thank-you for your Support</td>
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<td>Hodges, Malcolm</td>
<td>Early Successional Forest Habitat (Goal 2): We do not oppose this action, but we think that if fire is applied correctly and frequently, similar gaps in canopy would be achieved (and perhaps will as fire is applied as proposed in this project). The additional benefit of fire-caused ESFH is that they will not require subsequent mechanical or chemical treatment.</td>
<td>Prescribed fire can be used to create and maintain early successional forest habitat. However, the effectiveness these treatments is largely influenced by fire intensity. The low-to-moderate intensity prescribed burns that have occurred within the Cooper Creek area has created a limited amount of early seral habitat. As discussed in Section 3.8 Successional Stage Forests and Habitats of the EA, less than 1 percent of the project area is in early seral conditions, the majority of which is in patches less than 1 acre in size. The use of growing season prescribed burning and higher intensity dormant season burning in the Cooper Creek area may enhance opportunities to create and maintain ESFH in the future.</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>Woodland Restoration (Goal 3, Obj. 3.4): The Nature Conservancy strongly supports this action. We see woodland restoration as an important means of achieving ecological restoration of key upland habitats, in combination with prescribed fire. We question the reduction of some stands to a BA lower than 30, which, in our opinion, would constitute taking such stands to the density of savanna. Given the likelihood of additional canopy loss to wind-throw from high winds along ridge-tops, taking stands down to 15 BA could result in loss of any substantial canopy, and thus should be avoided. We think such an eventuality could be mitigated by buffering that loss with additional leave-trees.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>Midstory Treatment (Goal 3, Obj. 3.7): We support this action as a means of rapidly arresting succession of oak forests to undesirable forest types. We hope that maples will also be targeted.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Hodges, Malcolm</td>
<td>Release (Goal 3, Obj. 3.7): We support this action as stated. Herbicide use: We support the use of triclopyr due to its lack of soil activity.</td>
<td>Thank-you for your Support</td>
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Prescribed fire:
The Nature Conservancy strongly supports this action as being the most important action any land manager take to restore native forests and woodlands. We are supportive of the proposed frequency and mixed seasonality of fire.

Thank-you for your Support

Hodges, Malcolm

2) Road Access
The construction of new roads and maintenance of existing roads should be conducted with utmost care given to reducing sediment-laden runoff from entering adjacent waterways. The Nature Conservancy supports the proposed year-round and seasonal closure of roads and the reduction in maintenance levels for roads in the Lake Winfield Scott Recreation Area. Unpaved roads in forested areas are a major source of sediment loading to sensitive mountain streams and every effort should be taken to reduce their impact whenever possible.

Thank-you for your support

Hodges, Malcolm

From our perspective, the two most important actions in this proposed project, woodland restoration and prescribed fire, are not substantially different between alternatives 2 and 3. The reduction in commercially harvested woodland restoration stands from alternatives 2 to 3 is almost made up by the increase in non-commercial stand acreage, and the prescribed fire acreage is unchanged.

Some acres switched from commercial woodland to non-commercial woodland based on operational feasibility.

Hodges, Malcolm
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<tr>
<td>Hoecht, Dietrich</td>
<td>Serious damage is to be expected if the Forest Service executes its present plan, namely to all flora, wildlife and water.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Hoecht, Dietrich</td>
<td>The effects of temporary roads and skid trails are underplayed in this study, as to wash-downs, soil disturbance and vegetation destruction. We have such a show-case just behind our property in the National Forest from a past timbering event. I can tell you it is still a holy mess, even after 18 years. A surprising amount of silt is still accumulating in the creek that flows by the house, the creek being the drainage from the timbered acreage. The new tree growth is mostly limited to dense tulip poplar and junk pine thickets. Diversity is only retained in the cove zones with older growth.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats</td>
</tr>
<tr>
<td>Hoecht, Dietrich</td>
<td>the timber harvest is apparently treated as a 'management tool' rather than a prime purpose of its own. The timbering will cover vast areas, and the described land disturbance precautions will not necessarily be followed and verified, neither by the contractor, nor by the Forest Service representatives. Such past lax enforcement history has been observed and documented by the GA Forest Watch, including around Cooper Creek.</td>
<td>This project will be implemented in &quot;phases&quot;. There will be multiple timber sales put together over the next 5-10 years. Only a portion of the project area will have operations ongoing at any given time. This will allow for the needed oversight. The units will be laid out, and a boundary painted to ensure that proper work occurs in the area it was intended for.</td>
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<tr>
<td>Hoecht, Dietrich</td>
<td>The localized impact on imperiled plant and animal communities is not really predictable, since those are often hidden micro as opposed to macro zones. As an example, on our few acres of land we have nine different types of native orchids. Significant land disturbance and burning would wipe out most of them. Certainly there are comparable conditions and perils that apply to micro communities on the Cooper Creek acres to be 'managed'. We will never know what will have been destroyed.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Hogan, Bridget</td>
<td>I'm also concerned about the ecological justification for the project, namely that we need to create open woodland areas in the Cooper Creek watershed. Is there any evidence that open woodlands ever existed there? I haven't been able to find any. To me, it seems more important to protect one of our only old growth white pine and oak stands, and allow them to age naturally. My third concern is with the use of herbicides in this project. There really shouldn't be a place for chemical agents in our natural areas.</td>
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<tr>
<td>Hogan, Bridget</td>
<td>I'm writing to express deep concern with the proposed Cooper Creek logging project. As a Gwinnett County native, I grew up seeing all of my favorite forests clear cut to make space for subdivisions and strip malls. I'm still coping with the loss. In 2014, my husband and I decided to escape the overcrowded suburbs and move up to North GA where we could once again be surrounded by nature. The thought of losing a large tract of another favorite forest area is distressing for several reasons. People move to and visit North GA from all over the country for one principle reason - nature. The proposed project will drastically damage the ecosystems of a cherished backcountry area and give people the idea that Georgia doesn't appreciate its natural resources, or the people who love them. Our forests are a more valuable economic asset if left standing than any logging income could possible bring.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and Non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>holler, clyde</td>
<td>the Georgia Forest Watch organization presented a detailed critique of this project. I am inclined to think that their comments are well taken, and that the project should be drastically scaled back or abandoned. It seems clear that there are many other areas that are more suitable for logging, insofar as they do not have such scenic, historic stands. The Cooper Creek area has been famous for these stands for years, and there does not seem sufficient reason to disturb them, especially given that there are other areas more suitable. Unless and until the Forest Service can offer a detailed and convincing response to this letter, I will remain opposed to this project as unnecessary overreach. The present basis of the area's economy is tourism, and people do not come here to see clearcuts - they come to see scenic, national forest.</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). The road improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
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<td>Holton, Royce</td>
<td>Coopers creek</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Hopper, Lyn</td>
<td>Please leave our natural forests in the Cooper Creek watershed alone! I do not support the cutting of healthy, mature forests, or the capitulation to logging interests when there is no evidence this is essential to forest health.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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Author(s) | Comment | Response
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hussmann6930@comcast.net, Anon | I am stunned to learn of the forest service plan to "thin" the Cooper Creek watershed. I am staggered by the reason-challenged logic to support such an ill-advised project. The idea that you can "improve forest health" by cutting down 80% of mature hardwoods and build erosion producing logging operations is a "solution" looking for a problem | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

jackie.lloyd55@yahoo.com, Anon | From all I have read about your plans for this area I have to agree that this is a bad plan. It would destroy habitat for fish and animals and change a beautiful area into a wasteland. Please reconsider these plans. | The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.

Jackson, Derek | I'm writing to you to voice my opposition to this plan | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<td>Jackson, Derek</td>
<td>I'd like to retract my opposition to the restoration efforts of Cooper Creek.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Jacobs, Jimmy</td>
<td>I fully support the Forest Services Cooper Creek Project to restore balance to the forest and benefit the wildlife of the area.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Jamara, Sally</td>
<td>It is all about the money for loggers</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Jamara, Sally</td>
<td>I don't understand why the U.S. Forest Service isn't more concerned about the environment and wildlife habitat.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>Jamara, Sally</td>
<td>Considering this is a watershed area - even worse. The more trees you cut, the less it filters the water. Yes it absorbs more, which is a good thing to prevent flooding.</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25' of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
</tr>
<tr>
<td>James, Stanley</td>
<td>Develop the maximum allowable ESF in elevations below 3000 feet in addition to elevations above 3000 ft.</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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<td>Author(s)</td>
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<tr>
<td><a href="mailto:james.thurmond3@gmail.com">james.thurmond3@gmail.com</a>, Anon</td>
<td>I'm leaving my comment at this. Please disregard the left wing activists on the timber cutting matter, our mountain forests are in terrible shape, the native chestnut forests are gone anyway, let's manage what we have, why do we need 100 year old chestnut oak and poplar that probably sprouted from an older stump and is good for nothing but shading out new productive growth, let's cut some timber!!!!!!</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Jaworski, Derek</td>
<td>No cutting north of Duncan Ridge!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Jaworski, Derek</td>
<td>No cutting on steep slopes!</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
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<tr>
<td>Jaworski, Derek</td>
<td>Leave 200 acres plus of old growth alone!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Jaworski, Derek</td>
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<td>Jaworski, Derek</td>
<td>No cutting on steep slopes!</td>
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### Author(s) | Comment | Response
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Jaworski, Derek | Leave 200 acres plus of old growth alone! | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Jmwhitehurst@aol.com, Anon | Building roads on steep mountain slopes causes decades, maybe centuries, of erosion, landslides, muddy creeks (damaging aquatic life), destruction of wildlife habitat and provides opportunities for ATVs to further damage the forest. Green briars will quickly fill any openings in tree canopy. 2. Mother Nature is vastly SUPERIOR in prescribing for "forest health" than some theory that "forest management" can produce. | The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.
The estimated revenue ($25,000 less expenses), is ridiculously insignificant! NO SENSIBLE MANAGER WOULD EVER ENDORSE SUCH DAMAGE TO TAXPAYERS. The expense of building the additional roads would vastly exceed estimated revenue.

The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.
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<th>Author(s)</th>
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<tr>
<td>Johnson, Eleanor</td>
<td>This project will destroy habitat for migrating birds. Imagine flying over mountain streams and forest to rest where you know there is good habitat for you and your flock, only to find it is stripped bare of food and shelter, leaving you vulnerable to predators and hunger. The you fly down looking fora beetle or two and discover you are prey to the herbicidal application some human thought would make the job quicker and more permanent. So maybe its not the direct spray of herbicide but the dinner of bugs and leaf buds that does you or you mate in. Taking down tall pines and oaks constitutes killing wildlife and before you say that there is plenty of forest growth left, please look at photos of aerial views and see what has been done over the years when humans have moved into the forests.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
</tr>
<tr>
<td>Johnson, Eleanor</td>
<td>...I live in the north Georgia mountains, We find peace and quiet there, solace, which can be removed quickly if you proceed to act on such a large scale. Please rethink the value of the living environment over the value of the timber.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
</tr>
<tr>
<td>Johnson, Eleanor</td>
<td>These trees cannot regrow over night. These birds, animals, bugs, the whole web cannot just pick up and move because you want to sell timber. There has to be a stop to the destruction of what cannot be replaced, its not a building, its a forest, a home to layers of living breathing species.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
</tr>
<tr>
<td>Johnston, Rick</td>
<td>The aftermath is disastrous to wildlife as well as the rivers and streams. I live on a creek and see what is happening when building takes place upstream. We have had record amounts of rainfall over the last five years which only adds to excess amounts of silt.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats.</td>
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<td><a href="mailto:judyguitar@windstream.net">judyguitar@windstream.net</a>, Anon</td>
<td>I find the Cooper Creek logging plan to be an unconscionable act on a par with Flint MI. Destroying a healthy forest by logging and desecrating the watershed with harmful chemicals would have a lasting devastating effect on the environment.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td><a href="mailto:judyguitar@windstream.net">judyguitar@windstream.net</a>, Anon</td>
<td>I live in Dahlonega, a fast-growing university town not far south of the region involved. Cooper Creek is one of the main destinations for people to experience wilderness, i.e. tourism, escaping the city.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
</tr>
<tr>
<td><a href="mailto:judyguitar@windstream.net">judyguitar@windstream.net</a>, Anon</td>
<td>Erosion was what created Providence Canyon, a beautiful place, but no longer viable for farming because of misuse of the land. Most important, however, is what would happen to the clean water we are lucky to have available to us which would become contaminated from run-off. Please weigh the consequences of this project before making the wrong decision for the future of this treasure!</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
</tr>
<tr>
<td><a href="mailto:juli.parsons@gmail.com">juli.parsons@gmail.com</a>, Anon</td>
<td>Please rethink the logging project which is planned for the Cooper Creek Watershed. The forest CAN take care of itself. Trees grow in groves with other &quot;like minded&quot; trees. Their seeds sprout if they encounter environmental conditions favorable to their growth. There is no need to cut down old growth trees. They are magnificent. New ones will grow &quot;in the fullness of time.&quot;</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td><a href="mailto:juli.parsons@gmail.com">juli.parsons@gmail.com</a>, Anon</td>
<td>I am surprised that you would allow ANY logging in the Cooper Creek watershed after the severe flooding last fall.</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
</tr>
<tr>
<td>Katie, Anon</td>
<td>I am writing on behalf of north Georgia watershed project plans. This is devastating news I use to live in north Georgia and it is most beautiful untouched land it's natural beauty makes one feel alive. Let's think twice about this project under way remember the past it carries, it beauty, and the future it holds for our children and their children's children this earth is our home in which we need to treat with respect.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Kean, Judie</td>
<td>1. While it has been documented that the use of herbicides as a management tool will be limited to &quot;aquatically labeled herbicides&quot;, there are still toxicity and relevant water/soil interactions which remain questionable. Based on the CCWP, the suggested herbicide Triclopyr appears at first glance to provide ecological protection. While certainly not as toxic as other agents, this chemical remains in the soil for Project design features and mitigation measures for herbicides use are listed in d in section 2.4, and Appendix H of the Environmental Assessment. The effects of herbicide use on water quality are disclosed in section 3.4 (Water) and Appendix F (Risk Assessment).</td>
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<td>30–90 days and one of the degradation by-products of this breakdown is trichloropyridinol. This particular product can remain in the soil for up to one year and there is currently no scientific information regarding the toxicity profile. In addition &quot;run-off dynamics&quot; occur when the herbicides enter the water drainage system potentially threatening other non-targeted plants and organisms. Traces of triclopyr residues have been found at soil depths of 45 cm as late as 477 days after application (Newton et al. 1990).1 The Forest Service includes the use of &quot;Best Management Practices&quot; (BMP) for the use of herbicides; however the elements of unknown interactions and natural events place the use of herbicides as a poor management tool to be used in this environment. (Kreutzweiser et at (1991)2 suggest that water bodies can remain at risk of high contaminant levels in slow moving water bodies and shaded streams due to poor photodegradation. While the number of acres documented for herbicide application has been reduced from 3,251 acres (Alternative 2) to 1,327 acres (Alternative 3), the use of herbicides should be removed from all Alternatives. 2. Appendix I- Monitoring includes a list of potential issues and the type of monitoring to be included for this project. Testing of water bodies/soil/sediment/fish for herbicides should be included in this chart and conducted at the 3 month interval after herbicide application. Additional testing should be included as necessary.</td>
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<td>Author(s)</td>
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<tr>
<td>Kean, Judie</td>
<td>3. As documented in the draft EA, there is concern in regards to the enormous impact that will occur in the environment through commercial harvesting and thinning on such a large scale. One major impact is the construction and use of temporary roads (up to 3 miles) needed to handle commercial harvesting. Field studies included in the EA describe that the existing soil/sediment condition as moderate with the following notation: &quot;Most of this disturbance is the result of past management activities such as timber harvesting, road construction and maintenance, fire and recreation use. Ground-disturbing activities from forest management practices have the greatest chance in impacting soil productivity through erosion, compaction, rutting, and soil displacement.&quot; This useful background observation offers a good monitoring perspective of previous actions and represents direct risk limitations to proposed future actions. The balance between the focus of returning this forest area to a healthy and sustainable condition carries inherent environmental risks to soil/sediment and water interactions. The reduction of those risks could be gained through the removal of herbicide application and the reduction of scope in alternative 3 to a new Alternative 4.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats).</td>
</tr>
<tr>
<td>Keller, Mark</td>
<td>I support the plan outlined to bring the Coopers Creek watershed back into a more natural balance and state.</td>
<td>Thank-you for your Support</td>
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<td>Kibler, M.D., R.J.</td>
<td>I am writing to express my opposition to the &quot;Cooper Creek Watershed Project.&quot; I appreciate all the Forest Service does to protect our forests but this project, for the reasons so eloquently expressed by Mr. Tess Riddle of Ga. Forestwatch, should be discarded or modified significantly. Cooper Creek is a very special place which I have visited on a number of occasions.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>killmaster, charlie</td>
<td>I would like to voice my support of the proposed actions in the Cooper's Creek Watershed Project. Any action that will provide early successional habitat in the Chattahoochee National Forest is long overdue. Thanks</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>king, chase</td>
<td>I am reaching out to whom this concerns not for the selfish reasons I may have and the memories I hold dear with Coopers Creek but to participate in the overwhelming petition against cutting into the Chattahoochee National Forest's pristine climax forested areas. This kind of disturbance to Coopers Creek and its eco system's is avoidable. I am not going to act like I know what motivates the agenda of the Forest Service, however, they must be sympathetic to the long term consequences this plan will have on the forest. I support the Forest Service, its the cause and efforts put forth to &quot;care for the land and serving its people&quot;. Please, me and thousands of other people plead with you to put this plan where it belongs, in the campfire.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Kirkland, Diane</td>
<td>I've read that the purpose of the project is to improve the health of the forest, but research shows that Mother Nature &quot;knows&quot; what's best and can produce a much healthier and more diverse forest that we humans ever could. The Forest Service should simply protect our forest resources and stop trying to generate revenue. Please leave our forest alone and nature will take care of itself beautifully.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td><a href="mailto:kirkland3@comcast.net">kirkland3@comcast.net</a>, Anon</td>
<td>Proposed logging in the Cooper Creek area or others like it would be tragic. There does not seem to be any unhealthiness about this forest if, indeed, forests can be unhealthy. By this I mean, nature takes care of itself if the Forest Service doesn't meddle with it. And it amazes me to think that it could be profitable to the government. If so, it would only compound the tragedy. Please remember that I and others with these views in mind have an ownership stake here. Please refrain from this terrible plan. Thank you.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td><a href="mailto:kitecom@bellsouth.net">kitecom@bellsouth.net</a>, Anon</td>
<td>Thus I must speak out on your proposed massive timber project that would remove 30-80% of the trees from more than 2,000 acres within Cooper Creek area in Union County. This would be an undeniable atrocity due to the lack of true ecological justification.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Kittle, Kasandra</td>
<td>I believe the effects of the logging trucks on the area would be too devastating to the trout streams.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)</td>
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<tr>
<td>Kittle, Kasandra</td>
<td>I believe we need to leave our forests alone and build some old growth forests. Logging didn't help the Cohuttas back in the thirties, animal wise or tree wise. We need to create old growth forest's not cut them down. Please leave it alone.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td><a href="mailto:klbtctally1@comcast.net">klbtctally1@comcast.net</a>, Anon</td>
<td>Please keep up the good work and maybe send some your intelligent folks down here to Florida to help them manage.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Klem, Jamie</td>
<td>I am opposed to logging project in Coopers Creek and the Chattahoochee National Forest. I hike in these mountains and I am in favor of protecting the streams and tree stands for all the good and right reasons.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Knight, Bill</td>
<td>As a former grouse hunter, and I say former because there is no point in going any more, I'd like to say I support improving the habitat for all the successional forest dependant species. It has been a shame to see the species such as grouse and deer declinewith the transition to old growth forest! I am in favor of bringing back patch clear cutting in all of our national forests and WMAs. I basically stopped hunting the mountains in Georgia twenty years ago due to the decline of the bird populations there. I have been taking my hunting to other states since. I don't like feeling if I took a grouse , that it might be the last one there for many years! Just my $0,02 worth. Thank you for listening.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Knowlton, Elizabeth</td>
<td>It includes old growth forest as well as trees that will become old-growth if left alone.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Knowlton, Elizabeth</td>
<td>There is nothing unhealthy about leaving a well-watered, fertile area like this to its own devices.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Knowlton, Elizabeth</td>
<td>Enough logging has taken place in our national forests already.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Kostyrna, Jennifer</td>
<td>I strongly disagree with the plan to log large portions of mature (and even some old-growth) forest near Coopers Creek. This area is one of the most beautiful in Georgia - one of our family's favorite fishing and hiking areas. On our last hike along Duncan Ridge, we saw a couple of golden eagles for our first time in Georgia. It does not need &quot;rejuvenation&quot; or &quot;improvement.&quot; Trucking and hauling through these areas would be devastating. The scientific basis for this sort of woodland restoration in the Southern Appalachians is questionable at best. Create all the wildlife openings you want in the WMAs, but please do not &quot;restore&quot; this thriving forest.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Kramer-Dickie, Asa</td>
<td>I would like to voice my discontent with the proposed plan for the Cooper Creek Watershed Project in the Chattahoochee National Forest. This forest has survived for thousands of years without the help of humans, and if left alone, it will continue to do so for hundreds, maybe thousands, more. The reason for the state it is in today is due to logging, mining, and pollution in the area over the last 100 years, and more of that will do nothing to help the problem.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Kramer-Dickie, Asa</td>
<td>The roads that would be created for this plan, as well as the machinery required in the forest, will disrupt the growth and life of current species, and contribute to soil erosion in the area.</td>
<td>The EA analyzed the impact of roads in section 3.20 (Transportation) to the project area.</td>
</tr>
<tr>
<td>Kristy, Anon</td>
<td>This is a good thing. Our deer heard and grouse will thank you!</td>
<td>Thank-you for your Support</td>
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Kudro, Stephen

I wish to comment on the plan and to state my support for it in general terms.

The goals for ESF in the plan again appear to be minimal at best. While better than we've seen in the past, this still is on a small area of the Forest. As I understand it, the overall Forest plan states 5% ESF throughout the forest.

Additionally in my experience in seeing the cutting that has been done, both here and in other Forests in TN and NC, it shows a lack of diversity in the areas cut. The areas that would provide regeneration most beneficial to wildlife, particularly riparian and so-call "rich cove" areas, in other words moist areas are underrepresented to the point that they are extremely rare. If done properly this sort of cutting can be done with no effect on streams and water quality.

Given the lack of habitat diversity in the Forest at this point, it's hard for me to believe that the professional in FS couldn't make a better case for more ESF. Just north of us, in the Nantahala NF, much more of this work is being done, to the benefit of many species and to the users of the Forest as well.

Kunselman, David

Start logging the hell out of these national forests so that ruffed grouse, woodcock, songbirds, rabbits, etc. have habitat to survive.

Kyle, Anon

Glad to see the work on coopers creek being done. Would like to see more along the mountain wmas and national forest land. Would really like to see more timber cutting of old growth woods as alot of it has peaked out and dying

Thank-you for your Support
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<td>Lance, Will</td>
<td>Regarding the proposed Cooper Creek Watershed Project it's very difficult to see how humans coming in, cutting and setting fire to extensive areas of the forest with however potentially good of intentions, are in fact &quot;restoring the forest&quot; to natural conditions. That sounds more like just an excuse for making money off our national forest's trees and by catering to hunters who are also your paying customers (more planted wildlife fields within the Cooper Creek Wildlife Management Area for your hunter/customer clientele). As a hunter myself for the past 25 years I have to say that I thoroughly do not agree with the concept of wildlife management areas whereby the Forest Service in effect becomes a for profit business venture with notions of &quot;managing&quot; forest &quot;resources&quot; for the hunters who become their customers. The Forest Service is there to protect our natural areas for the entire public not to make profits off them.</td>
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<td>Lance, Will</td>
<td>Further the Appalachians are not the Rocky Mountains and don't naturally have parks/meadows interspersed among the forest. In lush eastern forests such as the Cooper Creek watershed there would be fires from time to time, but rarely would there be crown fires which would be necessary for opening up meadows in the forest. Instead the many streams and misty fogs would typically have prevented the vast majority of crown fires from happening in the first place or from becoming extensive when they did occur.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and Non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value. Prescribed fire will be applied through a site specific prescribed fire plan, designed to meet the objectives of the EA for each site specific location.</td>
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Also I don't agree with the wording of the study where it claims that there are areas where little to no light reaches the forest floor. This claim is not true because plenty of light reaches and supports an abundance of undergrowth such as wildflowers and rhododendrons in places near the many streams of the area. The way the forest is naturally set up is that wildlife finds cover mostly along the dense undergrowth of streams and food among the mostly hardwood covered slopes which provide mast in the form of oak, hickory, etc nuts. Meadows are not a common natural feature of the watershed area and when they have appeared historically due to crown fires they were VERY short lived and would grow back into the dominant forest cover within a few months or years-rather than indefinitely remain open meadows as the Forest Service wants to "manage" them in the Cooper Creek Watershed Project.

If the Forest Service wants to change any policy regarding the Cooper Creek Watershed it should be to make it a designated wilderness area like Cohutta or the Brasstown Wilderness Area.

Cooper Creek is a stunningly beautiful Appalachian cove forest blessed with maturing trees of very rich diversity. It also still has some of the largest old growth hemlock stands in the Southeast, if not the entire country, and these all deserve much better protection (not less) and the chance to once again become the pristine old growth forest they historically were.

As demonstrated from the departure analysis conducted as part of this project(See section 3.7 Major Forest Communities of the EA) although there are some limited areas with open canopies in the project area, the majority is in closed canopy conditions. Primarily due to the lack of fire for many years, the forest of the area are much less open that they would have historically been. On exposed slopes and ridgetops these open canopy conditions would have allow the development of grassy/herbaceous understories in portions of these areas.

This comment is outside of the scope of the project.

The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.
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<td>Lane, Tracey</td>
<td>Please leave this forest alone.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Larry, Anon</td>
<td>I support them as is in full.</td>
<td>Thank-you for your Support</td>
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<td><a href="mailto:larryluckett@windstream.net">larryluckett@windstream.net</a>,</td>
<td>PRESCRIBED BURNING- My concern here is that the implication for the thousands of acres to be PB over a 10 year period will create some early successional forest habitat (ESFH). If I interpret the EA correctly, the same areas will be PB on a very short rotation. If that is the case, it will create more of grass/forb seral stage than the ESFH with vertical stem density, which is more critical in this watershed than grass/forb habitat. There will be some ESFH created as portions of the landscape during a PB will become hot enough to remove enough tree canopy thru mortality to initiate that vertical stem growth. However, under the PB parameters allowed this will be minimal and will be negated during the next PB if burned on a very short cycle. Additionally, PB such large areas at one time will certainly be more cost efficient and help to make targets. However, it will reduce the effectiveness of wildlife habitat creation rather than PB smaller acreages in patches across the CCW. Concentrate your PB in those areas you have thinned to get the maximum benefit from PB and reduce the size per PB.</td>
<td>Frequent, moderate-intensity prescribed fires can topkill young seedling and saplings, reducing the availability of early successional forest for species like ruffed grouse, woodcock, and rabbits. In response to this concern which was raised in scoping, in Alternative 3 the locations of many of the stands to be regenerated were shifted to include stands on the lower portions of the slopes where fire intensity would be reduced and/or in areas outside of prescribed burning blocks.</td>
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<tr>
<td>Anon</td>
<td>COMMERCIAL THINNING-The Fast Facts sheet indicates that 20 to 60 trees per acre would remain per acre. Not sure exactly how this relates to BA, a more common term that most wildlife biologists and foresters can relate to, but my feeling is that unless the majority of the thinned stands are in the 20-30 trees per acre range not enough sunlight will reach the forest floor and benefits will be minimum. Thin to the lowest number of trees per acre allowable to have the best response to this activity.</td>
<td>There is a large range when talking trees per acre retained following the harvest treatment. This is largely due to the variation of tree sizes found across the area and capture them all in one statement. As for BA, we hope to achieve a mix of retained basal areas determined by the treatment and the ecological type found where the treatment is implemented. Basal areas will range from 30 in the most driest sites where woodland restoration is the treatment, to 80, where forest health in the more mesic ecological types are found. The bulk of the project will range from 50-60 BA, which depending on tree size and diameters, can still leave a wide range of the number of trees per acres following harvest.</td>
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<td><a href="mailto:larryluckett@windstream.net">larryluckett@windstream.net</a>,</td>
<td>NON-COMMERCIAL THINNING-Without cruising or looking at these proposed stands, am assuming that the volumes and quality of trees prohibit a commercial thinning. Your job certainly is not to consider current or future budgets in your analysis, but there is absolutely no way the current or short term future budgets will fund this, particularly with fire taking over half the annual budget of the Forest Service. Where possible include these stands in the commercial thinning portion to actually allow this practice to occur and provide benefits.</td>
<td>The opportunity to accomplish the non-commercial aspect of the project can come from a variety of sources. How it will be funded has not been decided at this time (either through the timber sale or as a stand alone project).</td>
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<td>Anon</td>
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<td><a href="mailto:larryluckett@windstream.net">larryluckett@windstream.net</a>,</td>
<td>OLD GROWTH CREATION- There is simply no need to target stands for this. There is adequate amount of these stands which will be retained thru simply being too steep, along recreational trails, riparian areas, economically unfeasible, etc. I would only assume this is a gesture that was necessary to the preservationist community. Where possible confine Old Growth Retention to the above mentioned stands to minimize future wildlife and timber management opportunities. Keep in mind any stand is future old growth given enough time.</td>
<td>The Forest LRMP mandates that in any given watershed where a project occurs in a 6th level HUC containing over 1,000 acres, a minimum of 5% of the acreage has to reserved for Old Growth, LRMP page 2-17 FW-044.</td>
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<td>Anon</td>
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ESFH CREATION-I am encouraged that there is going to be some ESFH thru several methods proposed which will create the vertical stem density needed for both game and non-game species. Quick analysis appears that the majority of this is on dry sites. However, it is a very small percentage compared to the size of the watershed. I am also concerned the Canopy Gap treatment although more sensitive to the preservationist zealots, the beneficial effects will be minimized by the small size of 1/4-1/2 acre which reduces the amount of sunlight reaching the forest floor as a result of shading and slope thereby negating any desirable outcomes from this treatment. Additionally, the Forest and Region has repeatedly said that we are not harvesting trees simply for commercial purposes but for accomplish restoration goals and wildlife habitat creation. If so, why are you not considering EAM management, a.k.a. clearcutting as a harvesting technique? It certainly requires less road building, is more cost efficient, and maximum wildlife benefit is realized and is a proven silvicultural technique in the Appalachian mountains. Increase the amount of creation of ESFH through commercial timber harvest across all sites including mesic ones, increase the size of opening in your canopy gap treatment, and consider EAM as a vegetative management technique.

The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.
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<td><a href="mailto:larryluckett@windstream.net">larryluckett@windstream.net</a>, Anon</td>
<td>Where possible maximize the benefits from road construction/reconstruction by daylighting the sides of the road thru commercial timber harvest (which will add in drying the road out for travel, retention of vegetative cover, reducing erosion, etc.) and reseeding to a favorable perennial wildlife mixture. In summary, I would recommend you choose Alternative 2, particularly in the Successional Stage Forest and Habitat portions along with my recommendations.</td>
<td>The daylighting of roads to create ESFH is already proposed in the Cooper Creek Watershed project. Two closed wildlife opening access roads, totaling approximately 1 mile will be daylighted to provide additional early successional forest habitat. The stands within 100 feet either side of these roads will be commercially thinned to approximately 20 square feet of basal area.</td>
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<tr>
<td>Lavender, John</td>
<td>I support the proposed plan to improve the habitat at coopers creek watershed</td>
<td>Thank-you for your Support</td>
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<td>Lawson, Charles</td>
<td>I am in favor of the Copper Creek Watershed Project. I think all our forest needs to be maintained for the maximum benefit for all fish and wild life. This includes timber harvest, control burns, wildlife openings, food plots and all other sound management practices.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Leigh, Danny</td>
<td>I am all for the Coopers Creek Watershed project improvements. It's been too long that the national forest has not been selectively cut and unfortunately the wildlife has suffered. I hope that the burning and thinning will help bring back the grouse population and I'm sure it will help both the game and non-game populations. I love fishing in the trout streams in the area and try to hunt there a couple times of year even though it is over 2 hours away from the house.</td>
<td>Thank-you for your Support</td>
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<td>Lenzen, Jane</td>
<td>Older people need to maintain as much &quot;wild spaces&quot; as possible for future generations. Old growth forests need not be decimated for financial gain. The environmental cost is too high.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Letters, Students</td>
<td>I am Marta Obio's and I am learning about John Muir and about Naturalists. My family and I love camping in the forest and climbing trees. I found out that you are planning on cutting 3700 acres of my favorite forest. Please consider not cutting so many trees cause that will affect the erosion and will bother the life of the animals living there. Like John Muir said &quot;When we try to pick out anything by itself we find it hitched to everything else in the universe.&quot; Sincerely, Marta</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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Dear Ranger Baker hi my name is Kaitlyn I am 8. Natrolists and one of the things I am studying and animals. I love camping and hiking and swimming and animals, I found out that you want to cut too many trees 3700 acres recently on steep slopes, and the trees are animals homes so if you are killing animals. Kaitlyn. Don't cut down so many trees. Thank you Kaitlyn
Dear Ranger Baker, My name is Javy McGinnis. Copper Creek woods are important. Please don't cut down so many trees. I have been to the Chattahoochee National Forest. I have seen frogs and I have seen fish. Please save the forest!! Sincerely, Javy

Dear Ranger Baker, My name is Mateo I am 10 years old. I love the woods and I love to plan in the woods and I like to camp and I don't want the woods to go away. I have been to the Chattahoochee National forest. It is one of my favorite places. I have seen a deer there and a fish and raccoon tracks, and if you do need to cut down the trees please don't cut so many! because it can cause erosion and it can cause problems for the river and fish. Please don't cut down the forest! Sincerely, Mateo McGinnis

Dear Ranger Baker, I am Afrika I just studied John Muir I love to climb trees and go camping. I am ten years old I am in fourth grade. I found out that you are planning to cut down 3700 trees in one of my favorite places. Please don't cut down that many trees. especially if there on steep slopes.!! thank you.!! Sincerely, Afrika

Dear baker, I am Audrey Bell, I am 10. I am learning about John Muir. I love the forest. I love animals. I found out that you are cutting down a lot of trees. Please don't cut so miny trees because it herts the environment, like erosion when you cut down the trees thay have berd nest in thim and then thay have no home to stay. From Audrey Bell PS: I hope you
chanch your mind.

Dear Baker, im Konji Jordan Im lerning about John Muir and I like tree climbing and the woods I found out that you are cutting down trees I don't like it bekus it herts the animals and trees he environment and eroson. We need trees to clean the air.

Dear Ranger Baker, I am Jaume Gorman, and I am 12 years old. My class has been studying John Muir. If you don't know wo John Muir is, he was a famous naturalist. He really loved nature and so do I. I especially love Cooper Creek. And I heard you were planning on cutting down 3700 acres in that area, an opportunity for business, but not for fans. I have recently been there and I think it is a beautiful place and full of nature. If your going to cut down these trees, please consider not cutting them on steep slopes, or not cutting them a all!! Please consider this beautiful area and other people that haven't seen it before.
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<td>Lewis-Weis, Lyn</td>
<td>It is well known that wildlife depend on the amount and distribution of suitable habitats. The current state and distribution of habitats on the Blue Ridge District does not provide for the diversity, abundance and sustainability of many wildlife species that it should. In particular, wild turkey, golden-winged warbler, ruffed grouse, cerulean warbler, American woodcock, prairie warbler, and others. All benefit from open woodlands, regenerating forests, and other early successional habitats. This project, although inadequate to address the overall needs of species that benefit from early successional habitats, is a start in the right direction. We encourage you to do even more.</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created with the Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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<td>Lewis-Weis, Lyn</td>
<td>Implementing forest management projects on public lands in the mountains has been difficult over the past few decades. That extended period of low to absent active forest management has had unintended deleterious effects on grass and forb communities, insect diversity and abundance, understory composition, and structural diversity across the landscape.</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created with the Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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Fire has been an integral part of shaping the forested habitats of the north Georgia mountains for centuries. With the onset of civilization and modernization it has become a 'process interrupted'. Development of plans and executing prescribed burns, allows the Forest Service to mimic the results of fire, restore some of the ecosystem relationships that have deteriorated over time, and is the next best thing (from a fire perspective) to what used to be the norm. It is unclear why only 11,000+ of the nearly 30,000 acre project area is scheduled for burning. On a 3-4 year schedule it would seem that at least half to 2/3 or more of the area would be eligible to see fire on the landscape. Growing season burns are more effective from an herbaceous response/grass development/hardwood control/wildlife habitat perspective. Dormant season burns are more suited for fuel reduction, WUI protection, and limiting effects of catastrophic wildfire. The NWTF would like to see the use of growing season burns be used more often whenever possible. A final thought on the subject, although currently you are covering prescribed burning in individual EA's, in the future, it may be a practice more suitable for a District wide EA that would likely encompass considerably more of the landscape.

Increasing nesting, brood rearing, and summer foraging habitat for ground nesting birds, rabbits, and other small mammals is especially needed in the Georgia mountains, and is good for everything higher up the food chain. The combined use of Woodland Restoration (Goal 3, Obj. 3, 4), Oak/Oak-Pine Thinning (Goal 3, Obj. 3.7), Pine/Pine-Oak Thinning (White Pine Removal) (Goal 3, Obj. 3.6) and, frequent prescribed fire is an example of how to establish and maintain healthy forest ecosystems.

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<td>Lewis-Weis, Lynn</td>
<td>Fire has been an integral part of shaping the forested habitats of the</td>
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<td>Development of plans and executing prescribed burns, allows the Forest</td>
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<td>wide EA that would likely encompass considerably more of the landscape.</td>
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maintain this structural habitat component of the Forest. The NWTF would like to see these companion activities become increasingly more commonplace on the Blue Ridge District. In addition, the closer the thinning residual basal area is to 60, the better prescribed burning will perform in the development of ground cover, midstory control, and managing forest composition over time. In addition, given the rather large area being considered in this project, the number of acres treated using these techniques would be expected to be in the 4,000 to 6,000 acre range for this entry.

3. It appears from the project descriptions that oak regeneration is the more important driver in Canopy Gap Thinning (Goal 7, Obj. 7.1), Mid-story Treatment (Goal 3, Obj. 3.7), and Release (Goal 3, Obj. 3.7). The emphasis on mast (hard and soft) trees in the overstory, and in regeneration, is indeed an essential component of the current and future stands scheduled for treatment. It is equally important however from a wildlife perspective (especially on the south facing slopes), to incorporate frequent prescribed burning in the long term maintenance and development of the composition and structural diversity of these important sites. A variety of wildlife will key in on primarily seasonal food sources (forage, seeds, and insects) from the increased sunlit conditions, as well as for thermal cover on these southern exposures. Again, the implementation of these companion activities is extremely important for the development of quality habitat.

The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.
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<td>Lewis-Weis, Lynn</td>
<td>Regenerating forests provide an ephemeral type of early successional habitat that literally grows into other habitats over time, thus contributing to a diversity of habitat conditions on the District far into the future. For instance, one year old regenerated areas provide a unique habitat, three year old regenerated areas provides another type of unique habitat, the seven year old regenerated area yet another, and so on. There is no question that it is essential the Early Successional Forest Habitat (Geal 2) be a part of the management scheme of forested conditions in the mountains. It needs to be said National Wild Turkey Federation Coopers Creek Watershed Project Comments Submitted to the Forest Service 5 February 2016 that clearcutting is not a bad thing, it is just another technique to use when the circumstances dictate it. Given the current distribution of habitats that exist on the District, we encourage you to incorporate creating young forest early successional habitat using techniques described in the Coopers Creek EA, clearcutting, and other methods in future projects to bring the age class distribution into more of a balance. A total of 253 acres in the proposed alternative entering this habitat condition is somewhat small compared to the size of the area considered in this project. Although there may be limitations that are not readily apparent in reading through the Coopers Creek EA, a more reasonable objective for regenerating forests contributing to early successional habitat in the area should be somewhere in the 1,500 to 2,400 acre range.</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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<td>Lewis-Weis, Lynn</td>
<td>Roads are the lifeline of a forest. They provide access to do work, manage fire, conduct search and rescue, and are avenues of entry (by foot, or by vehicle) used by thousands of people to hunt, fish, birdwatch, hike, and otherwise enjoy what the Forest has to offer. It is important to recognize that you have identified repair, maintenance, as well as future management of the road system servicing the area. Revegetating and maintaining closed roads essentially creates a 'wildlife corridor' for the animals that live there as well as the people that enjoy them. We recommend you consider their function in providing food, cover, and travel ways for wildlife as you change management of portions of the road system. Keep these corridors open to create food and cover for wildlife, manage to enhance conditions through daylighting, mastication, or other means and, maintain corridors considering wildlife benefits. We are not in favor of decommissioning a road unless it is absolutely necessary to address issues like soil erosion.</td>
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<td>Thank-you for your support</td>
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Lewis-Weis, Lynn

The National Wild Turkey Federation is dedicated to the conservation of the wild turkey and the preservation of our hunting heritage. In the north Georgia Mountains, young oak forests, woodlands, and savannahs are critical to all forest wildlife. Oak-dominated forests require active management, such as timber harvest, thinning, and prescribed fire for healthy wildlife as well as healthy forests. It is the expressed desire of the NWTF to encourage, contribute to, and support the Chattahoochee National Forest in the identification, design, and implementation of resource management activities that create, maintain, and improve habitats for wildlife. For instance, you have access to information that identifies sparse, low quality, damaged, and inadequately stocked stands; they should be a priority for treatment on your District. You also have access to age class distributions, forest types, and a separate departure analysis that would provide a basis for structuring a 'balanced' distribution of structural habitat conditions to achieve in an area. The NWTF prefers that you implement all practices that achieve wildlife habitat goals and objectives in the Cooper's Creek Watershed now (with this project), rather than later (incrementally through future projects).

Lewis-Weis, Lynn

The Cooper’s Creek Watershed Project captures the essence of what the NWTF is striving for, and we request that you to fully implement actions described in the selected alternative. In the same breath, we would encourage you to consider expanding some of the activities in this project, and increase the acres considered for treatment in future projects across the District to achieve a more balanced distribution of habitat conditions in our lifetime.

The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created with each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.

Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:

Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial
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<td>logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner. Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife. Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and</td>
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<td>Lois Curry, Larry</td>
<td>I believe the Forest Service people have the best of intentions, but hope they pause and consider that their idea of a &quot;perfect&quot; forest is one stage frozen in time. What is so beautiful about an old-growth forest is its continued development. Please shed the burden of &quot;managing&quot; it.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Long, Amy</td>
<td>By attempting to turn the area into what we THINK it should be, we will destroy it. Logging trucks will destroy the landscape; new roads will likely have to be created</td>
<td>The EA analyzed the impact of roads in section 3.20 (Transportation) to the project area.</td>
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<tr>
<td>Long, Amy</td>
<td>Habitat WILL be disrupted for any and all plant and animal species in this area</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<tr>
<td>Long, Amy</td>
<td>There will be noise pollution, air pollution, and run-off pollution, which will end up in water. And seriously...... herbicides? This is one of the biggest contaminants known.</td>
<td>Project design features and mitigation measures for herbicides use are listed in section 2.4, and Appendix H of the Environmental Assessment. The effects of herbicide use on water quality are disclosed in section 3.4 (Water) and Appendix F (Risk Assessment).</td>
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<td>Long, Amy</td>
<td>Will there be no wild places untouched by man for future generations to see?</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
</tr>
<tr>
<td>Lozott, Herb</td>
<td>President Reagan said (paraphrased), the biggest fear you can imagine, is someone saying &quot;I'm from the government, I'm here to help&quot;.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Lunsford, William</td>
<td>I agree with the forest service logging the cooper creek wma. I wish that you would continue doing this on more government land and burning off more land in the future. It will help the wildlife and create a better outdoor experience for all.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Macbeth, John</td>
<td>Clear cutting old growth forest is highly destructive</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Macbeth, John</td>
<td>The damage to the land and water would Far exceed any possible benefit.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
</tr>
<tr>
<td>Macbeth, Mary</td>
<td>I think it is deplorable that profit supersedes destruction of creeks,wildlife And old growth forest.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>MacDougald, Paul</td>
<td>I care about the Chattahoochee National Forest. I demand: 1. No cutting north of Duncan Ridge! 2. No cutting on steep slopes! 3. 200 acres plus for no clear cuts on old cuts!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>MacGregor, Jane</td>
<td>The plan to harvest trees in the Cooper Creek Watershed will upset the natural progression of a forest and will surely cause erosion and sedimentation problems in the watershed despite human efforts to the contrary. As a member of the Georgia Botanical Society and the Georgia Native Plant Society I urge you to cancel this project and let the natural progression of the old growth forest continue.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Maloof, Joan</td>
<td>The Old-Growth Forest Network membership stands firmly opposed to this logging plan. Scientific studies show that unmanaged forests have greater biodiversity than managed forests. This particular public forest should be left unmanaged.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Marcus, David</td>
<td>Please - modify the Cooper Creek proposal to put science-based ecological restoration and access to low impact recreation ahead of timber sales.</td>
<td>The purpose of this project is to meet the ecological restoration goals outlined in the Forest Land and Management Plan of the Chattahoochee - Oconee National Forest. Commercial timber sales are only one tool to accomplish those goals and they produce some revenue to fund non-commercial tools to help meet those goals.</td>
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<td>Marie1, Anon</td>
<td>How can cutting over 80% of the stands in the watershed of Bryant Creek (along with the roads built to harvest the timber) be an improvement? The expected erosion will most certainly not be an improvement for the trout streams therein.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public’s ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td>Marie1, Anon</td>
<td>How can cutting an old-growth stand with healthy oak and towering white pines be an improvement? The wildlife that value the acorns will not improve. It is not an improvement for those of us who frequently enjoy this area.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>Marie1, Anon</td>
<td>What is your basis for claiming that a dense forest canopy will limit hardwood tree diversity and wildlife habitat in our Southern Appalachian areas? Our abundant rainfall and fertile soils naturally lead to dense canopies. Does the Forest Service really believe they can or should do better than the natural course? The forest in this area is still recovering from the last round of logging. What evidence do you have that that the area in question was ever a woodland? If you do not have such evidence, then where is the rationale for cutting to &quot;restore&quot; woodlands by cutting as much as 80% of the trees on 720 acres?</td>
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<td>Maxwell, Victoria</td>
<td>As a 15+ year resident of Union County I care deeply about our National Forests, preserves, watersheds &amp; the bottom line is I care about the trees. I am totally unconditionally opposed to the Coopers Creek Watershed Project #44385 &amp; find it to be disastrous &amp; detrimental to move forward in this direction - once these steps are taken then can never ever be taken back nor can the loss be repaired. Please please please DO NOT proceed with this Project.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>McDonald, Rick</td>
<td>Please abandon plans to cut the old growth trees in this area on such a massive scale. Surely there are better uses of FS resources than to pursue this unnecessary and unwanted project. If cutting must occur, confine it to those areas that were planted two or three decades ago and leave the mature oaks and pines untouched.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>McGrath, Kevin</td>
<td>I support Coopers Creek Watershed Project #44385 including selective timber harvesting and controlled burning. These actions will make the habitat healthier.</td>
<td>Thank-you for your Support</td>
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Mckeral, Jim

As an avid sportsman I have hunted and fished on Coopers Creek since the 1970's. Your forest analysis is correct in that this forest desperately needs prescribed burning and selected timber harvesting. In my lifetime I have seen deer, and grouse populations plummet to the point of serious concern. I actually would like to see even more forest management to create larger areas of early successional forest than the suggested plan proposes. Additionally, I think this area would benefit from more and larger food plots because in years with poor acorn crops this is a vital food source. Thank you for considering my Comments.

Response

Thank-you for your Support

McKeral, Jimmie

To whom it may concern,

I have spent the past 20 years hunting, fishing, and camping in coopers creek. From turkeys and trout in the spring, to deer and bear in the fall. Over that time, I have seen the amount of wildlife and the health of the forest steadily decline. I believe the 5 year study conducted reflects this as well. I am wholeheartedly in SUPPORT of the proposed management plan. I would even encourage MORE efforts of a similar nature, to include clear cutting, more timber harvesting, planting of food plots in conjunction with more early succession forest throughout the area. Please move forward with this management plan and do not allow the voices of some who have never even been on this awesome piece of land stop good forest management.

Response

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<td>McKeral, Tiffany</td>
<td>would like to express my SUPPORT for the proposed management plan. As a Blairsville resident, I am very familiar with the cooper's creek area and the decline it has experienced over the past few years. As an outdoorswoman, I know first hand the repercussions of an unhealthy forest. I have seen numbers of deer, turkey and other wildlife steadily decline as the forest became more and more unhealthy. Please go ahead with this plan, and consider doing even more timber harvesting, thinning, clear cutting, and burning. The wildlife need a healthy forest.</td>
<td>Thank-you for your Support.</td>
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<td>McMillan, Linda</td>
<td>I don't understand why issues like this keep coming up. The forests can maintain themselves just fine and in the process protect the streams and all the life forms that depend on its health. The earth is very sick and developing a temperature. The earth needs all the protection it can get!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>McMillan, Linda</td>
<td>I do not trust the current leaders/government in Atlanta to protect the &quot;commons&quot; in any way. My fear is they want to turn everything over to PRIVATE corporations/cronies like they have done Georgia State Parks in north Georgia!</td>
<td>This comment is outside of the scope of the project.</td>
</tr>
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<td>McNall, Pam</td>
<td>* The Forest Service claims that a dense forest canopy is unhealthy, &quot;limiting hardwood tree diversity and wildlife habitat.&quot; But abundant rainfall and fertile soils naturally lead to dense canopies on most Southern Appalachian sites. As trees age, some fall and create small openings that provide wildlife habitat and high light for young trees to grow. This process is already happening in the project area, and will increase as the forest continues to recover from the last round of logging.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>McSwain, Rebecca</td>
<td>Based on the enormous area proposed for cutting, and the density of existing forest, removal of these trees will, without a doubt, adversely affect the watersheds in that area, threatening water quality and jeopardizing some of the best native brook trout streams in Georgia.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats</td>
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<td>McSwain, Rebecca</td>
<td>The Forest Service is proposing to cut an area of mature, healthy oaks and towering white pines. Mature forests with their acorns and pine seeds are important food sources for a wide variety of wildlife, and old trees provide much-needed nesting places.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
</tr>
<tr>
<td>McSwain, Rebecca</td>
<td>If the Forest Service wishes to create additional open areas in the National Forest, there are many candidate areas I've seen which I can only describe as &quot;ugly.&quot; These contain scruffy growth from previous clear cuttings. Removing those scruffy trees and opening those areas would be a plus for wildlife and for the health of those forest. And opening those areas would do much less environmental damage than removing the mature forest proposed in the Cooper Creek project.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
</tr>
<tr>
<td>Meadows, Jack</td>
<td>I am requesting that you not proceed with your proposal for Coopers Creek Watershed. Removing timber in such a place puts strain on the environment, takes away the natural layers of protection afforded by the multitude of growth from moss to tall oaks.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Meadows, Jack</td>
<td>Trees are more than mere commodities. Please do not proceed.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Meadows, Jack</td>
<td>The forest also breathes for all of us, offers home to a myriad of wildlife. It is a place of peace and tranquility that will be irrevocably change by this destruction called sale of timber.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td><a href="mailto:melanie@bassdesigns.com">melanie@bassdesigns.com</a>, Anon</td>
<td>Please do not cut the 1,500 acres in and around Bryant Creek and Pretty Branch as this would threaten some of the best native brook trout streams in Georgia</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.</td>
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<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td><a href="mailto:melanie@bassdesigns.com">melanie@bassdesigns.com</a>, Anon</td>
<td>Cutting should ONLY occur where management is needed, in younger stands that were clear-cut in the 1970s and 1980s. Without having evidence that woodlands ever occurred in the Cooper Creek watershed, attempting to &quot;restore&quot; woodlands in this area would be unsustainable. Moving forward with these proposed treatments would destroy some of the best examples of mature, healthy oak forests and towering white pines in the Chattahoochee National Forest. Preserving our streams, old-growth forests, and our irreplaceable soils must become a matter of priority. The SE is listed as one of the most threatened areas for tree canopy loss in the world. What is even more important to recognize is that our forests, lands and waters hold more bio-diversity than anyplace else in the world- making the Chattahoochee National Forest a world class environment. Additionally, science is just beginning to understand the significant role that old-growth soils play in ecology, carbon sequestering, human health and a host of other discoveries waiting to be studied. In other other words, we have our own native &quot;rain forest&quot; right here in our back yard.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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meryllc, Anon

As a citizen and registered voter I would like to let you know that I am against the proposal to commercially log in the Cooper Creek watershed. This would have a detrimental effect on this beautiful area for many years to come, and is a poor example of proper stewardship of our natural resources. Please do not approve this proposal with its resulting destruction of mature forest and native trout stream.

We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).
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<td>Meyers, Kitty</td>
<td>Over 80% of the stands in the watershed of Bryant Creek will be cut, threatening one of the best native trout streams in Georgia. Timber harvest activities, including the extensive road system that must be built to harvest timber, will increase soil erosion and raise water temperatures.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td>Meyers, Kitty</td>
<td>Over 300 acres of commercial logging are proposed in an area that the Forest Service previously designated for dispersed recreation and &quot;unsuitable for timber production.&quot;</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Meyers, Kitty</td>
<td>The Forest Service is proposing to cut some of the best examples of mature, healthy oak forests and towering white pines. This includes one of only two old-growth stands in the area</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Meyers, Kitty</td>
<td>Mature oak forests have high wildlife value because acorns are an important food source for a wide variety of species.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>Meyers, Kitty</td>
<td>The Forest Service claims that a dense forest canopy is unhealthy, &quot;limiting hardwood tree diversity and wildlife habitat.&quot; But abundant rainfall and fertile soils naturally lead to dense canopies on most Southern Appalachian sites. As trees age, some fall and create small openings that provide wildlife habitat and high light for young trees to grow. This process is already happening in the project area, and will increase as the forest continues to recover from the last round of logging.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Meyers, Kitty</td>
<td>As much as 80% of the trees on 720 acres will be cut to &quot;restore&quot; woodlands (open stands with more sky than tree cover). But there is no evidence that woodland ever occurred naturally in the area. Herbicide will be used extensively to prevent trees from growing back in these artificial woodlands.</td>
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<td>Mike, Anon</td>
<td>Cutting the old growth forest there would be a great injustice to the citizens of Georgia. I have seen many changes it the area over the years</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Mike, Anon</td>
<td>With the increased clearing of private land around the WMA it makes no sense the clear the public land. The only reason for this in to make money off of our land. Please stop destroying all the great natural resources in Georgia for your agents gain.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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| Mitchell, Katherine | Thank you for opening this plan to thin trees to comment and for all your efforts on behalf of our forests.  
>     
> This time though, I must object to the plan to thin trees. I believe that our forests have evolved to be capable of managing their own rejuvenation without our interference. I hope the magnificent trees in question will be left standing. | The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative. |
<p>| Mitchell, Molly   | feel that the timber sale as currently proposed would have a serious, negative impact on the recreation dollars that this area brings to Union County. | The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users. |
| Mitchell, Molly   | The timber cut would devastate 90 year old growth forests, pollute crystal-clear trout streams and further erosion | The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.                                                                                   |
| Mohr, Will        | Sounds like a great plan. Please stick to it.                            | Thank-you for your Support                                                                                                                                                     |
| Mohr, Will        | If we are going to improve the habitat shouldn't we re stock the upland game birds and deer. | The Georgia Department of Natural Resources has the responsibility for changes to hunting regulations and the stocking of wildlife and is outside the scope of this project. |</p>
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<td>Monte, Anon</td>
<td>You continue to confuse the issue with your definitions of early successional forest habitat (ESFH) and early &quot;successional &quot; habitat (ESH). ESFH by your definition is what most biologists recognize as ESH. There is nothing &quot;successional&quot; about your definition of ESH, which includes permanent wildlife openings, pastures, fields, R/W's and even open woodland. They are in a permanent or semi-permanent condition that does not change from year to year. The difference is critical when you are describing specific habitat required by different species of wildlife. One is true regenerating forest, with stem density (woody vegetation) critical to different species at varying levels of density. The other is an understory of grass, forbs, and or weeds with no woody stem density. Just call it what it is, Permanent Grass/Forb Wildlife Habitat, and your readers will certainly be less confused and have a better understanding of the purpose. Both conditions serve different wildlife communities, with some &quot;generalists&quot; utilizing both, but the need for true &quot;successional &quot; forest habitat is far more critical than pastures, fields, and R/W's, which are common in most areas surrounding the National Forests.</td>
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<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Monte, Anon</td>
<td>Frankly, I don't understand why there is so much emphasis currently on restoring &quot;Open Woodlands&quot; in the Appalachian mountains. There is no proof that such conditions were ever prevalent in the mountains. There is little or no evidence of such widespread conditions during turn of the century logging. Even if historians &quot;assumptions&quot; are even close to being correct, that the Indians burned these mountains so heavily and continuously that such conditions were fairly common, what is the esoteric reason that we should try to emulate them?</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Monte, Anon</td>
<td>There are problems with continuous burning, prescribed or wildfire, on steep terrain!</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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Monte, Anon

You state that the majority of the ESFH is proposed in prescribed burn blocks. With a 3-5 year burning rotation, you certainly aren't going to maintain woody stem density, as you claim on pages 98 and 99. If the rotational burning isn't to create a grassy understory instead of dense woody saplings, just what is the purpose? In fact, you state in the last paragraph on page 96 that ESH "over time, becomes dominated by grasses and forbs, rather than the woody growth of trees and shrubs which dominate ESFH". You later state on page 98 "The existing small pockets of young forest (approximately 228 acres) that has primarily been created and maintained through prescribed burning" etc. What makes you think you can have it "both ways" (woody stems and an open grassy understory)? That would be quite a feat, and would command utmost respect for Forest personnel's managerial capabilities! I think you should strike the words "successional" and "shrub" from the phrase "early successional grass/forb/shrub woodland habitat" in order to give a more accurate depiction.

Under the canopy gap writeup on page 98 you describe them as one quarter to one half acre in size. Then on page 99 you point out that in addition to maintaining ESFH with prescribed fire, it will "potentially" provide additional small canopy gaps (less than two acres in size) of ESH as a result of fire mortality. Potential or "possibility" is a long way from actuality! Is that what is called "management by accident"?

Frequent, moderate-intensity prescribed fires can topkill young seedling and saplings, reducing the availability of early successional forest for species like ruffed grouse, woodcock, and rabbits. In response to this concern which was raised in scoping, in Alternative 3 the locations of many of the stands to be regenerated were shifted to include stands on the lower portions of the slopes where fire intensity would be reduced and/or in areas outside of prescribed burning blocks.
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<td>Monte, Anon</td>
<td>Less than two acres in size is simply not large enough to be considered Early &quot;Successional&quot; Forest Habitat suitable for species such as Ruffed grouse and golden wing warbler and most other species in that guild. On page 96 you state that &quot;Currently, early seral forests comprises less than one percent of the project area, the majority of which is in patches less than 1 acre in size&quot;. Just what type habitat are you considering in order to count as early seral habitat (which I assume you would class as ESFH)? It's hardly realistic to define such small areas as ESFH if that is what you mean.</td>
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<td>Monte, Anon</td>
<td>What it boils down to is that currently there is practically no ESFH on your project area of approximately 30,000 acres, or your entire District acreage of over 300,000 acres, and you are proposing only 253 acres of such habitat on this Project for a 5 or 10 year period (not sure which), which figures out to approximately .008 percent of the Project acreage and .0008 percent of the District acreage. In addition, looking at the maps, it appears that the majority of this miniscule amount of harvesting is located on upper dry slopes, which are far less productive than lower moist slopes.</td>
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<td>Monte, Anon</td>
<td>The Forest Service infatuation with need for designated &quot;Old Growth&quot; is about as unexplainable as the need for &quot;Open Woodlands&quot; in these mountains. Of course Old Growth is scarce at present. The entire acreage was clearcut or cut to a diameter limit at the turn of the century. However, half the...</td>
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The distinction between early successional forest habitat (ESFH) and early successional habitat (ESH) is provided in section 3.8 Successional Stage Forests and Habitats of the EA and is based on definitions used in the Forest Plan. Early successional forest habitat (ESFH) is defined as regenerating forest of 0-10 years of age for all forest community types. It is characterized by dominance of woody growth of regenerating trees and shrubs, often with a grass/forb component, and relatively low density or absent overstory. Areas maintained as permanent openings such as open woodlands, savannas, grasslands, barrens and glades, balds, managed wildlife openings, old fields, pastures and rights-of-way do not qualify as ESFH (USDA Forest Service 2004a), but rather early successional habitat (ESH). Forest Plan Standards for Successional Stage Management established a minimum size of 2 acres for patches to be considered ESFH.

The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.
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<td>Forest is already in some designation limiting harvesting, insuring a surplus of old growth in the future, without the necessity of retaining patches of &quot;old growth&quot; in every proposed harvest area! It appears that the term &quot;Old Growth&quot; has practically attained religious stature in many peoples psyche, including Forest Service personnel. It might be interesting to ask a broad range of people to define old growth. Most would likely come up with a minimum age limit of 200, 500, or some such limit, and would have no idea of what such a limit would imply. Overall, hard and soft mast production, so important for many forms of wildlife, would be severely reduced, both by loss of shrubs and trees such as scarlet oak, black oak, dogwood and many other short lived species that are important mast producers, and simply through reduced metabolic rates from the few mast producers found in old growth forest. Furthermore, there would be far less open area in which nutritious forb and other low vegetative production is enhanced, than in a managed forest. The statement often made, that when a tree falls in an old growth forest, such conditions are produced, is blatantly false. If you have such a mistaken conception, it would behoove you to hike and observe conditions in the 4000 acre Joyce Kilmer Memorial Forest near Robbinsville N.C. The fact is that no wildlife species found in these southeastern National Forests require old growth to sustain a viable population. The relatively few &quot;interior&quot; species do as well or better in the 50-100+ age stands currently available than is the current situation with the significantly larger group relying on ESFH.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Moody, Mark</td>
<td>I support Coopers Creek project #44385. I believe it will help restore balance to the forest and ecosystem. It will encourage a diversity of wildlife and habitat, improving the area for both the wildlife and the people that visit it.</td>
<td>Thank-you for your Support</td>
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<td>Moore, John</td>
<td>I have hiked in the back country all of my life and nothing is more shocking and disheartening as coming out of pristine woods into an area that has been clear felled. The area resembles a First World War battleground and after a few months the erosion and weed growth makes it worse. Clear felling is a misnomer. Yes the trees are gone but the stumps and debris remain as well as the garbage and debris from the loggers. This is not forest management but simply a way to make a short term gain by selling off the forest and leaving a desolate moonscape in its place which must cause severe pollution problems downstream of this watershed. The US Forest Service designated this area for recreation - how is that compatible with removing all of the mature trees?</td>
<td>The effects of project activities on visual quality are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to the scenic quality of the area.</td>
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<td>Moore, John</td>
<td>If the area is also unsuitable for timber production then what is the point of denuding the forest? Renewable resources should always be a major tenant of the US Forest Service and destroying forest where no replacement is planned is a waste of 300 acres.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Moriarty, Frances</td>
<td>I am writing this letter with the hope of preventing the cutting down of trees in the Cooper Creek Watershed project. Water quality in the water sheds around that area are at risk of degradation.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats. The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>Moriarty, Frances</td>
<td>The dense forest there provides habitat for native wildlife. Removing those trees will have an adverse impact on wildlife that have adapted to the dense canopy of mature oaks and white pine.</td>
<td>Thank-you for your Support</td>
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<td>Moyer, Kevin</td>
<td>I am writing in support of the plan to rejuvenate this wildlife management area. It appears you have taken adequate protections for stream buffers and old growth wood. Let's bring back the native wildlife and get rid of the non-native growth, especially the white pines.</td>
<td>Thank-you for your Support</td>
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<td>Muise, Charlie</td>
<td>I fully support the work of the biologists of the Chattahoochee National Forest, and I support the Cooper Creek Watershed project as it is proposed. I hope you will note that not ALL members of environmental groups are knee-jerkingly against USFS actions, and many of us actually have an education that allows us to see the value of conservation projects that involved chainsaws and other tools.</td>
<td>Thank-you for your Support</td>
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<td>Mulchrone, Kathy</td>
<td>Please do not go against your own guidelines and cut the timber along the steep slopes within the Cooper Creek project area. The short term gain from any timber removed will never be balanced by the irreversible damage done to these slopes and their attendant watersheds. PLEASE do not yield to the allure of short term commercial gain.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Muller, Todd</td>
<td>Not just forests are at risk. 83% of the Bryant Creek and 57% of the Pretty Branch watersheds would be cut (totaling 1,510 acres), threatening water quality and some of the best native brook trout streams in Georgia.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1). The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Muller, Todd</td>
<td>The Forest Service claims that a dense forest canopy is unhealthy, but abundant rainfall and fertile soils naturally lead to dense canopies on most Southern Appalachian sites. If forests are allowed to age naturally, some trees will fall and create openings that provide quality wildlife habitat and light for young trees to grow.</td>
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<tr>
<td>MURPHY, CHARLES</td>
<td>Cutting down trees in this pristine forest would be devastating to the trout streams, hiking trails, and the intrinsic beauty and value of the land itself.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td><a href="mailto:Nandersen007@bellsouth.net">Nandersen007@bellsouth.net</a></td>
<td>Please do not cut the 1,500 acres in and around Bryant Creek and Pretty Branch as this would threaten some of the best native brook trout streams in Georgia.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public’s ability to utilize this area for recreational purposes.</td>
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<td>, Anon</td>
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<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td><a href="mailto:Nandersen007@bellsouth.net">Nandersen007@bellsouth.net</a></td>
<td>Cutting should occur where management is needed, in younger stands that were clear-cut in the 1970s and 1980s. Without having evidence that woodlands ever occurred in the Cooper Creek watershed, attempting to &quot;restore&quot; woodlands in this area would be unsustainable.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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<td><a href="mailto:Nanderesen007@bellsouth.net">Nanderesen007@bellsouth.net</a>, Anon</td>
<td>Moving forward with these proposed treatments would destroy some of the best examples of mature, healthy oak forests and towering white pines in the Chattahoochee National Forest.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>OCleary, Chris</td>
<td>I am opposed to cutting some of the best examples of mature, healthy oak forests and towering white pines in the project area. Mature oak forests have high wildlife value because acorns are an important food source for a wide variety of species, and old trees provide homes for cavity nesting species.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<td>OCleary, Chris</td>
<td>As much as 80% of the trees on 720 acres would be cut to &quot;restore&quot; woodlands (open stands with more sky than tree cover), but there is no evidence that woodland ever occurred naturally in the area in the first place.</td>
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<td>OCleary, Chris</td>
<td>The Forest Service should create these young forest habitats that some wildlife prefer from low wildlife value stands that were clear-cut in the 1970s and 1980s and are in need of management, instead of cutting healthy older stands.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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<tr>
<td>OCleary, Chris</td>
<td>Please save this. East idyl and important section of forest for future generations and wildlife.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Oliver, Hoyt</td>
<td>Please do not proceed with the project as now proposed. Review is needed and the public should have a significant influence on the review results. After all, the commercial interests of some should not cost the rest of the public enjoyment and sustainable development. Wildlife and habitat are necessary for all life on the planet. Do we really have so much we can continue to cave to commercial interests?</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>Ordiway, Linda</td>
<td>The degree of vegetative management outlined for this project is somewhat contradictory and vague in describing the expected impacts to populations you are attempting to benefit. Thinnings to 60-80% RD are not accomplishing the desired sunlight penetration to promote regrowth of woody vegetation prior to the likely crown closure of remaining canopy trees. It is recommended to have at least 50% continual sunlight for the development of advanced oak regeneration. The proposed removal merely results in a fully stocked rather than overstocked stand. Without future description of silviculture treatments this stand will remain in a vegetative state with what little regeneration has responded becoming stagnant and most likely succumbing to increased shade in following years. What is the clearly stated goal of thinning the proposed stands? Will the overstory trees be removed during the life of this project? Given the age and type of the outlined stands, diameter growth is negligible and crown closure is very probable. Spacing will be a critical factor when marking these stands to avoid the creation of open woodlands in all thinnings.</td>
<td>Opening the canopy up full large amounts of sunlight to reach the forest floor is not the desired condition for all treatment units. The Woodland treatment units are to open to the canopy for long term, most of the thinnings are to increase species diversity composition, and allow for some light to reach for forest floor, but as stated, those crown are expected to close back in with in a few years of treatment.</td>
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<td>Ordiway, Linda</td>
<td>Clarification within the narrative pertaining to prescribed fire and the stated retention of the newly established woody regeneration is needed. Stemming from previous field tours the discussion of revisiting / evaluation of the designated burn units following fire implementation for exclusion of areas responding positively in desired woody regeneration is included in the narrative but this needs to be a point of emphasis as it appears lost in communicating this point. Personal experience has demonstrated a lack of communication between wildlife, fire and silviculture personnel in defining the objectives and desired unit conditions with fire implementation.</td>
<td>Frequent, moderate-intensity prescribed fires can topkill young seedling and saplings, reducing the availability of early successional forest for species like ruffed grouse, woodcock, and rabbits. In response to this concern which was raised in scoping, in Alternative 3 the locations of many of the stands to be regenerated were shifted to include stands on the lower portions of the slopes where fire intensity would be reduced and/or in areas outside of prescribed burning blocks.</td>
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<td>Ordiway, Linda</td>
<td>There is a need for clarification in the use of terms ESFH and ESH. Maintained wildlife openings, open woodlands and shrub habitat are not equal in habitat characteristics nor the wildlife using these as provided in the ESFH. Your working definition of ESH describes permanent or semi-stagnate (as in ROW's) conditions lacking woody stem density and providing a dominant characteristic of grass and forb ground cover, therefore they are not successional by nature. A detailed segregation of these terms may provide clarity for the public understanding the exact nature of what the habitat created actually is.</td>
<td>The distinction between early successional forest habitat (ESFH) and early successional habitat (ESH) is provided in section 3.8 Successional Stage Forests and Habitats of the EA and is based on definitions used in the Forest Plan. Early successional forest habitat (ESFH) is defined as regenerating forest of 0-10 years of age for all forest community types. It is characterized by dominance of woody growth of regenerating trees and shrubs, often with a grass/forb component, and relatively low density or absent overstory. Areas maintained as permanent openings such as open woodlands, savannas, grasslands, barrens and glades, balds, managed wildlife openings, old fields, pastures and rights-of-way do not qualify as ESFH (USDA Forest Service 2004a), but rather early successional habitat (ESH). Forest Plan Standards for Successional Stage Management established a minimum size of 2 acres for patches to be considered ESFH. The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created with each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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<td>Ordiway, Linda</td>
<td>The canopy gaps proposed for creation are in silviculture terms employing a two-aged group selection management. Traditional group selection involves creating larger openings in most situations. Without subsequent stand entries the one-and-done of creating gaps &lt; 1 acre as described presents a higher likelihood of these pockets becoming sinks for any wildlife (primary songbird nesting success) due to predation. To minimize this effect it is recommended to implement cutback borders around the pockets when reentry is not part of the management plan.</td>
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<td>Ordiway, Linda</td>
<td>The groups are NOT classified as individual stands, by definition, and therefore should not be accounted for in calculating the amount of ESFH being created. It is inappropriate to 'count' the created gaps as ESFH if any are &lt; 1 acre as the USFS does not recognize this size in the current stand classification system to my knowledge.</td>
<td>The distinction between early successional forest habitat (ESFH) and early successional habitat (ESH) is provided in section 3.8 Successional Stage Forests and Habitats of the EA and is based on definitions used in the Forest Plan. Early successional forest habitat (ESFH) is defined as regenerating forest of 0-10 years of age for all forest community types. It is characterized by dominance of woody growth of regenerating trees and shrubs, often with a grass/forb component, and relatively low density or absent overstory. Areas maintained as permanent openings such as open woodlands, savannas, grasslands, barrens and glades, balds, managed wildlife openings, old fields, pastures and rights-of-way do not qualify as ESFH (USDA Forest Service 2004a), but rather early successional habitat (ESH). Forest Plan Standards for Successional Stage Management established a minimum size of 2 acres for patches to be considered ESFH. The Chattahoochee - Oconee Land Management Plan and EIS Outline Old Growth designation criteria that we followed here in the Cooper Creek Watershed Project. The Forest Service manages at the stand level and therefore when a stand is designated, rarely, although sometimes, is the stand further divided.</td>
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<td>Ordiway, Linda</td>
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Old growth classification in the scientific community constitutes more than designation of age as those with an environmentalist background emphasize. The structural diversity including residual large diameter trees, downed coarse woody debris and pit and mound topography have been described as key components characterizing an old growth community. Old growth is not defined as developed in the absence of human activities. Acknowledging the spiritual and/or aesthetic value a segment of the population places on these areas to comply with multiple use is a necessary part of project planning. Another, equally important subset of the population do not perceive these areas as having the societal importance revered by others. Emotions and feelings should not take precedence over best available science. The lack of biodiversity within many of the homogeneous old growth stands should serve as a reminder to managers when considering the ecologic need within the Chattahoochee of more old growth stands. This becomes increasingly frustrating to many users and natural resource professionals when the entire forest has not met the recommended amount of ESFH to maintain viable populations of wildlife. The Chattahoochee National Forest currently has numerous areas where management is prohibited and/or designated as old growth, natural areas, research natural areas, or wilderness where old trees are being preserved and younger stands moving towards the magic age. Placing supercilious emphasis on old growth rather than meeting the ecologic need of a lacking habitat throughout the landscape fails in the true definition of ecosystem management. Ecosystem management conserves ecological services and restores sustainable natural resources while also meeting the social, economic, political and cultural needs of present and for generations in perpetuity, all segments of the population equally.
Ordiway, Linda  
I would recommend to increase the acres of even-age regeneration through additional stand inclusion. Opposition to such an action equates to opposition in assisting the wildlife and flora for which this region is known.

Overdorff, Randall  
I think the proposed logging and management 'Abject at Cooper Creek is a bad idea. Such old growth forest is a precious resource in itself. The proposed logging will significantly diminish the value of this resource for aesthetic and recreational value for generations to come. I urge you to stop this project.

Owenby, Caleb  
To whom it may concern, as an avid outdoorsman and nature enthusiast born and raised in the North Georgia mountains, I fully support the Cooper's Creek Watershed Project! I have been recreating on the national forests of Fannin, Gilmer, Murray, and Union counties for the last 8 years of my life. Being 22 currently, I have spent countless days and hours hunting and hiking around the Brawley mountain and Skeenah.

The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created within each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Thank-you for your Support
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<td>area, Blue Ridge WMA, and Cooper's Creek WMA ever since I could drive. I have noticed the lack of wildlife in these areas, except for the Brawley mountain area. In order to find deer and turkeys in these areas, you must get close to the boundary line of national forest and private property. The animals are concentrated in those areas due to the increased food source found around pastures and other disturbed areas where humans frequent. The disturbance we create by clearing brush, mowing fields, and clearing timber allow for successional growth to occur in the disturbed areas, which increases browse for the first few years of growth. I think that burning, thinning, and even clear cutting are valuable forest management practices that should be utilized on the unhealthy forest of the Cooper's Creek Area! These measures would result in increased habitat for all species, as well as increased food sources for all wildlife. previously I mentioned that I hunt and hike in the area around Brawley Mountain (FSR 35 and the Brawley Mountain Road to the fire tower). I believe it was almost 8 years ago now that they started the Brawley Mountain Project in that area. At first I was unsure about the select cutting that was taking place on the mountain, however I now greatly appreciate the practice. After further education at UGA and the Warnell School of forestry for one semester, and then some independent studying on my own, I realize now that disturbance of the forest is a good thing for wildlife habitat management. In the 8 years since the select cut was started for the Golden Winged Warbler at Brawley Mountain, I have hunted and hiked the area year round. Some of my personal findings include, an increase in sightings of deer in that area (average of 3 deer per hunt), an increase in sightings of woodcocks (primarily in the last 2-3 years), a significant increase in...</td>
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sightings of Ruffed Grouse (none seen until 2 years ago), and a significant increase in sightings of wild turkey. This area is largely similar to the Cooper's Creek Watershed Project area and is proof that harvesting timber in these mountains will boost the productivity of the area. Brawley mountain was also prescribe burned last year, and that resulted in a large increase in new growth and browse productivity.

The Brawley Mountain Project was meant to provide habitat for the Golden Winged Warbler, however it also created prime habitat for one of North Georgia's important wildlife species, Ruffed Grouse in particularly. I have known the Ruffed Grouse to be a greatly suppressed species in the North Georgia Mountains, largely due to the lack of timber harvest and prescribe burning done on Forest Service property. These old growth forests that other groups are pushing for might look pretty, but they do not have adequate browse and shelter for many species. These "old growth" forests are not prime habitat for deer, turkey, grouse, and various other wildlife.

The Brawley Mountain Project is beginning to hold a population of ruffed grouse and woodcock due to the dense vegetation. The Ruffed Grouse and Woodcock require dense vegetation in order to hide from predators. By select cutting the property, the early successional plants were able to grow and become the dominant species on the property. The grouse and woodcock were then able to utilize the area for cover and food. This habitat feature is completely missing from our forests in the North Georgia Mountains, and because of that we will eventually end up missing the ruffed grouse unless we open up more national forest lands to timber harvesting.
### Author(s) | Comment | Response
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management and cutting, burning, and thinning.  
I completely agree with the Cooper’s Creek Watershed Project and I hope that this project will take place and that the North Georgia mountains and all of the other Ranger districts, besides just the Blue Ridge district, will initiate similar projects. I would love to see work done in habitat restoration utilizing these previously mentioned methods, and also by potentially replanting the American Chestnut into our mountain ecosystem again.  
Than you for your efforts in protecting and managing our natural resources and the mountains of North Georgia. I would love to help with any stages of the project that volunteers are allowed. I would also be interested in employment opportunities with the ranger district for this area. I believe in giving back to our mountains and our wildlife as well!

Paddock, David  
The recently released forest plan for the Cooper Creek Watershed appears to be a radical departure from previous Eastern Forest Service management plans that have generally taken a more responsible, conservative approach to management.  
This plan will be extremely destructive to biodiversity, wildlife habitat and ecological stability including water quality and fisheries.  
The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<td>Paddock, David</td>
<td>The Southern Appalachians are among the world's most biodiverse regions in temperate climate zones, and we should be working to improve and increase the native diversity, especially in old growth areas, instead of destroying them. There are marginal areas that would prove better locations for timber, and it is my opinion that the U.S. taxpayer should not be subsidizing the timber industry when they could buy and grow their own timber.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Paddock, David</td>
<td>At a time when knowledgeable climate change scientists are encouraging conservation of forests and reforestation of denuded areas, the Forest Service proposes clearing about 2000 acres of forest including mature, old growth forest and over 300 acres of forest the Forest Service declared previously was for dispersed recreation and unsuitable for timber production. There should be no dispute that the climate is changing, and the consequences could be catastrophic. If there is a dispute, it is the cause of the changing climate. There is no dispute that healthy forests can ameliorate climate change and deforestation can exacerbate it. This is the single overarching reason that the Forest Service should be in the business of conserving the forests, not destroying them.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).</td>
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<tr>
<td>Paddock, David</td>
<td>Another aspect is the long term economic benefit to the region brought by recreation, including fishing, hunting and hiking. I have to believe that the long term benefits of conservation significantly outweigh the short term benefits of harvest.</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). The road improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
</tr>
<tr>
<td>Paddock, David</td>
<td>I encourage the Forest Service to reconsider this poorly conceived project and error on the side of conservation. The District Ranger should want to leave a legacy he can be proud of. Mr. Baker: When you retire or move on, will you take your staff to look at the bare rock and stumps, a dead trout stream, and acres of ugliness and say “This is my proudest moment,” or will you leave a legacy of conservation of some of the finest old growth forest, an exemplary display of biodiversity, and a small but significant contribution to address a key component of climate change? At a time when knowledgeable scientists are proposing that we pay to conserve and preserve forests, how much sense does this project make? Please reconsider and propose a plan that is focuses on conservation.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Pardue, Joe</td>
<td>I seriously cannot believe that you guys are even considering this in the cooper's creek area. I am a resident and frequently visit this management area. Please don't do this</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
</tr>
<tr>
<td>Parkes, Anya</td>
<td>No cutting north of Duncan Ridge</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Parkes, Anya</td>
<td>No cutting on steep slopes!</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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### Author(s) 
#### Comment 
#### Response

**Parkes, Anya**  
200 acres plus for no clear cuts on old cuts!  
The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

**Parsons, Tyler**  
I would request that the any action in the Cooper Creek area of OUR national forest be minimized to preserve the healthy and productive ecological network that exists there today, so that current and future generations will be able to enjoy it tomorrow. My preference would be to eliminate as much commercial and pesticide treatments as possible from the plan of action, thereby removing alternative #2 for the available options.  
The Forest Service has made an extensive effort to look at various alternates and to produce a plan that meets the greatest balance of resource conservation and ecological restoration. Most of the commercial treatments are the tool to accomplish those ecological goals and / or provide the funding to accomplish additional work.

**Parsons, Tyler**  
If one of these alternatives must be chosen, the choice must be the one that is lightest on the land as possible and that preserves the precious few opportunities citizens have to truly connect with nature to teach their kids how to fish in pristine waters or to hike with their families in a safe and affordable setting.

The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.

**Parsons, Tyler**  
Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were
My ultimate preference would be that the Cooper Creek plan be modified to put science-based ecological restoration, incremental non-commercial forest improvements, and access to low impact recreation ahead of destructive timber sales. An alternative should be developed, consistent with prior public comments and using the best available science, that focuses on ecological restoration as defined by Forest Service regulations and directives including the agency's Restoration handbook.

The alternatives considered but eliminated from further detail:

**Alternative that:** avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.

**Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands.** The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into...
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<td>Parsons, Tyler</td>
<td>Many streams in the project area are already on the 303(d) list for impaired fish communities, including Cooper Creek (in multiple locations), Coosa Creek, East Coosa Creek, Little Youngcane Creek and Youngcane Creek</td>
<td>Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified. There are 303(d) listed streams in the Cooper Creek Watershed Project Area and this is discussed in the EA on pages 64 and 110. However as it states in the DEA we believe there are some issues with the selection of sites and also the methods for the listing of streams as impaired. The draft TMDL document which was not available prior to the Cooper Creek Watershed Project EA being completed, finds that Cooper Creek is impaired because of sediment, but we do not believe the amount of sediment found in the Cooper Creek during surveys (EA pg. 110) is enough to impact aquatic populations and is within the normal range. It is more likely the index is looking for diversity in the stream and as you move up in the streams they are actually less diverse as they should be as an example in most of the stream reaches that contain native brook trout in Georgia all you find is brook trout. The stream is not diverse from a fish standpoint, but it is exactly what it should be. We have had discussions with GA DNR concerning this issue and we will continue to do so.</td>
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<tr>
<td>Parsons, Tyler</td>
<td>The runoff generated by commercial cutting on steep slopes and road construction would choke pristine streams, dramatically altering their ecology and jeopardizing the clean water that millions rely on daily</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>Parsons, Tyler</td>
<td>Georgia EPD has authored TMDLs to cover these streams in the Tennessee River Basin, and they are currently in draft form. The land and riparian buffer disturbance, and road clearing caused by this action will only further degrade these larger creeks and will certainly degrade and destroy precious headwater streams that feed into them. For example, some type of forest treatment (mostly commercial) is proposed to cover almost the entire watershed of of Bryant Creek, at pristine tributary to Cooper Creek, that has a sustainable population of native Brook Trout. On of only a few Brook Trout stream in all of Georgia. This degradation of our precious resources, let alone out right destruction is not acceptable!</td>
<td>There are 303(d) listed streams in the Cooper Creek Watershed Project Area and this is discussed in the EA on pages 64 and 110. However as it states in the DEA we belive there are some issues with the selection of sites and also the methods for the listing of streams as impaired. The draft TMDL document which was not available prior to the Cooper Creek Watershed Project EA being completed, finds that Cooper Creek is impaired because of sediment, but we do not believe the amount of sediment found in the Cooper Creek during surveys (EA pg. 110) is enough to impact aquatic populations and is within the normal range. It is more likely the index is looking for diversity in the stream and as you move up in the streams they are actually less diverse as they should be as an example in most of the stream reaches that contain native brook trout in Georgia all you find is brook trout. The stream is not diverse from a fish standpoint, but it is exactly what it should be. We have had discussions with GA DNR concerning this issue and we will continue to do so.</td>
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<p>| Parsons, Tyler | Neither alternative explicitly removes old growth forest from harvesting areas, which is unacceptable when so little currently exists. These sparse groves of old tree provide important habitat and a critical food source for song birds and other wildlife. | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004). |</p>
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<td>Parsons, Tyler</td>
<td>Further, this project should be aligned with the Chattahoochee Forest Land and Resource Management Plan and Georgia Forestry Commission Best Practices by eliminating cutting north of Duncan Ridge and on all steep slopes and in all &quot;Dispersed Recreation Areas,&quot; which the forest plan describes as unsuitable for timber production.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Parsons, Tyler</td>
<td>The National Forests belong to everyone, but a project as large as the Cooper Creek proposal would cut too many Georgians off from their public lands. Please do what is best for the health of the entire ecosystem and what is right for the people of Georgia. Put science-based restoration ahead of timber sales!</td>
<td>This project was based on the ecological needs of the area, extensive modeling and ground examinations were conducted to produce an ecologically appropriate management plan. Timber sales are merely the ground tool that we can use to accomplish the objectives.</td>
</tr>
<tr>
<td>Patterson, Cynthia</td>
<td>Sedimentation and run off and road construction will contaminate pristine streams, dramatically altering their ecology, jeopardizing the clean water and killing trout.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)</td>
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<td>Patterson, Cynthia</td>
<td>Old growth forests provide important habitat and are a critical food source for song birds and other wildlife.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Patterson, Cynthia</td>
<td>What are the negative effects on climate change?</td>
<td>Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon “sink,” with carbon storage gains exceeding carbon losses (U.S. EPA 2012). The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation's CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant.</td>
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<td>Patterson, Cynthia</td>
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The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).

Patterson, Cynthia

This project should be aligned with the Chattahoochee Forest Land and Resource Management Plan and Georgia Forestry Commission Best Practices by eliminating cutting north of Duncan Ridge and on all steep slopes and in all "Dispersed Recreation Areas," which the forest plan describes as unsuitable for timber production.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<td>Patterson, Cynthia</td>
<td>Further, the Forest Service should strictly adhere to all requirements applicable to riparian areas and should preserve old growth trees.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Patterson, Cynthia</td>
<td>How is logging restoring a forest? Logging is for monetary profit. The Forest Service's estimated profit of $25,000 does not begin to cover the environmental and recreational value of the proposed logging acreage.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Patterson, Cynthia</td>
<td>Duncan Ridge would lose 20% of its trees. In other areas, 80% would be logged. Two thousand six hundred acres in the Cooper Creek watershed would be thinned to &quot;improve forest health.&quot; I oppose all of this logging.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Patterson, Cynthia</td>
<td>Cutting and removing trees. Five miles of temporary roads and widening 2.8 miles of existing roads tearing up the forest floor. Skidders and logging trucks compacting the soil and crushing plants and animals. Loss of rich topsoil.</td>
<td>The EA analyzed the impact of roads in section 3.20 (Transportation) to the project area.</td>
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<td>Patterson, Cynthia</td>
<td>Sedimentation of pristine trout streams. Bryant Creek is the southernmost habitat for brook trout.</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.</td>
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<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<tr>
<td>Patterson, Cynthia</td>
<td>Flooding and erosion. 18 inches of rain fell near Duncan Ridge in December 2015. Herbicides contaminating soil, water and air.</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
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<tr>
<td>Patterson, Cynthia</td>
<td>The most horrifying aspect of the plan is allowing logging in old-growth areas. Only 11,000, scattered areas of old-growth forest exists in GA. It is unthinkable to cut a single remaining old-growth tree and degrade the habitat by allowing logging equipment into the area</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Patterson, Cynthia</td>
<td>Natural forces over time will open areas in the forest and species that favor a young forest will return.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Peace, Corinne</td>
<td>I am opposed to the plans for commercial logging, road building, and herbicide use. The scale of the proposed acreage and the fragile areas chosen are quite excessive. Widespread commercial thinning, especially on steep ridges and near streams is far from a healthy management plan.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area. The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<tr>
<td>Peace, Corinne</td>
<td>Under no circumstances do I agree any mature stands should be thinned. The value to the forest and to the public is beyond measure. Mature oaks provide essential food and habitat.</td>
<td>The effects of the proposed treatments on the availability of acorns is discussed in the Black Bear portion of Section 3.14 Management Indicator Species. While some mature mast producing oaks will be cut through the proposed regeneration and thinning treatments this represents a small fraction of the mature hardwood forest in the project area. Mature oak stands comprise nearly 50 percent of the analysis area and the availability of oak mast will remain high. In the thinning treatments, the expansion of the crowns of the remaining trees will largely offset any reduction in oak mast production, especially on the lower slopes. In addition, the planting of oak seedlings in several regeneration stands as well as the proposed midstory and release treatments also will enhance future hard mast capability.</td>
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<tr>
<td>Peace, Corinne</td>
<td>It is imperative we leave these older stands to age naturally. That is genuine restoration. These stands will naturally diversify with age. The species requiring a complex mature forest deserve the right to exist. Not only is it imperative young children today will be able to experience the beauty of an old growth forest, but also to have the forest as a baseline to understand and study natural forest processes. Georgian's deserve to have more national treasures in their national forest.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Peace, Corinne</td>
<td>If you must diversify the forest age with management, choose the areas that have been cut in the last 20-40 years</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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<tr>
<td>Peace, Corinne</td>
<td>I am gravely concerned at any management prescriptions near creeks. Time and time again, we have learned the danger of sedimentation in streams and temperatures rising affecting aquatic habitat quality. The buffer you propose along the riparian corridor is simply not wide enough. There will be an edge affect from the cut and compacted soils, and issue will arise in a big wind or heat event. Protection of the native brook trout and salamanders are critical.</td>
<td>Please see Comment Response #32 which discusses BMPs and sediment and also Comment Response #35 which discusses Riparian Buffers and stream temperatures. With a 100 foot Streamside Management Zone that includes a 25 foot no harvest zone adjacent to the stream and a 75 foot strip where the average basal area will remain 50 or greater because of this we do not anticipate an edge effect in these riparian areas and we do not believe these areas will be more susceptible to wind throw or a heat event.</td>
</tr>
<tr>
<td>Peace, Corinne</td>
<td>want to see your forest plans include a more inclusive comparative value and cost analysis. What value analysis has been done on the recreation value of hiking and fishing, and on the ecosystem services provided- particularly watershed protection and water quality and carbon storage?</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). Theroad improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
</tr>
<tr>
<td>Peace, Corinne</td>
<td>I am greatly concerned with the impacts of climate change and believe forest protection is essential mitigation.</td>
<td>The EA address the Climate Change impact in Section 3.6 and their mitigation.</td>
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<tr>
<td>Peebles, Richard</td>
<td>As an avid hiker and lover of our forests, I find it highly unintuitive that putting in roads and logging large swaths of the forest would be beneficial. I have a hard time believing the potential, long term improvement could outweigh the near, and long term damages. I have read that we are already losing our forests to development, pollution, disease, and pests; why would we propagate the further removal of our trees?</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>peevy, jeannine</td>
<td>Leave the forests alone. God has taken care of them since they were created.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Peggy, Anon</td>
<td>That much open canopy is not native to this area. 2. Animals and bird of all types need the acorns for food and older trees for cavity nesting/denning.</td>
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<tr>
<td>Peggy, Anon</td>
<td>N.Ga <a href="http://N.Ga">http://N.Ga</a> . soils are prone to run off when it is disturbed. When near water ways, the silt spills into streams disturbing fish habitat.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
</tr>
<tr>
<td>Peggy, Anon</td>
<td>Small cuts are much better to accomplish the objectives identified for this project, if a project indeed must be done. So one wonders if the real objectives were for timber sales.</td>
<td>The commercial harvest in this project is merely the tool used to help accomplish the project goal of habitat and ecological restoration. It will also help by generating some of the funds to accomplish other, non-commercial treatments within the project area.</td>
</tr>
<tr>
<td>Peggy, Anon</td>
<td>The FS has had trouble maintaining its current roads and trails. New cuts will require new temporary (one hopes!) roads. Then what? More mud, encouraging off roadn vehicles.and mountain bikes...producing yet MoRE erosion.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Perdue, John</td>
<td>The term Historic is being misused to further commercial interests. Just 20 - 60 trees left per acre would be indistinguishable from clear-cutting and a complete destruction of natural habitat. This is not forest being improved. Young, open forest is nothing more than a contrived concept to justify other goals.</td>
<td></td>
</tr>
<tr>
<td>Perdue, John</td>
<td>This wrongness of this project seems almost incomprehensible. The scale is gargantuan, the enormous waste of natural resources criminal, the destruction of beauty will be a terrible bight upon the State of Georgia for generations. It makes a mockery of the Forest Service and the concepts of what a Natural Forest even is. The best way to manage these Forests is to not manage them at all. Instead the Forest Service is threatening their very existence with this proposal</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Peters, Ralph</td>
<td>What kind of &quot;improvements&quot; could ever justify the removal of 30-80% of the trees in the Cooper Creek area of the Chattahoochee National Forest? NOTHING replaces trees; national forests should be protected from this kind of &quot;progress.&quot;</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Peterson, Gary</td>
<td>Our membership consists of approx.300 individuals. and we are behind the Forest Service on this plan. We approve and appreciate Jim Wentworth and all the others who work so hard to maintain our forests in a healthy manor for generations to come.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Peterson, Gary</td>
<td>Our membership consists of approx.300 individuals. and we are behind the Forest Service on this plan. We approve and appreciate Jim Wentworth and all the others who work so hard to maintain our forests in a healthy manor for generations to come.</td>
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<td>Thank-you for your Support</td>
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<tr>
<td>Petty, Derek</td>
<td>It's Great to see an interest in such a valuable and enjoyable area as the Coopers Creek Watershed. A much needed project, we cant just abandon our National Forrest and hope for the best, they must be managed. I would also like to recommend giving private organizations and individuals a volunteering opportunity to assist in these type projects. The Blue Ridge WMA area is also in need of the same type of projects. We must be good stewards of what we've been blessed with in order to make it better and pass it on to the next generation.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Peyton, Kevin</td>
<td>I fully support the U.S. Forest Service and the Coopers Creek Watershed Project. This active forest management project will provide valuable wildlife habitat that is badly needed for our native game and non-game wildlife. Wildlife such as white-tailed deer, black bear, wild turkey, ruffed grouse, indigo bunting, yellow breasted chat and many others will benefit from the increased diversity of plants that will be promoted by opening the forest canopy to sunlight and by the use of periodic fire. This project will benefit hikers, bird watchers, hunters, anglers and will provide for a better multiple use forest. A diverse forest is a healthy forest. Thank you for reading.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Pierce, Jason</td>
<td>This is a beautiful area and should be left untouched. There are far too many forest being cut down in North GA for development. Lets leave this one alone.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Pierce, M</td>
<td>I am appalled at the current plan to allow logging for the alleged &quot;health of the forest&quot; in the Coopers Creek Watershed area. The forests have done just fine without our &quot;help&quot; over the millennia, and have suffered greatly during times of human &quot;assistance&quot;. Leave the Coopers Creek area alone, as well as the rest of our so-called &quot;protected&quot; National Forests. What is the point of such a designation if that protection is only valid until some bureaucrat decides to sell it off under the guise of &quot;helping&quot; the forest. Bull-oney! The forest doesn't need to be logged to survive, it needs to be left alone. Wasn't that the point of &quot;protecting&quot; these lands in the first place?</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Platt, Robyn</td>
<td>I do understand that timbering the forest is for a healthier forest, but it should be done on a smaller scale. This massive undertaking shows greed on the part of all parties. This greed shows how NOT to timber. Please start this new forest on a smaller scale that way if there are problems with impact this to the natural environment it can be changed in a cost effective impact to you office and the State of Georgia</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>plumly, chad</td>
<td>I am not opposed to restoring the forest to more natural conditions for grouse, deer, etc.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>I am very concerned about Bryant Creek, however, particularly runoff and siltation.</td>
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<td>Pociask, Matthew</td>
<td>We have an opportunity here to have something really special in north Georgia: an old growth forest. Imagine the pristine beauty of an old growth forest, a cathedral of massive pines, oaks, hemlocks, spruces and firs, with its roots sunk deep into the Appalachians, that beautiful rocky remnant of the mighty mountain chain first formed almost 500 million years ago. All we have to do is wait. Nature will take care of the rest. Please do not muck it up.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Poole, David</td>
<td>I fully support the thinning of the forest and also prescribed fire use on the same forest. I think this is long, long overdue. The forest has become stagnant and useless for wildlife because of the current management practices. Thinning is badly needed if this forest is expected to survive and thrive.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Powell, Chase</td>
<td>support your efforts in managing our forests with controlled burns, etc. Unfortunately a lot of our lands have suffered due to a lack of management. Your efforts in this regard will be greatly appreciated.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Puckett, Marc</td>
<td>The Coopers Creek project will negatively impact the ecosystem it purports to improve</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Puckett, Marc</td>
<td>, as well as the local economy which caters to outdoor enthusiasts. The Cooper Creek wildlife management area is highly popular with hunters, fishermen, and campers. The local loss of revenue from these activities will hurt the community.</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). Theroad improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
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<td>Rasmussen, Margaret</td>
<td>White Pine (Pinus strobus L.) is threatened. As an environmentally, aesthetically and historically evergreen vital to the ecology of the Chattahoochee National Forest, white pine should not be targeted for cleared as proposed in 22 percent of the targeted area, the U.S. Forest Service should be ashamed to be so uninformed.</td>
<td>The purpose of this project is not to clear white pine from the area, but to contain the white pine in its natural regime.</td>
</tr>
<tr>
<td>Rasmussen, Margaret</td>
<td>An expert forest ecologist must conduct an extensive evaluation of the U.S. Forest Service environmental assessment before another step, another chain saw, another bush hog is taken into the Chattahoochee forest.</td>
<td>The Draft EA used the best available science and follow the NEPA, NFMA, CONF Forest Plan.</td>
</tr>
<tr>
<td>Rasmussen, Margaret</td>
<td>White Pine, native species to eastern North America, is ecologically precious, is not an invasive species and grows in the wild no further south than northernmost Georgia. White pine towers over broadleaf hardwoods, sequestering carbon dioxide emissions to abate global warming and providing food and shelter for numerous forest birds and mammals.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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Eastern white pine forests originally covered much of northeastern North America. Yet only one percent of the old-growth forests remain after extensive logging operations dating from the 18th century when the English sought the white pine as masts for the British Royal Navy’s sailing ship, and American Colonials cut down and hauled off the "mast pines" in the Pine Tree Riot of 1772 Act of Rebellion.

Old-growth white pine forests are a protected species in Great Smoky Mountains National Park. Yet, the ecologically uninformed Forest Service proposes to destroy the white pine, known to Native Americans as the Tree of Peace.

Rasmussen, Margaret | External Ecologist Must Evaluate Assessment To layman conservationist or | The Draft EA used the best available science and follow the NEPA, NFMA, CONF Forest Plan.                                                                                                               |
professional/educated/experienced forest ecologist, the proposed Forest Service environmental assessment to restore native plants and improve habitat for wildlife, i.e. "improve forest health," by logging 2,600 acres in the Cooper Creek watershed contains many fallacies. Before this project proceeds one step into the forest further, the Forest Service must solicit an in-depth review and feasibility analysis by qualified forest ecologists. FYI, we refer you to the following forest ecologists for guidance:

* Dr. Joan Maloof, forest ecologist, founder and director of the Old-Growth Forest Network, works to identify and document old-growth forests in every State of the U.S. that meets strict criteria of accessibility to the public for nature recreation and education, integrity of the forest, and ecological conservation. She is author of Teaching the Trees and Among the Ancients. Her second "agroforestry think" book The Healthiest Forest: What Science Says about Old Growth is scheduled for release in Fall 2016 by Timber Press. jemaloof@salisbury.edu, 410-251-1800 www.oldgrowthforest.net.

* Chris Wilson is Director of Conservation Science for Unique Places. LLC, Asheville, NC. A wildlife ecologist and conservation scientist, Wilson has been providing complete ecological assessments of conservation properties throughout the eastern states since the late-1990s. He and his associates have worked with old-growth inventories, and classified and mapped natural communities across the United States, according to Natural Heritage methodologies, using Open Standards for the Practice of Conservation.

Wilson has 20 years of experience as a conservation scientist and wildlife biologist, providing science-based expertise for
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<tr>
<td>Redmon, Tom</td>
<td>assessment, protection and management of biodiversity. His book Documenting and Protecting Biodiversity on Land Trust Projects: an introduction and practical guide, published by the Land Trust Alliance, outlines his approach. Chris Wilson <a href="mailto:critterfro@gmail.com">critterfro@gmail.com</a> <a href="http://www.linkedin.com/in/chriswilsonbiologist">www.linkedin.com/in/chriswilsonbiologist</a> Without dangers to human populations I see no basis for efforts to make the forest more &quot;healthy&quot; except according to a theoretical expectation about opening canopies and &quot;improving biodiversity and wildlife habitat.&quot; Improvements will occur naturally as old growth falls.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Redmon, Tom</td>
<td>Erosion of the land itself and into stream beds and trout habitat,</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes.</td>
</tr>
<tr>
<td>Redmon, Tom</td>
<td>road building that will not be as easy to &quot;erase&quot; as you suggest,</td>
<td>The EA analyzed the impact of roads in section 3.20 (Transportation) to the project area.</td>
</tr>
<tr>
<td>Redmon, Tom</td>
<td>access to sensitive wildlife and botanical habitat that once disturbed will not easily come back;</td>
<td>The effects of the proposed activities on Threatened, Endangered, Proposed, Sensitive, and Locally Rare species are disclosed in Section 3.13 of the EA. The Biological Evaluation will on the selected alternative will be completed and made available to the public prior to the final decision.</td>
</tr>
<tr>
<td>Redmon, Tom</td>
<td>--recreational vehicle access and abuse that is very hard POLITICALLY to recall;</td>
<td>No new OHV trails are proposed. New temporary roads will be closed and re-vegetated after the project is done.</td>
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<tr>
<td>Redmon, Tom</td>
<td>We have plenty of &quot;young&quot; forests that were created by (sometimes) well meaning land owners and by the Forest Service and Georgia state agencies. It is almost impossible to guarantee to the citizens of Georgia that these &quot;youngsters&quot; will become healthy &quot;oldsters&quot; a hundred or more years down the road.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
</tr>
<tr>
<td>Redmon, Tom</td>
<td>Please reconsider the enormous costs to taxpayers and the natural consequences of taking actions that cannot be assured in future years.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
</tr>
<tr>
<td>Reeves, Joe</td>
<td>I support Coopers Creek Watershed Project. #44385 and see it as being a positive project for sportsmen, hikers, nature lovers and conservation. I see nothing negative about this project.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Reid, Travis</td>
<td>One of the gems is Cooper Creek. Creeks, big trees, great camping all provide an amazing escape from Atlanta. When I heard the proposal to log the area, I had to comment. Please find other areas than the Cooper Creek area.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Rex, James</td>
<td>I strongly support this forest management plan for the Coopers creek area. Thinning and burning will help the forest as well as the wildlife.</td>
<td>Thank-you for your Support</td>
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<td>reynolds, sarah</td>
<td>First I'd like to know if there is an ulterior motive—does someone want some timber all of a sudden? Is a hunting organization promoting opening up forest canopy? Usually there is a hidden agenda, and I'd like to if that's the case here.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<td>reynolds, sarah</td>
<td>Next is the fact that there are spots in the woods that are old wildlife openings and guess what? Now they are invading the forest. There is Russian olive still growing in several places in the forest. Wouldn't it be great to go in there and get those areas cleared out. The older maps surely have it marked and wow, you would have invasive species reduced and open areas-what a win, win! There is an area on Blood Mountain that also has a huge Chinese privet!! growing. And when roads are built and people go in guess what else happens? Yep...trash and microstegium. So you will actually end up doing even more harm. Sorry, gentlemen, but trucks lead to trash; that stuff that gets tossed in the back gets blown out. And when you put gravel down for roads, you get microstegium started...auughhhhhhh!!!! Can you please at least talk to some UGA people like Jennifer Ceska, Linda Chafin and Heather Alley who can also give you some feedback? And how about some DNR people like Mincey Moffet who work in the field with native forests? Kudzu was a great erosion idea but have you seen it on Wolf pen? It's gonna creep into the whole forest some day if we're not careful and all invasives LOVE open areas! You know the tornado that ripped through Helen, GA. It opened up a lot of canopy along the old turnpike road which is a great hiking trail. I found a mahonia growing right in the middle of the trail a few years back. Most any forest opening (especially manmade) is a gateway opening for invasives. Give em an inch... Please</td>
<td>The effects of project activities on the spread of NNIS is disclosed in Section 3.15 of the EA. The project includes design features and mitigation measure to reduce the potential for spread. In addition, the District has previously completed an Environmental Assessment that guides the NNIS control program across the District.</td>
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<td>Riddleberger, Ken</td>
<td>In preparation for the EA on the CCWP, the USFS Chattahoochee-Oconee National Forest (FS) has invested roughly five years in developing the Cooper Creek Ecological Classification System, conducting a Departure Analysis and completing a Watershed Assessment. The FS has made a thorough, science-based analysis of the approximately 34,000 Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:</td>
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<td>acres of national forest property within the project area, investing significant time and resources to analyze the Cooper Creek Watershed (along with portions of Youngcane and Coosa Watersheds). Given the significant levels of effort and investment of resources, it is unclear why the proposed alternatives would not include all appropriate treatments called for in the Land and Resource Management Plan (Forest Plan, 2004) thereby providing a pathway for restoration of the entire watershed to be implemented over time. The two proposed alternatives to no action are very similar and offer no alternative that is directed toward the extensive management needed to address deficiencies noted in the analyses. WRD supports the CCWP goals of restoring native plant communities, regenerating the oak-pine forest community, improving forest health, and enhancing wildlife habitat; however, WRD believes that the scale of the project is too small to address the scope of the purpose and needs obvious from the analyses. At the time of the Cooper Creek Watershed Assessment (June 2014) the FS indicated that 76% of the analysis area was in mid to late successional stage and roughly 200 acres (0.6%) of early successional habitat (ESH) existed. Now, the FS indicates that approximately 82% of the area is mid to late succession and the former 200 acres of ESH has now transitioned from that classification (pg. 96), effectively making ESH 0% within the analysis area. Best illustrating the problem with the scope of the proposed actions is the FS’s Departure Analysis (EA, pg. 89) which found three of seven stands &quot;highly departed&quot; from the reference conditions with a fourth only 1% away from also being thus classified. Further, two of the other three stands are &quot;moderately departed&quot; with the third at the exact upper limit of &quot;minimally departed&quot;. In total, 72% or approximately</td>
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<td>Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner. Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.</td>
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24,400 acres of the analysis area was found to be highly departed from the reference condition. At best, Alternative 2 proposes to treat 11% of the analysis area (not counting prescribed fire) if each treatment acre is unique, over a period of the next ten to fifteen years. WRD believes that the rate of proposed work will not adequately address the identified needs.

Personal communication between our staff has indicated that the scope of the project was limited to that which could be accomplished by existing FS staffing levels. WRD recommends that the analysis and planning process be used to identify the work appropriate to address the natural resource need(s) identified. The FS has in the past approved projects to be “on the shelf” in order to have approved projects ready for implementation when possible. If the limiting factor for doing more work is personnel, we would encourage the FS to engage conservation partners to implement the work. WRD, along with the National Wild Turkey Federation, the Ruffed Grouse Society and other conservation groups could be engaged to cooperate. WRD is committed to helping the FS advance the process to a final decision and timely implementation of CCWP. However, WRD advocates taking greater steps toward accomplishing the goals of the Forest Plan.

Among the three alternatives described in the DEA, we believe that only the Proposed Action (Alternative 2) provides the beginnings of a watershed project that would have a reasonable chance at achieving stated goals. WRD is concerned about the narrow breadth of alternatives presented in this DEA, especially in light of the feedback received during the five-year process leading up to this DEA. It only addresses the portion of public/agency feedback that desires minimal forest management. The input of WRD and your forest

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<td>Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.</td>
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<td>Riddleberger, Ken</td>
<td>constituent groups who desire greater management actions, consistent with Forest Plan direction were not addressed in the narrow range of alternatives presented. WRD opposes the No Action Alternative and Alternative 3. In the absence of an alternative with significant wildlife and timber management actions, WRD recommends a &quot;modified&quot; Alternative 2, with additional actions: For treatment of Pine and Pine-Oak stands to reduce white pines, we recommend harvest and replacement instead of thinning. The proposed actions will result in a rejuvenation of the white pines in these stands creating significant future challenges. The parking lot expansion from Alternative 3 should be added to Alternative 2.</td>
<td>While the long term future desired condition is more of an oak component, we do not anticipate that happening after one entry. The opportunity here is to identify and promote what few species are in the stands, and there sustainability to provide an easier conversion in the long term. The parking lot expansion at the Cooper Creek WMA Check Station was not included in the original proposed action (Alternative 2) but was incorporated into Alternative 3 as a result of comments received during scoping.</td>
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<td>Riddleberger, Ken</td>
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<td>Riddleberger, Ken</td>
<td>Provide much more detailed analyses of Project impacts on base cation levels and aquatic habitats. Include specifics about the impacted catchments (e.g. size, fish populations, etc.), the extent of impact, and possible mitigation measures.</td>
<td>Previous research has documented short-term increases (less than 12 months) in stream nitrates following harvesting. However, the ecosystem is unlikely to sustain any severe damage from the nitrate increases. The catchments where trees are commercial thinned or regenerated will remove calcium. However, the long-term estimates for most of the area indicate the additions of calcium from the weathering of rocks and deposition from the atmosphere is sufficient to maintain stream acid neutralizing capacity (ANC) the same as the no action alternative. Only two catchments have at a long-term risk of the ANC decreasing below the modeled estimate of 100 micro-equivalents per liter (ueq/L). Both of these areas are adjacent to catchments where the modeled ANC of 65 ueq/L or greater is likely in the no action alternative. Sullivan and others (2011) estimated in 1860 (prior to heavy acid deposition) the stream ANC may have been as low as 30 ueq/L with an average of 65 ueq/L elsewhere in Southern Appalachia. The model results using the Ecosystem Management Decision Support (EMDS) tool estimated the long-term stream ANC will be greater than or equal to 65 ueq/L (Reynolds and others, 2012) with and without commercial thinning or regeneration. Sullivan and others have suggested that achieving an ANC of 100 ueq/L is unlikely at many high elevation catchments. Although there may be a greater abundance of insects in streams with an ANC of 100 versus 65, there will still be sufficient food to support reproducing brook trout populations. A stream with an ANC of 65 ueq/L still has buffering capacity to strong acids to prevent episodic acidification and the extirpation of the insects is unlikely. Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these</td>
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|           | Please consider adding these components to Alternative 2 and strengthening the analyses of Project impacts on natural resources and users. WRD believes our recommendations will result in a much more productive project that will achieve some Forest Plan objectives. | \[\text{Alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:}

\begin{itemize}
  \item \text{Alternative that:} avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.}
\end{itemize}

\begin{itemize}
  \item \text{Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands.} The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would}
substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.
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<td>Riddleberger, Ken</td>
<td>Pine/Pine-Oak Thinning: As explained in our 2014 comments on this project, we do not believe the proposal(s) for Pine/Pine-Oak Thinning in the vegetation management section will have the stated effects. The proposal identifies 13 stands, with no oak or desirable pine components totaling 992 acres, to be treated by thinning to 60-80BA. The text (pg. 10) states &quot;in those stands where sufficient oak regeneration is not present, thinning will allow sunlight to reach the forest floor stimulating oak regeneration over time&quot;. We have previously suggested that this course to convert these stands will not result in the desired conditions. The correct course to remedy the issue (stand replacement harvests) would actually provide additional ESFH which is lacking in all alternatives within the proposal. We point out that the USFS's Fire Effects Information System (FEIS) information for Pinus strobus reads &quot;The two-cut shelterwood method is recommended for maximizing regeneration of eastern white pine. The first cut removes approximately 50% of the overstory and a final cut five to ten years later to remove the remainder after seedlings have established&quot;. Based on this, it seems that the proposed action will maximize the regeneration of eastern white pine. This DEA fails to provide sufficient evidence or alternatives to address this issue. As previously suggested, these stands should be replaced through proper harvest and replacement, thereby also providing some remedy to the paucity of ESH otherwise provided. Some stands may also be designated for replacement with desirable pine species such as shortleaf (P. echinata) which would also serve Objective 3.1 calling for restoration of 1,100 acres of shortleaf not otherwise addressed.</td>
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<td>Riddleberger, Ken</td>
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While the long term future desired condition is more of an oak component, we do not anticipate that happening after one entry. The opportunity here is too identify and promote what few species are in the stands, and there sustainability to provide an easier conversion in the long term.
In regard to Early Successional Forest Habitat (Goal 2) WRD again maintains that none of the alternatives proposed adequately addresses the needs identified within the Cooper Creek Watershed Assessment (CCWA). Forest Plan targets for ESH were calculated within the CCWA and ranged from 588 to 2117 acres based on ranges for each management prescription. The DEA (pgs. 96-97) describes a severe lack of ESH (including ESFH) across the analysis area and describes 88% or the Cooper Creek Watershed as closed canopy. Section 3.8.1 already generously includes open woodlands, grasslands, barrens, glades, balds, managed wildlife openings, old fields, pastures and rights-of-ways in estimates of existing ESH and still finds the habitat type lacking. The description goes on to point out that a number of ESFH-dependent species have suffered declines due to limited availability of habitat.

For example, the Forest Plan sets forth the prairie warbler as the Management Indicator Species (MIS) for this habitat type. Occurrence of prairie warbler is described as having been "relatively common" but is now described as uncommon and the DEA points out that they have not been detected in any survey in this area from the last seven years. On a broader scale, the Breeding Bird Survey data has shown a marked prairie warbler population decline of over 40% and the National Audubon Society Watchlist (2001) notes a decreasing population trend (> 5% annually). For the effects analysis, Alternatives 2 and 3 are described to be similar as both would create approximately 250 acres of ESH. The DEA states that local populations of prairie warbler would increase and "this project...will begin to reverse this declining trend"; however, the effects analysis is vague on the expected level of improvement to the population. For the effects on Ovenbirds (MIS for forest interior habitat, pg. 141) the DEA says that the...
availability of interior forest conditions are expected to increase. The DEA fails to clearly describe how the proposed actions will improve conditions for both ESH-dependent prairie warblers while at the same time increasing forest interior habitats for ovenbirds. The analysis of effects of these two MISs is done on different scales. The expected improvements to prairie warbler populations were done at a local level and the effect on ovenbirds done across the analysis area as a whole. WRD suggests that a description of effects for prairie warblers across the analysis area would not result in significant improvement to the population, given the limited amount of ESFH being created in either alternative. The CCWA estimated that approximately 200 acres of ESFH (0.6%) existed from some vegetation work conducted in 2004-05. These acres have, at this point, grown out of the designation of ESFH (defined as 0-10 years). Thus all alternatives fall well short of the Forest Plan required minimums with Alternative 2 proposing only 253 acres and the new Alternative 3 proposing only 249 acres. Curiously, the new alternative 3 proposes this treatment on eight new stands (not in Alt. 2) and 20 acres in roadside daylighting (not in Alt. 2); however, these stands were not added to the original proposal but replaced other stands that were removed. These "new" stands in Alt. 3 account for 176 acres of treatment which, if added to the stands proposed in Alt. 2, would create 429 acres total or 72% or the identified minimum. We propose the FS should include them all. In combination with some stand replacement from the previously mentioned Pine/Pine-Oak Thinnings, this project could easily achieve at least the Forest Plan minimum for critical ESFH.

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<td>Riddleberger, Ken</td>
<td>Old Growth</td>
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<td>WRD is disappointed in the high targets for designated Old</td>
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Growth in light of the shortage of active vegetation management proposals in the DEA for almost every other treatment as previously discussed. For Old Growth, the DEA (pgs. 100-103) identifies required targets from the Forest Plan for each of the three included watersheds and the proposal exceeds each. The required minimum for the Cooper Creek Watershed was calculated as 1171 acres which would, by default, include 540 acres of designated Wilderness. The current proposal suggests allocating 1,235 acres in Cooper Creek. The proposals for Coosa Creek (339ac) and Youngcane Creek (259ac) are closer to those targets (318 ac and 208 ac respectively); however, the text also indicates "There are no old-growth compatible Management Prescriptions in Coosa Creek or Youngcane Creek Watersheds".

Further, the text of the Old Growth section is unclear as to the actual standard being applied to the proposed stands. The DEA devotes a paragraph (pg. 101, paragraph 2) to stands "that [are] approaching Old Growth minimum age requirements" and goes on to point out "it is likely that 130 years of age is too young to attain all old-growth characteristics but is consistent with the age threshold for some hardwood types in Region 8 (FS) guidance" and "that by 160 years some secondary hardwood forests have characteristics of old-growth". Since the table of proposed stands does not include stand age, it is unclear what standard is being used. Further confusing the issue, following the table (pg. 102) the text points out that an analysis of stands found individually older trees but the number of trees in the upper age class did not meet the number required for old-growth criteria. The text continues, "most stands did not meet other old-growth criteria..." Finally, this portion concludes with the fact that only the stands proposed for some vegetative management have been analyzed so other stands, if they are

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<td>The Chattahoochee - Oconee Land Management Plan and EIS outline Old Growth designation criteria that we followed here in the Cooper Creek Watershed Project. The Forest Service manages at the stand level and therefore when a stand is designated, rarely, although sometimes, is the stand further divided.</td>
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<td>Riddleberger, Ken</td>
<td>determined to meet criteria, may be allocated later. It appears that this DEA has set out to designate and exceed all minimum allotments of potential-future old growth from only those stands analyzed for potential vegetation management while at the same time stating that many don't meet criteria and further stating that there are other stands in these watersheds that have not been analyzed.</td>
<td>Prescribed fire will be used in conjunction with the other treatments prescribed in the EA. Growing season burn units will be on the smaller scale, for multiple reasons. Each burn unit and site area will have a site specific prescribed fire plan that will prescribe treatments to help meet the objectives of the EA.</td>
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| Riddleberger, Ken | Prescribed Fire  
We support the use of prescribed fire for the benefit of the forest, its communities and dependent wildlife. As is widely understood, fire has played a much larger role in shaping these landscapes in the distant past than in recent decades. We therefore support the plan to rotate fire on 11,000 acres of the Cooper Creek Watershed. We do not believe that fire alone will address the needs identified in the DEA and should be used in conjunction with other treatments including herbicides. All of the prescribed burns in the proposal indicate that they may be conducted as dormant or growing season burns depending on site specific conditions and analysis. WRD supports this provision; however, we recommend limiting growing season burns where possible. As previously mentioned, we suggest that burns be evaluated specifically to identify reduced acreages for growing season burns when nesting and young are present. Smaller patch size for growing season burns reduces direct mortality and nest destruction and assures escape cover is closer after the burn. | The discussion of the potential effects of the loss of hemlocks on water quality and aquatic habitat as a result of HWA disclosed in Section 3.4 (Water) of the EA has been revised to reflect the uncertainty of long-term effects. |
| Riddleberger, Ken | Stream systems in the Project area are of special interest because they support trout populations as well as sensitive non-game species. Of the three watersheds in the Project Area, the majority of the trout populations and non-game species of interest occur in the Cooper Creek watershed. Rainbow trout populations occur in Cooper Creek, Mulky |                                                                                                                                                                                                           |
Creek, Dixon Creek and Jarrard Creek. In addition, Cooper Creek supports an important stocked trout sport fishery, which is maintained by the GAWRD/U.S. Fish and Wildlife Service's cooperative stocking program. Many of the tributaries to Cooper Creek support wild brook trout, including Bryant Creek, Pretty Branch, Burnett Creek, Long Creek, Logan Creek and Boardcamp Creek. Of these streams, Bryant, Burnett, Logan and Pretty Branch are believed to support the Southern Appalachian strain of brook trout and are of particular interest to WRD. Genetics research continues. Because of the fisheries significance of the entire Cooper Creek watershed, great emphasis should be placed on protecting water quality, restoring aquatic habitat, and restoring instream connectivity.

In terms of water quality, aquatic communities in the project watershed are sensitive to increased sediment loads, stream warming, and loss of dissolved minerals. They are also heavily influenced by stream gradient, which was not mentioned in the Affected Environment section. The DEA identified stormwater runoff from roads as the primary source of sedimentation in project streams. We appreciate the attention given in the DEA to meet current Best Management Practices (BMP) for road construction and timber harvest. By following forestry BMPs, we believe that stormwater runoff, stream sedimentation, and the potential for stream warming will be minimized. The loss of hemlocks is inferred to have the potential for negative impacts to stream temperatures, but no true impact analysis of hemlock loss was done. We suggest greater attention in the final EA to these factors in order to assess cumulative effects (both positive and negative) of hemlock loss: a) percent contribution of hemlocks to canopy cover in riparian zones, b) effects of canopy gaps on stream.
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<td>primary productivity, and c) effects of large woody debris (LWD) additions into affected stream reaches, which are often deficient in woody debris loadings and instream habitat complexity.</td>
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Riddleberger, Ken

The DEA mentioned the potential impact of timber harvest on stream water quality, specifically a reduction in the stream's Acid Neutralizing Capacity (ANC) value. At the present time, ANC values are reported to be marginal; therefore, a further reduction in ANC values could negatively affect some trout populations in the Project area. However, the DEA fell far short of assessing the expected effects of timber harvest on base cation levels and resulting ANC values. Catchment size, biotic community composition in those catchments, and probable downstream mitigation with increased watershed size were not assessed. If an adequate assessment did show potential negative impacts to ANC values, then a discussion of mitigation alternatives (cut/leave alternatives to maintain base cations, less cutting in the two catchments/more cutting in others, or even fertilization) would strengthen this DEA and give both our agencies a better decision tool.

Previous research has documented short-term increases (less than 12 months) in stream nitrates following harvesting. However, the ecosystem is unlikely to sustain any severe damage from the nitrate increases.

The catchments where trees are commercial thinned or regenerated will remove calcium. However, the long-term estimates for most of the area indicate the additions of calcium from the weathering of rocks and deposition from the atmosphere is sufficient to maintain stream acid neutralizing capacity (ANC) the same as the no action alternative.

Only two catchments have a long-term risk of the ANC decreasing below the modeled estimate of 100 micro-equivalents per liter (ueq/L). Both of these areas are adjacent to catchments where the modeled ANC of 65 ueq/L or greater is likely in the no action alternative. Sullivan and others (2011) estimated in 1860 (prior to heavy acid deposition) the stream ANC may have been as low as 30 ueq/L with an average of 65 ueq/L elsewhere in Southern Appalachia. The model results using the Ecosystem Management Decision Support (EMDS) tool estimated the long-term stream ANC will be greater than or equal to 65 ueq/L (Reynolds and others, 2012) with and without commercial thinning or regeneration. Sullivan and others have suggested that achieving an ANC of 100 ueq/L is unlikely at many high elevation catchments. Although there may be a greater abundance of insects in streams with an ANC of 100 versus 65, there will still be sufficient food to support reproducing brook trout populations. A stream with an ANC of 65 ueq/L still has buffering capacity to strong acids to prevent episodic acidification and the extirpation of the insects is unlikely.
### Author(s) | Comment | Response
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Riddleberger, Ken | The DEA indicated that the amount of large woody debris (LWD) in project streams is limited, which likely explains the low habitat complexity in most streams. The FS has worked with WRD to restore instream habitat by placing LWD in several streams (page in). In addition, the FS replaced a perched culvert on Bryant Creek (p.17), which restored fish passage for brook trout. Such work, to date, is commendable. The DEA states on page 113, "Fisheries work in these watersheds will continue to focus on restoring aquatic habitat for native brook trout and other species. Habitat improvements such as adding woody debris to streams and reconnecting fragmented habitats through road stream crossing upgrades will improve aquatic habitat." Although fish habitat enhancements have occurred in several brook trout streams, the opportunity exists for significantly more improvements throughout the project. We would like to see the Final Decision and resulting work plans include more trout enhancement activities, including felling large numbers of trees over a significant stream distances, as well as replacing all perched culverts. | District Ranger Andy Baker made a decision not to propose aquatic habitat improvement projects under this Environmental Assessment. In the future there may be opportunities to analyze new proposals to improve aquatic habitat conditions in this portion of the Cooper Creek Watershed.|

Riddleberger, Ken | In terms of nongame fish species, we offer the following comments. The upper Toccoa watershed was designated a high priority watershed in the recent update to Georgia’s State Wildlife Action Plan. The watershed was selected because it contains important populations of Wounded Darter, Tangerine Darter, Olive Darter, Blotched Chub, Redline Darter, and Eastern Hellbender. Further, based on the number of rare aquatic species and their global rarity, this watershed was considered to have "high global significance. Please consider these specific issues during DEA revision: | Both the Water Analysis and the Aquatic Habitats Analysis identify the Cumulative Effects Analysis (CEA) area as the three sixth level HUCs that the project occurs in. These sixth level HUCs are Cooper Creek 25,290 acres, Coosa Creek, 14,364 acres and Youngcane Creek, 20,717 acres. Under Alternative 2, which has the most silvicultural treatments 8% of Cooper Creek would be treated, 13% of Youngcane Creek would be treated and none of Youngcane Creek would be treated (Youngcane Creek only has prescribed fire treatments). The Aquatic Habitat and Fauna Analysis indicates that there is the potential for negative cumulative effects to aquatic habitat and associated species under Alternatives 2 and 3, especially in drainages where treatments are
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* Only Hellbenders and Mountain Brook lampreys are listed. Please add the following species, which are known from Cooper Creek. While these species have been recorded in the portion of Cooper Creek downstream of the USFS boundary, the project has the potential to benefit water quality and habitats in downstream reaches of Cooper Creek:

- **Wounded Darter (Etheostoma vulneratum), State Endangered.** Within Georgia, this species only occurs in the upper Toccoa River system.

- **Tangerine Darter (Percina aurantiaca), State Endangered.** Within Georgia, this species only occurs in the upper Toccoa River system.

- **Olive Darter (Percina squamata), State Endangered.** Within Georgia, this species is only known from the upper Toccoa River system and the Little Tennessee River system.

- **Blotched Chub (Erimystax insignis), State Threatened.** Within Georgia, this species is restricted to large rivers and tributaries in Blue Ridge portions of the Tennessee drainage.

* Please delete reference to Mountain Brook lamprey, that species is no longer recognized as a Special Concern species in Georgia.

concentrated, but through the use of BMPs and mitigation measures the potential for negative cumulative effects to aquatic fauna and habitat would be minimized (DEA pg 118). The Aquatic Habitat analysis also indicates that cumulative effects from sediment would be localized and short term (DEA pg 80). As mentioned in the analysis the areas of concentrated treatments are Bryant Creek and Pretty Branch and as both analysis state this is where effects could occur, neither analysis indicated cumulative effects would be seen outside the designated CEA area. If the expected cumulative effects in Cooper Creek are minimal we do not expect cumulative effects further downstream and these analysis justify the selection of the CEA.

The eastern hellbender is on the Chattahoochee-Oconee National Forests' Locally Rare list and it does occur in the Project Area. Eastern Hellbenders could be negatively impacted by sediment introduced into streams as could all the other species listed in these comments that occur outside the project area. As mentioned in the DEA Waters (1995) provides an extensive overview of the negative effects sediment can have on aquatic habitat and organisms. The eastern hellbender has a global rank of G3G4 which means it is vulnerable to apparently secure in its range and it occurs from New York south to Georgia and west into Kentucky, Indiana, Illinois and Missouri.

In her letter dated November 3, 2016 to Ms. Sarah Francisco from the Southern Environmental Law Center, Ms. Kimberly Terrell, Director of Research and Conservation at the Memphis Zoo (see Project File) indicates that the Forest Service acknowledges the hellbender is known to occur in Cooper Creek and that there is a risk to hellbenders from sedimentation into streams. Ms. Terrell also writes there are
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<td>Riddleberger, Ken</td>
<td>In our June 2014 comments on the project, WRD indicated agreement with the proposed Road Access actions in compliance with the previously conducted Transportation Analysis Plan (TAP). Roads and road access are very important to our collective ability to conduct habitat projects. Access is vital to the operation of our WMA and is one of the most valued attributes for WMA hunters, anglers and other users. WRD cooperated in the TAP to identify the least damaging losses to road systems. This was done in good faith with the FS's budget challenges in mind. In recent years, WRD has contributed to the maintenance of FS roads above and beyond those that we have traditionally maintained through our WMA agreements. From 2013 to the present, WRD has invested more than $285,000 on maintaining FS roads while also maintaining WRD-designated roads. An additional $100,000 is slated for FS road maintenance this year. Through discussion with the FS Supervising Biologist for the project, we were told the additional road segments in alternative 3 were originally identified through TAP, but were erroneously left out of the original proposal. Given our agency's financial commitment and our users' need for forest access, we support the minimum loss of roads needed to comply with TAP.</td>
<td>no published studies that quantify the effect of sedimentation on eastern hellbenders and it is impossible to know how a population will respond to any specific increase in sediment load. We agree with this information in Ms. Terrell's letter, but we also think because of BMPs hellbenders will not be negatively impacted in the PA. Finally, the Cooper Creek Project would not affect the viability of the eastern hellbender species. The EA has been modified to include analysis for the eastern hellbender. Thank-you for your support</td>
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<td>Riddleberger, Ken</td>
<td>Also concerning the proposals for Road Access, we note that the new alternative includes expanded parking for the check station, as has been discussed between our agencies. We are disappointed that the agreed upon, needed parking expansion is only tied to the reduced project proposal. The need for this project has been discussed for some time. The DEA actually indicates that due to the lack of adequate parking there are traffic and safety concerns associated with our youth hunt. The problem is notable enough that the Union County Sheriff briefly took issue with the event this year. WRD therefore recommends that this portion of work be included in all proposed alternatives.</td>
<td>The parking lot expansion at the Cooper Creek WMA Check Station was not included in the original proposed action (Alternative 2) but was incorporated into Alternative 3 as a result of comments received during scoping.</td>
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<td>rider, wayne</td>
<td>As for road closures I would suggest a rotation of closures so that access to the more remote areas could be reached by outdoor enthusiast (hunters, fishermen and car type campers etc.) who can't or don't want to hike in, close a road off for a few years then open it while another area then was closed.</td>
<td>The roads identified for year-round closures are dead-end roads that receive minimal use. The roads identified for seasonal closure are frequently used by hunters, fishermen, and campers. However, they will remain open from mid-March to the end of December when they are most heavily used, and will only be closed during the winter months when use is limited. A rotational closing of these roads would not achieve the objective of closing these roads during the winter freeze/thaw period when road damage and runoff from these roads is the greatest.</td>
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<td>rider, wayne</td>
<td>Fire management practices seem to be a very useful tool in forest management and one that I'm in support of however I am unfamiliar with the forest type (Savannah) desired, can you give me a reference of local stands that are of this type that perhaps were created by fire? My concerns with fire are that too much under and/or mid story vegetation is taken away and all that is left is mature canopy overhead. On the Chattahoochee WMA there is a large prescribe burn area that while it went through mature stands it also went through early succession that was just getting of age for hunting in for grouse, woodcock and rabbit but the fire seeming killed it back to a sprout stage I can't understand why this area was targeted for fire?</td>
<td>Frequent, moderate-intensity prescribed fires can topkill young seedling and saplings, reducing the availability of early successional forest for species like ruffed grouse, woodcock, and rabbits. In response to this concern which was raised in scoping, in Alternative 3 the locations of many of the stands to be regenerated were shifted to include stands on the lower portions of the slopes where fire intensity would be reduced and/or in areas outside of prescribed burning blocks.</td>
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<td>rider, wayne</td>
<td>Mr. Wentworth, let me say that I am excited and very pleased to see interest from the USFS to actively manage our forests and their valuable renewable resources. I am very much in favor of a plan that addresses the need and or desire of increasing early succession at all elevations and even in some riparian zones (Goal 2) I feel that with the commercial removal of older marketable timber it would boost local economies and provide needed resources for the operating expenses of other needed projects by USFS.</td>
<td>Thank-you for your Support</td>
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<td>rider, wayne</td>
<td>Really fire managed stands I may not be that familiar with again references would be nice. In closing let me say again that I appreciate the opportunity to comment and am well pleased with the project as a whole and look forward to seeing it implemented on the ground.</td>
<td>Thank-you for your Support</td>
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<td>Rider, Tony</td>
<td>I am commenting in favor of the Coopers Creek Watershed Project#44385. I am a retired Forest Service employee since 2006. I started my FS career on the Chatt/Oconee in 1973 as a forest worker. In my 30+ years I saw the forest go from management of all the resources to No Management. I bothers me when I ride through the forest that I worked in and see the conditions it in today. System roads washing away, road banks over grown. I blame Forest Watch and Serria Club for this. It’s time for our professional forester, Wildlife and Fisheries Biologist are allowed to do their jobs. MANAGE THE FOREST!</td>
<td>Thank-you for your Support</td>
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<td>Roach, Greg</td>
<td>would like to express my support for the Coppers Creek Project as is stated in the Coopers Creek Flyer dates 12/15. I am in full support of the efforts to create and maintain both forest and wildlife diversity. I also appreciate the efforts being made to accomplish this diversity while still protecting other aspects of the Coopers Creek Watershed. I understand the difficulties in trying to appease every interest and yet accomplish viable goals that ultimately benefit the ecosystems in such beneficial ways. The forest habitat found in the southern Appalachians are a treasure when properly managed, yet without this proper management we are left with a vast sterile environment that generates minimal benefits to a number of species, including man. Again I appreciate the efforts being made to re-establish a degree of diversity in the forest eco-system and I support this proposed project as I have read it on the 12/15 Coopers Creek Flyer. I only hope that these same type efforts can be employed in other areas of the Chattahoochee National Forest.</td>
<td>Thank-you for your Support</td>
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<td>Robbins, Guynelle</td>
<td>Your definition of &quot;improving&quot; the area around Cooper Creek as being to cut 85% of the trees in 2,591 acres and thinning concentrated in a 5,100 acre area is very warped. My husband and sons fished in that area and disappointment runs rampant in our family regarding this devastation. I know of no one who frequents the National Forest that would ever believe that cutting mature oak trees would benefit the forest or the streams contained therein, I am amazed that the forest service has not progressed any further than clear cutting, thinning, and herbicide use in the last 50 years. I remember family trips to the Pocket area about 50 years ago when clear cutting was taking place within a few miles of the trout stream. There were red muddy roads down the side of the mountains to assist the logging trucks and areas that only had bare red clay on the slopes where once there had been pine trees. It was an assault to an area that we had enjoyed. Please reconsider your plans to devastate yet another area of our national forests. They are national and that means they belong to the people. Read all the correspondence directed to you on this very vital issue that means more devastation for our national forest.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td><a href="mailto:robertajo.cook@gmail.com">robertajo.cook@gmail.com</a>,</td>
<td>I oppose using our National forests as &quot;tree farms&quot;. The Forest Service doesn't need to &quot;manage trees&quot; because that function is already performed by mother nature. Mother nature serves the trees and wildlife adequately without interference from the Forest Service.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Anon</td>
<td>It is ironic that The Forest Service is the worst enemy of our National Forests, which has evolved into a commercial entity. If someone wants to harvest trees, they should plant them on their own private property rather than taking advantage of taxpayer owned woodlands.</td>
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<td>If the Forest Service perpetuates cutting trees in our National Forests, then we need to stop using the label &quot;National Forests&quot; and rename them, &quot;National Tree Farms&quot;. A forest can no longer be called a forest, when it is absent of trees.</td>
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<td>I am outraged tree clear-cutting is allowed in development of populated areas and that mentality carries over to what we call National Parks, which is where we should be preserving wildlife and woodlands.</td>
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<td>DON'T CUT ANY TREES IN THE COOPER CREEK WATERSHED!!!!!!</td>
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<td>ROBERTS, WILLIAM</td>
<td>I am very much in favor of the Cooper Creek Watershed project as proposed.</td>
<td>Thank-you for your Support</td>
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<td><a href="mailto:rockdale.pd@juno.com">rockdale.pd@juno.com</a>, Anon</td>
<td>I was drawn by the remaining stands of old growth forest you wish to sell at a pittance of the value it has. Don't waste any more of our lovely preserves.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Royeton, Elizabeth</td>
<td>I believe the natural secession of the forest should be studied and enjoyed not &quot;improved&quot; by humans. We have lost too many forests in the south.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Saine, Tracy</td>
<td>To me, it seems the forest can take care of itself which would spare a great deal of erosion, destruction and noise in one of the most peaceful areas in the North GA mountains.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>Schneider, Rachel</td>
<td>I do hope this is misleading as this large a clear cut is just too massive and would increase flooding downstream to highly destructive levels not to mention the loss of shade, air filtering functions, wildlife displacement and the aesthetic values. Downstream, we already have significant flooding about every week we've had so much rain and development on private land. As a result of this flooding, we have increased erosion, increased stream and reservoir sedimentation, culverts collapsing, roads collapsing and damage to private property from these rain events.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>Schneider, Justin</td>
<td>I would like to take a minute of my time and yours to thank you for starting the active habitat improvement of our National Forest in Georgia!!! It is long overdue and desperately needed! And on more than just Coopers Creek! I have hiked, fished, hunted, and just plain taken my kids for walks in the Chattahoochee Forest many times and have always hoped I see some type of management occurring. I have seen with my own eyes the number of Grouse flushes drop over the years. To even mention the deer and turkey would to to exhausting. All to often the folks that really care about our land remain silent, somewhat trapped in our busy lives trying to contribute to our Country and finding time to get outside, and the only voice that is heard are those with an agenda to advance instead of helping the critters on the ground.</td>
<td>Thank-you for your Support</td>
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<td>Sealey, Linda</td>
<td>I recently hiked this area and was shown the area in question. The trails, woods and beautiful near by Coopers creek are a refuge for many people. I'm sadden to learn of the planned cutting, new roads, logging trucks and the many other things needed for this type of operation. It will not be a time the National Forest, which belongs to all of us, can be enjoyed. No solitude, no hikes, people there will not be the hikers who love it and walk through with respect, instead it will be trampled by those working who have little regard for it's well being. After the equipment is gone the forest will not be the same, the injury will be seen for a long time.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Sealey, Linda</td>
<td>There will need to be burns and poisoning just to maintain what we have created. The National Forest should remain as natural as possible.</td>
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<td><a href="mailto:sheilareggie@tds.net">sheilareggie@tds.net</a>, Anon</td>
<td>I am writing in opposition to your proposed plan for the Cooper Creek Watershed. I live very close to the Cooper Creek Wildlife Management area, and I walk in it on an almost daily basis. I have lived here for nearly 40 years, and have deeply appreciated the changes in the forest since most commercial logging ended. I am very concerned that you are again making decisions based on commercial interests, and that this will include road building, which I thought had come to an end. There is little old growth timber left in this area, and it would be a crime to cut it, for reasons of culture, natural beauty and majesty, preserving our natural environment, and maintaining a carbon sink that we can't afford to lose. I am also appalled that you propose to use herbicides to maintain a &quot;woodland&quot; environment that is not even native in this area. (I've traveled western forests where this is a natural phenomenon.) Please re-evaluate your plan to put the environment above commercial logging interests.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative. The commercial harvest in this project is merely the tool used to help accomplish the project goal of habitat and ecological restoration. It will also help by generating some of the funds to accomplish other, non-commercial treatments within the project area.</td>
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| Shell, Sara   | No cutting north of Duncan Ridge!  
2. No cutting on steep sloops!  
3. 200 acres plus for no clear cuts on old cuts | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004). |
<p>| Shofner, Nancy| Why is a dense forest canopy unhealthy? | Dense forest and or closed canopy forest does not always mean unhealthy. An ecological departure analysis was conducted to provide a model of how much forest canopy opening would have been observed historically.                                                                                                                                                                           |
| Shofner, Nancy| Your project will destroy one of the few remaining beautiful forests with old-growth trees in north Georgia | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004). |</p>
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<tr>
<td>Shofner, Nancy</td>
<td>It will endanger or destroy much of the wildlife who depend on this kind of forest for their existence.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species. The effects of the project activities on the spread of NNIS is disclosed in Section 3.15 of the EA. The project includes design features and mitigation measure to reduce the potential for spread. In addition, the District has previously completed an Environmental Assessment that guides the NNIS control program across the District.</td>
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<td>Shofner, Nancy</td>
<td>Clear-cutting, or almost clear-cutting, will open up the forest to the many invasive plants that grow in such areas.</td>
<td>The Forest Service (FS) have been working closely with the American Chestnut Association and when seedlings become available the FS will look for places where we can use American Chestnut as the specie for reforestation.</td>
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<td>Shofner, Nancy</td>
<td>If you want more trees, plant them in a specified, suitable area.</td>
<td>This project will be implemented in &quot;phases&quot;. There will be multiple timber sales put together over the next 5-10 years. Only a portion of the project area will have operations ongoing at any given time. This will allow for the needed oversight. The units will be laid out, and a boundary painted to ensure that proper work occurs in the area it was intended for.</td>
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<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>First, I wonder how practical and feasible it will be to maintain the precise boundaries of each section when the proposed commercial logging and thinning are actually conducted. How will the intricate and irregular boundaries of each section be established and maintained on the ground? How will the actions of commercial logging be monitored and controlled to assure that the work is constrained to the designated areas?</td>
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Second, every effort should be made to preserve the areas that have old growth or near old growth character. Disturbance of such areas should be prevented. The actions proposed for sections containing stands of healthy oaks over 100 years old should be carefully considered and controlled to preserve these unique areas.

Third, the importance of creating early successional forest areas or open woodlands to favor specific types of wildlife versus the adverse impacts on the forest of: commercial logging on steeply sloped terrain; the potential for erosion and stream sedimentation from access roads and logging operations; impacts of widespread use of herbicides on fauna and water supply; and impacts on scenic quality should be more clearly justified and documented.
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<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>The action proposed as Alternative 3 appears to be a great improvement over the Alternative 2 that was described in the 2014 scoping document in that the potential impact and acreage involved is considerably reduced. However, I do not think that the need for the actions, even Alternative 3, is adequately described or explained to justify the adverse impacts that may result. It is stated that the action is proposed to &quot;restore native plant communities, enhance wildlife habitat conditions, and improve forest health.&quot; The EA does not explain why the proposed actions would be the best approach to these goals rather than a series of more limited and less impactful actions.</td>
<td>The FS used the best available science to write their analysis on chapter 3 of the Draft EA.</td>
</tr>
<tr>
<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>In view of the current resources and staffing levels available to the Forest Service, the EA needs to also address the question of how likely the Forest Service will be to have the resources to undertake, properly oversee and adequately assure that the actions of both contractors and Forest Service staff comply with the plan and actions described for the chosen Alternative for such a large scale undertaking. What assurance can the public have that this very significant project can be conducted, overseen and monitored in view of the resources currently available or reasonably expected?</td>
<td>This project will be implemented in &quot;phases&quot;. There will be multiple timber sales put together over the next 5-10 years. Only a portion of the project area will have operations ongoing at any given time. This will allow for the needed oversight. The units will be laid out, and a boundary painted to ensure that proper work occurs in the area it was intended for.</td>
</tr>
<tr>
<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>One of the aims of the project is described as an increase in the open woodlands (Woodland Restoration) for this area. Although restoration of woodlands is described as one of the dominant restoration goals of the Forest Plan, it is not shown that open woodlands is an appropriate condition for a forest in the Cooper Creek watershed or that open woodlands of the type contemplated was ever a natural condition for this area. Is maintaining open woodlands a return to a previous natural condition or necessary for forest health of this area</td>
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<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>While I do not oppose actions that will accomplish the goals expressed to restore native plant communities, enhance wildlife habitat conditions, and improve forest health, the proposed reductions of scope from Alternative 2 to Alternative 3, without any indication of a reduction in expected benefits, raises the question of how much more could the scope, and potential adverse impact, be reduced and the goals accomplished. The Economic Analysis of section 3.17 is meaningless without some method to assess the benefits other than income from timber sales or costs that result, which are other than cost incurred by the Forest Service in undertaking the actions.</td>
<td>While the long term future desired condition is more of an oak component, we do not anticipate that happening after one entry. The opportunity here is too identify and promote what few species are in the stands, and there sustainability to provide an easier conversion in the long term.</td>
</tr>
<tr>
<td><a href="mailto:shopetb@windstream.net">shopetb@windstream.net</a>, Anon</td>
<td>In short, the EA does not demonstrate to me that the proposed actions are needed, that their benefit will exceed the potential adverse impacts or that the environmental impact will be insignificant</td>
<td>The FS used the best available science to write their analysis on chapter 3 of the Draft EA.</td>
</tr>
<tr>
<td>Shortt, Sidney W</td>
<td>In reality, clear cutting destroys eco systems, wildlife habitat, established hiking trails and opens up the forest floor to run off, which in turn would cause erosion. Run off flows into the streams and tributaries which feed major sources of water designated for human consumption.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
</tr>
<tr>
<td>Shortt, Sidney W</td>
<td>Clear cut areas are often burned or sprayed with dangerous herbicides which destroy native plants.</td>
<td>The effects of prescribed burning and herbicide use on native plants is discussed in Section 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species of the EA and Appendix F- Herbicide Risk Assessment. The majority of the prescribed burning will occur during the dormant season and will not impact herbaceous plants. All herbicide applications will be very selective, treating individual target plants so impacts to other non-target plants will be minimal.</td>
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<tr>
<td>Sibille, Keith</td>
<td>I am a supporter of the plan</td>
<td>Thank-you for your Support</td>
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<td>Author(s)</td>
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<tr>
<td>Simons, Frampton</td>
<td>Massive amount of herbicides will have to be used for years in order to &quot;restore&quot; woodlands. Given that I get my water from a well, I am extremely concerned about the health effect of the unknown chemicals in the herbicide formulation on my drinking source. Additional residents downstream may also be subject to exposure to these chemicals. Any deer harvested from the area and surrounding area will also be exposed to these chemicals, having an unknown effect on the safety of eating any of the harvest. The same applies to fish. All this is despite the evidence that &quot;woodlands&quot; probably never occurred naturally in this area.</td>
<td>Project design features and mitigation measures for herbicides use are listed in section 2.4 and Appendix H of the Environmental Assessment. The effects of herbicide use on water quality are disclosed in section 3.4 (Water) and Appendix F (Risk Assessment).</td>
</tr>
<tr>
<td>Simons, Frampton</td>
<td>You plan to cut several old growth stands. These trees provide valuable sources of food for wildlife, like acorns that new trees can't. I am not sure why you want to hurt the animal population. As a hunter in this area, it is important to maintain these food sources. Additionally the majestic nature of these older trees cannot be replicated for another hundred years. I am not sure why you would want to take this resource from the public.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Simons, Frampton</td>
<td>I don't understand why you want to cut an area previously designated for dispersed recreation and was considered &quot;unsuitable for timber production&quot;. The population of our state of Georgia is increasing dramatically. Please continue to maintain this recreation area for both today's and tomorrow's citizens.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<tr>
<td>Simons, Frampton</td>
<td>The few jobs created by this project will mostly be from companies outside Union County. Many more jobs will be lost as fewer people visit our forest. This will hurt the home building and tourism sectors. The only jobs left for us will be spraying herbicides each spring! This is not something I want for my children or neighbors.</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). The road improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
</tr>
<tr>
<td>Simons, Frampton</td>
<td>The extensive logging and road system will cause major soil erosion, affecting water quality and temperatures.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
</tr>
<tr>
<td>Simons, Frampton</td>
<td>Trees often fall, opening up areas for new trees to grow. Sometimes we have major storms. Don't forget Hurricane Opal, which opened massive amounts of area for new tree growth. You don't need to open up the forest with these timber operations. Let Mother Nature take care of this!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Simpson, Keri</td>
<td>When, oh when, will &quot;man&quot; learn to leave nature alone and let it do what God intended it to? Forests have survived hundreds of years without the so called help of man. Every day you hear of more and more forests being taken over by man claiming it will help the forest growth or being bulldozed for business.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Simpson, Keri</td>
<td>This is helping the wildlife and fish how? There are already concerns about what the logging will do the for the trout</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1). The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
</tr>
<tr>
<td><a href="mailto:skipperhubp2025@comcast.net">skipperhubp2025@comcast.net</a>, Anon</td>
<td>Cutting should occur where management is needed, in younger stands that were clear-cut in the 1970s and 1980s. Without having evidence that woodlands ever occurred in the Cooper Creek watershed, attempting to &quot;restore&quot; woodlands in this area would be unsustainable.</td>
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<td><a href="mailto:skipperhubp2025@comcast.net">skipperhubp2025@comcast.net</a>, Anon</td>
<td>as this would threaten some of the best native brook trout streams in Georgia</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1). This comment is outside of the scope of the project.</td>
</tr>
<tr>
<td><a href="mailto:skipperhubp2025@comcast.net">skipperhubp2025@comcast.net</a>, Anon</td>
<td>Hopefully this is not the tail wagging the dog. Hopefully this is not a mystery that can be solved by following the money trail. Hopefully it is not another example of political shackling of government agencies involved in preservation of our natural resources as often occurs in our state when very questionable activities are in the offing. Hopefully no one is selling their soul to the devil.</td>
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<td><a href="mailto:skipperhubp2025@comcast.net">skipperhubp2025@comcast.net</a>, Anon</td>
<td>Moving forward with these proposed treatments would destroy some of the best examples of mature, healthy oak forests and towering white pines in the Chattahoochee National Forest.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td><a href="mailto:skipperhubp2025@comcast.net">skipperhubp2025@comcast.net</a>, Anon</td>
<td>Please publish the names of the commercial entities involved and the value of the woodlands to be cut.</td>
<td>There are no commercial entities involved in the planning of the project. When the project is approved, any timber to be sold will be offered to prospective timber purchasers and sold through a competitive bidding process. The estimated value of the timber is approximately $300,000 and disclosed in Section 3.17 Economic Analysis of the EA.</td>
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<td>smith, brenda</td>
<td>I am very concerned about the proposed plan to cut timber from the Coopers Creek watershed area. I would like to register my opposition to this proposal. I am a member of Georgia Forest Watch and lead hikes on a regular basis.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Smith, Nancy</td>
<td>My husband and I have chosen to live directly across from the Cooper's Creek area for over twenty years. We've enjoyed hiking, biking, camping and fishing in the area. We moved here for those reasons. There have been several times in the past when we were denied the use of this gorgeous environment due to choking smoke from prescribed burns of Duncan Ridge. The only time we've been forced to vacate, though, was when one of the prescribed burns escaped and threatened homes adjacent to Jarrard Gap, of which ours is one.</td>
<td>All prescribed fires on National Forest Lands have a site specific prescribed fire plan. This plan has detailed information on the prescription for each specific area. This plan covers a section on smoke management and all prescribed fires adhere to the states smoke management guidelines.</td>
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<tr>
<td>Smith, Nancy</td>
<td>The logging and burning of this old-growth habitat will only serve to damage and destroy various ecological systems within this area, not &quot;improve&quot; them to meet an unrealistic model of what the Forest Service seems to think is appropriate.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Smith, Nancy</td>
<td>I understand that the economic benefit of selling one-hundred year old oak trees is appealing to the Forest Service, but I can't imagine that the monetary gains will be as expected after considering the costs of site remediation, road-building, and the long-term costs associated with maintaining the &quot;woodland&quot; areas, i.e. continued herbicide administration.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<tr>
<td>Smith, Nancy</td>
<td>Once again, please reconsider this flawed plan, one that would severely damage this beautiful, mature ecosystem, as well as negatively impact the local economy of the tiny Suches community, which reaps the economic benefits of a thriving outdoor activity-driven economy.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Smith, Ray</td>
<td>Managing a forest properly is much better for the long term health and viability of a forest than doing nothing. With active forest management you can control understory growth this reducing fire risk and improving wildlife habitat and, take out diseased trees improving the longevity of the forest. . Allowing no activity in a forest is not stewardship its neglect.</td>
<td>Thank-you for your Support</td>
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In my opinion we should allow the forestry service to do what is was chartered to do. That is mange the forest for wood products instead of dream up worthless policies to appease the environmental community. This would also create
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| Sosebee, Nicholas | I would like to state that I oppose the commercial logging of any land within the Chattahoochee National Forest. These wilderness areas should be just that, wilderness areas. These forests have existed and thrived far prior to mans influence upon them.  

As an avid hiker, backpacker, outdoors man I ask that what little wilderness we have left to be left alone.  

It is an absolute shame when profit is more important to the land managers in charge of this "public" land than the protection and preservation of it.  

I have spent a large majority of my free time either hiking or backpacking in the Chattahoochee in one location or another oft spending multiple nights a month in the backwoods, primarily the Cohutta Wilderness, and would hate for future generations to miss out on these great experiences. | The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and Non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value. |
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<td>Spoon, Mary</td>
<td>My permanent address is in the Cooper Creek area. I have had a home there for 15 years. I understand that funds are in short supply, but selling off the only &quot;business&quot; in the area for a short term fix to fund the forest services is not the answer. We won't need a forest service because there will not be a forest. You are throwing the baby out with the bath water! Get a gripe on reality and stop the destruction!</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
</tr>
<tr>
<td>Stanhouse, Glenna</td>
<td>You need to leave our forests alone. Mother Nature knows best</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Stansell, Dennis</td>
<td>A reference in the project, titled &quot;Early Settlement and Land Use in the Present Toccoa Experimental Forest&quot; has several pertinent comments about the condition of the land from first European settlement until commercial logging removed the last of the virgin timber. Yellow poplars, white and short leaf pines, white oaks and chestnut are listed with chestnut accounting for &quot;25-30 per cent of the standing timber volume&quot;. Heavy grazing by sheep and hogs along with erosion from plowing slopes and occasional burning &quot;...the land had been extensively depleted in less than a generation&quot;. Top soil appears to have been seriously depleted less than a century ago and the forest continued to be logged and burned by the USFS. I think we need to know a lot more about the soil's ability to support a mature forest if the USFS continues to burn off the leaf litter and woody debris necessary to restore the soil.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Stansell, Dennis</td>
<td>The use of prescription fire as a management tool in a non fire dependent forest is unacceptable when carbon sequestration is essential to mitigate global climate change.</td>
<td>This project would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon &quot;sink,&quot; with carbon storage gains exceeding carbon losses (U.S. EPA 2012).</td>
</tr>
<tr>
<td>Stansell, Dennis</td>
<td>Fire causes so many problems in this area of steep slopes and human residents and tourists.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>Author(s)</td>
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<td>Stansell, Dennis</td>
<td>Smoke according to medical research that I will be glad to provide, repeatedly identifies wood smoke as a pollutant dangerous to even healthy people. &quot;Wood Smoke Exposure Induces a Pulmonary and Systemic Inflammatory Response on Fire Fighters&quot; is an article in European Respiratory Journal vol. 32, number 1, pp. 129-138. that describes the implications. I live in Suches near the project area. Several previous prescribed burns have caused me to stay inside my house because the smoke burns my eyes and irritates my throat. There is an assisted living facility near my house. The AT and BM trails are nearby. Smoke seems to follow the narrow stream corridor upward and into the Suches Valley.</td>
<td>Wildland fires do release fine particulate matter and other pollutants that can affect people's health when concentrations are too high. Both Department of Agriculture and Forest Service regulations require that prescribed fires conducted by the Agency are not to be a significant contributor to any National Ambient Air Quality Standard (NAAQS). The DEA provided a graphic showing fine particulate matter concentrations, at a nearby monitor, are below the daily NAAQS. The assisted living facility is an example of a smoke sensitive target. Identification of these types of locations occurs in the prescribed fire plan. The prescribed fires are planned to avoid exceeding the NAAQS or causing unacceptable air pollution or smoke impacts at the sensitive target. Thank you for your comment. These comments represent a general statement.</td>
</tr>
<tr>
<td>Stansell, Dennis</td>
<td>The National Roadmap for Responding to Climate Change, July 2010, USDA Forest Service apparently has not been referenced nor has the many publications by the National Academies of Science on climate change causes and mitigation. A project of this size should identify concerns and opportunities.</td>
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<tr>
<td>Stege, Kathy</td>
<td>and we don't have many areas this pristine and old growth left</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Steiner, Bret</td>
<td>We are not opposed to the management of the forest, however we would like to see a highly controlled and monitored process that will restore rather than destroy this valuable ecosystem. We would like to propose that the areas opened for commercial logging are opened in stages and in a staggered fashion, so the proposed areas are not completely denuded all at once. We would like to see the time line for logging overlaid a top of the proposed commercial logging maps, indicating a staggered approach with stiff fines to the logging companies for violations of the rules imposed. We would like to see 50 to 80 trees left per acre of land, instead of 20 to 60 per acre. These trees remaining should be diverse in nature and of different ages, not all young or old. Commercial companies go for the more mature and valuable trees and they tend to leave a few scraggly Pines or Tulip trees that are to weak to survive on their own.</td>
<td>This project will take approximately 10 years to carry out fully, several different timber sales over several years. The loggers will not have choice of which trees to cut, that will be the Forest Service. Logging Unit boundaries will be designated on the ground (painted) and the trees to removed will be designated by either painting the trees to be cut or possibly painting the trees that are to be reserved.</td>
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<tr>
<td>Steiner, Bret</td>
<td>Controlled burns should be limited to 50 to 100 acres per burn over a period of 10 years rather than every 2 to 3 years for thousands of acres at the time. This would limit the pollution generated by the burning and would allow for areas of recovery while others are being burned. Animals will have a place where to move to, if the areas are not too extensively burned at one time.</td>
<td>Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.</td>
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<tr>
<td>Steiner, Bret</td>
<td>We live in an area that was logged 7 years ago and the company left only a few pines and tulip trees behind. We know that 20 trees per acre is way too few trees. It has taken 7 years to see smaller hard woods reappear that are now about 6 to 8 feet tall. While the process is slow, it does bring balance to the ecosystem and it is needed from time to time, just not all at once and not all in the same area of concentration as it is being proposed in the maps for Cooper Creek. Lumbering operations should be scattered within a given year and spread over the 10 year period proposed. Compliance and oversight should be monitored by the yearly pictures generated in Google maps and posted on the Chattahoochee National Forest website to demonstrate compliance by the logging companies with the mandates and for transparency of the operation. Our fear is the &quot;free for all attitude&quot; that lumbering companies can have and the total disregard for nature, animals and the environment. Careful monitoring, oversight and sanctions for violations should be strictly enforced.</td>
<td>This project will take approximately 10 years to carry out fully, several different timber sales over several years. The loggers will not have choice of which trees to cut, that will be the Forest Service. Logging Unit boundaries will be designated on the ground (painted) and the trees to removed will be designated by either painting the trees to be cut or possibly painting the trees that are to be reserved.</td>
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<tr>
<td>Steiner, Bret</td>
<td>With all this in mind, we support your efforts for restoration and we trust that you will modify your plans to be mindful of the surrounding communities that will have to live with the pollution and the restoration project for the next 10 years. We trust that you will be mindful of the fact that the forest is mostly in the state of Georgia, where we have been able to conserve many coastal areas and restore long needle pine forests to create habitat and beauty for all to enjoy. You should also be mindful that this forest attracts many tourists and visitors to the Appalachian Trail and to all of North Georgia. This forest is part of the economy of the small towns and communities in many Georgia counties.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Stephens, T.</td>
<td>I am in favor of your plans for Coopers Creek. We have gone too long without timber cutting and our wildlife species have suffered from it. I hope your plan goes through</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Stover, Jerry</td>
<td>I fully support the plan to increase habitat and select cut timber on Coopers Creek.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Strickland, Ken</td>
<td>Please become the Protector of these ecologically intact islands (our National Forests) instead of allowing the extraction industry (logging in this case) to do its bidding. I don't have to look far to be saddened by what I see as a result: Huge logging scars on the southern sides of Tipton and Brawley Mountains in Fanning County, where I live (forty years now) and appreciate nature and the outdoors in a low impact way. Please, protect our National Forest, not commodify it.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25' of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.

Thank-you for your Support
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<tr>
<td>Swayne, Tyler</td>
<td>However I would be for doing a little more research on the brook trout populations there and fix a few culverts across the wma.</td>
<td>District Ranger Andy Baker made a decision not to propose aquatic habitat improvement projects under this Environmental Assessment. However, in recent years the Chattahoochee-Oconee National Forests has worked with GA DNR and the Georgia Council of Trout Unlimited to improve habitat not just in steams in the Cooper Creek watershed, but also other trout streams across the National Forest. In recent years the Forest Service also replaced a perched culvert on Bryant Creek and there are plans to replace culverts on Pretty Branch and Dixon Creek (EA pg. 111). GA DNR has also headed up an extensive monitoring program of our habitat improvement work and this monitoring indicates our efforts have been successful.</td>
</tr>
<tr>
<td>Tally, Nina</td>
<td>I know I am not an expert in forest management, but it seems to me that the forest can manage itself. The forest ages in thousands of years versus a human life span. Please let the forest continue to be naturally managed. Thank you.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
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</table>
Talmadge, Lynda  
Please do not proceed with this "project" to decimate old growth forest. If you must "manage" the forest to achieve younger growth with more open spaces, do so in an area that is not old growth and has already been clear cut within the last 30 years. This is a terrible idea and will have ecological ramifications that are very damaging.

Response to Comment (By Comment Author)  
4/27/2017 4:55:15 PM

Tbcallahan@aol.com, Anon  
This is one of the true treasures of the Forest. Please do not destroy this old growth forest

Response to Comment (By Comment Author)  
4/27/2017 4:55:15 PM

Tbcallahan@aol.com, Anon  
Our wonderful trout streams are suffering enough with all the death of the hemlocks. Logging in this area would further damage trout streams

Response to Comment (By Comment Author)  
4/27/2017 4:55:15 PM

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats)
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<tr>
<td>Thaxton, David</td>
<td>Please continue with the forest service primary focus of returning this woodland to historic conditions. This action is long overdue and will be a significant benefit to the wildlife, flora and fauna of the area.</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Thomas, Britt</td>
<td>I do not see any reason whatsoever for humans to get involved with thinning the vegetation and potentially jeopardizing old-growth trees, which are rare these days. Please reconsider.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Thomas, Sam</td>
<td>I fully support the Forest Service Coopers Creek Project plan.</td>
<td>Thank-you for your Support</td>
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<td>THOMAS, JOHN</td>
<td>I am opposed to the plan to &quot;manage&quot; our forests by logging, building roads, spraying herbicides, burning, etc. If non-native vegetation is the issue, put out a call for volunteers to manually thin these areas. Let's tread lightly in the forests and have confidence that nature will find a way to manage itself without heavy-handed and misguided human management, and will reward us and our descendants with a healthy and beautiful habitat for countless forest species. After all, the forests managed quite well for millions of years before humans were around!</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Thompson, Jennifer</td>
<td>No cutting north of Duncan Ridge!</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Thompson, Jennifer</td>
<td>No cutting on steep slopes!</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.

The effects of project activities on visual quality are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to the scenic quality of the area.
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<td><a href="mailto:TLLJR8@aol.com">TLLJR8@aol.com</a>, Anon</td>
<td>Please don't let the monetary needs of a few take precedence over the healing powers and food sources for the many thousands.</td>
<td>The activities proposed within the Cooper Creek watershed were identified in order to respond to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests and helps move the project area towards desired conditions described in that plan. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. Commercial timber sales are just one of the tools that will be used to implement the project along with other non-commercial activities and prescribed burning. As disclosed in Section 3.17 Economic Analysis, the economic values presented only considered revenue derived from timber harvest activities and non-monetary benefits, such as wildlife habitat improvement and enhanced recreation opportunities, were not considered in calculations for this analysis. However, the qualitative and economic value of these actions would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy, thereby increasing the Benefit/Cost Ratio to a positive value.</td>
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<tr>
<td><a href="mailto:tlport@windstream.net">tlport@windstream.net</a>, Anon</td>
<td>Please do not disturb the delicate ecosystem that Coopers Creek watershed provides. Thanks Larry Portwood</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Tomasovich, Stephen</td>
<td>I see no downside to the project. I fully support your efforts.</td>
<td>Thank-you for your Support</td>
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<td>Tomlin, William</td>
<td>Particularly, I’m not convinced that you’ve conducted the necessary analysis of this project's environmental impacts, I think you’ve proposed too much and inappropriate management in too small of an area, and I’m left with unanswered questions about this project’s impacts on rare and potentially threatened species.</td>
<td>The effects of the proposed activities on Threatened, Endangered, Proposed, Sensitive, and Locally Rare species are disclosed in Section 3.13 of the EA. The Biological Evaluation will on the selected alternative will be completed and made available to the public prior to the final decision.</td>
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<tr>
<td>Tomlin, William</td>
<td>First your environmental assessment is lacking in specificity. It reads more like a literature review or a high school research paper than an actual assessment of the environmental impacts of this project. For instance in your section on climate change, you reference multiple publications describing climate change more generally, but you don't provide any estimates about how this project will affect the balance of greenhouse gases in the atmosphere. Given that you're proposing to cut thousands of acres and burn thousands more, this oversight evidences a dangerous lack of respect for the impacts of this project and for the democratic process, especially given the emphasis President Obama and other world leaders recently placed on protecting forests as carbon sinks in the Paris Agreement and especially because Google makes it so easy to find information, like a New York Times article I found in less than a minute reporting on research showing that one acre of a fifty-year-old oak forest can sequester 30,000 pounds of CO2.</td>
<td>Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon “sink,” with carbon storage gains exceeding carbon losses (U.S. EPA 2012). The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation’s CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed,</td>
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<tr>
<td>Tomlin, William</td>
<td>Further, your lack of cumulative impacts analysis is insulting. In your climate change section, you only mention some burning that occurred in the last decade. What about other cutting projects? What about reasonably foreseeable actions? Your website lists numerous projects. Are none of those projects reasonably foreseeable? What about projects in neighboring states or on state- and privately-owned lands? Unless you go back and actually provide the analysis federal law requires you to provide, this public comment period is fairly meaningless. The public can't respond to an assessment that hasn't been done.</td>
<td>because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a). The EA disclosed the cumulative impacts on chapter 3 in the document.</td>
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<tr>
<td>Tomlin, William</td>
<td>Second, this project calls for some large swathes of cutting in a fairly small area not suited for this type of management. You rather dishonestly describe a very large project area and hide behind a distorted percentage that makes the cutting look small, but it looks like a lot of the cutting is concentrated near Bryant Creek and around Duncan Ridge. Hiking in that area, I'm struck by how steep the slope is there, and I'm worried that cutting north of Duncan Ridge will lead to a huge increase in soil runoff that would damage the watershed. Further, I can't see how so much cutting near Bryant Creek, more than 80% of the watershed, won't have a significant impact on that native trout stream. This cutting should be eliminated from the proposal.</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<td>Tomlin, William</td>
<td>Third, I have unanswered questions as to what impact this project will have on rare and potentially threatened species. What impacts will the project have on bat populations suffering from white-nose syndrome, rare plants like the various lady slippers growing in the area, and rare fish and amphibians native to North Georgia?</td>
<td>The effects of the proposed activities on Threatened, Endangered, Proposed, Sensitive, and Locally Rare species are disclosed in Section 3.13 of the EA. The Biological Evaluation will on the selected alternative will be completed and made available to the public prior to the final decision.</td>
</tr>
<tr>
<td>Tomlin, William</td>
<td>You'll have to forgive me if I'm left feeling like you don't care about what's best for the forest or about representative government. On page 28 of the EA, you dismiss reasonable alternatives based on science-based ecological restoration and alternatives that would limit cutting to younger stands rather than old growth. You say the latter alternative isn't &quot;commercially viable.&quot; Is that what this project is about, money? Is that why you haven't provided a true assessment to the public and instead throw out misleading descriptions of the project area? These are public lands, and this is my home. Please, reconsider this project, provide a real assessment of its environmental impacts, and consider alternatives that are actually focused on ecological restoration.</td>
<td>This project was based on the ecological needs of the area, extensive modeling and ground examinations were conducted to produce an ecologically appropriate management plan. Timber sales are merely the ground tool that we can use to accomplish the objectives.</td>
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We want to be clear that we support sound, science-based ecological restoration. While landscape-scale ecological models can be useful for project planning, they must also be field-verified and their predictions modified as needed, based on the conditions observed "on the ground" in specific project areas and specific sites. This is needed to ensure that predictions of desired and current conditions scale down accurately to smaller areas and "match" the actual site conditions there, especially in our highly varied Southern Appalachian landscape. Unfortunately this second step has not occurred here, leading to the continued proposal to force woodland conditions on inappropriate types of sites.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Principles of ecological restoration also require land managers to weigh the risks and benefits of active versus passive restoration for any given site. In many project stands, we believe the risks and impacts of attempting to alter stand structure through commercial logging, with its associated road construction and other disturbance, outweigh any possible benefit. We did identify more degraded stands where restoration is more needed and where tree cutting would carry fewer risks, but as noted above those alternatives have not been fully considered.
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<td>Topa, Mary</td>
<td>Certainly, the District does not have to accept all of our recommendations, but we have sought, and will continue to seek, a path forward that reduces conflict and could lead to a project that has more broad public support, while allowing the District to implement its goals. We hope that the following comments are read in that light.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Topa, Mary</td>
<td>The District does have to comply with the National Environmental Policy Act, the National Forest Management Act, and other authorities, however, and the draft EA is inadequate to do so. Although lengthy, the EA lacks a clear analysis of all the relevant information regarding the conditions at Cooper Creek and a clear application of that analysis to the specific proposed activities and their effects.</td>
<td>The Draft EA used the best available science and follow the NEPA, NFMA, CONF Forest Plan.</td>
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Many of the impacts associated with this project are not adequately disclosed, considered, and addressed in the EA, as we have noted in our comments. The EA’s analysis of these risks, as well as its analysis of the project’s purpose, need, adverse effects, and alternatives, omits scientific and other highly relevant information that must be disclosed. We recognize our comments are lengthy; this is due in large part to our efforts to provide much of the information we believe is currently missing from the draft EA and to show its importance to further analysis of this project. In many instances, the project’s adverse effects and risks could be avoided or further reduced with reasonable action alternatives, which are not yet considered or are not fully considered.

For example, alternatives that avoid logging in the riparian corridor, avoid logging on lands unsuitable for timber production, and avoid concentrated logging in the watershed of Bryant Creek (an important tributary to Cooper Creek) should be considered. These and other reasonable alternatives discussed further below should be fully and fairly presented, analyzed, and considered to allow the public and agency to weigh the most appropriate alternative.

The FS used the best available science to write their analysis on chapter 3 of the Draft EA.

Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:

**Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed.** No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of...
mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.

**Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands.** The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

**Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes.** Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.
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<td>Topa, Mary</td>
<td>Beyond the incomplete nature of the EA's environmental analysis, the EA also does not address serious questions regarding this project's compliance with existing direction and procedures for management of the CONF, including: the National Forest Management Act (NFMA); the CONF Forest Plan; Forest Service regulations and other applicable rules; and the Forest Service Manual, Handbook, and regional guides. Many of these authorities provide mandatory direction for this project, as well as guidance and information developed by the Forest Service itself, which should aid in the interpretation and application of these authorities and which should be taken into account in shaping this project. Instead, the draft EA often turns a blind eye to them or picks and chooses the elements it wishes to consider.</td>
<td>The Draft EA used the best available science and follow the NEPA, NFMA, CONF Forest Plan.</td>
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<tr>
<td>Topa, Mary</td>
<td>The EA should be revised to address and repair these problems or an EIS should be prepared. Any revised, supplemental, or additional environmental analysis should be reoffered and re-noticed for public review and comment, before the district develops and releases a draft decision notice.</td>
<td>The draft EA haven't found a significant effect on the quality of the human environment considering the context and intensity of impacts. Thus, an environmental impact statement will not be prepared. An EIS is not necessary because there will be no significant effects on public health and safety, or on unique characteristics of the area (historic and cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers). This project will have no adverse effect on sites eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historic resources. It will not adversely affect any endangered or threatened species or habitat that has been determined to be critical under the Endangered Species Act of 1973. It will not violate Federal, State or local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (Biological Evaluation and Biological Assessment in the project record).</td>
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<td>Topa, Mary</td>
<td>In a region with such varied topography, elevation, and soils as Cooper Creek, simply saying &quot;many of the stands in the project area are dense and overcrowded&quot; does not clearly present conditions in the area. EA at 2.</td>
<td>The models were used to identify potential needs. Field data for all proposed units was gathered to determine the actual ecological needs of the stands.</td>
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<td>Topa, Mary</td>
<td>Discussing health issues in terms of forest types or ecological units helps address this issue, but does not completely solve it. The same condition, such as closed canopies, may have different causes in different forest types and thus require a different management. Moisture conditions in particular need to be explicitly stated when discussing forest conditions at Cooper Creek.</td>
<td>Though moisture conditions are not separately discussed, they are a criteria of the ECS modeling exercise that was conducted for Cooper Creek (Appendix C).</td>
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<td>Topa, Mary</td>
<td>Fundamentally, forests are healthy when they live and develop under the same conditions that shaped them. Evolution has adapted forests to those conditions, particularly to natural environmental stresses such as drought, fire, and pest and pathogen outbreaks, and these may vary in degree, and spatially and temporally. Conversely, any condition outside the natural range of variation for that ecosystem has the potential to disrupt structure and composition and threatens forest health. The key to how an ecosystem responds to a stress is whether it evolved with that particular stress or disturbance.</td>
<td>The ECS model and Departure Analysis were tools used in conjunction with field surveys to maintain the stands composition within their natural range of variation where applicable.</td>
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The age of the forests at Cooper Creek also directly suggests that a low rate of canopy gap formation should be expected. In surveying old-growth forests across the CONF, ForestWatch found the median age of representative trees was 213.5 years for white oaks and 189 years for chestnut oak. These ages underrepresent the longevity of the species, because cores rarely hit the pith, time to reach coring height was not included, and cores were obtained from live trees. White and chestnut oaks may be the two most common species in the Cooper Creek area and many other dominant species have similar longevity. The dominant trees at Cooper Creek are less than halfway through their life spans. If the forests are healthy, we would expect low rates of mortality and consequently, little canopy gap formation.

Due to the younger age of the stands, and lack of natural mortality creating canopy gaps, the proposal will provide those gaps to increase the structural diversity until the stands age to a point where we see more gaps form naturally.

There are also reasons to expect Cooper Creek to have less open canopy than a generic, average forest of similar age. Many broad-scale, intense disturbance events are both infrequent and patchy in their effects. Consequently, even when a major event occurs, most of the effects will be concentrated in a few areas.

The basis for the proposed action is founded on the ECS modeling analysis, Appendix D, and the field inventory of the stands.

Relative to preceding centuries, the 20th century was a wet one for north Georgia. Recent droughts have been shorter and less severe than occurred in earlier periods, especially 1696-1820. Extended drought is a major cause of direct tree mortality, and also increases the vulnerability of trees to other stresses, particularly pathogens and insect pests. Consequently, we would expect healthy forests in the 20th century to have relatively low mortality rates and dense canopies. As far as we understand, the stage and transition models that the departure analysis is based upon do not account for this long term-variation in drought or other disturbances that result in tree mortality.
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<td>Topa, Mary</td>
<td>While the Draft EA focuses on canopy density, other potential forest health issues are inaccurately assessed or ignored. The Draft EA states that snags, cavities, and coarse woody debris (CWD) are &quot;abundant&quot;, and cites &quot;past southern pine beetle activity, periodic ice and windstorms, and fire&quot; as sources. EA at 105.</td>
<td>The availability of CWD is disclosed in section 3.10 Snags, Dens, and Downed Wood of the EA. While the commenter is correct that the abundance of CWD and snags are less than was present in presettlement conditions, they are not scarce and occur throughout the older stands in the project area. The EA lists a number of factors that have contributed to the availability of CWD including that approximately 60% of project area contains trees that are older than 80 years as well as past southern pine beetle activity, periodic ice and windstorms, fire and HWA mortality. As noted by the commenter, SBP activity and ice storms have played a very limited role in the area as compared to other factors.</td>
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<td>Topa, Mary</td>
<td>There is no evidence of recent southern pine beetle outbreaks in the area, and the preferred host species, yellow pines, are rare. EA at 90.</td>
<td>The availability of CWD is disclosed in section 3.10 Snags, Dens, and Downed Wood of the EA. While the commenter is correct that the abundance of CWD and snags are less than was present in presettlement conditions, they are not scarce and occur throughout the older stands in the project area. The EA lists a number of factors that have contributed to the availability of CWD including that approximately 60% of project area contains trees that are older than 80 years as well as past southern pine beetle activity, periodic ice and windstorms, fire and HWA mortality. As noted by the commenter, SBP activity and ice storms have played a very limited role in the area as compared to other factors.</td>
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<td>Topa, Mary</td>
<td>Tree crowns in the area do not show breaks from ice damage, and ice storms disproportionately affect small trees. Windstorms and fire have produced some snags and CWD, but no major events have occurred in the project area in recent decades. These forests have very little CWD and snags relative to pre-settlement conditions, as is indicated by the much greater abundance of CWD in the old-growth forests that once dominated the area. The claim that Cooper Creek is replete with snags and CWD is further belied by the emphasis on canopy density; how have snags been formed without creating gaps in the canopy? Snags and CWD are as scarce as gaps across most of the area. Adding logs to Pretty Branch to create trout habitat also clearly shows the functional shortage of CWD. See EA at 111.</td>
<td>The availability of CWD is disclosed in section 3.10 Snags, Dens, and Downed Wood of the EA. While the commenter is correct that the abundance if CWD and snags are less than was present in presettlement conditions, they are not scarce and occur throughout the older stands in the project area. The EA lists a number of factors that have contributed to the availability of CWD including that approximately 60% of project area contains trees that are older than 80 years as well as past southern pine beetle activity, periodic ice and windstorms, fire and HWA mortality. As noted by the commenter, SBP activity and ice storms have played a very limited role in the area as compared to other factors.</td>
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<td>Topa, Mary</td>
<td>Similarly, tree cavities and microtopography are relatively scarce. Trees in this area have not been large enough for long enough time to give fungi and other forces opportunities to produce cavities. They are present in the area, but much reduced relative to pre-settlement times. Early 1900s logging operations destroyed much of the existing microtopography, such as pits and mounds. The shortage of uprooted large trees has limited the rate of new microtopography formation. The relative scarcity of microtopography is again indicated by an abundance of microtopography being used as one way to identify old-growth stands.</td>
<td>The Forest Service has analyzed both through models and field exams to produce alternatives to meet the Purpose and Need. The Forest Service is still governed by NFMA and stocking must be meet and maintained. Planting needs are discussed in the EA and well as the stands target for oak maintenance were natural oak regeneration would be anticipated(Ch. 2).</td>
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<td>Topa, Mary</td>
<td>While this project views closed canopies as a &quot;symptom&quot; of an unhealthy forest, it does nothing to address the actual cause of the condition. The silvicultural treatments in this project will immediately open the canopy, but they will not cause the forest to start producing more canopy gaps in the future. In fact, these treatments will do the opposite. Residual trees will experience reduced competition and have more resources to defend themselves against pests and pathogens. At the same time, the forest's ability to produce cavities, snags, and coarse woody debris will be severely diminished for decades. The retained trees will be less likely to become any of these assets, and about half of the existing trees will have no chance to contribute because they will be removed. While the retained trees will have a slightly increased chance of windthrow, none of the removed trees will generate pit and mound microtopography. Given the scale of cutting, the rate of formation of these assets that literally hundreds of species use is likely to decrease by more than 50% for decades. This project offers a short-term solution to a dubious problem while disrupting processes essential to long-term forest health.</td>
<td>Dense forest and or closed canopy forest does not always mean unhealthy. An ecological departure analysis was conducted to provide a model of how much forest canopy opening would have been observed historically.</td>
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<td>Topa, Mary</td>
<td>Long-term effects on forest composition are also far from certain. Silvicultural treatments aimed at oaks will often provide opportunities for more competitive early successional species to regenerate as discussed further below. Even where fire will control those early successional species, oak regeneration is not guaranteed. Studies pairing silvicultural treatments with prescribed fire have had mixed results in regenerating oaks. Prescribed fires on their own, approved prior to this project, are more likely to generate long-term vegetation changes by limiting tree regeneration and selecting against fire-sensitive species.</td>
<td>The Forest Service has analyzed both through models and field exams to produce alternatives to meet the Purpose and Need. The Forest Service is still governed by NFMA and stocking must be meet and maintained. Planting needs are discussed in the EA and well as the stands target for oak maintenance were natural oak regeneration would be anticipated (Ch. 2).</td>
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<td>Topa, Mary</td>
<td>The implications of existing treatments on forest processes, structure, and composition have also not been appreciated. The Draft EA acknowledges that prescribed burns have &quot;created and maintained&quot; early successional habitat in the project area. The Upper Warwoman Project Environmental Assessment predicts that prescribed fires in new burn units would eventually convert 35% of the unit area to early successional habitat, and that prescribed burns would maintain existing early successional forest produced by earlier burns. Warwoman EA at 126. Given that potential to create and maintain early successional habitat with prescribed burns, we find it strange that the Draft EA concludes early successional habitat within Cooper Creek burn units &quot;would grow older and lose its value as early successional habitat for wildlife species&quot;.</td>
<td>Prescribed fire can be used to create and maintain early successional forest habitat. However, the effectiveness these treatments is largely influenced by fire intensity. The low-to-moderate intensity prescribed burns that have occurred within the Cooper Creek area has created a limited amount of early seral habitat. As discussed in Section 3.8 Successional Stage Forests and Habitats of the EA, less than 1 percent of the project area is in early seral conditions, the majority of which is in patches less than 1 acre in size. The use of growing season prescribed burning and higher intensity dormant season burning in the Cooper Creek area may enhance opportunitiesto create and maintain ESFH in the future.</td>
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<td>Topa, Mary</td>
<td>Prescribed fires can produce open canopies and early successional habitat in at least two ways. The first is by top-killing dense mountain laurel thickets. Gaps in the overstory with mountain laurel underneath them are considered closed canopy because the ecological classification modeling assessed &quot;canopy&quot; at two meters above ground and mountain laurel is typically over two meters tall. Prescribed fire would convert those overstory gaps to areas of open canopy and early successional habitat. Mountain laurel does not resprout vigorously and is killed by successive fires, so these areas are likely to remain open.</td>
<td>Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.</td>
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<td>Topa, Mary</td>
<td>Prescribed fire can produce open canopies and early successional habitat, secondly, by limiting tree regeneration. One of the principle goals of prescribed fires is to reduce understory saplings. Without saplings able to take their place, the death of canopy trees will lead to persistent openings and early successional habitat. On most sites, three to five years is not enough time for trees in this region to grow large enough to withstand even low intensity fires. That process is what allows fire to maintain woodland and savannahs. Ridges and dry slopes will see gradually diminishing tree cover as long as prescribed burning is conducted on a three-five year frequency.</td>
<td>Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.</td>
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Topa, Mary | The Draft EA has failed to fully assess needs within the project area and how the proposed actions will affect the myriad processes that influence forest health. Stand development processes, the longevity of dominant species, and variability of disturbances in both space and time all call into question whether forests are too "dense and overcrowded". That question has not been thoroughly analyzed. If the forests are overcrowded, existing prescribed fires will reduce density and create early successional habitat. The proposed silvicultural fixes would disrupt key ecological processes, without providing a long-term solution. Long-term solutions to the area's needs require appreciation of the complexity of the situation and reassessment of the full effects of potential actions. | The ECS model and Departure Analysis were tools used in conjunction with field surveys to maintain the stands composition within their natural range of variation where applicable. |
Topa, Mary | Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail: **Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed.** No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early... |
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<td>Forest Service regulations define ecological restoration as &quot;[t]he process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed.&quot; 36 C.F.R. § 219.19; see FSM 2000, Ch. 2020. Restoration aims to reestablish the &quot;composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions.&quot; Id. Ecological restoration moves an area towards &quot;ecological integrity&quot; which is the &quot;condition of an ecosystem when its...composition, structure, function, [and] connectivity...are within the natural range of variation.&quot; 36 C.F.R. § 219.19. The natural range of variation is &quot;the full range of variation produced by dominant natural disturbance regimes&quot; and generally refers to a &quot;pre-European influenced reference period.&quot; FSH 1909.12, Ch. 05. &quot;Adaptive management, monitoring, and evaluation are essential to ecological restoration.&quot; FSM 2000, Ch. 2020.6. In sum, a project is only restorative if it is moving an area towards ecological integrity which requires bringing the composition, structure, function, and connectivity of an ecosystem more in line with the natural range of variation.</td>
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Topa, Mary

The Forest Plan defines restoration as "ecologically, the process of returning ecosystems or habitats to their former structure and species composition, especially through the return of former ecological processes such as fire." As provided above, the Forest Service more recently adopted a different definition: "The process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecological restoration focuses on reestablishing the composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems' sustainability, resilience, and health under current and future conditions." The Society for Ecological Restoration defines ecological restoration as an "intentional activity that initiates or accelerates the recovery of an ecosystem with respect to its health, integrity and sustainability." In keeping with these definitions, for the woodland treatments in this project to be restoration, they must occupy sites that were woodland in the past. For that to be the case, the natural, specific site conditions must dictate a woodland community.

Topa, Mary

In our response to the May 2014 scoping, we asked for evidence that the woodland restoration treatment stands were woodland under natural (pre-European settlement) conditions. The Draft EA recognizes that concern in the Issues section, and states "the appropriateness of the sites selected for woodland restoration are discussed in Chapter 3 of this document." EA at 6-7. However, we could find no direct discussion of the appropriateness of the woodland treatment stands in that chapter. Indeed, we found no justification for the woodland treatment in the Draft EA beyond "sites proposed for woodland restoration in the Cooper Creek Project were identified through the use of the Cooper Creek Ecological Classification System." EA at 6.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<td>Topa, Mary</td>
<td>It is unclear how the Ecological Classification System (ECS) could be used to identify pre-settlement woodland sites. The ECS purports to map pre-settlement ecological units, but no ecological unit on the CONF is associated with only woodland conditions. Ecological units associated with woodland condition also have closed canopy forest forms. It appears the assumption was made that every occurrence of an ecological unit associated with woodland is capable of supporting woodland. Thus, any ecological unit associated with woodland is sufficient justification for woodland restoration.</td>
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<td>Topa, Mary</td>
<td>We tested that assumption by applying ecological classification at the landscape scale and comparing the results to historic landscape descriptions. We used Steve Simone’s first approximation of ecozones on the Chattahoochee National Forest to identify pre-settlement ecological units. This model produces outputs similar to the Cooper Creek ECS, and is the best available data for the surrounding landscape. We removed Tennessee, Ridge and Valley, and Piedmont sections of the output so that the data set would better match the Cooper Creek area and historical references. We also removed private lands since they are not available for management. The data set does not cover the northeastern part of the Chattooga River Ranger District, but includes the rest of the Blue Ridge in the CONF. We then used Landfire Biophysical Settings used in the Upper Warwoman Landscape Management Project to estimate the extent of woodland from the ecological units. Mesic ecological units such as acidic cove and northern hardwood forest can exist in open canopy forms. However, these open canopies are usually transitory, so we assumed they contributed no woodland. For all oak and pine ecological units, we treated them as woodland if they had an open canopy, and the proportion in an open canopy was found by summing the percentage in each open canopy stage. For instance, dry-mesic low elevation oak forest has 13% in the mid-open class, 14% in late-open and 42% in late 2-open, so 69% of the ecological unit was assumed to be woodland. The total extent of woodland was found by multiplying the area of each ecological unit by the percent in woodland and summing for all oak and pine types.</td>
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<td>Topa, Mary</td>
<td>The ecological unit modeling and Biophysical Settings predicted that 60% of the CONF Blue Ridge province was woodland during pre-settlement times, a proportion not supported by historical data or reflected in current conditions. Ayers and Ashe survey of Southern Appalachian forests described the forest as typically dense. Landscape photographs from the same period also show continuous closed-canopy forest stretching across multiple ridges and slopes. Those photographs would not be possible if the region were over half woodland. This would be especially true by 1900 when higher rates of burning and livestock grazing had increased the extent of woodland above pre-settlement levels. Thus, the ECS approach predicts woodland in many places that were not woodland during pre-settlement times. Our analysis demonstrates that the ECS approach alone is not sufficient to identify sites suitable for woodland restoration.</td>
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<td>Topa, Mary</td>
<td>To be truly restorative, proposed restoration activities must be evaluated based on an individual site's specific characteristics (e.g. soil, topography, fire compartment size, and potential productivity). At each site, the agency should be able to describe an appropriate reference condition based on the site's characteristics, identify any ecological degradation that has occurred, and consider options for repairing that damage, including options for active and passive restoration (see DellaSalla et al. at 17). But the Draft EA does not offer any site-specific characteristics of the stands proposed for woodland restoration. If the agency cannot identify ecological departure from an individual site's reference condition, restoration is unnecessary. Actions that are not consistent with this definition and are not supported scientifically should not be labeled as restoration. If there is a conflict between model results and evidence from a particular site, the local evidence should take precedence over theoretical predictions.</td>
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Landscape indicators of pre-settlement conditions do not suggest woodland

While the agency has not offered any evidence that any woodland existed in the treatment area prior to European settlement and has not provided any justification for its selection of individual stands for woodland restoration, there is persuasive evidence indicating that there was never any significant pre-settlement woodland in these stands.

Woodlands naturally occur only where disturbances kill most saplings. If disturbances kill almost all saplings, a savannah or prairie will result. If disturbance kills only a few saplings, a closed-canopy forest results. Determining what ecosystem would naturally occur at a site then depends on estimating how many saplings would be killed under a pre-settlement disturbance regime. This number varies with how large the saplings are when the disturbance occurs. That size in turn depends on how long it has been since the last disturbance and the growth rate of the saplings. The suitability of Cooper Creek for woodland restoration then depends on the pre-settlement frequency of disturbance and the local growth rate of trees.
Pre-settlement fires were started by either Native Americans or lightning. Native American impacts on the landscape were patchy and concentrated around their settlements. Hence, Native Americans burned primarily near their settlements. Native Americans developed their communities around reliable, perennial water sources on level terrain. Duncan Ridge runs through the middle of the treatment area and eliminates opportunities for settlement within the treatment area or to the east and west. That leaves the valleys between the treatment area and Blairsville and along Cooper Creek itself as potential settlement areas and sources of fire. For most of its length, Cooper Creek is deeply incised, so any settlements would have been along its lower reaches.

In the north Georgia mountains and the Chattahoochee NF, the number one cause of wildfire is humans. With the primary source being for escape from escape debris burns, followed by arson. This allows for fire origin to not be limited to ridge tops as most lightning fires are.

The large flats on Cooper Creek are over four miles from many of the proposed woodland stands. Fire has no clear path to migrate from the potential settlement sites to the proposed woodland restoration stands. East-west ridges, streams, isolated peaks, and broad gentle slopes fragment the terrain in between. Fires set near potential settlements would encounter barriers to spread before reaching the proposed woodland sites and would typically go out before reaching those areas. So fires set near Cooper Creek settlements would contribute little to fire frequency on the upper slopes of Duncan Ridge.
Fire would be even less likely to spread from settlements near Blairsville. Fire from those areas would have to cross the consistently steep and rich north slope of Duncan Ridge to reach the proposed woodland treatment sites. Those conditions create a continuous mesic area that functions as a broad fire barrier.

Simple geometry dictates that setting fires far from settlements would result in lower frequency of fire across a broader area. For example, if a community of Native American's burned 2,000 acres annually, it would take them three years to burn all the area between one and two miles from their settlement. However, it would take the same group nine years to burn all the land between four and five miles from their settlement. The farther from settlement areas, the less frequent fire would be even if Native Americans set fires far from their settlements. Difficulties of fire spread across a heterogeneous and fragmented terrain would still apply. Overall, the landscape suggests that the frequency of Native American fire in the Cooper Creek treatment area was low.

Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.
Fire would be even less likely to spread from settlements near Blairsville. Fire from those areas would have to cross the consistently steep and rich north slope of Duncan Ridge to reach the proposed woodland treatment sites. Those conditions create a continuous mesic area that functions as a broad fire barrier.

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Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.
Topa, Mary

From 1970 to 1999, there were 143 lightning strike fires on the Chattahoochee-Oconee National Forest. Assuming that fires were distributed equally throughout the CONF during this time, then 124 fires occurred in the Chattahoochee, and 19 fires occurred in the hotter and drier Oconee National Forest. If Cooper Creek is representative of the Chattahoochee, Cooper Creek would have averaged less than one fire in 30 years. Additionally, lightning strike fires in the Cooper Creek vicinity would suffer from the same spread issues as fires set by Native Americans. If a fire started on Duncan Ridge itself, the deep Mulky Gap, with its associated north-facing slope, and the high and moist Coosa Bald would serve as barriers to spread along the ridge. The top of Duncan Ridge within the treatment area is generally moist for a ridge, and supports cove species such as may-apple, showy orchis, and blue cohosh. Thus, lightning strike fires probably occur on Duncan Ridge below the typically low rate, and even if recent lightning fire underestimates historical rates, lightning fires would have been rare in the Cooper Creek area.

Response

In the north Georgia mountains and the Chattahoochee NF, the number one cause of wildfire is humans. With the primary source being for escape from escape debris burns, followed by arson. This allows for fire origin to not be limited to ridge tops as most lightning fires are.
Without frequent fire, slow tree growth rates would be necessary to limit sapling density and prevent canopy closure. However, the treatment area contains tall trees, which indicates fast growth rates. The tallest known silverbell and basswood in Georgia grow in the treatment area; yellow-poplar comes within 10 feet of the state height record; and farther down Cooper Creek white pine reaches 169’ tall. The state champion Fraser magnolia and Alleghany serviceberry also grow in the treatment area. The area appears to have generally productive soils capable of supporting high rates of growth. The scarcity of rock outcrops also suggests soils are relatively deep, which would buffer stands from the effects of droughts. Only stand 505-17 has several rock outcrops, and most of the remaining stands do not even have isolated rock exposures. For any given landscape position, growth rates in the Cooper Creek treatment area appear moderate to fast, and trees would develop resistance to fire at a proportionately quick rate. Consequently, landscape evidence suggests the balance of fire and growth would favor forest over woodland in the Cooper Creek area.

Examination of existing vegetation provides an alternative means of evaluating the likelihood of pre-settlement woodland at a specific location. Logging and fire exclusion destroyed evidence of woodlands in many areas, while European burning extended woodlands into areas previously occupied by forest. Hence, both presence and absence of woodland structure and species must be interpreted cautiously.

The basis for the proposed action is founded on the ECS modeling analysis, Appendix D, and the field inventory of the stands.
Pines (excluding white), clonal heaths, low branching oaks, composites (Asteraceae), and warm season grasses have all been pointed to as indicators of woodland. Pines (excluding white), are generally scarce in the Cooper Creek area. The project is just outside of the range of pitch pine and table mountain pine, the most fire-associated pines in the region. Shortleaf pine is scarce, but that may reflect elevation more than disturbance history. Virginia pine often occupies the dry and exposed landscape positions favored by pitch and table mountain pines outside of the range of those species. In the treatment area Virginia pine is scarce, found primarily in flats along upper Bryant Creek that were likely farmed. Deep soils and competition from faster-growing hardwoods seem the most likely explanations for the lack of Virginia pine. Overall, the lack of fires-associated pines argues against the presence of pre-settlement woodland.

The use of prescribed fire on south facing dry slopes, helps to create the desired effects and objectives of the project.
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<td>Topa, Mary</td>
<td>Mountain laurel is common and the most widespread heath in the treatment area. While mountain laurel is an important component of some open communities, the species' shade tolerance also allows it to grow and reproduce underneath a closed canopy. Fire easily top-kills mountain laurel, and the species recovers slowly. This combination of traits allows mountain laurel to thrive under conditions that do not support woodlands, so the species' abundance cannot be interpreted as evidence of past woodlands. Other clonal heaths that recover faster after burning are rare or absent in the treatment area. Bearberry huckleberry is surprisingly scarce given how common the species is in oak forests across north Georgia, and low-bush blueberry appears restricted to narrow sections of ridge-tops. These species are not woodland obligates, so their scarcity is not conclusive. However, it would be surprising that so little of them persisted if extensive woodland occupied the area pre-settlement.</td>
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<td>Topa, Mary</td>
<td>Oaks with open grown morphology are essentially absent from the Cooper Creek area. That absence could reflect either their historical absence or their removal during industrial logging. The oak species in the region most closely associated with woodlands, post and blackjack, do not occur in the treatment area. However, those species rarely occur at such high elevations, so a pre-settlement woodland in the area likely would not have included them. Other oaks species such as white and chestnut are among the most abundant species in the Cooper Creek area. Those species are well adapted to both forest and woodland habitats, so they are not reliable indicators of early community structure. If the mere presence of those species is interpreted as an indicator of woodlands, then one would have to conclude that the majority of the CONF was woodland in pre-settlement times. However, accounts from the early settlement period clearly contradict that interpretation as described above. Overall, the current structure and abundance of oaks in the treatment area provide little information about prior woodlands or their absence.</td>
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<td>Topa, Mary</td>
<td>Composites and warm season grasses are major and consistent components of woodland ecosystems. More generally, they are characteristic of disturbed habitats. Their small wind-dispersed seeds allow them to colonize even isolated recently disturbed areas. Within the treatment area, shade-tolerant species not typical of woodlands, such as Curtis's goldenrod, are widespread, and light-demanding species are restricted to road edges and similarly disturbed areas. The light from the road may have allowed the latter to persist in an otherwise inhospitable environment, or they may have colonized the road edge from a distant location after the disturbance. The existing vegetation does not allow either of these possibilities to be eliminated, particularly since every sunny road bank and building site in Georgia supports warm season grasses or composites after a year or two. Consequently, these species are not reliable vegetation indicators of pre-settlement woodland in the Cooper Creek area.</td>
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<td>Topa, Mary</td>
<td>Just as we can look for species that indicate pre-settlement woodland, we can look for species that indicate pre-settlement forest. As mentioned above, may-apple, blue cohosh, and showy orchis grow on top of Duncan Ridge, but are typically found in rich cove forests. Mesic forest herbs have a notoriously difficult time recolonizing sites after disturbance, so it is unlikely these species colonized Duncan Ridge after the advent of fire exclusion. Their presence indicates that the upper edge of the general woodland treatment area was forest during pre-settlement times, and that Duncan Ridge has unusually rich soils.</td>
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In their early forest surveys, Ayers and Ashe8 noted that American chestnut is sensitive to fire. American chestnut also provides unique information about historical forest conditions, because the species no longer reproduces by seed and sprouts typically survive only when originating from small diameter stems. The location of current chestnut sprouts then identifies places that had fire sensitive individuals in the 1930s. While a few chestnuts might escape a fire, an abundance of sprouts indicates the area did not burn frequently. We encountered abundant chestnut sprouts in the northern half of 505-6, on top of Spencer Knob, and the upper slopes of 504-18. Chestnut might have been able to rapidly colonize openings in woodlands if fires were stopped. However, chestnut blight generally coincided with the start of active fire exclusion, so chestnut could have colonized former woodlands only if fire exclusion started unusually early in that area. The current distribution of chestnut sprouts suggests that several areas in the woodland treatments were forest during the early 1900s.
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<td>Topa, Mary</td>
<td>Much of the existing vegetation at Cooper Creek is inconclusive regarding woodland. Many species are adapted to both forest and woodland habitats, and post-settlement disturbance has destroyed much potential evidence. The woodland vegetation that is likely to persist, pine, is scarce, which suggests the area lacked woodland. Concurrently, fire-sensitive species that do not readily colonize new habitat remain across much of the proposed treatment area. Overall, the existing vegetation indicates the treatment area was forest during pre-settlement times. This landscape stands in stark contrast to other parts of the region like Rabun Bald or the escarpment around Amicalola Falls where south-facing slopes are extensive and long south-trending ridges provide corridors for fire movement and spread.</td>
<td>The use of prescribed fire on south facing dry slopes, helps to create the desired effects and objectives of the project.</td>
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<td>Topa, Mary</td>
<td>Woodlands occur where fire or other disturbances kills most saplings and maintain an open canopy. Patterns of fire spread, Native American settlement, and lightning ignitions in the Southern Appalachians indicate the project area experienced fire infrequently during pre-settlement times. The fast tree growth in the area and long intervals between fires would allow most saplings to grow large enough to survive fires. Existing vegetation is often not definitive, but generally supports this conclusion. Persistent woodland species are absent or scarce across the project area, and fire-sensitive species are widespread. Thus, we are forced to conclude that the woodland treatments in this project would not contribute to the goal of restoring 10,000 acres of woodland, because these areas were forest rather than woodland.</td>
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<td>Topa, Mary</td>
<td>The Forest Plan indicates that the priority for woodland should be old-growth types 22 (dry-xeric oak forest, woodland, and savanna) and 24 (xeric pine and pine-oak forest, woodland, and savanna) (FW-055). These old-growth types have a site index of less than 60, except where dominated by pitch or table mountain pine (EIS tables 3-30 and 3-81). The Continuous Inventory of Stand Conditions lists only one stand in the Cooper Creek Watershed Project area, 633-18, as having a site index of less than 60, and pitch and table mountain pines are absent from the treatment area. Stand 633-18 contains existing old-growth, so it should not be thinned. Therefore, even if any of the stands in this project were appropriate for the woodland treatment, they should be low priority.</td>
<td>Prescribed fire will be used in the 3-5 year rotation to control the undesirable hardwoods by allowing the desirable ones (fire tolerant) a chance to compete. Once it is determined by the monitoring and the Silviculturist recommendation the fire return interval will be modified to meet the desired objectives. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Topa, Mary</td>
<td>How will sprouting of these &quot;undesirable&quot; hardwoods be addressed in the Cooper Creek Project where a 3-5 year prescribed burn is proposed?</td>
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<td>Topa, Mary</td>
<td>The Introduction to the Forest Plan states that the Plan &quot;represents an adaptive management approach,&quot; which means &quot;practicing restorative ecosystem management with the understanding that we are students of nature, not masters of it.&quot; As &quot;students of nature,&quot; the Forest Service should not attempt any additional creation or &quot;restoration&quot; of woodland until it can demonstrate a reasonable prospect of success, and even then only on sites that show clear signs of having supported natural woodland in the past.</td>
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<td>Topa, Mary</td>
<td>The Plan goes on to state that &quot;[a]daptive management will use our scientific knowledge and experience to design strategies that allow us to progress toward ecological and socioeconomic objectives as we learn. The adaptive aspect of these strategies is the ability to test our assumptions and make adjustments as we learn from our work and the work of others in the field. ... With sustainable forest habitats and healthy watersheds and ecosystems as primary goals, a great deal of knowledge is being tested; and there are many factors to monitor over time. ... Monitoring (and constant evaluation) is the heart of adaptive management&quot; (Plan at 1-2).</td>
<td>Monitoring is an essential part of the Chattahoochee-Oconee National Forests Plan (CONF) and the Forest Plan give us the protocols to follow for any project developed on National Forest land.</td>
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<td>Topa, Mary</td>
<td>When the Forest Service proposes to create woodland on an even larger scale than at Brawley, in similar conditions, with the knowledge that this first attempt (at Brawley) has not proven successful to date, it is not acting as a &quot;student of nature&quot; or practicing &quot;adaptive management.&quot; It is violating its own plan.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Topa, Mary</td>
<td>NEPA requires that &quot;relevant information&quot; be made available so the public can evaluate projects proposed by federal agencies such as the Forest Service. As discussed further below (see, infra, Section IX(3)(iii)) the District's experience and results with its woodland creation efforts thus far are highly relevant information that must be considered and disclosed, under NEPA. The Draft EA should provide a detailed, forthright explanation of the outcomes so far at Brawley and explain why and how the Forest Service believes it can achieve a different result in the Cooper Creek Watershed Project. Proceeding with woodland creation in the absence of such recognition and explanation would be arbitrary and capricious because of the failure &quot;to consider an important aspect of the problem.&quot;</td>
<td>Woodland restoration affects and consequences in the Cooper Creek Project is disclosed in the EA (Chapter 3) in almost every specialist report. Brawley Mountain Project is cover under another EA.</td>
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<td>Topa, Mary</td>
<td>The Draft EA does not adequately explain or demonstrate how the proposed woodland treatments are appropriate ecological restoration. It must disclose and consider relevant information regarding appropriate ecological restoration and squarely address how this proposal meets that standard. Aspects of the project that cannot be justified based on ecological restoration should be reconsidered or re-justified. At a minimum, the District should consider an alternative justified solely by ecological restoration. The District should ensure that restoration activities developed as part of this project conform to the definition of ecological restoration. Project activities should also adhere to other highly relevant information developed by the agency and by reputable scientific authorities that defines and establishes best practices for ecological restoration.</td>
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<td>Topa, Mary</td>
<td>Sustainability and success of woodland restoration at Brawley Mountain and proposed Cooper Creek sites will always be low because these sites never supported woodland and they are simply too productive. If the District feels that it must make more progress towards the Forest Plan's goal of 10,000 acres of woodland, it should follow the principle of adaptive management, look for an appropriate site, start on a much smaller scale than 720 acres, test its assumptions, make adjustments, monitor, and constantly evaluate its successes and failures.</td>
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<td>Topa, Mary</td>
<td>The Draft EA does not justify woodland restoration in the Cooper Creek area. The ECS approach (modeling general relationships among current topo-edaphic conditions, historical vegetation, and disturbance regimes) over-predicts the extent of historical woodland and is not a reliable means of identifying pre-settlement woodland stands. Site specific conditions and current vegetation indicate Cooper Creek naturally supported very little if any woodland. This information indicates woodland cannot be &quot;restored&quot; at Cooper Creek, and results at similar sites call into question the feasibility of creating woodland at Cooper Creek. Given the Forest Service's limited capacity to maintain the disturbance regimes needed for woodland, attempting to create woodland at Cooper Creek would only prevent woodland restoration at more appropriate sites within the Chattahoochee, where the agency would likely have a higher degree of reaching targeted goals.</td>
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<td>Topa, Mary</td>
<td>As described in the EA, this treatment is unlikely to achieve its stated goals of improving stand health and regenerating oaks. However, it could easily be modified to meet those goals, assuming appropriate stands are selected. Some of the issues with the treatment derive from the particular stands selected, and those will be addressed in our comments on individual stands (see below). Increasing the basal area retained to 80-100 ft²/acres would improve the treatment by better mimicking natural disturbance regimes and making oak regeneration much more likely.</td>
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<td>Topa, Mary</td>
<td>Disturbances in mature lower slope or fairly mesic forests, such as those targeted by the proposed treatment, consist primarily of gaps of one or a few trees produced by weather events, often wind storms. In such cases, closed canopy forest entirely surrounds the gaps. Removing a third or less of the existing canopy would mimic that disturbance and produce a gradient of light levels within the stand. The resulting light gradient would create a variety of niches and maximize short-term diversity. Removing a third or less would also produce the structure that more bird species are adapted to. However, if the stands are allowed to age naturally, this treatment would still be unnecessary, because natural gap formation is inevitable. But taking the stands down to 60-80 basal area as proposed would create high light conditions across the entire stand and greatly reduce the ability for gaps to occur naturally in the future. Overall the stand will be healthier if basal area targets are higher.</td>
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<td>Topa, Mary</td>
<td>Oaks require low levels of competition and intermediate to high light levels for regeneration. As proposed, these treatments would create high enough light levels for highly competitive, fast-growing early successional species like white pine and tuliptree to regenerate and likely out-compete any oak seedlings. This issue is particularly problematic, because treatments are proposed outside the prescribed burn units. The seedling number of early successional species could easily overwhelm herbicide treatments. Even in areas that are burned, fires are unlikely to eliminate all of the white pine and tuliptree on such sites. The reduced thinning we suggest (80-100 BA) would maintain enough shade to suppress early successional species while still providing enough light for advanced oak regeneration to develop. When gaps naturally occur, the oaks would then have a height advantage that would allow them to out-compete early successional species. Maintaining higher basal areas would also reduce or eliminate the need to cut mature oaks to meet the target basal area, so this group of important species for wildlife would be better maintained both now and in the future.</td>
<td>Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon &quot;sink,&quot; with carbon storage gains exceeding carbon losses (U.S. EPA 2012). The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the</td>
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<td>Deliberately favoring white and northern red oak also seems to run counter to the forest health goals of this treatment. Oak species are ecologically distinct with different species being adapted to different site and microsite conditions. The presence of chestnut oak in a mixed stand indicates it is the best adapted species to the site/microsite conditions. Deliberately favoring other oaks over it will likely result in a stand that is less adapted to local conditions and more vulnerable to pathogens and climate extremes. This situation will probably become worse over time, because climate change is expected to intensify droughts in the Southern Appalachians. Favoring white and northern red oak over chestnut oak will likely result in forests that are less resilient to climate change; instead of increasing forest health, this treatment will reduce forest health. Chestnut oak is one of the most drought tolerant oaks. We see no justification for favoring white and northern red oak over chestnut oak in this area, particularly when one of the goals of this project is to increase the health and resilience of these stands to climate change.</td>
<td>nation's CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).</td>
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<td>Topa, Mary</td>
<td>This treatment has issues similar to the oak/oak-pine thinning regarding the amount of basal area retained and potential for oak regeneration. We have additional concerns about the sites selected for this treatment. This treatment specifically targets white pine, red maple, and tuliptree, and the increase of white pine and red maple on uplands over the past century is well known. However, many of the stands are in acidic mesic and riparian areas where all of the targeted species have historically occurred and are well adapted. In fact, these treatments border the entire length on Bryant Creek in the project area as well as parts of Pretty Branch and several smaller streams. Removing white pine, red maple, and tuliptree on such sites will not &quot;restore oak to its native sites&quot;. Hence, the pine/oak thinning treatment should be restricted to dry upland sites and planted white pine stands.</td>
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<td>Topa, Mary</td>
<td>Like the thinning treatments, the purpose of this treatment does not seem to match the design of the treatment. Birds in this region evolved with disturbances that create gaps, holes in a closed canopy, in mesic forests. The Draft EA notes that &quot;patchiness' of canopy caused by the death of single or multiple trees in small groups&quot; contributes to forests &quot;rich in diversity.&quot; EA at 100. These natural gaps were not in open canopies, as is proposed in this project, and were much smaller than the gaps in this treatment. If the goal is to produce the structural diversity that will benefit birds the most, we wonder why the Forest Service does not mimic the kind of structure with which these birds evolved with. As designed, this treatment will insure continued failure of oak regeneration rather than promote oak regeneration, the stated goal. This treatment will produce light levels high enough for fast-growing early successional species to easily out compete oak trees. None of this treatment occurs within prescribed burn units, so oaks will have to compete with faster-growing species. If true canopy gaps were created that would be optimal for forest birds, light levels would be sufficient for oak regeneration while not allowing early successional species to become established.</td>
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<td>Topa, Mary</td>
<td>This treatment is overwhelmingly concentrated in Prescription 7.E.1 which is classified as &quot;unsuitable&quot; for timber production under the National Forest Management Act (&quot;NFMA&quot;). The Draft EA only provides one justification for this treatment - preparation for &quot;stand regeneration.&quot; EA at 13. In other words, this treatment is advanced site preparation for a future commercial timber sale. As discussed below (see, infra, Section VIII(i)) this treatment cannot be implemented in Prescription 7.E.1 consistent with designation as &quot;unsuitable&quot; for timber production under NFMA.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Topa, Mary</td>
<td>This treatment has great potential to produce both long- and short-term benefits. It will immediately produce canopy gaps and over the long term shift the species composition back towards a more natural mix. We suggest that the treatment be carried out with only chainsaw felling, unless there is a safety risk.</td>
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<td>Topa, Mary</td>
<td>One of the stated purposes of the project is to &quot;[e]ncourage regeneration of Oak and Oak-Pine Forest communities.&quot; EA at 37. ForestWatch agrees with the need to encourage oak regeneration but doubts that harvesting mature oaks will have a beneficial effect on hard mast production, even in the long run.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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<td>It may be argued that there will be many acres of oak forest remaining in the project area after project implementation. However, that argument takes only a short-term view. The scientific literature has thoroughly documented the scarcity of oak reproduction across much of the eastern United States. In our visits to the project area, we found that while mature oaks</td>
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may be widespread, advance regeneration is consistently scarce. Hence, oaks will likely decline in this area over the coming decades. Harvesting mature oak stands would then be sacrificing current mast production for the hope of an increase in mast production beginning many decades in the future. That choice seems especially odd if the goal is to improve wildlife habitat, not hasten its deterioration. In particular, this concern applies to stands 398-28, 399-12, 504-15, 504-21, 505-07, and 505-19 (see attached stand-specific comments).

We were surprised by the claims that cutting young (less than 40 years old) stands would provide limited benefit to wildlife and produce insufficient regeneration. These claims rest on a false premise, and are inconsistent with research on temperate forest regeneration. Limits to wildlife use and regeneration purportedly result from boles and other slash left on site, which is in turn a consequence of the stands being too young to harvest commercially. While the trees in many young stands are too small to harvest, many other young stands already have commercial size trees. LiDAR data indicates that over 250 acres of young forest in the analysis area are already dominated by trees 50 to 70 feet tall. This would be enough acreage to replace all the proposed early successional forest habitat. Trees in those stands are large enough for commercial harvest, and commercial harvests are planned in stands with the same canopy height range, such as 505-007.

To determine if concerns about wildlife use of non-commercially harvested stands were valid, we reviewed the scientific literature. We could not find support for either claim. Slash appears to restrict the movement of only large ungulates, , , , , suggesting that of the many species using
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<td>early successional habitats in Cooper Creek, only white-tailed deer would be impacted. These studies refer to &quot;microsites&quot; such as piles of logs or treefall mounds (which would not be produced by non-commercial treatments) where tree seedling and saplings experience reduced browsing. As controls they often used seedlings and saplings at the same sites but outside of these protected microsites. The control seedlings are consistently browsed. Taken together, these studies imply only small parts of stands would be inaccessible to deer, and that accessible vegetation would still be enough to meet deer needs. Any loss of browse for deer would also have to be weighed against the loss of mast production from cutting mature stands. Studies of bird use of naturally disturbed sites such as tornado swaths suggest that fallen trees do not restrict use. We did not find any other research documenting or suggesting that slash restricts wildlife use of early successional forest habitat. If you have data or studies to suggest otherwise, we would appreciate seeing those results.</td>
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<td>All of the native wildlife in this region pre-dates commercial timber harvesting. Disturbances with abundant slash are the norm for these species. Any species dependent on early successional habitat that could not use such areas would have gone extinct long ago.</td>
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<td>Studies of regeneration in the context of disturbance and slash document sufficient regeneration across a wide variety of temperate forest settings. We did not find any studies that directly compared the amount of regeneration in commercially and non-commercially logged stands, but salvage logging versus no treatment following wind disturbances provides a close analog. One study in Europe that examined windthrow gaps in a wide variety of forests found salvage logging</td>
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sometimes increased regeneration, but soil pH and ground vegetation cover were better predictors of sapling density 11 to 21 years after disturbance. Another study in western Tennessee found that two years after a wind disturbance, herbaceous cover and tree seedling density did not differ between salvaged and unsalvaged areas. An unsalvaged forest damaged by a tornado in Kentucky also had no shortage of tree regeneration. Finally, a comparison of loblolly pine stands in Texas subject to either southern pine beetle mortality or cut-and-leave control procedures found "abundant hardwood regeneration" in both stands. On the CONF, the 2011 tornado swath has abundant regeneration in areas that were not salvaged. We can find no evidence to support the assertion that "material left on the ground would substantially impede the regeneration of the stand."

The wildlife value of early successional forest habitat produced by cutting young stands is not different in any meaningful way from that produced by cutting mature stands. Stands less than 40 years old have value to wildlife, but not as much as mature stands (see our scoping comments). Hence, these should be considered a higher priority for management, particularly since the ecological departure analysis also identified consistent shortages of stands in the oldest age classes. The practicality of this alternative (cutting these younger stands) is even imbedded in Alternative 3; stand 398-002 is proposed for commercial regeneration harvest, but is only 35 years old. This approach should be the default.

In choosing where to apply the treatment, effects on future ESFH formation should be considered. Harvesting young stands for ESFH has little effect on future ESFH formation while harvesting mature stands will decrease natural ESFH
formation over the next century. We believe the treatment should not be part of the problem.

Among the stands proposed for ESFH treatment, 398-32, 504-31, 505-26 and the degraded part of 505-7 are good choices. These stands are either young or planted. They currently have low diversity and provide little in the way of wildlife value (see attached stand comments for details).

We also note that the treatment includes planting oaks, and that four of the stands are in prescribed burn units. Are there plans to plant oaks in those stands? Planted specimens will be burned in the fires. The stress of planting also makes them likely to resprout less consistently and vigorously than naturally occurring sprouts in the area. Given that these stands occur adjacent to stands with mature oaks that should supply sufficient acorns, encouraging and protecting naturally occurring oak seedlings seems more likely to re-establish oak on these sites.

In Alternative 3, daylighting is proposed on two closed wildlife opening access roads to provide additional early successional forest habitat. Wildlife openings often harbor multiple non-native invasive species (NNIS), and canopy removal provides opportunities for NNIS to become established. The linear nature of the opening creates corridors for NNIS spread. The potential for transport by vehicles also make roadside NNIS populations particularly problematic. Daylighting should not be carried out unless the Forest Service commits to regular monitoring and eradication of NNIS in these areas and the wildlife openings for the duration of the treatment.

Finally, ESFH treatments are not the only source of ESH in the
Topa, Mary

We were disturbed to see that both alternatives still call for cutting existing old-growth. In a meeting on 6/22/15, we notified the district that old-growth forest occupies the central part of 633-018 and extends slightly into 633-019. This forest is easily identifiable as existing old-growth. The circa 1900 road used to log the adjacent area stops roughly 100 yards short of the stand edge. Trees within the stand are somewhat larger and obviously much older than the trees in the surrounding forest. We encountered no evidence of direct human disturbance within the stand. This stand or patch of approximately eight acres meets Region 8 old-growth criteria and should be added to the stands designated for old-growth in this project. If the District insists upon proposing cutting here, a revised EA must disclose and consider the potentially significant environmental effects of cutting existing old-growth (see further discussion below).

This stand may have eluded detection due to deficiencies in the district's old-growth survey. At our request, the district provided a copy of its "Old-growth Analysis Process" paper for this project. According to that document, the initial step in the survey was to "ID all stands with vegetation management..."
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<td>treatment planned (excluding fire) that were within 10 years of meeting Old-growth age requirement according to historic data (CISC).” However, the table of surveyed stands omits multiple treatment stands that CISC identifies as within 10 years of old-growth age requirements, including 633-018 (origin year 1880). We suggest that surveys for old-growth should also consider landscape positions that early logging operations often avoided, such as remote, steep, south- and west-facing slopes. This is particularly useful, because stand ages are less reliable for older stands (e.g. 633-019 is listed as originating in 1960). That strategy would likely also have found the old-growth in 633-018. We prioritized ground-truthing that stand, because it is the single steepest treatment stand in the entire project. The district should conduct additional old-growth surveys in all treatment stands within 10 years of the old-growth criteria and steep stands with difficult access from historic routes. Once all surveys are complete, we request an opportunity to review the survey data and discuss the survey results with the district. We are interested in gaining a better understanding of the district’s approach to old-growth surveys and survey methods.</td>
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<td>Topa, Mary</td>
<td>Another issue with the designated stands is at least three of them were largely clear-cut, likely in the 1980's. These stands, 395-010, 395-016, and 395-022, are all located on the north side of Coosa Bald. Conversely, the four stands in the analysis area that have been previously identified in Georgia ForestWatch surveys as existing old-growth are not proposed to be allocated to old-growth management. These old-growth stands occupy parts of 398-024, 402-014, 403-007, 630-006, 630-007, 632-001, 633-033, 633-039, and 633-041. The stands containing clear-cuts should be replaced by these stands, and lower elevation stands along Cooper Creek or its tributaries should be added. Additional high-quality stands identified in GFW comments submitted June 29, 2015, should be considered and designated as future old-growth patches, including 399-62, and 398-9.</td>
<td>The Chattahoochee - Oconee Land Management Plan and EIS outline the guide for Old Growth designation. Old Growth stands have not been identified for commercial harvest.</td>
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<td>Topa, Mary</td>
<td>The Draft EA consistently understates the impact of this project on the potential for future old-growth. Continuity of ecological process and lack of human disturbance are at the heart of the myriad of definitions of old-growth. As described above, mechanical treatments will disrupt ecological processes such as snag formation and alter nutrient cycling, and temporary roads and skid trails will leave indelible signs of human impact. These treatments will impact roughly 34% of the treatment area, and hundreds of additional acres were clear-cut in the 1970s and 1980s. Exacerbating the extent of the treatments, they disproportionately focus on acidic cove and dry oak ecosystems, so these ecosystems will have little opportunity to transition to old-growth within the project area.</td>
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<td>Treatments also threaten the old-growth potential of 504-009, the stand that the old-growth survey identified as having the strongest old-growth characteristics. Even if the oldest trees</td>
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<td>are targeted for retention, reducing the basal area in parts of the stand to 15 to 30 ft²/acre will reduce the number of old trees below the threshold for old-growth. Prescribed fires also are not likely to remove all the signs of the thinning. Even high intensity, stand replacing wildfires typically leave over 90% of the biomass on site. That means that lower intensity prescribed fires will not consume cut boles or cut stumps, which are likely to persist in places for decades. This level of extensive disturbance would conflict with old-growth characteristics. According to the ecological departure analysis, as presented in the Draft EA, most forest ecosystems here are lacking both old-growth and open conditions (early succession and/or open canopies). The Draft EA does not address, however, the consequences of creating open conditions from many of the mature stands that are closest to reaching old-growth, thereby reducing the amount of older stands that will soon develop into old-growth, to help close that gap in the departure analysis as well. The Draft EA asserts the project won't negatively affect old-growth development because trees will be cut on only 6% of the project area. We are unsure what the draft EA could be referencing, because approximately 33% of the project area would receive commercial harvest under Alternative 2. Moreover, this focus on percentages of the entire project area fails to identify and grapple with the fact that the trees to be cut will be taken, in part, from many of the oldest stands with greatest ecological value in the project area, which are closest to meeting old-growth conditions. It also fails to address the fact that cutting is concentrated on particular ecosystems, thereby retarding achievement of old-growth conditions in those ecosystems to a greater extent than in the others.</td>
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Topa, Mary

Given the rarity of old-growth in the Southern Appalachians and the little existing old-growth identified on the CONF, we firmly believe that any existing old-growth should be protected and not logged. The CONF Forest Plan directs that existing old-growth forest be prioritized for protection in old-growth patches. See Plan at 2-17 (standards FW-46 and 49). While the Plan seems to permit woodland creation in old-growth (see Plan at 2-18), altering existing old-growth forest may still have significant impacts which must be disclosed and analyzed, and alternatives considered, under NEPA.

Response to Comment (By Comment Author)

Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:

Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.

Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early...
successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

**Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes.** Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.
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<td>Topa, Mary</td>
<td>Although &quot;[m]uch is still unknown&quot; about old-growth, the Forest Service has recognized that old-growth forests hold biological, ecological, scientific, cultural, aesthetic, and spiritual values, which increase in importance because old-growth is so rare in the Southern Appalachians. Regional Guidance at 1, 12-14. As the Forest Service has recognized, old-growth communities &quot;are rare or largely absent&quot; in Southeastern forests, perhaps occupying about one half of one percent (0.5%) of the total forest acreage; old-growth is &quot;the missing portion&quot; of southern forest ecosystems. Regional Guidance at 1. Old-growth takes centuries to develop, so it is irreplaceable on a human time scale if it is replaceable at all. See Neighbors of Cuddy Mountain v. U.S. Forest Service, 137 F.3d 1372, 1382 (9th Cir. 1998); Idaho Sporting Congress v. Alexander, 222 F.3d 562 (9th Cir. 2000). Accordingly, cutting old-growth implicates many of the factors of significant impacts, tending to show that logging old-growth is likely to significantly affect the quality of the human environment, requiring an EIS. See 42 U.S.C. § 4332(2)(c); 40 C.F.R. § 1508.27(b)(3), (5), (8) (providing that an EIS is more likely to be required when the resource affected is unique, culturally or scientifically significant, or uncertain). The need for an EIS would actually become greater if the District continues to dispute whether the stands identified by GFW are existing old-growth. See 40 C.F.R. § 1508.27(b)(4) (&quot;controversial&quot; effects are more likely to require an EIS; see, infra, Section XV).</td>
<td>The Chattahoochee - Oconee Land Management Plan and EIS outline the guide for Old Growth designation. Old Growth stands have not been identified for commercial harvest.</td>
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<td>Topa, Mary</td>
<td>1) Possible inaccuracies in old-growth surveys and needs for additional analysis and consideration.</td>
<td>The Chattahoochee - Oconee Land Management Plan and EIS outline the guide for Old Growth designation. Old Growth stands have not been identified for commercial harvest.</td>
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<td>As noted above, the district should complete surveys in the remaining stands that may be existing old-growth. We also encourage the district to further explain the basis for determining that 504-009 is not existing old-growth. This stand was excluded based on human disturbance, but there is no explanation in the Draft EA or the Old-growth Analysis process paper of what specifically the human disturbances were and why they were determined to excessively conflict with old-growth characteristics. As the Guidance explained:</td>
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<td>&quot;... the acceptable level of past human disturbance can prove difficult to quantify. For this reason, a 'coarse, non-quantified, and common sense' approach will be used when considering past human disturbance. For a stand to be considered as existing old growth, no obvious evidence of past human disturbance which conflicts with the old-growth characteristics of the area should be present. Recent vegetative management activities which maintain characteristics consistent with old growth probably would not disqualify an area as existing old growth. Examples of these activities may include commercial thinnings, mid-story treatments, prescribed fire, or interpretive trails.&quot;</td>
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<td>Topa, Mary</td>
<td>2) The analysis and designation of stands for old-growth management is not adequate under the Forest Plan and Regional Guidance.</td>
<td>The Chattahoochee - Oconee Land Management Plan and EIS outline the guide for Old Growth designation. Old Growth stands have not been identified for commercial harvest.</td>
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<td>To implement the Old-growth Guidance, the Forest Plan directs for the CONF to &quot;Provide a well-distributed and representative network of large, medium and small potential</td>
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old-growth blocks in the Blue Ridge Mountains and Southern Ridge and Valley ecological sections." Plan at 2-16. The Plan sets up the beginning of the old-growth network by identifying large and medium old-growth patches (which the plan calls old-growth "blocks") in old-growth management prescriptions and other prescriptions compatible with the protection or development of old-growth conditions. Plan at D-16 to 17. The old-growth network will be filled out through the identification of small patches of old-growth at the project level, so that at least 5% of every 6th level watershed is allocated to old-growth management. Plan at 2-16 to 17; Plan Appx. D-17 to 18.

The Forest Plan and Regional Guidance set forth several factors which should be considered in selecting the small patches, most of which are not considered and analyzed in the draft EA. Therefore, it is not evident that the District has satisfied the Forest Plan and Regional Guidance direction for the CONF's old-growth network. In fact, it appears the patches do not meet the direction. Moreover, this is another example of the District's repeated choices, with this project, to ignore Plan direction, agency guidance, or other information which expands upon or aids in the interpretation of its obligations under the Forest Plan and other authorities.

In order to achieve the well-distributed and representative network required by the Plan and the Guidance, the Plan sets priorities for identifying small patches. Plan at 2-17 to 18; Plan Appx. D-17 to 18. First, identify existing old-growth. Plan at 2-17. Second, identify "stands that most-nearly meet the criteria for existing old-growth." Id. Third, identify patches "with decreasing preference with increasing departure from the old-growth criteria; that is, quality is more important than block..."
size or distribution within the watershed.” Id. Finally, in the Blue Ridge, identify patches based on representation of Old-Growth (OG) Type, in the order of: (1) river floodplain hardwood, (2) dry and dry-mesic oak-pine, (3) conifer-northern hardwood, and (4) all others. Plan at 2-18.

The Draft EA does not consider these factors and work through this prioritized analysis as directed by the Forest Plan. As far as we can tell from the information provided, the existing old-growth forest identified by Georgia ForestWatch and the nearly old-growth stands identified by the district were not considered for allocation to an old-growth patch (except for one stand), despite the clear Plan direction to identify small old-growth patches first in existing old-growth and second in forest most nearly old-growth. We cannot tell whether or how much of the possible old-growth in the project area, see Table 3.9.3, was actually proposed for old-growth patches in Table 3.9.4. Other high-quality stands identified by Georgia ForestWatch were not considered for small old-growth patches, either (as discussed above), despite the Plan direction that quality is the next important factor. And several young stands, not likely to attain old-growth conditions any time soon, are proposed for old-growth. These stands should be replaced by more suitable candidates.

The Draft EA also does not consider additional direction provided by the Plan and Regional Guidance to select small patches based on the representation, distribution, and linkages or connectivity of the patches of each OG Type. See Guidance at 14-20, 26-27; see Plan at Appx. D-2 to 4, D-17 to 18. Yet the Draft EA does not discuss geographic distribution of patches at all and, in fact, the proposed old-growth patches are not adequately distributed. For example, in the Cooper
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| Topa, Mary | Creek watershed, all proposed patches are concentrated at the eastern end of the watershed, at higher elevations. The Draft EA does not discuss the representation of the various OG Types and disclose the OG Types of the proposed old-growth patches in the watershed. Therefore we cannot tell whether or how the proposed old-growth patches fill gaps in the representation of the various OG Types in the network. We doubt that they contain a representative distribution of OG Types, given that they are all located in higher elevations. Finally, we wish to express our consternation that the district has touted this project based on the claim that it sets aside a large amount of forest for old-growth management. This creates the wrong impression, because most of the forest identified for old-growth management already has a considerable level of protection. Over 50% of the proposed old-growth patches are located in the Coosa Bald National Scenic Area, and another 30% are in existing Wilderness. Wilderness already is permanently protected and already was considered a large old-growth block in the Plan, to boot. While identifying old-growth patches in Coosa Bald may give them some extra protection, this Congressionally-designated area already is managed in a very limited way. It is duplicative and contrary to the letter and spirit of the Plan and Guidance direction for watershed-level old-growth networks to place all but one of the new old-growth patches in Cooper Creek watershed in Coosa Bald, neighboring the large block of old-growth in the Wilderness, concentrated at one end of the project area. | V. PRESCRIBED FIRE

Prescribed fire is an inherently powerful management tool. A
single day's work can dramatically alter 1,000 acres of forest for decades to come. Hence, careless use of prescribed fire could do great damage. With that in mind, we believe the agency should take a cautious approach to transitioning from dormant season burns to growing season burns, especially since this change in treatment will impact nearly half of a high quality watershed.

We suggest that no growing seasons burns be conducted in units that have not already had dormant season burns. Phasing in the burns will allow organisms to gradually adjust and shift resources farther belowground. This condition has been agreed to in other projects. Growing season burns should also be done twice in the smallest burn unit before being implemented across all 11,800 acres. Those first two burns should be monitored for biological effects beyond standard prescribed burn monitoring, including effects on duff layer thickness, forest-floor dwelling animals, and invasion of exotic species. More detailed monitoring (both pre- and post-burn) would help identify any adverse effects early before they potentially impact nearly half of a high quality watershed.

The 2010 scoping for the Fish Knob, Cliff Ridge, Dunsmore Mountain, Coosa Bald, and Bryant Creek burn units (most of the prescribed fire units in this project) describes the burns as "moderate to low intensity surface fire". Under Alternatives 2 and 3, "high to moderate fire intensities are desired for the south and west-facing xeric ridges, with moderate intensity fire on the midslopes." EA at 16, 25. While the Draft EA describes why changing from dormant season to growing season burns could be beneficial, no justification is provided for the increase in fire intensity. Fire intensity can strongly impact vegetation, soils, water quality, air quality, and CO2.
emissions, so we believe such large changes in the prescribed fire plans should not completed without thorough justification, public discussion, and monitoring if implemented.

Ubiquitous burning homogenizes the forest just as complete fire suppression does. Without refuges, fire-sensitive species will be lost from the forest. Invertebrates and vertebrates living in the leaf litter are particularly vulnerable. These issues of extent and homogeneity can be addressed by carefully implementing prescribed fire in a way that mimics natural fire. If fires are set from only a few ignition points on ridges and south-facing slopes, fire patterns should mimic those that occur naturally. Limiting the number of ignition points is important for preventing unnaturally intense and widespread fires. Targeting ignitions on ridgelines and south-facing slopes focuses fire on naturally fire-prone areas. With those methods, fire would likely not penetrate mesic areas, which could be severely damaged by fire, because fire intensity on lower slopes would not be unusually intense. This method of burning would also create both temporal and spatial heterogeneity. Lower slopes would burn in some years and not in others - depending on weather and fuel conditions - thus producing heterogeneity in the fire return interval. That heterogeneity would allow different species adapted to the full continuum of fire return intervals to survive rather than only those adapted to frequent fire or no fire. Pockets within burn areas would also escape. Those areas would add heterogeneity in and of themselves and help sustain biodiversity by helping re-colonization of adjacent areas.
Author(s) | Comment | Response
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Topa, Mary | Alternatives 2 and 3 are proposing to change the seasonality of burn from dormant to dormant + growing season, and to use high to moderate fire intensities on the south and west-facing xeric ridges, with moderate fire intensity on the midslopes. EA at 16, 25. We caution doing this without monitoring the Oi and Oe + Oa (duff) layers over the long-term since both fire severity and intensity will impact consumption of both the litter and duff layers, since even low intensity fires have been found to reduce mass, carbon and nitrogen of the duff layer by almost 50%. In another study, forest floor N in the Oi and Oe + Oa layers were reduced two years after a fell-and-burn treatment. These long-term effects of prescribed burns on soil carbon and nitrogen cycles, overall soil health, and tree growth and health must be monitored to ensure compliance with the Forest Plan. | Each site location will have a site specific prescribed fire plan written. This plan will prescribe the desired treatments needed to meet the objectives of the EA. Moderate to higher intensity landscape fire allows for desired treatment on the dry south facing slopes, with the low intensity fire prescribed for the north facing slopes and riparian areas. Only areas where growing season prescribed fire meets the objectives, according to the EA, will site specific prescribed fire plans be written and implemented.

Topa, Mary | We believe the Forest Service intends to implement some of these concepts in their prescribed burns. However, the Draft EA provides few details on how burns will be implemented. Since the people who ultimately conduct some of the burns may not currently be involved and burns must be carefully planned and implemented in order to achieve the desired result, the final Environmental Assessment/Environmental Impact State and draft decision should explicitly state details of how burns will be implemented. | Site specific prescribed fire plans are written for each site location to meet the objectives of the EA. Larger landscape prescribed fires creates desired mosaic treatments, while meeting the objectives. Based on the desired objectives for the site location, the fire return interval will adjusted as prescribed.

Topa, Mary | VI. Non-Native Invasive Species

Non-native invasive species are a leading threat to biodiversity conservation. According to the Draft EA, the proposed actions in Alternatives 2 and 3 "would increase the risk of introduction, establishment, and spread of non-native invasive species compared to the No Action Alternative by increasing the amount of ground disturbance in the project area." EA at | The effects of project activities on the spread of NNIS is disclosed in Section 3.15 of the EA. The project includes design features and mitigation measure to reduce the potential for spread. In addition, the District has previously completed an Environmental Assessment that guides the NNIS control program across the District.
162. Establishment and range expansion of NNIS are facilitated by disturbances, particularly anthropogenic disturbances, including fire, road building, logging and other forest-related management techniques. These disturbances often increase light levels, reduce competition for soil resources from native species, and/or increase seedling germination and establishment through changes in the soil microenvironment.

The Draft EA acknowledges the presence of various NNIS along road corridors, wildlife openings, campgrounds, and other disturbed areas in the Cooper Creek project area. It also identifies precautions that will be taken during road reconstruction/construction, and ground-disturbing activities such as temporary roads, log landings, and fire lines. EA at 161-162 and Appendix I. Monitoring Plan. However, it is unclear whether continued monitoring and mitigation activities would occur after all these ground-disturbing activities are completed, particularly within treatment areas and prescribed burn units. The Monitoring Plan focuses on "roadsides and along high risk habitats and adjacent areas (fire lines, roads, trails, log landings, skid trails, wildlife openings, etc."

As a measure of responsible land stewardship, the District should perform a comprehensive NNIS inventory, both pre- and post-treatment, in all the proposed treatment areas (vegetation management, daylighting and prescribed burns) to ensure that NNIS are not inadvertently spread into areas of the forest that are currently free of NNIS infestations. Monitoring and eradication of NNIS prior to any disturbance activity is important, but it must continue throughout the duration of the treatment. With the increase in prescribed burning throughout CONF over the last decade, and proposed
changes in the seasonality and intensity of burning, monitoring for NNIS is particularly critical. Prescribed fire is being used in the Cooper Creek Watershed Project to open the canopy and expose mineral soil to promote regeneration/restoration of native oak/yellow pine forest types, with the highest intensities in woodlands. Unfortunately, some of the worst NNIS in the region require similar conditions for establishment.

The best protection a forest has against the invasion by NNIS is its closed canopy. The low light levels found in forest interiors prevent most NNIS from establishing. The closed canopy surrounding small-scale disturbances like tree fall gaps, helps protect against invasion by exotic species. Additionally, the transient nature of such small high light (gap) environments minimizes NNIS persistence and spread.

All the vegetation management, prescribed burn and ESFH treatments proposed in the Draft EA will open the forest canopy and increase the likelihood of NNIS spreading. Of the three alternatives, Alternative 1 (No Action) is the only alternative that is expected to have no direct or indirect effects on the spread of NNIS and no impact to habitats since it does not propose any ground disturbing activities.

The Forest Service recognizes that the most effective strategy against invasive species is to prevent them from being introduced and established (http://www.fs.fed.us/invasivespecies/prevention/index.shtml), identifying prevention of the introduction and establishment of noxious weed infestations as an agency objective (USDA - Forest Service Guide to Noxious Weed Prevention Practices, 2001). The first goal listed in the Forest Service Guide is to
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<td>incorporate weed prevention and control into project layout, design, alternative evaluation, and project decisions. The final EA should: commit to NNIS monitoring and eradication; disclose the degree of success or lack thereof in eradicating or controlling NNIS in prior, similar projects on this Forest and the additional steps that will be taken if initial NNIS treatments are not successful; and commit that the project's vegetation management, daylighting and prescribed burning activities will not be implemented unless it is certain that any associated NNIS treatments can be carried out too. An NNIS mitigation plan is an essential part of this project, and NEPA requires the frank disclosure of the realistic likelihood of mitigation measures being successfully implemented and back-up plans in the event of poor results.</td>
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<td>Topa, Mary</td>
<td>The prescribed burning monitoring is particularly insufficient. The monitoring determines if the fires opened the canopy enough to create early successional habitat and restore woodland. EA at Appendix I - Monitoring Plan. This monitoring implies that lower intensity fires that did not open the canopy would be deemed a failure. However, such lower intensity fires better match historical fire patterns, and can return understory competition to historical levels, one of the most important benefits of reintroducing fire. The monitoring also glosses over potential harm by fires. No monitoring is planned specifically to determine if oak and pine saplings are killed by the fires or if fires are damaging mesic areas. A monitoring plan that can suggest only that more fire is needed but ignores potential harm is a recipe for future damaging fires. The prescribed burning monitoring plan needs to be amended to identify any damage caused by the proposed changes in the fires regime (growing season burns and higher intensity fires), including the spread of NNIS, loss of critical forest-floor wildlife (particularly amphibians), and impacts on aquatic species dependent on cool, clear headwaters, in particular native brook trout and hellbenders.</td>
<td>The firemonitoring will be done in accordance to Regions 8 fire monitoring guidelines.</td>
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<td>Topa, Mary</td>
<td>Even more deficient is the monitoring of the effectiveness of silvicultural treatments. There is none. Success is far from certain, so monitoring seems only prudent. Adaptive management, as required by the Forest Plan, is impossible without monitoring.</td>
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| Topa, Mary     | i. Timber Harvest And Related Activities Proposed on Lands Unsuitable for Timber Production in Management Prescription 7.E.1  

1). Introduction                                                                                                                                                                                                 | USFS monitoring reports are available on the website. The Chattahoochee-Oconee NFs Monitoring report for the current Forest Plan have been reporting since 2004 and the last one reported was in 2012. This Monitoring Report included question about silvicultural treatments effectiveness.                                                                                                                                 |
Alternatives 2 and 3 contain substantial logging and related activities in management prescription 7.E.1, Dispersed Recreation Areas. The Forest Plan classified lands within 7.E.1 as unsuitable for timber production. Alternative 2 would entail about 850 acres of commercial logging and about 861 acres of non-commercial midstory treatment to prepare for future logging, as well as non-commercial vegetation management, in 7.E.1. Alternative 3 reduces this, but would still involve 327 acres of commercial harvest and 233 acres of midstory treatment, as well as 181 acres of other non-commercial activities, within 7.E.1. Commercial logging would also require system road reconstruction and maintenance, as well as construction of temporary roads, skid roads/trails, and log landings.

Specifically, Alternative 3 would include the following within 7.E.1:
* 101 acres of timber harvest (two-aged shelterwood with reserves harvest) to a low, 20 sq. ft. residual BA, to create "early successional habitat"
* 226 acres of timber harvest (heavy thinning to residual 60-80 sq.ft. BA) to manage various oak and pine stands and to thin and create canopy gaps
* 233 acres of midstory treatment "in preparation for stand regeneration" in older oak forest (93 to 108 yrs. old)
* 104 acres of non-commercial canopy gap creation
* 77 acres of non-commercial release of desirable trees (crop tree release) in previously clearcut stands
* Reconstruct .25 mile segment of FSR 4 Mulky Gap Road (ML3) to accommodate timber haul, assume maintenance on remainder of road
* Reconstruct .75 mile segment of FSR 287 Gillespie Branch Road (ML2) to accommodate timber haul, assume

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
Our scoping comments raised a number of concerns regarding timber harvest and related activities proposed in 7.E.1, because the Forest Plan classified those lands as unsuitable for timber production. Among other points, we explained our view that the commercial harvest and midstory treatment do not comply with the NFMA and the Forest Plan. We urged the District to drop those activities from the proposed project. If the District insisted on attempting to proceed with them, we stated our belief that, under NEPA and the National Forest Management Act (NFMA), the EA must forthrightly disclose the fact that timber harvest and related activities were proposed on unsuitable lands in 7.E.1 and address whether and how those activities are consistent with the NFMA and the Forest Plan. We also urged the District to consider alternatives that avoided commercial logging and preparation for future logging in 7.E.1, given that the lands are unsuitable for timber production and in light of the prescription’s emphasis on
recreation, scenic views, and water quality.

Instead, the Draft EA makes only one oblique reference to this issue at all, in the course of rejecting our request to consider alternatives, with the bald assertion - and non-sequitur - that logging is permitted in 7.E.1:

"Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1(Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner." EA at 28.

For the reasons further discussed below, we continue to believe that the proposed harvest does not comply with the NFMA and the Forest Plan and should be dropped from the project. Certainly the draft EA has not shown such harvest is proper. If the District insists upon proceeding with these activities, NEPA and the NFMA require that the draft EA be revised to disclose and address the commercial logging, and activities to prepare for future logging, proposed in 7.E.1 and the consistency of such activities with the NFMA and the Forest Plan and to consider alternatives that don't include such activities. The revised draft EA should be offered for another round of public review and comment on this information, which is fundamental to the project's development and analysis, before developing and releasing the draft decision.

Topa, Mary 2) The NFMA generally prohibits timber harvesting on lands unsuitable for timber production, with certain exceptions which this proposal does not fit.
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All projects or activities in national forests must be consistent with the forest management plan. 16 U.S.C. § 1604(i); see, e.g., Sierra Club v. Martin, 168 F.3d 1, 4-5 (11th Cir. 1999); Cherokee Forest Voices v. U.S. Forest Serv., 182 F. App’x 488 (6th Cir. 2006). The NFMA directs the Forest Service, when developing forest plans, to "identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors to the extent feasible ...." 16 U.S.C. § 1604(k). The agency "shall assure that, except for salvage sales or sales necessitated to protect other multiple-use values, no timber harvesting shall occur on such lands . . ...." Id. Note that, once lands are identified as unsuitable for timber production, the NFMA prohibits all timber harvest, of any type, there, except under two narrow circumstances: (1) salvage sales or (2) "sales necessitated to protect other multiple use values." 16 U.S.C. §1604(k).

Other than timber, multiple uses and values include: outdoor recreation, streams and watersheds, wildlife, fish, the diversity of plant and animal communities, and soil productivity. See 16 U.S.C. § 528 (1960); § 1604(e), § 1604(g)(3). All of these are likely to be adversely affected, not protected or enhanced, by logging proposed in 7.E.1.

The CONF Forest Plan classified lands within prescription 7.E.1, Dispersed Recreation Areas, as "unsuitable for timber production; not appropriate." Forest Plan at 3-125. The Forest Plan's Appendix F explains that 7.E.1 and other "not appropriate" lands were identified as unsuitable for timber production because "a planned, periodic timber harvest would preclude the achievement of other non-timber management objectives." Plan, Appx. F-12.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
The Cooper Creek project, Alternative 3, proposes 327 acres of commercial timber harvest on unsuitable lands. This logging is not salvage. Therefore, the logging could only be permitted under the NFMA if it is necessary to protect other, non-timber multiple use values and is consistent with the Forest Plan. The Forest Service bears the burden of demonstrating this compliance. See Lands Council v. McNair, 537 F.3d 981, 994 (9th Cir. 2008) (Forest Service must support its conclusions that a project meets the requirements of the NFMA and relevant Forest Plan); Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1377 (9th Cir. 1998) ("Forest Service must demonstrate that a site-specific project would be consistent with the land resource management plan").

The agency has not shown this here, nor could it. Logging of the proposed intensity and scale, proposed to further general goals, cannot meet that standard, particularly since such logging is likely to degrade, not protect, other values, including values prioritized for the 7.E.1 prescription.

Topa, Mary

This "necessary to protect" exception to the NFMA's prohibition on timber harvest on unsuitable lands must have boundaries - it cannot be an infinite loophole. Otherwise, harvest on unsuitable lands could be limitless, defeating the purpose of identifying suitable and unsuitable lands on the CONF and rendering meaningless this Forest Plan's distinct management direction for suitable and unsuitable lands.

Logging at Cooper Creek is proposed to meet general goals that apply broadly across the forest. The stated Purpose and Need for the project is to "restore native plant communities,
The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

According to Forest Service analysis, these allegedly dense, overcrowded conditions are widespread across the project area. See EA at 89-90. Indeed, we expect these conditions are widespread across the entire forest, because of the history of widespread, unregulated logging on the CONF and across the Southern Appalachians prior to Forest Service acquisition in the early 1900s and the CONF's own subsequent clearcutting program carried out until the late 1990s. As these forests age, natural growth and disturbance processes are diversifying these conditions (as discussed elsewhere in these comments).

The Draft EA goes on to summarize each type of activity within each alternative. Although some activities have non-timber goals, the goals are very general, such as: creating early successional habitat for "grouse and other early successional species"; heavy thinning in oak and pine stands to encourage or release oak regeneration and to "improve the health and vigor" of these stands; and canopy gaps and heavy
thinning to "enhance habitat for a variety of bird species". EA at 18-21. The midstory treatment has a timber goal - to prepare for stand regeneration. EA at 23.

The discussions of purpose and need and alternatives make no distinction between activities proposed on suitable or unsuitable lands, or between harvest proposed within 7.E.1 or in other prescriptions.

None of the proposed harvests meet the bar set by the NFMA's exception to its general prohibition on harvest on unsuitable lands. Two of them are particularly egregious attempts run around the NFMA's and Forest Plan's limits on harvest on unsuitable lands on the CONF: intensive, even-aged logging to create early succession, and midstory cutting to prepare for such logging in future.

Creation of early succession is the primary means by which timber will be produced from the CONF, and vice versa, under this Forest Plan. Plan FEIS at 3-541 to 542. The Plan designated approximately 367,000 acres of the Chattahoochee National Forest as suitable for timber production (about 49% of the Chattahoochee). Plan Appx. F-10. Most of the suitable acreage, approximately 270,000 acres (about 36% of the Chattahoochee) was placed within management prescriptions with minimum objectives to create early succession, primarily through timber harvest. Plan FEIS at 3-160 to 161. Thus many thousands of acres on suitable lands are allocated to the type of harvest for ESH proposed here, and it is on those lands, not on 7.E.1, that the plan intended such harvest to occur.

In contrast, Prescription 7.E.1 and similar unsuitable
prescriptions have no minimum ESH objectives and were not expected to provide a regular amount of ESH or timber. See, e.g., Forest Plan at 3-123. Clearly the Forest Service intended something different for the unsuitable management prescriptions, and wholesale creation of ESH here is not appropriate or consistent with the Plan. See further discussion below regarding planning for unsuitable lands.

The proposed midstory reduction is proposed for the sole, explicit purpose of stimulating oak seedlings and saplings "in preparation for stand regeneration" in the future, i.e. in preparation for the next cycle of intensive, even-aged, commercial logging here. EA at 23. There is no asserted purpose or need to reduce the midstories of over 230 acres of older oak forest (93-108 years old) other than preparation for future harvest. This is precisely the type of planning and management for periodic entries of large-scale timber harvest which the Plan does not intend, and may not occur, on unsuitable lands. See further discussion below.

These two activities illustrate the District’s disregard for the unsuitable designation and the District’s apparent view that it may freely proceed with timber management on unsuitable lands, which runs contrary to the letter and spirit of the Forest Plan and to the NFMA.

The Forest Service has not demonstrated that the proposed logging is "necessary to protect" other specific, compelling values or objectives in this particular area of 7.E.1, in contrast with instances where courts have permitted harvest on unsuitable lands. See Native Ecosystems Council v. U.S. Forest Serv., 428 F.3d 1233, 1235-37, 1247-48 (9th Cir. 2005) (within a Montana national forest, allowing thinning and
removal of small-diameter trees, prescribed burning, and weed management on lands unsuitable for timber management, in order to lower the risk of catastrophic wildfire in a specific area identified as prone to high intensity wildfire; large trees would be retained and project plans did not even specify a commercial timber sale, rather, a contractor would be required to remove trees regardless of commercial value); Glisson v. U.S. Forest Serv., 876 F.Supp. 1016, 1032 (S.D. Ill. 1993) (permitting harvesting of planted, non-native pines in order to restore hardwoods, per Forest Plan direction, in an area designated as "unsuitable for timber production"); see also Native Ecosystems Council v. Kimbell, 304 F. App'x 537 (9th Cir. 2008) (allowing hazardous fuels reduction project on unsuitable lands on another Montana national forest).

Thus, this proposal has not been shown to fit within - and we believe it cannot fit within - the exceptions allowing commercial timber harvest on unsuitable lands as set forth in this Forest Plan and the NFMA. The limits of these exceptions must be respected.

Moreover, rather than "protecting" a use or value here, the proposed harvest would negatively impact the very uses and values which are prioritized in prescription 7.E.1 and which presumably led to these lands being identified as unsuitable in the first place.

Topa, Mary

b. Harvest on unsuitable lands is not permitted by the NFMA and the Forest Plan when it damages, not protects, non-timber multiple uses and values, especially those uses and values prioritized in Forest Plan direction for the prescription area.
We believe that any logging in an unsuitable prescription must not adversely affect the priority uses and values there - the uses and values which presumably led to designating those lands as unsuitable for timber production in the first place, such as, for 7.E.1, trail use, recreational experiences and settings, scenic beauty, and water quality. Lands within Prescription 7.E.1, Dispersed Recreation Areas, are managed with an emphasis on providing recreation opportunities and scenic views, while protecting and restoring water quality:

These areas receive moderate to high recreation use and are managed to provide the public with a variety of recreation opportunities in a setting that provides quality scenery, numerous trails and limited facilities. The management emphasis is to improve the settings for non-formal outdoor recreation in a manner that protects and restores the health, diversity, and productivity of the watersheds. Plan at 3-123.

The direction for 7.E.1 can be contrasted with the direction for prescription 7.E.2, Dispersed Recreation Areas with Vegetation Management, which is suitable for timber production and emphasizes a balance of recreation, water quality, wildlife, and forest management goals. Plan at 3-126. Certainly forest management and timber harvest must be more limited under 7.E.1 than under 7.E.2, or there would have been no reason for the Plan to draw up suitable and unsuitable Dispersed Recreation Areas.

Within prescription 7.E.1, Alternative 3 would log hundreds of acres now and in the future. Road reconstruction and

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<td>temporary road construction will be required to access these stands, and further ground disturbance will result from construction of skid roads/trails and log landings. Logging is proposed near or visible from trails, primary recreational access roads, and areas designated for High and Moderate scenic integrity and logging will negatively impact recreational use, access, and scenic views (EA at 164-168). Logging will increase sediment in streams (EA at 70, 73, 77, 79-80, 114-115), which adversely affects aquatic species and habitat (EA at 108-109, 114-118). Although efforts will be made to mitigate these adverse effects, they cannot be eliminated. The scale and intensity of proposed and future harvests and their adverse effects on other uses and resources, including those prioritized in 7.E.1, cannot be distinguished from the effects of regular, large-scale timber production. Indeed, these impacts are the very type of logging impacts that the Forest Service had in mind and wished to avoid on these lands when, during forest planning, it determined that periodic timber harvest would preclude achievement of other, non-timber objectives for these lands, and designated the lands unsuitable. Moreover, we believe these logging impacts are likely to be greater than the mild picture the EA attempts to paint, as discussed elsewhere in these comments. These impacts will be particularly excessive and detrimental to the present uses and values of these 7.E.1 lands, as evidenced by the outcome at Brawley Mountain on unsuitable, 7.E.1 lands within this same ranger district. The Brawley Mountain Project offers a vivid example of the harsh effects of large-scale, intensive, commercial harvest of</td>
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the very type proposed here. This project also is located within the 7.E.1 prescription and it involved timber harvest of similar intensity. Because that project was proposed for the specific purpose of improving habitat for a golden-winged warbler population known to exist at that specific site, we ultimately chose not to dispute whether it qualified for the narrow exceptions for timber harvest on unsuitable lands. The District also promised a "light hand on the land" approach there. This light approach did not come to pass, as broad access roads were constructed and large log landings cleared of trees. Bare soil on these sites, or many of them, still had not revegetated as of fall 2015 and does not look likely to revegetate soon. In fact, the project failed to comply with the basic limitations of the project plans (e.g., no whole tree harvesting) and mitigation measures (e.g., revegetating access roads, skid roads/trails, and log landings). See further discussion in attached July 8, 2014, letter and photos.

The EA, the additional information and analysis presented in these comments, and the documented impacts of the Brawley project demonstrate that the proposed logging on 7.E.1 lands in Cooper Creek would negatively impact scenic views, recreational experiences, and soil and water quality, and that such logging is not appropriate or compatible for these 7.E.1. lands, would conflict with the Forest Plan, and run contrary to the purposes for which 7.E.1 was established, and therefore is not permitted.

Based on the draft EA's only oblique reference to this issue, we expect the District will contend that the proposed harvest is permitted to meet other Forest Plan goals and objectives, and that such harvest must have been contemplated when those goals and objectives were set.
First, the relevant standard in prescription 7.E.1 states in full as follows:

"These lands are classified under NFMA as unsuitable for timber production; not appropriate; however, salvage sales, sales necessary to protect other multiple use values, or activities that meet other Plan goals and objectives are permitted." Plan at 3-125.

The first two clauses track the narrow exceptions set forth in the NFMA - salvage salvage sales and sales necessary to protect multiple use values other than timber. The last clause, regarding activities that meet other Plan goals and objectives, ties back to the NFMA planning regulations in effect when the CONF plan was revised, commonly referred to as the 1982 regulations. Those rules provided 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." (emphasis added).
36 C.F.R. § 219.27(c)(1).

These regulations, therefore, reinforce the NFMA’s requirement that projects must be consistent with forest plans and aid in interpretation and application of the 7.E.1 standard - harvest on unsuitable lands to meet other Plan objectives is permitted only if the forest plan establishes that such actions are appropriate. See also 16 U.S.C. § 1604(i) (all projects must be consistent with forest plans). In this case, as

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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Topa, Mary | discussed above, a complete reading of the Forest Plan direction for prescription 7.E.1 shows that the proposed Cooper Creek harvest is not appropriate, because it would degrade, rather than protect or enhance, the uses and values that are prioritized in 7.E.1. | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Topa, Mary | Second, the NFMA regulations and the Forest Plan ultimately must comply with the NFMA. Therefore, the Forest Plan's allowance for timber harvest to meet other Plan goals and objectives must be read together with the "necessary to protect" language of the NFMA. Clearly mere agency desires for harvest to meet Plan goals that can be met on suitable lands elsewhere in the forest, as the Plan intended, do not meet the standard for when harvest may occur on unsuitable lands on this Forest. | The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

 | Third, contrary to the district's apparent suggestion that it must harvest unsuitable lands to meet its Plan goals and objectives, the CONF did not rely on timber harvest on unsuitable lands when calculating Plan goals and objectives. | Regarding the district's apparent belief that it needs to harvest unsuitable lands to meet Plan goals, and that the goals were set based on the assumption that such harvest would occur, a review of the Forest Plan's Appendix F and the FEIS for the plan shows that harvest on unsuitable lands generally, and 7.E.1 lands in particular, was not relied upon in developing Plan goals or objectives for timber harvest, early succession, and other forest management.
In the Forest Plan, goals and objectives for timber harvest and for early successional habitat were connected. Timber harvest primarily would occur as a result of creating ESH, and vice versa. FEIS at 3-541 to 542. During forest planning for timber and for wildlife habitat, prescription 7.E.1 and other unsuitable -not appropriate management prescriptions were not relied on or modeled for timber harvest and were not predicted to contribute any substantial, regular amount of ESH. FEIS at 3-158 to 160; FEIS at 3-542; Forest Plan, Appx. F at F-12. In fact, the Plan and FEIS make clear that any timber cutting on unsuitable lands would be salvage harvest or small-scale, incidental harvest. Plan FEIS at 3-569 to 569; Plan Appx. F-2.

It is important to underscore that 7.E.1 has no minimum objective level of ESH. It has a goal of 0-4% ESH. In 7.E.1 and other prescriptions with 0-4% ESH goals, some amount of ESH was expected to be provided in the course of other management, such as through salvage, incidental activities, and natural disturbances. FEIS at 3-568 to 569. As the FEIS explains, some unsuitable prescriptions "permit harvest to occur on an irregularly scheduled, case-by-case basis. An example might be a developed recreation prescription in which timber is cut and removed to clear for campground road construction. However, much of it is likely to be salvage of insect, disease, wildfire, or storm killed trees." FEIS at 3-568. In prescriptions with a 0-4% ESH objective (like 7.E.1), the Plan FEIS explained "it is likely that much of the habitat creation activity will be done in response to natural mortality of one kind or another and thus be salvage." Id. Therefore, the Plan EIS estimated that an average of approximately 0.5% of the unsuitable prescriptions, like 7.E.1, would contain early succession, and that it would vary widely from year to year. FEIS at 3-568 to 569. The type and scale of harvest
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<td>proposed on unsuitable lands at Cooper Creek goes far beyond the expectations, intent, and examples described during forest planning, such as harvest that truly is incidental to another activity central to the purpose of a recreation prescription, such as cutting timber to clear the way for campground road construction. Based on all this, it is unclear why the District believes it must cut on these 7.E.1 unsuitable lands to meet Plan goals and objectives or why the District believes such cutting was intended by the Plan. If the CONF wishes to press forward with the proposed logging here, a significant forest plan amendment and additional environmental analysis likely would be required. The CONF cannot simply decide that it needs or wishes to target unsuitable lands for massive logging project such as this, throwing out a forest planning structure that assumed such logging would not occur on unsuitable lands, without thorough analysis of the implications for the forest plan and its effects as a whole. As discussed above, harvest of this type and scale on unsuitable lands exceeds the amount that was estimated and considered in the EIS for the Forest Plan. If the CONF insists on proceeding with this proposal, that would signal a substantial change in the implementation of the Forest Plan, a change which would significantly affect unsuitable lands in ways not considered in the Plan EIS. Such a change likely would require environmental analysis, such as a supplement to the Plan's EIS, see 40 C.F.R. § 1502.9(c), to disclose the agency's current intentions for logging on unsuitable lands and to analyze, consider and disclose the effects on the uses and resources for which the Plan designated those lands as unsuitable. Complicating matters, since forest planning assumed the unsuitable lands would be generally left undisturbed, these lands likely were relied upon</td>
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<td>in the plan EIS' analysis of effects on various other resources, e.g., mature and interior forest wildlife habitat and species, cumulative effects on water quality and aquatic species and habitat, old-growth, etc. These conclusions will be cast into serious question, and would need to be reanalyzed, if extensive commercial harvest is now intended for the unsuitable lands.</td>
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<td>Topa, Mary</td>
<td>4) Lower Logging and No Logging Alternatives in 7.E.1</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004). Particularly in this prescription where timber harvest generally is not permitted, less damaging alternatives that would meet, or contribute to meeting, the project’s asserted purposes must be considered. Reasonable alternatives include: dropping all tree cutting proposed in 7.E.1; dropping all commercial harvest in 7.E.1; moving desired tree cutting to locations outside 7.E.1; and using non-commercial methods and/or less intensive methods instead in 7.E.1. Given that 7.E.1 has no minimum ESH goal, another action alternative that does not include harvest in 7.E.1 is an eminently reasonable alternative that would meet the stated purpose and need (working towards Plan goals), better fulfills the intent of this prescription, and must be considered. In particular, avoiding commercial timber harvest here and instead using non-commercial cut-and-leave to manipulate stand structure and composition is an alternative(s) that would avoid or greatly reduce the negative impacts of commercial logging and associated ground disturbance on recreation, scenery, and water quality. Such an alternative(s) would also avoid the need to invest in reconstruction and maintenance of roads that access unsuitable lands (which seems an unwise investment). The district’s refusal to consider alternate, non-commercial means to achieve its goals here further shows that timber harvest and production is driving this project.</td>
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<td>Topa, Mary</td>
<td>5) NEPA issues regarding needs for environmental analysis and consideration of alternatives presented by proposed harvest on unsuitable lands.</td>
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The proposed logging in an unsuitable prescription also gives rise to NEPA obligations. The fact that logging is proposed on lands unsuitable for timber production is highly relevant to the project - to the public's understanding of the proposal and to the agency's analysis of its environmental effects. Yet the EA does not address it. Environmental analyses must evaluate the significance of the project's effects, which includes consideration of both the context and intensity of the impact. 40 C.F.R. § 1508.27. The regulations implementing NEPA explain that "the significance of an action must be analyzed in several contexts such as... the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action." Id. The fact that logging is proposed on lands unsuitable for timber production, where recreational, scenic, and water quality goals are prioritized, is obviously relevant to the context of the proposed project and to the analysis of the significance of its impacts within that setting. The alleged benefits of the project must be weighed against the risks to these other resources and values, and those other values should be given greater weight on the scale since they are, after all, prioritized here.

These 7.E.1 lands, moreover, are located in a region of the forest that contains especially significant and important recreational, scenic, and water resources. The project area and its immediate surroundings include: Cooper Creek, which is recognized and protected within Cooper Creek Scenic Area (designated by the Regional Forester in 1960) and Forest-Designated Outstandingly Remarkable Stream corridors and is eligible, although was not recommended, for Wild and Scenic River designation; Duncan Ridge, with its long-distance, remote hiking trail running along the boundary of the 7.E.1...
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prescription; many other trails; and the Coosa Bald National Scenic Area, the Appalachian Trail Corridor, and Forest-Designated Scenic Areas. Effects should be considered in this context as well.

Logging on unsuitable lands is relevant to several other factors of significance, too, such as the unique characteristics of the geographic area, and the degree to which the project’s effects are likely to be controversial. § 1508.27(b)(3), (4). It is also relevant to whether the action may set a precedent or represent a decision in principle about a future consideration. The District’s complete disregard for the constraints of unsuitable prescriptions identified in the CONF Forest Plan may set a precedent for logging on unsuitable lands across the CONF. It certainly represents a major change in the studies and expectations underpinning this Forest Plan and the ways in which the CONF has implemented this Plan for more than a decade. We seriously question whether the Forest Service as a whole wishes to go down this road. Certainly such a significant move, at a minimum, must be disclosed and squarely addressed in the project’s analysis. The midstory cutting also makes a decision in principle about another 233 acres of logging here, since preparation for that future logging is the purpose of the midstory cutting.

Finally, another factor of significance is whether the proposal threatens a violation of state, Federal, or local law. The project’s compliance with the NFMA and Forest Plan, therefore, is directly relevant to the NEPA analysis.

Therefore, under NEPA, if the District wishes to proceed with its proposed timber harvest and midstory cutting in 7.E.1, the environmental analysis must forthrightly acknowledge and
address this issue, fully disclose and consider whether logging there is permitted by the NFMA and Forest Plan, and thoroughly analyze the effects of logging there on other resources and uses, particularly those prioritized in 7.E.1.

Under NEPA, the agency also must consider reasonable alternatives that would respond to or address this issue, such as dropping commercial harvest and midstory removal in 7.E.1, moving such activities to alternate locations on lands suitable for timber production, and other options discussed above. NEPA requires the consideration of all reasonable alternatives, including those that would avoid or minimize negative environmental impacts. In this case, such reasonable options clearly include alternatives that avoid timber harvest on 7.E.1 lands.

Topa, Mary

1) Alternatives 2 and 3 Exceed Forest Plan Limits for Early Successional Habitat in Violation of NFMA

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

The CONF Forest Plan objective for early successional forest conditions in Prescription 7.E.1 is "up to 4 percent" "created both naturally and through management." Forest Plan at 3-123. Four percent is a ceiling: to comply with the Forest Plan the agency cannot create additional ESH if it would exceed the four percent threshold though any lower percentage of ESH is compliant. These limits must be met at local and landscape scales and specifically "percentage objectives apply to blocks of over 1,000 acres of contiguous prescriptions with the same successional objectives." Forest Plan at F-31.

The agency has generally identified the management prescriptions where project activities will take place (EA at 3)
but has not disclosed how much of the project area is within each prescription. Based on GIS data it appears that approximately 2,565 acres of the project are located in Prescription 7.E.1 (compartments 398 and 399). Four percent of 2,565 acres is approximately 103 acres - the upper limit of ESH allowed in the Prescription.

According to the agency approximately 0.8% of the project area currently exists as early successional forest. EA at 97. The EA does not disclose if that percentage differs by prescription, but assuming it does not, approximately 20 acres of ESH currently exists in Prescription 7.E.1. As a result, the agency is limited to creating no more than 83 acres of ESH in 7.E.1.

But the EA discloses that the agency plans to create 102 acres of ESH in Prescription 7.E.1 under Alt. 2 (EA at 10-11) and 101 acres of ESH in Prescription 7.E.1 under Alt. 3 (EA at 21). This will cause the ESH limits in Prescription 7.E.1 to be exceeded by at least 19 and 18 acres respectively.

Additionally, the EA provides that canopy gap thinning treatments will "create small pockets of [early successional forest habitat]." EA at 98. Alternative 2 includes 466 acres of canopy gap thinning treatments and Alternative 3 includes 100 acres of canopy gap thinning treatments in Prescription 7.E.1. EA at 98-99. Not all of the acreages subjected to these treatments should be considered ESH but the agency must calculate and disclose how much ESH will be created and include that in its assessment of compliance with Prescription 7.E.1 ESH limits.

The EA also acknowledges that prescribed fire creates and
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maintains ESH. See, e.g., EA at 94, 98, 139, and 148; see also Forest Plan at F-32 (noting that prescribed burning may create early successional forest). There is currently prescribed fire in Prescription 7.E.1. See Cooper Creek Watershed Burn Units Maps (produced with EA). The agency must assess and disclose the degree that fire will create ESH and that must be included when assessing compliance with Forest Plan ESH objectives. Moreover, the assessment of ESH by other treatments, particularly fire, must be completed to demonstrate that the agency is not exceeding ESH limits in other prescriptions, such as 7.E.2.

Finally, the agency must consider early succession existing on adjacent private lands when developing alternatives and before choosing the level of early succession to create with the project. Forest Plan at F-31. "[H]igh amounts of quality early-successional forest on surrounding private land might result in decisions to provide such habitats on national forest land at the low end of the objective range." Id. at F-31-32. Based on the agency’s analysis, it appears that this key step was overlooked. When assessing the "effects on forest successional stage and habitats" the EA purports to have considered a 60,371 acre area including 26,353 acres of privately owned land. EA at 97. But data on successional stages is only included for 29,626.6 acres. Id., Table 3.8.1. The agency must consider the extent of early successional forest on private and public lands that were not assessed in the EA before choosing how much ESH to create as part of the project, particularly in Prescription 7.E.1 which will exceed allowable ESH limits under both alternatives. At a minimum that analysis should be expanded to include all 60,371 acres identified in the EA. Adequate assessment of ESH on private lands is also necessary to evaluate the cumulative impact of
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<td>Topa, Mary</td>
<td>transitioning older forests to younger forest on National Forest system lands as discussed further below. Failure to consider early succession existing on adjacent private lands and surrounding public lands violates Forest Plan direction and NFMA.</td>
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<td>As currently drafted alternatives 2 and 3 both exceed limits for early successional forest conditions in management Prescription 7.E.1 (and possible other prescriptions) in violation of the CONF Forest Plan and NFMA. The alternatives must be withdrawn or altered and the agency must provide sufficient evidence with the revised alternatives to prove compliance with Forest Plan ESH limitations.</td>
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<td>The commenter correctly identified an error in Table 3.4.3 related to Riparian Corridor widths. These widths have been corrected in the EA.</td>
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2) Alternatives 2 and 3 Violate Forest Plan Standards for the Riparian Corridor

The CONF Forest Plan establishes an embedded Riparian Corridor Prescription that "encompasses riparian areas, as well as adjacent associated upland components." Plan at 3-175. Riparian Corridor widths are "measured in on-the-ground surface feet perpendicular from the edge of the channel or bank (stream, water body, etc.) and extend out from each side of a stream" and are slope dependent. Id. In other words, the higher the degree of slope the larger the Riparian Corridor. For perennial streams, the Riparian Corridor is 100 feet for slopes of 0-10%; 125 feet for slopes of 11-45%; and 150 feet for slopes over 46%. Forest Plan at 3-176.

"Major human actions or activities that create long-term impacts or permanent changes to water drainage, soil exposure and productivity, create impervious surfaces, or permanent removal of vegetation cover are prohibited within..."
Activities within the Riparian Corridor must clear two hurdles. First, all management practices, including silvicultural activities, must be "specified to maintain riparian functions and values." Forest Plan 3-175. Any management activity which is not "specified to maintain riparian functions and values" is prohibited. Certainly any activity which harms riparian functions and values explicitly violates this standard. Second, for activities that clear the initial hurdle, certain discrete activities are allowed. In terms of silvicultural activities, tree removal is allowed "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." Plan at 3-181 (emphasis added). Reading these requirements together, tree removal which maintains riparian functions and values by enhancing the recovery of the diversity and complexity of vegetation is allowed. Traditional timber harvest "[is] not allowed in riparian areas." CONF Revised Land and Resource Management Plan Appeal Decision (July 25, 2006) at 30. The basis of any activity in the Riparian Corridor must be maintaining riparian functions and values.
### Comment

The EA discloses that "treatment of riparian corridors would occur." EA at 75. But compliance with the Forest Plan is addressed almost as an afterthought: "treatments are permitted within riparian corridors." EA at 77. The EA does not correctly identify, much less protect, the riparian corridor. The "Minimum Riparian/Water Protection Zones" chart on page 67 is erroneous and inconsistent with the Forest Plan - it shows widths for riparian corridors on the Chattahoochee National Forest that are more narrow than those prescribed by the Plan. Plan at 3-175; Plan Appx. C. According to the Plan, along both perennial and intermittent streams, where slopes are 0-10% riparian corridors must be at least 100 feet wide, and when slopes are between 11-45% riparian corridors must be at least 125 feet wide. Id. The EA incorrectly classifies slopes up to 30% as only requiring a riparian corridor of 100 feet. EA at 67. We expect most riparian zones in the project area will be located within the 11-45% slope class, therefore, they will require a minimum riparian corridor of 125 feet.

Regarding cutting within riparian corridors, the agency commits itself to abiding by the less strenuous (but still applicable) Georgia Forestry BMP standards of avoiding harvest within 25 feet of a stream and limiting harvest between 25-100 feet of a stream to a reduction of no greater than 50 basal area but that commitment is insufficient to meet Forest Plan requirements which go above and beyond the requirements of Georgia Forestry BMPs. EA at 73, 77. The EA lacks discussion of compliance with Riparian Corridor standards altogether.

Practically, it is unclear why the agency has a Riparian Prescription at all if it believes it is only bound by the Georgia Forestry BMPs. To put it more coarsely, why embed a Riparian

### Response to Comment (By Comment Author)

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<td>Topa, Mary</td>
<td>Prescription in different prescriptions throughout the forest if the designation has little or no import? The answer must be that these areas require additional protections and analysis under NEPA and the Forest Plan prior to implementation of activities that may affect the &quot;riparian functions and values&quot; it is to be managed for. We can think of few activities with the potential to impact those values more adversely than commercial timber sales. To implement this timber project, the Forest Service must explain how its planned silvicultural activities within the riparian corridor meet NFMA exceptions for harvesting in unsuitable areas and meet the Forest Plan requirement &quot;to maintain riparian functions and values.&quot;</td>
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<td>Soils in the project area are already degraded. &quot;Soil condition in the three 6th level hydrologic unit (HUCs) was rated as Fair (1.7 to 2.0) or functioning at risk.&quot; EA at 40. &quot;Soil productivity is . . . impaired and the ability of the soil to maintain resource values and sustain outputs is compromised in 5 to 15 percent of the watershed.&quot; Id. &quot;Most of this disturbance is the result of past management activities such as timber harvesting, road construction and maintenance, fire, and recreation use.&quot; Id. Now the agency proposes to implement the very same activities which degraded soil in the past. The EA concludes that Regional Forest Service standards requiring at least 85% of an activity area to be left in a condition of acceptable soil productivity will be met, largely relying on mitigation measure. As explained in Section IX(ii)(3), the mitigation analysis itself is deficient, and thus there is insufficient basis upon which to assert that mitigation would prevent substantial and permanent impairment to the soil resource. But even assuming that the analysis in the EA is correct, if the project leaves an additional 15% of the activity area in a condition of</td>
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unacceptable soil productivity it risks converting 30% of the areas soils into a state where "the ability of the soil to maintain resource values and sustain outputs is compromised." EA at 40.

Particularly given the acknowledgement that existing soil conditions are impaired, the Forest Service lacks the site-specific data necessary to conclude that Regional Forest Standards requiring at least 85% of an activity area to be left in a condition of acceptable soil productivity will be met. The Forest Service must conduct stand specific studies to determine if the proposed action will cause soil productivity to be reduced below the 85% threshold. See Rocky Mountain Wild v. Vilsack, 843 F. Supp. 2d 1188, 1195 (D. Colo. 2012). This does not necessarily require hand surveys of each stand "but [the Forest Service] must, however, at least have some reliable methodology for estimating soil compaction [or productivity loss in this instance] in every land unit" to meet NEPA's "hard look" requirement and to demonstrative compliance with NFMA Id. at 1198.

Given the highly erodible soils in the project area, this same analysis must be applied to the potential for erosion to violate NFMA standards. Nearly every stand in the project area has a "severe" erosion risk rating and utilizing ground-based logging techniques on steep slopes is likely to accelerate erosion, potentially to a point where "soil, slope, or other watershed conditions [are] irreversibly damaged." § 1604(g)(3)(E)(i). The evidence before the agency shows that soil productivity may be impaired through loss of productivity and/or erosion, in violation of NFMA. At a minimum, in the face of its own evidence, under both the NFMA and NEPA, the District must demonstrate how it will avoid such impairment, which it has
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<td>Topa, Mary</td>
<td>iv. Proposed woodland creation presents issues regarding compliance with the NFMA and Forest Plan which are unaddressed in the EA. In our scoping comments, we raised concerns that the proposed woodland creation may violate provisions of the NFMA and the Forest Plan related to: (1) protecting the soil resource and the productivity of the land; (2) preserving existing tree species diversity and avoiding forest type conversations; (3) limiting the size of individual even-age cut areas and separating such openings; and (4) restocking after any type of timber harvest. See Scoping Comments at 23-27 for further discussion and citations. We explained these potential problems could be avoided if the District would restore woodlands on ecologically appropriate sites. The draft EA does not address these issues, however. Attempting to impose woodlands on inappropriate sites (e.g. mostly all of those proposed) through logging, herbicide, and prescribed burning in perpetuity likely would, over time, damage the existing quality of the soil resource and substantially impair the existing productivity of the land. In Alternative 3, timber harvest to create woodlands is proposed on 490 acres, in many stands over 40 acres in size, many of which are contiguous or nearly so and many of which are adjacent to stands proposed for non-commercial cutting as well. See EA 22-23 and Map of Alt. 3 Commercial and Non-commercial Treatments. Harvest down to 15-20 sq. ft. BA on the ridges and 30-60 sq. ft. on the slopes (EA at 22) clearly would have effects comparable to even-aged harvest methods, for example, shelterwood harvest. Therefore, it The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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should be subject to the NFMA and Forest Plan limitations on the size and spacing even-age cuts. Occurring within this sea of logging, the lower slope "thinning" to 60-80 sq. ft. BA would only contribute to the excessive forest openings. These sites would be prescribe burned indefinitely to prevent tree regrowth, exacerbating the negative effects of these overlarge, contiguous cuts which the NFMA and Plan limits were intended to avoid.

The District's insistence on creating woodland via intensive commercial harvest of mostly older forest, and refusal to consider alternate, more suitable sites for woodlands, is inexplicable. We wonder whether this is occurring because true woodland-type sites tend to be, by definition, less productive and contain lower value timber. If this is the case, such an approach would run contrary to other NFMA requirements regarding timber management. See 16 U.S.C. § 1604(g)(3)(E)(iv) (A timber harvest system may not be chosen "primarily because it will give the greatest dollar return or the greatest unit output of timber."); 16 U.S.C. § 1604(e)(1); Envtl. Prot. Info. Ctr. v. U.S. Forest Serv., 234 F. App'x 440, 443-45 (9th Cir. 2007) (pursuant to § 1604(e)(1), forest management projects must "include coordination of" timber and the other values and timber cannot be elevated over the others, particularly when doing so constrains the alternatives considered and excludes alternatives that might better meet forest plan goals). The District should consider alternate sites that would better meet woodland goals or explain the refusal to do so.

These problems could be remedied by relocating woodland creation to ecologically appropriate sites, where the existing type, structure, and productivity of forest are more consistent.
with woodlands, where soils are already poor, and where other characteristics of woodland sites exist. Yet, rather than do so or explain the refusal to do so, the EA does not address or consider these troublesome issues at all. For example, the EA does not disclose the NFMA's and Plan's normal requirements for timber harvest and even attempt to explain why the District believes the proposal is permissible.

Topa, Mary

i. Evaluation of alternatives

Adequate consideration of alternatives is the "heart" of the NEPA process because it defines the issues and provides a clear basis for choices by the decision maker and the public. 40 C.F.R. § 1502.14. According to NEPA:

Federal agencies shall, to the fullest extent possible: [u]se the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.

40 C.F.R. § 1500.2(e) (emphasis added). Therefore, the Forest Service must consider a "broad range of reasonable alternatives." Curry v. United States Forest Service, 988 F. Supp. 541, 554 (W.D. Pa. 1997); see also Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1225 (9th Cir. 1988), cert. denied 489 U.S. 1066 (1989) (stating NEPA requires federal agencies to "study, develop, and describe appropriate alternatives"). This requirement applies to EAs as well as EISs. Bob Marshall Alliance, 852 F.2d at 1229; see Save Our Cumberland Mountains v. Kempthorne, 453 F.3d 334, 343-44 (6th Cir. 2006) (discussing NEPA requirements to consider alternatives in environmental assessments). The failure to

Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail:

Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.
We presented the agency with a viable alternative that met the project's purpose and need in our June 6, 2014 scoping comments. See Scoping Comments at 33. That alternative allowed the agency to meet its project objectives while reducing adverse effects upon the quality of the human environment. We met with the agency to explain our concerns on March 5, 2015 as well as to talk about alternative proposals for the project area. On June 22, 2015, we provided additional information related to the alternative we suggested by submitting a detailed letter identifying specific treatments for individual stands that would further the agency's objectives. The outline of the alternative we asked the agency to consider is reproduced in the EA verbatim. EA at 28. Instead of giving the alternative informed and meaningful consideration as required by NEPA, the agency dismissed the alternative out of hand for two main reasons: 1) that avoiding cutting mature oaks would limit the ability to provide early successional forest habitat, and 2) that Forest Plan goals and objectives may not be achieved to the same degree under the alternative proposal. "A cursory dismissal of a proposed alternative, unsupported by agency analysis, does not help an agency satisfy its NEPA duty to consider a reasonable range of alternatives." Envtl. Prot. Info. Ctr. v. U.S. Forest Serv., 234 F. App'x 440, 443 (9th Cir. 2007).

Agencies must consider viable alternatives to proposed early successional forest habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.

Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and environmentally sound method of timber harvest and the opportunity to utilize cable logging was evaluated in the Cooper Creek project. However, due to limitations of topography, access, and stand conditions, no opportunities for the use of cable logging systems were identified.
actions. The justification employed by the agency to reject our suggested alternative demonstrates that the alternative is, in fact, viable. The purpose of the Cooper Creek project is to "restore native plant communities, enhance wildlife habitat conditions, and improve forest health" and our alternative is consistent with that purpose. EA at 2. The alternative was eliminated based on assertions that it "limit[s]" or "reduce[s]" the agency's ability to meet project objectives as compared to the proposed action. EA at 28. Under that reasoning, anything less than the proposed action, including new Alternative 3, should be rejected because it may not allow the agency to meet its objectives to the same degree or in the same manner as the proposed action. To the contrary, like Alternative 3, the alternative we outlined is a viable project alternative that furthered the project's purpose and must be considered. See Native Fish Soc. v. Nat'l Marine Fisheries Servs., 992 F. Supp. 2d 1095, 1110 (D. Or. 2014), appeal dismissed (May 13, 2015) ("Where a feasible alternative would meet the project's purpose and need, it should be considered.").

Instead, the agency dismissed the alternative by prematurely weighing its benefits against the proposed action and concluding that the alternative was not worth pursuing. This puts the cart before the horse. Weighing the benefits and adverse effects of viable alternatives is precisely the function that alternative consideration under NEPA is meant to perform; and the step the agency skipped here. See 40 C.F.R. § 1500.2 ("Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment"). Prematurely rejecting the alternative, without "informed and meaningful" consideration, denied the public and the decisionmaker a "clear basis for

Even if the agency could dismiss the alternative as not viable (which it cannot and has not done here), the justification for that dismissal must be reasonable. The conclusory and unsubstantiated justification provided in this instance misses that mark. The agency asserts that "eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat" without explaining why cutting mature oaks is necessary to create early successional habitat. EA at 28. As explained previously, this explanation lacks a firm foundation. As the agency knows, early successional forest habitat can be created almost anywhere on the forest by removing any variety of trees, not specifically oaks. Over 3,500 acres in the analysis area contain stands less than 40 years old total. Since these stands have been logged recently, road templates exist to access them and most are likely suitable for ground-based logging under Georgia forestry best management practices. The 3,500 acres far exceeds the area proposed for commercial logging in either Alternative 2 or 3.

Related, the agency asserts that avoiding harvesting mature oaks limits its ability to create young oak stands in the future. Id. This justification suffers from a similar flaw in that the basis for requiring harvest of mature oaks specifically to create young oaks is unclear and unsubstantiated. Past harvests in the 3,500 acre area mentioned previously were largely without plans for regeneration, so these stands are likely depauperate in oaks. Hence, cutting these younger stands instead of mature oak stands would not limit the ability to provide early successional forest habitat and would create better opportunities for restoring oaks and increasing their extent.
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<td>Finally, the agency asserts that avoiding commercial logging in the 7.E.1 Prescription and logging generally in the Riparian Prescription would &quot;substantially reduce&quot; the agency's ability to meet Forest Plan Goals and Objectives. It is unclear what Forest Plan Goals and Objectives this is referring to, regardless the EA fails to explain how avoiding those specific activities reduces the agency's ability to meet any Forest Plan goals. Presumably this is not referring to goals and objectives related to early successional habitat because unsuitable areas were not considered when setting those objectives during the Forest Plan revision, as discussed previously. See supra, Section IX(i)(2)(a). Stated differently, there is no Forest Plan ESH goal or objective for unsuitable areas thus it cannot be reduced or limited. As we provided in the alternative we suggested, to meet other goals and objectives in these areas, the agency should consider management techniques with less adverse impacts (e.g., prescribed fire, non-commercial cutting) in lieu of commercial timber sales.</td>
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<td>In addition to the requirement to meaningfully consider viable project alternatives presented directly to the agency, the agency has a general obligation to &quot;identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment&quot; &quot;to the fullest extent possible.&quot; 40 CFR § 1500.2(e); see 42 U.S.C. § 4332(2)(E) (&quot;study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternate uses of available resources.&quot;); 40 CFR § 1502.14 (&quot;rigorously explore and objectively evaluate all reasonable alternatives&quot;).</td>
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Alternative development and consideration begins with an analysis of the project's purpose and need. As stated previously, the given purpose of the Cooper Creek project is "to restore native plant communities, enhance wildlife habitat conditions, and improve forest health." EA at 2. The project is needed purportedly "because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity." Id. Assuming that those needs are accurate and the purpose is appropriate, the agency must consider alternatives that can be employed to meet those objectives while "avoid[ing] or minimize[ing] adverse effects . . . upon the quality of the human environment." 40 C.F.R. § 1500.2(e)

Specifically, the agency should consider the following changes to the project as part of its alternatives analysis:

* Creating early successional forest habitat from stands less than 40 years old,
* Avoiding cutting mature oak trees,
* Avoiding cutting in unsuitable prescriptions
* Reducing commercial harvest in the Bryant Creek watershed
* Creating woodlands only where site-specific conditions suggest woodlands are appropriate
* Avoiding all ground-based logging on slopes over 35%
* Increasing mitigation measures to avoid sedimentation of streams

Implementing these changes will still allow the agency to meet its purpose and need for this project. Consideration of these reasonable alternatives is necessary to fulfill agency obligations to "emphasize real environmental issues and alternatives," 40 C.F.R. § 1500.2(b), and "avoid or minimize
adverse effects." 40 C.F.R. § 1500(e). Without consideration of reasonable project alternatives, the EA cannot (and does not) meaningfully compare the effects of the possible alternatives available to the agency to meet its objectives, denying the public and the agency itself a clear basis for choice among these several options.
Response to Comment (By Comment Author)

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<td>Topa, Mary</td>
<td>ii. The Agency's Analysis of Impacts to Soils is Inadequate Under NEPA</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats).</td>
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<pre><code>                                                                                                                                                                                                                                                                                                       |
</code></pre>
<p>| Topa, Mary        | 1) The General Description of Soil Conditions is Inadequate             |                                                                                                                                                                                                                                                                                                                                                                                                     |</p>
The District’s analysis of existing soil conditions provides a helpful, but only general, overview of soils/slopes in the project treatment areas. The area is steep: 54.5% of the treatment stands are on slopes greater than 25% gradient and nearly 10% are on slopes over 45% gradient. EA at 41-42. "Soils on the steeper slopes have more runoff than soils in the less sloping areas." EA at 38. "As a result, they are more susceptible to erosion." Id. All soils on slopes over 25% gradient are rated as "poorly suited" for roads and log landings and have erosion and soil rutting hazard risk ratings of "moderate" to "very severe." EA at 43. In other words, over half of the treatment stands are unsuitable for roads and log landings with a significant likelihood of erosion and rutting. "Very severe [erosion hazard risk ratings] indicates that significant erosion is expected, loss of soil productivity and off-site damage are likely, and erosion-control measures are costly and generally impractical." EA at 44-45. All soils on slopes over 45% are rated as "poorly suited" for operating any ground-based logging equipment. Id. "These soil map units have high erosion potential, slope failure potential and present challenges to equipment operation." EA at 42. According to the CONF Forest Plan "[t]hese slopes require an overhead cable or helicopter logging system." Plan at F-11 (emphasis added). Yet the agency appears to be planning to conduct ground-based logging in these and other problematic areas.

It only "appears" that the agency is planning to conduct ground-based logging in many of these areas because it is unclear. The EA fails to describe soil conditions in combination with the treatments proposed for those soils/slopes. As an example, the EA discloses that some type of treatment is
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 | proposed on 350 acres with slopes over 45% (EA at 42) but does not disclose if those treatments will be commercial or non-commercial, the purpose of the treatments, or the degree of basal area reduction. Presumably less treatment is planned on areas with slopes over 45% under Alt. 3 given agency commitments to "modify" stand boundaries to "minimize" disturbance on those slopes, but that too is unclear and unexplained. Id. Any treatment on erosive soils over 45% gradient is likely to cause adverse impacts but commercial harvesting, requiring skid trails, temporary roads, log landings, etc., is likely to be significantly more impactful than non-commercial treatment. Without information relating specific treatments to site-specific conditions the public and the agency cannot weigh the risks inherent in each action alternative. See 40 C.F.R. § 1502.14.

The factual descriptions of soil types and hazard ratings are also inadequate because they fail to convert ratings into potential effects on soil and water resources. For example, the agency discloses that much of the treatment area has "moderate," "severe," of "very severe" erosion risk ratings but does not explain what those ratings mean in terms of on-the-ground consequences; with one exception, the agency does disclose that a "[v]ery severe [erosion hazard risk rating] indicates that significant erosion is expected, loss of soil productivity and off-site damage are likely, and erosion-control measures are costly and generally impractical." EA at 44-45. To understand the import of these ratings the public must seek out separate NRCS soil data that is not coherently discussed in the EA as NEPA requires. See Environmental Defense Fund, Inc. v. Andrus, 619 F.2d 1368, 1375 (10th Cir. 1980) ("The thrust of NEPA is that all pertinent environmental data be gathered in one place, i.e., the 'statement', there
constituting a discussion of all relative environmental impacts of a proposed course or alternative courses of action which reflects that the agency has given all pertinent environmental matters a 'hard look'...").

Finally, we note that analysis of soil slumpage, mass wasting, or landslide risk appears to be missing from the EA entirely. Given the steep slopes, erosive soils, and very high rainfall in the project area the District must assess and disclose the potential for project activities to lead to mass wasting events.

Topa, Mary

2) The Assessment of Impacts to Soil Conditions is Inadequate

"Ground-disturbing activities from forest management practices have the greatest change [sic] in impacting soil productivity through erosion, compaction, rutting, soil displacement and removal of the organic surface." EA at 40. As the description of soils in the treatment areas generally illustrates, the likelihood of those impacts increases with slope gradient and erosion hazard potential. But the agency's assessment of impacts from ground-based harvesting suffers from the same shortcoming as the agency's disclosure of soil conditions - it lacks the site-specific information necessary to constitute a "hard look." The EA describes the impacts of ground-based logging uncoupled from the site specific conditions at Cooper Creek, e.g., steep slopes and highly erosive soils, in violation of NEPA.

The EA's general discussion of potential impacts from ground-based logging could be used to describe impacts from logging anywhere in the Southeast: "Potential effects of Alternatives 2 and 3 on soil productivity would include compaction, rutting,
displacement, erosion, loss of soil organic matter, short-term changes in soil moisture content and changes in nutrient cycles. Introduction of invasive weeds can also be detrimental to native plant growth on soils." EA at 47. Discussion of the relationship between ground-based harvesting, slope, and soils is limited to the general maxim that "the steeper the slope gradient, the higher the potential for soil disturbance to operate ground based systems." EA at 52. This only underscores the need for actual analysis of the impacts of ground-based logging on the steep slopes and erodible soils at Cooper Creek.

A particularly striking shortcoming is the agency's assessment of sedimentation and soil productivity impacts associated with permanent and temporary roads. Both alternatives involve building/rebuilding up to at least five miles of temporary roads. EA at 45. Roads both produce ("Runoff from road surfaces can detach and transport the fine material (soil particles) from road prisms and ditches, particularly during storm events") and deliver ("Sediments delivered to streams from roadside ditches may have originated from sheet or rill erosion in upland areas prior to entering road surfaces or ditches") sediment to streams. EA at 50. "Roads within the project area intersect numerous streams, of all types." Id. Over 98% of the treatments stands are on soils/slopes "poorly suited" for roads. EA at 43 (emphasis added). At least 0.7 miles of temporary road are planned for the most problematic soils, on slopes in excess of 45%. EA at 42. Nevertheless the District foregoes this analysis altogether because "[s]ediment delivery directly from road surfaces to water courses is difficult to estimate since it occurs as non-point runoff." EA at 50. This does not approach compliance with NEPA's "hard look" requirement. The agency must assess and disclose the
impact of road building and use on the steep slopes and erosive soils at Cooper Creek including an estimate of sediment yield to streams under any project alternative.

Similarly, the agency discloses that between 84 and 116 log landing and loading areas will be required under Alternatives 3 and 2, respectively. EA at 52. The EA also discloses that 97% of the soils in treatment areas are "poorly suited" for log landings. EA at 43. The agency must assess the likely impacts of siting numerous log landings on soils that are "poorly suited" to accommodate them.

The Draft EA dismisses other concerns without adequate explanation as well. "The Forest Service, in soil quality monitoring protocols (USDA Forest Service 2009) has developed thresholds for compaction, displacement, rutting, severe burning, surface erosion, loss of surface organic matter, and soil mass movement." EA at 44. As an initial matter, it is unclear what these thresholds are. Will the agency disclose them? Given the site-specific conditions, is the project likely to exceed them? Analysis of these two questions is critical as exceedance of threshold values "result[s] in significant change to soil productivity levels" potentially in violation of both NEPA and NFMA. Id. Finally, what is the relationship between these thresholds and project monitoring requirements? The agency determined that "[T]he Cooper Creek Project, the DSD categories of compaction, rutting, displacement, and surface erosion would be the thresholds of most concern" and focused most of its analysis on those issues. Id. Nowhere does the EA explain why loss of surface organic matter and soil mass movement, in particular, are not concerns at Cooper Creek. NEPA requires the agency to assess these risks or explain in sufficient detail why they are
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<td>Topa, Mary</td>
<td>3) Discussion of Mitigation Measures for Soil Impacts is Inadequate</td>
<td>Project design features and mitigation for resource protection is described in section 2.4 of the EA.</td>
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Finally, the District's discussion of mitigation measures is also inadequate. Perfunctory descriptions of mitigating measures, without sufficient detail to ensure that environmental consequences have been fairly evaluated, are inconsistent with the "hard look" required under NEPA. Neighbors of Cuddy Mountain v. United States Forest Serv., 137 F.3d 1372, 1380 (9th Cir. 1998) (citations omitted). Mitigation measures can only be used to justify a FONSI when their efficacy is "supported by substantial evidence. . . ." National Audubon Soc'y v. Hoffman, 132 F.3d 7, 17 (2nd Cir. 1997) (Without "substantial evidence to support the efficacy" of the mitigation measure at issue in that case, such as a study of the measure's likely effects, monitoring to determine how effective it was, and detailed alternatives in the event that it
failed, the Forest Service's consideration of the proposed action was inadequate and violated NEPA); see also Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1151 (9th Cir. 1998), overruled on other grounds by Lands Council v. McNair, 537 F.3d 981 (9th Cir. 2008) ("Without analytical data to support the proposed mitigation measures, we are not persuaded that they amount to anything more than a 'mere listing' of good management practices.").

Unfortunately, the agency frequently resorts to a "mere listing" of good management practices to mitigate impacts. The District repeatedly cites pre-operation planning as meaningful impact mitigation. On slopes over 45% "[p]ossible Design Criteria . . . include pre-operation location and design of access routes [and] avoiding existing or predicted unstable slope areas where possible." EA at 42 (emphasis added); 47. "To effectively mitigate the hazard of erosion on treatment activity areas will require pre-operation planning to identify suitable access routes (skid trails, temporary roads) that can minimize erosion and sediment movement on steep slopes into riparian areas." EA at 45 (emphasis added). "Landings will need to be planned prior to construction to identify optimum locations." Id. "Mitigation measures to minimize soil compaction on proposed treatment activity areas include pre-operation planning and design to minimize operations on soils rated moderate to severe during wet periods of the year." Id. (emphasis added).

The commitment to consider the placement of various aspects of the project prior to project implementation is a good, common sense requirement but the commitment does little to ensure impacts are properly mitigated at Cooper Creek. Given the high risk of impacts at Cooper Creek due to steep slopes,
erodible soils, and concentration of treatments in three smaller watersheds, it is unclear how impacts can be reduced to an acceptable level at all. The terrain at Cooper Creek makes it difficult to implement commercial timber harvest without causing significant adverse impacts even with the highest quality pre-operation planning. Further, in most instances the commitment is only to "minimize" or "reduce" impacts "where possible" without explaining the degree of impact reduction that can likely be achieved. We appreciate the agency's commitment to use pre-operation planning to evaluate ways to reduce impacts but the result of that evaluation is yet unclear and thus provides no information or basis upon which to assess claims that impacts will, in fact, be sufficiently mitigated.

Moreover, the evidence before the agency casts doubt on this approach. Presumably the agency utilized pre-operation planning to mitigate impacts as part of the Brawley Mountain timber sale but impacts far exceeded the "light hand on the land" approach promised by the agency. Many parts of the Brawley sale remain unvegetated even 3-5 years after treatment, particularly temporary roads, skid trails, and log landings. At the least the agency must disclose its experience at Brawley and explain why it will be more successful mitigating impacts at Cooper Creek.

For similar reasons, reliance on the "skill and experience of project managers, such as timber sale layout technicians, timber sale administrators, and skilled equipment operators" is not a reasonable mitigation measure. EA at 45. Again, the experience at Brawley suggests that simply employing the right people is ineffective to sufficiently mitigate impacts. Moreover, countering this commitment the agency should
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<td>disclose that it was unable to sufficiently monitor timber contractors at Brawley leading to violations of the project EA, Decision Notice, and timber sale contracts. See Letter from Sarah A. Francisco and Patrick Hunter, SELC, to Andrew L. Baker, Blue Ridge District Ranger (July 8, 2014)(attached). The public should be able to safely assume that the Forest Service will always employ highly-skilled staff and contractors so it is unclear what this specific commitment is adding. Finally, this commitment appears particularly ineffective at mitigating impacts in areas of the project where &quot;erosion-control measures are costly and generally impractical.&quot; EA at 44-45 (emphasis added).</td>
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<td>As a mitigating factor, the District discloses that some &quot;[s]tand boundaries were modified to minimize ground disturbance on steep slopes in excess of 45%&quot; but does not disclose which stand boundaries or how they were modified. EA at 42. This is a positive step but insufficient to meet NEPA's &quot;hard look&quot; requirement. Recently, the agency has assured the public via its website that it will not conduct &quot;ground based commercial thinning on steep slopes (35 percent sustained grade or more.)&quot; The closest thing we can find to this assertion in the EA is a commitment not to operate skidders on sustained slopes over 35%. EA at 29. The assertion seems inconsistent with other sections which contemplate use of temporary roads and ground-based equipment to log on slopes over the 35% threshold. See, e.g., EA at 42 (identifying need for at least 0.7 miles of temporary roads on steep slopes). We ask that the agency to explain this commitment in more detail to allow the public to evaluate its significance. What constitutes a &quot;sustained&quot; slope? Will the agency commercially log these lands via methods that are not reliant on skidders such as chain logging with winches?</td>
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The district also relies on time constraints to mitigate impacts. Namely, sequencing treatments so that "the likelihood of large-scale soil erosion or sediment delivery to streams is minimal" (EA at 50) and utilizing "shut down" periods "for roads and mechanical vegetation treatments during wet weather" (EA at 47). As discussed elsewhere, the commitment to sequencing treatments does not necessarily mitigate impacts but changes the type of impact from a short, intense impact to a more prolonged impact. Additionally, this commitment will be completely ineffective if areas of past treatment have not sufficiently healed so as not to exacerbate the impacts of active treatments. The agency must explain why its failure to revegetate areas at Brawley will not be replicated here. Finally, a commitment to utilizing shut down periods may help mitigate some impacts, rutting for instance, but is ineffective to combat others, such as erosion. Again, the agency has demonstrated an inability to sufficiently monitor these activities as demonstrated by noncompliance with timber sale contracts at Brawley.

The most specific commitment made in the EA is that "[w]ood debris from forest thinning (i.e. slash, tops, branches) would be lopped and scattered on skid trails, log landings and temporary roads after operations end to provide ground cover and erosion control, further reducing potential adverse effects to soils." EA at 48. But the EA contains no data regarding the efficacy of that commitment. Moreover, taking forest thinning from treated stands and placing it on skid trails, log landings, and temporary roads would seem to leave those stands more vulnerable to erosion because they would lack the protective cover.
Overwhelmingly the EA resorts to relying on unspecified BMPs to "minimize adverse impacts to soils and water quality" without providing any evidence that those BMPs will minimize adverse impacts at Cooper Creek specifically to an acceptable degree. EA at 47, 53. The inadequacy of this approach is illustrated with a typo (and discussed in sections IX(iv)(2) and IX(ii)(3). According to the Cooper Creek EA, with "implementation of applicable BMPs as outlined in Table 2.16 - Design Features and Mitigation Measures for Action Alternatives, most adverse effects to soils would be minimized, mitigated or treated to begin restoration to desired conditions." EA at 47. There is no Table 2.16 in the Cooper Creek EA. Unsure of this commitment we looked at other projects on the CONF to see if they included a Table 2.16 and we found one - the Sumac Creek project. The Sumac Creek project was located on a different district on the CONF with different soil and slope concerns and different proposed treatments. Yet, Table 2.16 in the Sumac Creek EA and Table 2.4.1 in the Cooper Creek EA - both of which set out design features necessary to mitigate impacts to soil and water - are identical. The agency is relying on exactly the same BMPs to mitigate impacts in areas of the forest with different slope gradients, soils, aspects, precipitation patterns, forest communities, etc. While these BMPs may have some impact, simply referencing the BMPs fails to explain how or why they will be successful at Cooper Creek. The District is only committing to implementing standard mitigation measures incorporated in multiple EAs across the forest.

Documents referenced in the EA to explain soil and slope concerns belie the efficacy of this approach. NRCS soil data explains that ratings of moderate or severe erosion hazard "indicate the need for construction of higher standard roads,
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<td>additional maintenance of roads, additional care in planning harvesting and reforestation activities, or the use of special equipment. Soil Survey of Fannin and Union Counties, Georgia 45. In other words, soils with at least a moderate erosion hazard risk rating - 96% of the treatment area - require above standard mitigation measures. See EA at 45. Moreover, the EA discloses that some treatment areas have &quot;very severe&quot; erosion hazard risk ratings where &quot;erosion-control measures are costly and generally impractical.&quot; EA at 44-45 (emphasis added). To meet its NEPA obligations the agency must either commit to specific, above standard measures to mitigate impacts to soil and water, or demonstrate why &quot;standard&quot; measures will be effective will sufficiently mitigate impacts on soils/slopes with unusual, higher than standard risks. In sum, the lack of site- or project-specific analysis, the reliance on general, ill-defined mitigation standards that cannot be fairly assessed for their efficacy, and the District's cursory assumptions and explanations, render the District's analysis inadequate under NEPA. For examples of the types of analysis that we believe are missing see, infra, Section IX(iv) (2).</td>
<td>The EA disclosed the cumulative impacts on chapter 3 in the document.</td>
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iv. Agencies must consider relevant information

As mentioned previously, a core objective of NEPA is to "ensure that the agency will not act on incomplete information, only to regret its decision after it is too late to correct." Friends of the Clearwater, 222 F.3d 552, 557 (9th Cir.2000). The EA and/or EIS requirements further that objective by "ensur[ing] that the agency, in reaching its decision, will have available, and will carefully consider,
detailed information concerning significant environmental impacts" and by "guarantee[ing] that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision." Dep't of Transp. v. Pub. Citizen, 541 U.S. 752, 768, 124 S. Ct. 2204, 2215-16, 159 L. Ed. 2d 60 (2004)(citation omitted). When relevant information about a project and its impacts is available, the agency must consider and disclose it.

Agencies also have an affirmative duty to research, uncover, and disclose information about potential impacts from projects. Agencies cannot research impacts "in a cursory manner nor sweep[] negative evidence under the rug." Nat'l Audubon Soc'y v. Dep't of Navy, 422 F.3d 174, 194 (4th Cir. 2005). "[A]gencies violate NEPA when they fail to disclose that their analysis contains incomplete information." N. Carolina Wildlife Fed'n v. N. Carolina Dep't of Transp., 677 F.3d 596, 603 (4th Cir. 2012); see also State Farm, 463 U.S. at 43, 103 S.Ct. 2856 (holding that an agency acts arbitrarily and capriciously when it fails to "examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made") (internal quotation marks omitted). Withholding "up-front disclosures of relevant shortcomings in the data or models" violates NEPA. Lands Council v. Powell, 395 F.3d 1019, 1032 (9th Cir.2005). Here, the District has relevant data about its efforts to create woodlands as part of the Brawley Mountain project that it has not considered nor disclosed in violation of NEPA.

The Brawley Mountain Project was an approximately 400-acre woodland development project located on the Blue Ridge
Ranger District. Authorized in 2009, harvesting began in 2010 and lasted through 2014. According to the agency, woodland conditions should exist at the site after two burns if there was no herbicide treatment or one burn if there was herbicide treatment; approximately three to five years. Brawley EA at 81. At the least, the EA provided that "woodland conditions would be created . . . by about five years post-harvest." Id. at 82. According to that projection, woodland conditions should exist across large parts of the project area. The Forest Service also committed to conducting post-project monitoring to evaluate the agency's success at creating woodlands at Brawley. Id. at 20 ("Standard Forest Service procedure includes monitoring for achievement of objectives. These include post-burn monitoring, vegetation composition monitoring, and implementation and effectiveness monitoring of mitigation measures"); see also 23-24, 183.

Information regarding the District's ability to create woodlands at Brawley Mountain is directly relevant to its new effort to create woodlands at Cooper Creek. NEPA requires this information to be considered in the Cooper Creek environmental documents and disclosed to the public. But information regarding the District's efforts at Brawley Mountain is completely missing from the EA. This leaves critical questions unanswered including: What indicates that the agency was successful at creating a woodland ecosystem at Brawley? Are woodland associated species present, and if so, to what degree? Does the agency intend to change its approach to future woodland projects in response to its adaptive management responsibilities? If the agency was not successful, what indicates a probability of success at Cooper Creek? The agency should have information to answer these questions that must be considered and disclosed in the EA.
Alternatively, if the agency has not collected sufficient information to evaluate success at Brawley it must disclose that its analysis at Cooper Creek contains incomplete information. See N. Carolina Wildlife Fed'n v. N. Carolina Dep't of Transp., 677 F.3d 596, 603 (4th Cir. 2012).

Given the recent emphasis on woodland "restoration" on the CONF, we have been working with an expert biologist to evaluate the agency's efforts to create woodlands at Brawley mountain. We hope this work is useful to the agency and leads to better adaptive management, appropriate selection of woodland "restoration" sites, and a generally healthier forest. Professor Evans' initial scientific review of the Brawley Mountain Project (attached) also contains directly relevant information which NEPA requires the agency to consider before the agency moves forward with creating additional woodlands at Cooper Creek.

One of Prof. Evans' key findings was that there was no "evidence to suggest that natural woodland communities ever existed at the Brawley Mountain site" and that as a result "there is no basis to support the idea that the simple manipulation of forest structure (opening the canopy, suppressing resprouting, controlled burns) would result in the appearance of any of the 64 Woodland dependent species" mentioned in the Brawley EA. Id. at 4. Agency records do not reveal the recruitment of any of these indicator species to the Brawley site in significant numbers. At best this is inconclusive evidence regarding the agency's ability to create a woodland community. If that is the case, it begs the question why the District is choosing to create nearly 700 additional acres of woodland on questionable sites before it has shown it can be successful creating woodlands at all. In fact, the evidence
before the agency indicates that it created temporary woodland canopy structure but failed to create a woodland community. Prof. Evans evaluation suggests that the agency can be much more successful at creating self-sustaining woodlands where individual site-specific characteristics lend themselves to a woodland community. In other words, whether or not the CONF as a whole has a shortage of woodlands, creating woodland communities can only be successful where site-specific conditions prescribe them. What site-specific characteristics at Cooper Creek does the Forest Service believe suggests woodlands are appropriate here?

From our perspective, there is minimal site-specific evidence that woodlands are appropriate for many of the sites considered as part of the Cooper Creek project. See, supra, Section III(iii). We fear this will repeat mistakes made at Brawley and fail to create a sustainable woodland community. Information about the agency's success or lack thereof at Brawley is relevant information about the agency's ability to create woodlands which must be considered and disclosed as part of this project. Additionally, as the agency has justified this project with general promises of mitigation, it must also disclose that it was unable to sufficiently monitor the Brawley sale to insure mitigation measures were in place. The agency must examine the data before it "and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made," in this instance, the choice to create additional woodlands at Cooper Creek. State Farm, 463 U.S. at 43, 103 S.Ct. 2856.

Topa, Mary

iv. Cumulative impacts analysis

Under NEPA, an agency must take a "hard look" at a project's

The EA disclosed the cumulative impacts on chapter 3 in the document.
environmental consequences. California v. Block, 690 F.2d 753 (9th Cir. 1982). The "hard look" includes an examination of direct, indirect and cumulative impacts. A "cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. Here, the agency’s assessment of cumulative impacts fall short on multiple fronts.

One overarching shortcoming is that the agency has completely failed to assess impacts from private lands which plainly fall within the definition of "cumulative impact." See 40 C.F.R. § 1508.7. Table 3.2.1 provides a helpful overview of other agency actions in the vicinity that may lead to cumulative impacts but they are only that - agency actions. EA at 33-34. While the agency may not have control over impacts from activities on private lands, the cumulative impact of those activities in combination with impacts from this proposed activity must be assessed to comply with NEPA. Relevant questions include, but are not limited to: what is the cumulative effect, both in terms of forest communities and wildlife use, of transitioning older forest to younger forest on public lands given conditions on private lands? And what is the cumulative impact to soil health in the area (including private lands) given soil productivity decline that is predicted to occur as part of the project?

Assessment of cumulative impacts inclusive of impacts from private lands is likely most critical for water quality considerations. These concerns will be discussed further below but are worth flagging here. Most of the area subject to ground-based logging as part of this project drains into Cooper Creek. Cooper Creek is listed as impaired by the state

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of Georgia (EA at 64), flows downstream onto private property and ultimately into the Toccoa River. The EA must consider the cumulative impact of this action, in combination with activities on private lands, on water quality of Cooper Creek and potential impact on the Toccoa River. The question of whether the sum of activities on private and public lands, including activities being considered as part of this project, may impact these water bodies to an unacceptable degree is unanswered.

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<td>Topa, Mary</td>
<td>1) Cumulative impacts and soils</td>
<td>The EA disclosed the cumulative impacts on chapter 3 in the document.</td>
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<td>First, the agency has spatially limited its analysis of cumulative impacts to soils in violation of NEPA. We appreciate that &quot;[a] ssessing soil quality within too large an area can mask site-specific effects&quot; (EA at 36) but similarly, assessing soil quality within too small an area can mask landscape-scale effects - both assessments are necessary. &quot;Analysis of direct and indirect effects for soil quality and productivity was [only] applied to the land area within the boundaries of proposed treatment units&quot; and cumulative effects were only assessed where there were direct or indirect effects, i.e., also only within the boundaries of the proposed treatment units. EA at 36. The agency illustrated its assessment with an example: &quot;if one acre of land receives soil impacts - resulting in reduced soil porosity, water holding capacity, aeration, long-term productivity - and a second management activity is planned for the same site, then soil cumulative effects are possible.&quot; Id. (emphasis added). This approach is inadequate because it ignores the combined effect of harmful impacts to soils from a landscape perspective; the EA admits as much: &quot;there are many present and reasonably foreseeable activities that are not considered for the soils cumulative effects analysis</td>
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because they do not occur within unit boundaries." EA at 53. To use the agency's example, if one acre of land has received soil impacts causing a reduction in long-term productivity, and this project would cause the adjacent acre to also experience a reduction in long-term productivity, the cumulative effect of that action (two acres with reduced productivity) must be considered. In other words, cumulative effects analysis must assess the environment as a whole, not only specific sites where direct effects attributable to the project will occur.

The assessment of cumulative impacts within individual treatment units is also inadequate. The EA asserts that "[m]ost of the proposed units for Alternatives 2 and 3 have had prior entries, and the effects of a secondary entry do not necessarily add to effects of the earlier harvests because existing landings and temporary roads would be used again." EA at 54. Reusing existing log landings and temporary roads will cause a cumulative impact by, for example, further compacting previously compacted soil thereby making vegetation reestablishment in that particular footprint even more difficult. To be clear, we support the approach of utilizing old roadbeds and log landings whenever possible, but the impact of that use is a cumulative effect that must be assessed under NEPA.
### Response to Comment (By Comment Author)

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<td>An initial step of cumulative impacts analysis is to identify the likely sources of impacts including sources of direct and indirect impacts associated with proposed alternatives, and past, present, or reasonably foreseeable impacts which may &quot;add to, modify, or mitigate&quot; the impacts of proposed alternatives. See 36 C.F.R. § 220.4. Here, the agency has done a commendable job of identifying potential sources of impacts to water quality including: permanent and temporary roads and road building (EA at 70); prescribed burning (EA at 71); timber harvests/silvicultural treatments (EA at 73-76); herbicide (EA at 76); other past or planned agency actions (EA at 33); impacts from dispersed recreation (EA at 79); impacts from climate change (EA at 79); impacts from the loss of hemlocks due to hemlock wooly adelgid (EA at 80); and impacts associated with long term acidic deposition (EA at 80). The agency should also consider sources of impacts to water quality on private lands. Ultimately however, consideration of these potential impacts is lacking and some, impacts from recreation for instance, are not assessed at all.</td>
<td>The potential effects of both private lands and recreation on water quality are discussed in Section 3.4 (Water). The EA acknowledges that most dispersed recreation in the project area is water centric and results in frequently denuded and trampled stream banks that increase erosion and sediment to channels. Water quality impacts of private land activities also are disclosed in the discussion of 303(d) listed streams.</td>
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<td>Topa, Mary</td>
<td>Compounding that problem, in some instances the agency has confused the obligation to consider cumulative impacts with an obligation to mitigate events beyond the scope of this project. The EA acknowledges that &quot;[t]he greatest concerns to water resources come from effects of climate change, loss of hemlocks from HWA, and long term acidic deposition&quot; but dismisses those concerns because &quot;[t]he ability to address these issues extends beyond the scope of this document.&quot; EA at 80. This brings the wrong lens to the analysis. The agency's obligation is not to alter outside events to mitigate impacts, but to weigh those impacts in combination with those of the proposed action, and where necessary, change the proposed action to mitigate overall impacts.</td>
<td>As disclosed in Section 3.4 (Water) off the EA, potential changes to water resources resulting from the effects of climate change, loss of hemlocks from HWA, and long term acidic deposition exist, but are unknown. The ability to address these issues extends beyond the scope of this document; however, a primary objective of the Cooper Creek Watershed Project is to improve forest health and ecological resilience. Achievement of these objectives may result in benefits to water resources.</td>
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<td>Topa, Mary</td>
<td>This is not just a paper consideration. Elsewhere the EA acknowledges that the loss of hemlock and climate change have the potential to cause an increase in water temperature in streams. EA at 66. The EA also discloses that the vegetation treatments proposed in Alternatives 2 and 3 have the potential to &quot;increase water temperature&quot; (EA at 73) and that prescribed burning can lead to changes in water temperature (EA at 71). The agency must assess and provide detailed information on the cumulative effect of hemlock loss, climate change, and prescribed burning, in combination with the proposed vegetation treatments on in-stream water temperature. Where the likely impact is substantial, the agency should adjust the vegetation treatments to mitigate the cumulative impact.</td>
<td>As disclosed in Section 3.4 (Water) off the EA, potential changes to water resources resulting from the effects of climate change, loss of hemlocks from HWA, and long term acidic deposition exist, but are unknown. The ability to address these issues extends beyond the scope of this document; however, a primary objective of the Cooper Creek Watershed Project is to improve forest health and ecological resilience. Achievement of these objectives may result in benefits to water resources.</td>
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"To 'consider' cumulative effects, some quantified or detailed information is required. Without such information, neither the courts nor the public, in reviewing the Forest Service's decisions, can be assured that the Forest Service provided the hard look that it is required to provide." Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1379 (9th Cir. 1998). Simply providing, "[g]eneral statements about 'possible' effects and 'some risk' do not constitute a 'hard look' absent a justification regarding why more definitive information could not be provided." Id. at 1380; see, supra, Section IX(ii)(3). Unfortunately, the agency has employed that approach repeatedly in the Cooper Creek EA.

Given the size of the Cooper Creek project and concentration of soil disturbing mechanical treatments in a roughly 5,100 acre area with steep slopes and very high rainfall, there is a strong possibility of cumulative impacts to water quality and riparian habitat from sedimentation. The EA repeatedly dismisses these concerns with general statements about possible effects and risk, such as: "[i]mplementation of best management practices during and post treatment helps reduce the risk" (EA at 79) and unspecified "design criteria would minimize the risk of effects being of magnitude and extent to impact beneficial uses." EA at 80. Further, to reduce detrimental impacts to soil which may lead to sediment entering streams, the EA relies on "the skill and experience of project managers, such as timber sale layout technicians, timber sale administrators, and skilled equipment operators." EA at 45. As discussed elsewhere, these general, unspecified commitments are insufficient in multiple ways.
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<td>First, summarily relying on BMPs to mitigate impacts, without some analysis of the effectiveness of those BMPs, runs afoul of NEPA. See Wilderness Soc’y v. Bosworth, 118 F. Supp. 2d 1082, 1107 (D. Mont. 2000) (holding summarily relying on BMPs to mitigate a high risk of landslides, when those measures have not been specifically assessed for effectiveness against landslides, inadequate under NEPA); Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 352 (1989) (finding incomplete discussion of mitigation measures violates NEPA); Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1151 (9th Cir. 1998), overruled on other grounds by Lands Council v. McNair, 537 F.3d 981 (9th Cir. 2008) (“Without analytical data to support the proposed mitigation measures, we are not persuaded that they amount to anything more than a ‘mere listing’ of good management practices.”); see, supra, Section IX(ii)(3).</td>
<td>Project design features and mitigation for resource protection is described in section 2.4 of the EA.</td>
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<td>Topa, Mary</td>
<td>Second, unquantifiable commitments to reduce or minimize risk are inadequate to allow the public and the decisionmaker an opportunity to compare risks under different alternatives. Simply stating that risks will be reduced or minimized does not provide any information about the level of risk or the degree it can be reduced. This approach is especially concerning in this instance where risks are particularly high due to site-specific conditions. In some instances, even a minimized risk may be too great. In others, additional mitigation measures beyond BMPs may be required to reduce risk to acceptable levels. The agency must have data supporting its assertions about risk and minimizing risk and that data must be disclosed to the public to allow it to weigh those considerations.</td>
<td>The cumulative effects of project activities on water quality and aquatic habitats are disclosed in Sections 3.4 (Water) and 3.11 (Aquatic Habitats), respectively of the EA. The focus is on streams in and immediately below the project area but does consider effect further downstream. The qualitative analysis provides sufficient detail to assess potential effects to water resource’s from the proposed activities.</td>
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<td>Topa, Mary</td>
<td>The agency’s analysis also has a problem of scale. Analysis of effects on water quality and aquatic species and habitats must consider adequately the impacts at all relevant scales.</td>
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on tributaries, impacts on Cooper Creek itself and on the overall health of the Cooper Creek watershed, and the cumulative impacts on rivers downstream. The EA's analysis of effects on water quality and aquatic species and habitat relies primarily on the theory that sediment impacts are diluted as sediment-laden water flows from smaller streams into larger ones, downplaying impacts to Cooper Creek and the Toccoa River. The analysis of impacts to Cooper Creek is particularly sparse which is all the more problematic because Cooper Creek is already listed as impaired by the state of Georgia. The EA fails to consider that Cooper Creek itself is essentially at the bottom of the funnel of all of the tributaries that feed it. Cooper Creek will receive all of the sediment from its tributaries, therefore, while it is a larger stream, it will receive a greater total volume of sediment, and perhaps a greater concentration of sediment. The EA's failure to consider and address this is a major flaw. A revised EA should address this issue, with quantified estimates of the sediment likely to be produced in the tributary watersheds and in Cooper Creek as a whole and a detailed analysis comparing such sediment increases to the baseline current conditions and considering how the sediment increases may affect water quality and aquatic species and habitat.

Compounding this error is the assumption that sediment moves through the stream system in an even manner. The cumulative impacts analysis implicitly assumes that sediment flows evenly and constantly through the stream system, in the same amount all the time. But in reality sediment moves episodically. Once delivered to a stream, sediment may persist for years, decades or centuries, depending on the amount. Sediment may accumulate in upper stream reaches and then be delivered downstream in storm events, causing damaging...
pulses of sediment. It is likely that sediment will accumulate in the tributaries' streambeds, damaging aquatic habitat and species, and be delivered downstream in storm events, dumping periodic, concentrated sediment loads into Cooper Creek, where it will persist in the streambed, damaging habitat and species there, and then be delivered to the Toccoa River, perhaps to do the same. The analysis of effects on water quality completely avoids analysis of impacts on Cooper Creek and the cumulative impacts on rivers downstream in violation of NEPA.

The EA also dismisses concerns over cumulative impacts to smaller tributaries despite data leading to the opposite conclusion. Burnette Creek, a small stream in the project area already has a high percentage of fine sediment that does not appear to be flushing out of the stream. EA at 117. "This suggests that if sediment is introduced into other streams in the project area it also has the potential to persist and this would negatively affect aquatic habitat and fauna." Id. (emphasis added). The importance of consideration the cumulative impact on these small streams with concentrated treatments cannot be overstated.

We agree that the EA acknowledges the potential for negative cumulative effects to aquatic habitat and associated species and that the negative impacts of sedimentation on aquatic fauna are well documented and discussed in the EA. However, we disagree that the cumulative impacts to water quality, riparian habitat and brook trout are dismissed or are not supported by the EA specifically in the Bryant Creek watershed.

Table 3.2.1 (DEA pg. 33) lists all the past, present and reasonable foreseeable activities in the Cooper Creek
a) Bryant Creek Watershed

Indeed, one of our primary concerns with the proposed project are the cumulative, unacceptable risks posed to the Bryant Creek watershed, which includes its tributary Pretty Branch. Bryant Creek is likely Georgia's largest and best native brook trout stream and home to state-threatened hellbenders. Despite this value, the Bryant Creek drainage, which comprises 2,048 acres, is scheduled for 1,510 acres of silvicultural treatment in Alternative 3 - 74% of the drainage - of which approximately 1,239 acres are commercial and will involve ground-based logging. EA at 117. In Alternative 2, silvicultural treatment is proposed on 1,611 acres of these same drainages. EA at 115. The EA acknowledges that "[o]verall, there is the potential for negative cumulative effects to aquatic habitat and associated species under both Alternatives 2 and 3, especially in drainages where treatments are concentrated" such as Bryant Creek and Pretty Branch. EA at 118 (emphasis added). The negative impacts of sedimentation on aquatic fauna are well documented and discussed in the EA on pages 84, 117, and elsewhere. Analysis of cumulative impacts to water quality and riparian habitat in this watershed is critical and dismissal of concerns over cumulative impact to water quality and riparian habitat is not supported by analysis in the Draft EA.

Watershed. Of these activities the fish habitat improvement work, the Bryant Creek Arch Culvert, Pretty Branch Arch Culvert and some Soil and Water projects occur within the smaller Bryant Creek watershed and would involve ground disturbance in the riparian area and also effect in stream habitat. While some sediment could enter the stream from these activities there is a net benefit to aquatic habitat from them and any sediment input would be short term. Other potential sources of disturbance in Bryant Creek riparian areas would be road maintenance and prescribed fire including fire lines. These are on going activities and sediment introduced into Bryant Creek from them would of been seen during surveys. Of the 11 brook trout streams surveyed during 2014 across the Chattahoochee National Forest Bryant Creek had the 4th lowest amount of fines in both riffles (14%) and pools (40%). Conversely, Burnett Creek which also supports a brook trout population had 40% fines in riffles and 79% in pools (DEA pg. 110).

The riparian area along Bryant Creek and other streams will be protected by following BMPs which in this case consist of a 100 foot Streamside Management Zone which includes a 25 foot no cut zone adjacent to the stream and then a 75 foot strip where the lowest the BA can be reduced to is 50 BA. Through the use of these BMPs the potential for sediment being introduced into the streams in the Bryant Creek watershed is greatly reduced and the potential negative effect to aquatic habitat and fauna from sediment would be greatly minimized as well (DEA pg. 118). The buffer will also help maintain shade over streams such as Bryant Creek. Concern responses 32 and 35 discuss the stream buffer to be used for the Cooper Creek Project and address shading and sedimentation.
The concentration of treatments, particularly commercial treatments, seems likely to result in a cumulative increase of sediment to Bryant Creek. Averaging all the treatments, this project, as currently proposed, will remove about half of all trees in the Bryant Creek drainage making the underlying soil more susceptible to erosion. Nearly all the temporary roads, log landings, skid trails and haul road realignments planned for the project in Alternative 3 will be constructed in the Bryant Creek drainage. The Draft EA acknowledges that these actions will cause an increase in erosion and increased delivery of sediment to Bryant Creek, but, as discussed elsewhere in these comments, the Draft EA unjustifiably relies on general commitments to implement BMPs to mitigate the impact.

The acid neutralizing capacity is discussed on pages 55 - 60 of the DEA and the cumulative effects show that two catchments in the Bryant Creek Watershed could decrease by one category from 100 ueq to 65ueq, but this would still allow for brook trout populations. One of the small catchments contains a tributary to Pretty Branch and the other occurs high in the headwaters of Bryant Creek. Other catchments in this area have similar ANC levels and contain healthy aquatic populations.

In summary we believe that cumulatively there could be some effect to aquatic habitat and fauna, but through the use of BMPs which will keep streams shaded and prevent sediment from entering streams the potential is minimized. While ANC could decrease in two small catchments it is not enough to have affect aquatic fauna and habitat. Because the direct and indirect effect in these areas is minimal we also believe cumulative effects will be minimal.

The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.
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<td>Topa, Mary</td>
<td>The Draft EA also acknowledges that most current sources of sedimentation come from roads. EA at 68. The existing road system is judged to be inadequate for the timber haul planned, and road realignment and &quot;curve widening&quot; are contemplated. EA at 70. This is puzzling, as the existing road system served for the timber haul in the 1970s and 1980s, when over 3,000 acres were clear-cut in the analysis area. In the draft EA and on field visits, the agency has stated that tractor trailers will not be used for the haul. From an engineering standpoint, curve widening is problematic on the steep narrow roads found in the project area. Additional fill material has to be found, and most often this material is removed from the cut side of the road and deposited on the fill side. This procedure weakens the cut bank and makes it more prone to erosion. Depositing the removed material on the fill side to widen the road raises another issue as it is nearly impossible to compact the material sufficiently without building a road below the fill side. Road construction, reconstruction, and use, whether temporary or permanent is also likely to lead to increased sedimentation and potentially slope failures which could dramatically increase sedimentation.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats). Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon &quot;sink,&quot; with carbon storage gains exceeding carbon losses (U.S. EPA 2012). The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are</td>
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<td>In assessing the project's impacts to Bryant Creek, all of the negative factors have to be considered in light of cumulative impacts associated with global climate change. The Draft EA devotes most of the climate change analysis to the loss of carbon storage, forest resilience, pests and fire but fails to include an analysis of changing precipitation patterns, incorrectly stating that precipitation patterns are predicted to be stable. EA at 84. In fact, though the annual total precipitation may remain nearly the same, cycles of precipitation are likely to change substantially. Both very dry and very wet summers have become more common over the past 60 years, and that pattern is expected to continue.</td>
<td>miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation's CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and mid-story. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).</td>
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<td>More specifically, on examining 75 years of temperature and precipitation data in the Coweeta Basin, Coweeta scientists have confirmed that local temperature and precipitation trends are following those predicted for the southeastern USA. Their analysis has revealed a significant increase in temperatures since the late 1970s, an increase in drought severity and frequency, and more extreme precipitation distribution. The southeastern United States is predicted to be the most susceptible to novel climates (combinations of seasonal temperature and precipitation that have no historical or modern counterpart). Any forest project within the Chattahoochee-Oconee National Forests must consider the cumulative impact of these environmental changes and should consider how to best maintain forest health and diversity in light of these changes.</td>
<td>Thank you for your comment. These comments represent a general statement.</td>
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<td>Topa, Mary</td>
<td>Additionally, the recently released National Climate Assessment (<a href="http://nca2014.globalchange.gov/">http://nca2014.globalchange.gov/</a>) predicts an increase in violent, torrential rain events, such as the 1,000 year flood in South Carolina this past fall. Locally, over 20&quot; of rain fell in parts of north Georgia in the month of December 2015. These uncommonly heavy rains scoured streams and did an enormous amount of damage to Forest Service roads as the agency is well aware. All of the activities proposed for the Bryant Creek watershed should be analyzed in light of this prediction. This includes activities intended to mitigate impacts from the proposed actions as well, such as the efficacy of BMPs to deal with non-standard precipitation events.</td>
<td>Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon “sink,” with carbon storage gains exceeding carbon losses (U.S. EPA 2012). The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation’s CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon</td>
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storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and mid-story. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA Forest Service 2004a).
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<td>All of the ground disturbing activity associated with this project, spread over an extended period of time, makes it very likely that an extreme weather event will occur while a good deal of soil is exposed; consequently, unacceptable levels of sediment will be deposited into Bryant Creek. The EA recognizes this reality: &quot;The concern with so much activity in [sic] drainage at once is that if there is a storm event and areas have not revegetated sediment could be introduced into aquatic habitats. While a slight increase of sediment into these streams probably would not be detrimental to aquatic fauna a larger increase would be.&quot; EA at 115. Despite &quot;the potential for negative cumulative effects to aquatic habitat and associated species under both Alternatives 2 and 3, especially in drainages where treatments are concentrated&quot; the draft EA dismisses these concerns almost solely relying on unspecified &quot;BMPs and mitigation measures&quot; to &quot;minimize&quot; &quot;the potential for negative cumulative effects to aquatic fauna and habitat.&quot; EA at 118. &quot;Minimize&quot; is unqualified and BMPs have often been overwhelmed by extreme weather events. Even with BMPs in place, acres of exposed soil still exist at the Brawley project years after the timber cutting ended. If Brawley, in its current condition with large unvegetated areas, was adjacent to Bryant Creek as much of this project is, the impacts from rainstorms in December 2015 would have been quite significant.</td>
<td>Soil sedimentation and its impact to soil, water and aquatic resources is analyzed in the EA (Section 3.3: Soil, 3.4: Water, 3.11: Aquatic Habitats).</td>
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As mentioned in the Draft EA, ground-based logging, prescribed fire, and herbicide use will result in increased flows due to the reduced transpiration, interception, and infiltration. EA at 72-76. The Draft EA goes on to say that "in smaller watersheds, with palmate patterns, such as Bryant Creek, peak flows may be affected somewhat more." This certain rise in water yield, coupled with extreme rain events, makes it likely that Bryant Creek will experience major flooding during the course of this project. In addition to sedimentation delivery, this can negatively affect the native brook trout population directly. A study in the Monongahela National Forest in West Virginia found that "[brook trout] were scoured during the January 1996 flood. Few age-0 trout were found in summer 1996, and their density averaged about 98% less than the previous year. Age-1 and older trout also declined; their density in 1996 was about 84% less than the previous year."

The potential cumulative effects of Alternatives 2 and 3 on water yield can be found on page 79 of the Draft EA. The analysis states that a short term increase of 10-35% is likely in the Bryant Creek (includes Pretty Branch) and Gillespie Branch sub-watersheds with the increase being greatest if all treatments occur within 1-2 years. It is highly unlikely that treatments will be completed in 1-2 years.

The EA goes on to state that the increase in baseflow is spread out throughout the year and does not proportionally increase peak flows. While there is always the potential for flooding due to large amounts of precipitation the additional water yield from the Cooper Creek project would have very limited impact on how these floods affect the aquatic habitat and fauna during these floods.

Carline and McCullough (2003) studied the affect of flood events on brook trout in the Monongahela National Forest in West Virginia in the mid 1990's. They estimated the flood events to be in the 5-25 year recurrence interval. If we had similar flood events here in Georgia there is the potential we could see similar declines in brook trout populations. However, as Carline and McCullough state "Aquatic Communities in mountain streams are adapted to frequent disturbances (Reice et al. 1990; Roghair et al. 2002; therefore, rapid recovery is a likely outcome".

In summary while flood events can negatively affect aquatic habitat and fauna they are beyond our control and the Cooper Creek Project will not contribute to the frequency or magnitude of flood events.
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<td>Topa, Mary</td>
<td>The native brook trout population in Bryant Creek is at the very southern limit of its range, constrained by water temperature. The Draft EA states on page 66 that &quot;[w]ater temperature of streams in the project area are likely to rise as a result of both climate change and loss of the eastern hemlock.&quot; Increased sediment delivery will also increase turbidity which in turn will raise water temperatures. The Draft EA predicts that timber harvesting in the Bryant Creek watershed will not raise water temperatures because of the 25-foot no harvest riparian buffer. Trees to be harvested along Bryant Creek and Pretty Branch frequently have branches exceeding 25 feet and hemlocks in the area are dying, creating natural canopy gaps. Additionally, the sun is never directly overhead at temperate latitudes, so preserving the canopy directly over streams would not be sufficient to maintain shading. A study in a Maine brook trout stream found that an 11-meter buffer during a timber harvest resulted in a rise in water temperature of 1.0-1.4 °C. Aside from the requirements of the Georgia Forestry BMPs, on what basis did the District conclude that a 25-foot riparian buffer was sufficient for streams in this area?</td>
<td>Georgia Best Management Practices for Forestry (Georgia Forestry Commission, 2009) will be adhered to for the Cooper Creek Watershed Project. Around trout streams there will be a 100-foot Streamside Management Zone (SMZ) that includes a 25-foot no-harvest zone adjacent to the stream. Harvest can occur within the next 75 feet of the SMZ, but an average of 50 square feet basal area (BA) or at least 50% canopy cover must remain. Bryant Creek’s average width is 12-14 feet (DEA pg. 110) and Pretty Branch is smaller than Bryant Creek, so a 25-foot buffer should be sufficient to maintain cold water steam temperatures (DEA pg. 115). Wilkerson et al. (2006) looked at the effectiveness of various riparian buffer strips in Maine and they concluded that water temperature in small headwater streams is protected from the effects of clearcutting by an 11-m buffer (with &gt;60% canopy retention). During this study timber harvest was conducted in the buffer strip with the BA being reduced to approximately 60. The Cooper Creek Watershed Project has a 25-foot no-cut zone adjacent to the stream and then a 75-foot strip where the lowest the average BA can be reduced to is 50 BA. We believe this is more than sufficient to maintain water temperatures for trout and other cold water aquatic organisms.</td>
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<td>Topa, Mary</td>
<td>The Draft EA also states that &quot;acidic deposition is still above natural background levels [in the Blue Ridge province]. Studies in the Appalachian Mountains, including the project area, indicate sulfate concentrations in streams have increased over the last decade while the acid neutralizing capacity (ANC) has decreased (Elwood et al., 2012, Webb, 2004). Streams within the project area are considered vulnerable to acidification. Multiple water quality samples for acidity, anions, and major cations were collected in Cooper Creek in 2012. The results show a vulnerability to acidity.&quot; EA at 65.</td>
<td>Previous research has documented short-term increases (less than 12 months) in stream nitrates following harvesting. However, the ecosystem is unlikely to sustain any severe damage from the nitrate increases. The catchments where trees are commercial thinned or regenerated will remove calcium. However, the long-term estimates for most of the area indicate the additions of calcium from the weathering of rocks and deposition from the atmosphere is sufficient to maintain stream acid neutralizing capacity (ANC) the same as the no action alternative. Only two catchments have at a long-term risk of the ANC decreasing below the modeled estimate of 100 micro-equivalents per liter (ueq/L). Both of these areas are adjacent to catchments where the modeled ANC of 65 ueq/L or greater is likely in the no action alternative. Sullivan and others (2011) estimated in 1860 (prior to heavy acid deposition) the stream ANC may have been as low as 30 ueq/L with an average of 65 ueq/L elsewhere in Southern Appalachia. The model results using the Ecosystem Management Decision Support (EMDS) tool estimated the long-term stream ANC will be greater than or equal to 65 ueq/L (Reynolds and others, 2012) with and without commercial thinning or regeneration. Sullivan and others have suggested that achieving an ANC of 100 ueq/L is unlikely at many high elevation catchments. Although there may be a greater abundance of insects in streams with an ANC of 100 versus 65, there will still be sufficient food to support reproducing brook trout populations. A stream with an ANC of 65 ueq/L still has buffering capacity to strong acids to prevent episodic acidification and the extirpation of the insects is unlikely.</td>
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Despite this vulnerability to acidification, this project proposes to remove approximately half the trees in the Bryant Creek watershed. This will result in a short-term reduction of nitrogen uptake with a corresponding increase of nitrates deposited into Bryant Creek. Removal of the boles will also remove a major calcium source and disrupt the cycling of this critical, base cation from the immediate area. Loss of organic base cation sources, both from fallen leaves and boles and woody debris, may impact the buffering capacity of the area from ongoing sulfate and nitrogen deposition. Critically, brook trout prey, primarily insects, are also more sensitive to acidification than trout, and are adversely affected at ANC below 100. In 2012 the ANC was measured at 70 in Pretty Branch and 84 in Bryant Creek (personal communication with J. Wentworth). The assurances in the EA that stream acidity will not reach levels adversely affecting brook trout are meaningless if their food source is eliminated.

Previous research has documented short-term increases (less than 12 months) in stream nitrates following harvesting. However, the ecosystem is unlikely to sustain any severe damage from the nitrate increases.

The catchments where trees are commercial thinned or regenerated will remove calcium. However, the long-term estimates for most of the area indicate the additions of calcium from the weathering of rocks and deposition from the atmosphere is sufficient to maintain stream acid neutralizing capacity (ANC) the same as the no action alternative.

Only two catchments have a long-term risk of the ANC decreasing below the modeled estimate of 100 micro-equivalents per liter (ueq/L). Both of these areas are adjacent to catchments where the modeled ANC of 65 ueq/L or greater is likely in the no action alternative. Sullivan and others (2011) estimated in 1860 (prior to heavy acid deposition) the stream ANC may have been as low as 30 ueq/L with an average of 65 ueq/L elsewhere in Southern Appalachia. The model results using the Ecosystem Management Decision Support (EMDS) tool estimated the long-term stream ANC will be greater than or equal to 65 ueq/L (Reynolds and others, 2012) with and without commercial thinning or regeneration. Sullivan and others have suggested that achieving an ANC of 100 ueq/L is unlikely at many high elevation catchments. Although there may be a greater abundance of insects in streams with an ANC of 100 versus 65, there will still be sufficient food to support reproducing brook trout populations. A stream with an ANC of 65 ueq/L still has buffering capacity to strong acids to prevent episodic acidification and the extirpation of the insects is unlikely.

We agree that the EA acknowledges the potential for negative cumulative effects to aquatic habitat and associated species.
The sedimentation, rising stream temperatures, and increased acidity that would result from this project threaten the continued survival of one of Georgia’s largest native brook trout populations. Even if those changes do not independently eliminate brook trout, their combined effects or interaction may prove fatal. As explained by the Ninth Circuit Court of Appeals when assessing a cumulative impacts analysis looking at salmon viability: "the addition of a small amount of sediment to a creek may have only a limited impact on salmon survival, or perhaps no impact at all. But the addition of a small amount here, a small amount there, and still more at another point could add up to something with a much greater impact, until there comes a point where even a marginal increase will mean that no salmon survive." Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt., 387 F.3d 989, 994 (9th Cir. 2004)(finding NEPA requirement to take a "hard look" at cumulative impacts unsatisfied)(emphasis in original). Here, trout will be exposed to numerous stressors, not just sediment, and exposure to one stressor can increase an organism's susceptibility to another. The Draft EA fails to analyze the combined effects of all the stressors affecting the brook trout population in Bryant Creek in violation of NEPA.

and that the negative impacts of sedimentation on aquatic fauna are well documented and discussed in the EA. However, we disagree that the cumulative impacts to water quality, riparian habitat and brook trout are dismissed or are not supported by the EA specifically in the Bryant Creek watershed.

Table 3.2.1 (DEA pg. 33) lists all the past, present and reasonable foreseeable activities in the Cooper Creek Watershed. Of these activities the fish habitat improvement work, the Bryant Creek Arch Culvert, Pretty Branch Arch Culvert and some Soil and Water projects occur within the smaller Bryant Creek watershed and would involve ground disturbance in the riparian area and also effect in stream habitat. While some sediment could enter the stream from these activities there is a net benefit to aquatic habitat from them and any sediment input would be short term. Other potential sources of disturbance in Bryant Creek riparian areas would be road maintenance and prescribed fire including fire lines. These are ongoing activities and sediment introduced into Bryant Creek from them would of been seen during surveys. Of the 11 brook trout streams surveyed during 2014 across the Chattahoochee National Forest Bryant Creek had the 4th lowest amount of fines in both riffles (14%) and pools (40%). Conversely, Burnett Creek which also supports a brook trout population had 40% fines in riffles and 79% in pools (DEA pg. 110).

The riparian area along Bryant Creek and other streams will be protected by following BMPs which in this case consist of a 100 foot Streamside Management Zone which includes a 25 foot no cut zone adjacent to the stream and then a 75 foot strip where the lowest the BA can be reduced to is 50 BA. Through the use of these BMPs the potential for sediment
being introduced into the streams in the Bryant Creek watershed is greatly reduced and the potential negative effect to aquatic habitat and fauna from sediment would be greatly minimized as well (DEA pg. 118). The buffer will also help maintain shade over streams such as Bryant Creek. Concern responses 32 and 35 discuss the stream buffer to be used for the Cooper Creek Project and address shading and sedimentation.

The acid neutralizing capacity is discussed on pages 55 - 60 of the DEA and the cumulative effects show that two catchments in the Bryant Creek Watershed could decrease by one category from 100 ueq to 65ueq, but this would still allow for brook trout populations. One of the small catchments contains a tributary to Pretty Branch and the other occurs high in the headwaters of Bryant Creek. Other catchments in this area have similar ANC levels and contain healthy aquatic populations.

In summary we believe that cumulatively there could be some effect to aquatic habitat and fauna, but through the use of BMPs which will keep streams shaded and prevent sediment from entering streams the potential is minimized. While ANC could decrease in two small catchments it is not enough to have affect aquatic fauna and habitat. Because the direct and indirect effect in these areas is minimal we also believe cumulative effects will be minimal.
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<td>Topa, Mary</td>
<td>With 34,018 acres of Forest Service land available in the project planning area, why must timber harvest and the resulting disturbance be concentrated in the watershed (as close as 25 feet from the very banks) of one of the best, but also one of the most vulnerable, brook trout streams in Georgia, and on the upstream edge of the healthiest hellbender population in the state?</td>
<td>Commercial harvest is only one tool to accomplish the goals of the project. It also helps to fund other aspects of the project. Commercial harvest activities will be subject to GA and Federal BMP measures to ensure stream quality protection. And while commercial harvest may occur, equipment operations will be further restricted from the creeks.</td>
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<td>Topa, Mary</td>
<td>The mitigation measures the agency relies on to alleviate concerns on cumulative impacts to water quality at both local and landscape scales are inadequate. For additional discussion of the legal requirements applicable to mitigation measures, see, supra, Section IX(ii)(3). The agency significantly relies on the &quot;timing of timber sales and sequencing of entry into units&quot; to mitigate risks. EA at 118. This approach is problematic as discussed above, given the likelihood of intense precipitation events during that time period and potential for compounding impacts from previously treated but unhealed, unvegetated areas. The approach also introduces a new problem - prolonged introduction of sediment into the stream as a result of years of sequenced timber sales. Both approaches will generate impacts: potentially some more acute and some more chronic. The assurance of stretching out entry into units is more of a trade-off of impacts than a mitigation of impacts.</td>
<td>The effects of project activities on water quality and aquatic habitats are disclosed in Sections 3.4 (Water) and 3.11 (Aquatic Habitats), respectively of the EA. Best management practices are considered the primary tool for managing non-point source pollution. Project design features are designed to be special mitigation measures to minimize impact.</td>
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<td>Topa, Mary</td>
<td>The agency overwhelming resorts to the inadequate explanation of BMP reliance to dismiss concerns over cumulative impacts. EA at 118. Sole reliance on general BMPs is particularly insufficient here where impacts are highly concentrated. Additionally, the agency commits to reseed and revegetate potential areas of erosion once a sale unit is completed. Id. Relying on the agency's ability to reseed and revegetate areas of erosion as a key factor in reducing cumulative impacts to water quality is problematic given the agency's experience at Brawley Mountain. There, efforts to revegetate areas of erosion were unsuccessful and now, years after entry, many of the temporary roads, log landings, and skid trails remain bare. Blindly relying on the agency's assertion that cumulative impacts to water quality will be prevented by revegetating areas is unreasonable when the agency has not shown that it can be consistently successful in those endeavors. Regardless the &quot;generalized conclusory statements that the effects are not significant or will be effectively mitigated&quot; are insufficient to meet NEPA's requirements. See Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt., 387 F.3d 989, 996 (9th Cir. 2004). To fulfill its &quot;hard look&quot; requirement, that agency must present &quot;some quantified or detailed information&quot; demonstrating that it considered cumulative impacts and efforts to mitigate them. Neighbors of Cuddy Mountain, 137 F.3d at 1379.</td>
<td>The EA disclosed the cumulative impacts on chapter 3 in the document.</td>
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<td>Topa, Mary</td>
<td>We have seen other Forest Service environmental assessments for projects likely to affect important streams and rare or vulnerable aquatic species that included much more thorough discussions and quantified analyses of current conditions and predicted future conditions regarding erosion, sedimentation, and effects on water quality and aquatic species and habitat. These analyses were specific to the</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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project's watershed (usually 6th level watersheds, such as the Cooper Creek watershed), not generic discussions of possible types of effects. Examples of the types of information and analyses that we have seen in some other EAs include:

* Using tools and models for estimating erosion and sediment delivery that are widely used and available to the Forest Service, such as: the Universal Soil Loss Equations; the USDA Forest Service "Guide for Predicting Sediment Yield from Forested Watersheds" which tiers to the guide "An Approach to Water Resources Evaluation of Non-Point Silvicultural Sources" (WRENSS); the Water Erosion Prediction Project model; and others. The tools and models we have seen used take into account key factors such as the soil types and their erodibility factors and slopes involved.
* Estimating the erosion rates and quantity of sediment likely to be produced in the watershed if the watershed were in an undisturbed condition (e.g., pounds per acre per year of soil loss; total loss in smaller tributary watersheds and entire watershed).
* Estimating the current erosion rates and quantity of sediment produced in the watershed, given known existing disturbances, such as roads (e.g., pounds/acre/year of soil loss; total loss in tributary watersheds and entire watershed; current loss compared to undisturbed levels).
* Estimates of the erosion rates and quantity of sediment likely to be produced by project activities, such as timber harvest, roads, skid roads/trails, log landings.
* Estimates of the total (cumulative) erosion rates and quantity of sediment likely to be produced by existing sources, project activities, and reasonably foreseeable ongoing or future activities (e.g., pounds/acre/year of soil loss; total loss in tributaries and entire watershed; percent increase over
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<td>undisturbed conditions and percent increase over current conditions.</td>
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<td>* Discussion of BMP implementation and effectiveness rates in the state and/or national forest.</td>
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<td>* Estimates of current streamflows and predicted increase in water yield and storm flows; scientific literature regarding consequences of various intensities of timber harvest and ground disturbance.</td>
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<td>* Assessment of existing condition of stream habitat for sediment-sensitive species, e.g., pebble counts or other assessments of the degree to which stream substrate is covered by fine sediments.</td>
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<td>* Consideration of scientific literature regarding the effects of sediment on aquatic species, including sediment-sensitive and/or endemic species and the amount of sediment such species can tolerate before they are negatively impacted.</td>
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4) Cumulative impacts to wildlife habitat and corridors

The EA discusses some of the potential cumulative impacts of combining silvicultural treatments with prescribed burns, but fails to discuss how the impacts of treatments change as the area of contiguous treatments increases. Abundance of both late successional and generalist birds is negatively associated with treatment size. As treatment size increases, dispersing to the interior of the treatment area becomes more difficult and migrating across the area becomes more difficult for many species. Many forest herbs are dispersal limited, and maintaining connectivity of habitats can be important for minimizing adverse impacts to salamanders. Timber harvests consistently decrease salamander populations, and dispersal from adjacent areas is likely a key factor in recovery, which may take 100 years. The last point is particularly relevant when the impacts of the proposed treatments are considered in the context of past harvests in the project area; as proposed, only three and half stands in the Bryant Creek watershed would be left with canopies dominated by trees over 60 years old. The impact of proposed treatments cannot be assessed without considering the effects of scale and past management. Especially alarming, the effects of some harvest techniques appear non-linear with more dramatic effects above threshold sizes.

Commercial Harvest Units will vary from the project analysis units through the unit layout phase during implementation. Access, streams, and slope will dictate the Harvest Unit boundaries on the ground likely producing fingers and patches of untreated ground across the project area.

i. The Biological Evaluation (BE) has not yet been prepared, therefore the draft EA's analysis and conclusions regarding effects on PETS species are unsupported and inadequate.

The Biological Evaluation (BE) is the primary process by which effects on PETS species are analyzed, considered, and documented. See, e.g., FSM § 2672.4 and § 2672.41. BEs are

The effects of the proposed activities on Threatened, Endangered, Proposed, Sensitive, and Locally Rare species are disclosed in Section 3.13 of the EA. The Biological Evaluation will on the selected alternative will be completed and made available to the public prior to the final decision.
conducted in order to ensure that Forest Service actions do not contribute to a loss of any species' viability or a trend towards federal listing, or jeopardize species listed under the Endangered Species Act (ESA) or adversely modify designated critical habitat for listed species. A project’s BE usually contains a more detailed analysis of effects on PETS species than is found in an EA, and the BE informs the project EA’s analysis of effects of rare species under NEPA and analysis of project compliance with the NFMA and ESA.

We were disappointed to learn that the BE for this project has not yet been completed or drafted. Without the BE having been prepared, the basis for the EA’s conclusions are unclear. It also appears that the district has predetermined the outcome of the BE process. A Forest Service staff member informed us, in response to our request for the BE, that "The BE hasn't been written but the analysis and determinations will be the same as what is disclosed in the TES portion of the EA."

The Draft EA's analysis and conclusions regarding effects to PETS, therefore, is premature. For example, the EA sets forth conclusions about effects on federally-threatened and endangered (T&E) species, yet the Forest Service has not yet consulted or coordinated with the U.S. Fish and Wildlife Service regarding the northern long-eared bat (and possibly other T&E species that may be affected by this project), as required by the ESA.

In another example, the Draft EA contains little information about the district's survey and analysis methods for PETS here. Presumably the BE will explain in more detail the information and surveys relied upon. For example, how did
the agency decide which species to conduct field surveys for within project stands, and which species were found and which were not. This information is important for the public to understand, particularly given the contentious history around the Southern Region's failure to conduct required field surveys for PETS and then the agency's improper attempts to change its regional vegetation management standards, regional Manual, and many forest plans, including the CONF's prior plan, to try to eliminate the requirement. Presumably this information will be described fully in the BE.

We wish to note that conducting the BE after releasing a Draft EA is not the usual practice among the national forests in the Southern Appalachians. We know of no other national forest in the region that writes BEs after releasing draft EAs for public comment. On prior projects on the CONF, for example, the Conasauga District and former Tallulah District have completed and provided draft BEs while draft EAs were out for public comment. Elsewhere in the region, the Cherokee National Forest in Tennessee routinely places the BE in an appendix to the EA and posts the complete draft EA, with BE, to the website during the public comment period, as does the Nantahala-Pisgah National Forest in North Carolina.

The ability to review and comment on the BE, and on more detailed EA analysis that is based on the BE and includes the additional information and analysis recommended below, is necessary to provide an opportunity for well-informed, meaningful public comment on this project, as required by NEPA.

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<td>Topa, Mary</td>
<td>XI. CLEAN WATER ACT</td>
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The Forest Service must ensure its proposed activities comply with the Clean Water Act. Based on analysis in the EA it is unclear if the project qualifies for the silvicultural exemption in Clean Water Act § 404 and meets Georgia's antidegradation requirements.

i. Clean Water Act § 404

Under the Clean Water Act, the discharge of any pollutant by any person into a water of the United States is unlawful unless the discharger complies with the permitting requirements under the Act. See 33 USC § 1311(a). To discharge "dredged or fill material" an applicant must obtain a permit under Clean Water Act § 404. See 33 USC § 1344. Construction and maintenance of forest roads, which require the discharge of dredged or fill material, are exempt from Clean Water Act § 404 permit requirements as long as those "roads are constructed and maintained . . . to assure that flow and circulation patterns and chemical and biological characteristics of the navigable waters are not impaired . . . and that any adverse effect on the aquatic environment will be otherwise minimized." 33 U.S.C. § 1344(f)(1)(E). If a road is causing an adverse effect on the aquatic environment by contributing sediment that is harming aquatic resources or not providing for unimpaired flow it cannot meet the exception.

The Draft EA lacks sufficient analysis to reach conclusions at this point, it is likely that several roads are also causing disproportionate impacts to water quality by contributing sediment. If so, these roads do not meet the requirements for the § 404 exemption and as a result the Forest Service must either fix the organism passage and/or sedimentation problems or obtain a § 404 permit to complete work on the project.

The project will follow all Best Management Practices for Forestry, including the 15 baseline provisions for forest road construction and maintenance mandated in the Clean Water Act to qualify for the forest road exemption (see Georgia's Best Management Practices for Forestry- Section 3.3.1.)
To obtain a permit, the Forest Service must show that there is no "practicable alternative to the proposed discharge that would have less adverse effect on the aquatic ecosystem." 40 C.F.R. § 230.10(a). Army Corps Section 404 Guidelines establish rebuttable presumptions that (i) alternatives for non-water dependent activities that do not involve special aquatic sites exist; and (ii) alternatives that do not involve special aquatic sites have less adverse impact on the aquatic environment. (40 C.F.R. § 230.10(a)(3)). Streams in the project area are defined by riffle and pool complexes (EA at 110) which are considered "special aquatic sites." 40 C.F.R. § 230.45. Because a roadway is not a water-dependent activity, no permit may be issued to impact a special aquatic site unless the Forest Service clearly demonstrates that there is no practicable alternative. See 40 C.F.R. § 230.10(a)(3).

ii. Antidegradation

The Clean Water Act also requires states to "develop and adopt a statewide antidegradation policy." 40 C.F.R. § 131.12 (a). The antidegradation policy shall, "at a minimum," maintain and protect existing instream water uses and water quality. Id. For the most part, "[w]here the quality of the waters exceeds levels necessary to support the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water, that quality shall be maintained and protected." Id.

Georgia's antidegradation policy requires "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses [to] be maintained and protected." Ga Comp. R. & Regs. 391-3-6-.03(2)(b). The Forest Service must
Several streams in and downstream of the project area are already not complying with existing instream water uses and the level of water quality necessary to protect the existing uses. See EA at 64. Those streams are listed as impaired on Georgia's 303(d) list though the cause of impairment has not been determined. Id. For streams listed on the 303(d) list, Georgia must develop a "total maximum daily load" ("TMDL") which is "established at a level necessary to implement the applicable water quality standards." 33 U.S.C. §1313(d)(1)(C). Once established, point and nonpoint source discharges cannot exceed their waste load allocation in the TMDL. Limitations on nonpoint source discharges are specifically enforced through state water quality management plans. Anacostia Riverkeeper, Inc. v. Jackson, 798 F. Supp. 2d 210, 217 (D.D.C. 2011).

Approximately 10 miles of Cooper Creek is impaired, nearly all of which is downstream of the project area. EA at 64. The entirety of the impaired section of Cooper Creek is on National Forest System Lands. Approximately 93% of the Cooper Creek watershed consists of National Forest System Lands. Id. at 62. Given the high percentage of Forest Service ownership of the watershed it is very likely that the impairment of Cooper Creek is attributable to source(s) on agency-owned land.

Instead of working to recover designated uses as required by the State's antidegradation policy the Forest Service dismisses the impairment listing by pointing to allegedly inadequate sampling procedures. EA at 110. This is a hollow attempt at explaining the impairment. If the agency believes the listing is in error, a better approach - indeed the only approach with
any impact - would be to conduct the sampling necessary to have the stream segment delisted during the next § 303(d) revision. Without explanation the agency also asserts that "[a]n inference that following the guidance for managing non-point source with Best Management Practices is adequate to address the current stream listings can be made." EA at 65. Nothing supports that approach; the Forest Service has not provided any evidence or reasoning to support its "inference." To the contrary, the evidence before the agency suggests that Cooper Creek is impaired (i.e. water quality standards are not being maintained), and that the source of impairment is mostly likely coming from Forest Service land. Therefore, even if Forest Service lands have functioning BMPs now, the "inference" is that those BMPs are insufficient to maintain water quality. This casts doubt not only on the agency's capacity to protect water quality in this area but also on the ability of BMPs to sufficiently mitigate impacts from the Cooper Creek project. Certainly BMPs to mitigate the negative effects of this project cannot actually improve water quality over its current condition.

As a result of the 303(d) listing, Georgia will prepare a TMDL allocating waste loads to different sources within the Cooper Creek watershed. The only "source" we are aware of upstream of the impaired segment belongs to the Forest Service. If the Forest Service is subject to a TMDL, it will be required to reduce waste loads to the stream to bring it back into compliance with water quality standards. Many of the activities associated with this project, particularly those that are likely to increase sedimentation, are inconsistent with that requirement. The Forest Service may not increase the waste load to Cooper Creek, as it appears likely as part of this project, and maintain compliance with Georgia's
Topa, Mary | XII. UNINVENTORIED ROADLESS AREAS  
Logging and presumably temporary road construction is proposed in three areas included in the Georgia's Mountain Treasure's publication: Duncan Ridge, Board Camp, and the Cooper Creek Scenic Area Extensions. The Board Camp area in particular was recognized for its roadless values as a RARE II area and portions of it were included in the Coosa Bald National Scenic Area designation. Large portions of these areas were not evaluated for roadless characteristics during the last Plan revision due to controversies surrounding the directives in place at the time. Those directives have now been revised and all or portions of these areas likely meet the new criteria for inclusion in the potential wilderness inventory to be completed during the next Plan revision. See FSH 1909.12, Ch. 71 (2015). Other parts of the project area meet this criteria as well. Under NEPA, the Forest Service must consider and disclose the effects of logging and road construction/reconstruction on roadless areas' characteristics, even when those areas not included in current, official roadless inventories. The failure to do so renders an EA inadequate.  

The project don't cover any Roadless areas in the forest. The effects of logging and road construction is disclosed in the EA.

Topa, Mary | i. The Forest Service Must Assess this Project's Impact on Roadless Characteristics  
Courts have recognized that "roadless areas have certain attributes that must be analyzed" when projects may impact those values. Lands Council v. Martin, 529 F.3d 1219, 1230 (9th Cir. 2008) (emphasis added); see Special Areas, Roadless Area Conservation, 66 Fed. Reg. 3244,3245 (Jan. 12, 2001) (discussing characteristics values of roadless areas). Because  

The project don't cover any Roadless areas in the forest. The effects of logging and road construction is disclosed in the EA.
of the independent environmental significance of the values characteristic of areas that meet roadless criteria - whether officially inventoried pursuant to the 2001 Rule or uninventoried - they must be assessed pursuant to NEPA. As explained by Lands Council, whether an area was officially inventoried or uninventoried, and whether it contained less than 5,000 acres, did "not provide a meaningful legal distinction" for purposes of complying with NEPA. Id. at 1231. Prior to logging and road upgrades which could degrade roadless areas and alter their status, NEPA requires consideration of these areas' unique values and the effects of this project upon them.

As explained below, much of the project area currently qualifies for inclusion in the next potential wilderness inventory to be completed with the CONF Forest Plan revision. The agency must acknowledge and assess the impacts of the proposed action that may preclude a significant portion of this area from the possibility of future wilderness classification. If the assessment of the proposed actions' impacts on roadless areas' characteristics reveals that those impacts are significant, the Forest Service will be required to prepare a full Environmental Impact Statement. 42 U.S.C. § 4332(C); see 40 C.F.R. §§ 1502.3, 1502.4. An alternative that avoids commercial logging and road construction in areas that qualify for the potential wilderness inventory, in order to avoid impacts to the roadless or remote characteristics of an area with significant public interest and concern, is a reasonable alternative which, under NEPA, must be considered. See Alaska Wilderness Recreation and Tourism Association v. Morrison, 67 F.3d 723, 729 (9th Cir. 1995) (failure to consider a "viable but unexamined alternative" renders an EA inadequate).
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<td>ii. The Eligibility of Areas that Meet Criteria for Inclusion in the Potential Wilderness Inventory Should Be Maintained</td>
<td>The project don't cover any Roadless areas in the forest. The effects of logging and road construction is disclosed in the EA.</td>
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At a minimum, no action should be implemented as part of this project which might preclude areas from being included in the potential wilderness inventory as part of the next Plan revision. There are at least two such areas that will be impacted by the Cooper Creek project. Now that "roadless" or "potential wilderness inventory" criteria have been clarified and revised, these areas should be evaluated and management considered accordingly.

Eligibility for the inventory will be evaluated during the next Forest Plan revision according to new directives found at Forest Service Handbook (FSH) 1909.12, Ch. 70 (2015) - hereinafter referred to as "Ch". As an initial step, the directives require the Forest Service to complete an inventory of "all lands that may be suitable for inclusion in the NWPS [National Wilderness Preservation System]." (Ch. 71.1). Recognizing that the controversies surrounding previous roadless inventories were caused by the subjective use of narrow criteria, the new directives restrain the agency's inventory consideration to three objective factors: size, roads improvements, and other improvements. (Ch. 71.2). These factors are described briefly below.

a. Size

Areas included in the inventory must have "at least five thousand acres of land or [be] of sufficient size as to make practicable its preservation and use in an unimpaired condition." (Ch. 71.21 (quoting 16 U.S.C. § 1131c)). As stated
above, the Cooper Creek project will impact at least two areas that meet this initial size threshold

b. Roads Improvements

Unlike past roadless inventories which assessed areas based on road density, the new directives instruct that certain roads may be included in potential wilderness areas, while other roads may not. Areas that include maintenance level 3, 4, and 5 roads are to be excluded from the inventory with few exceptions. Ch. 71.22a. However potential wilderness areas may include:

* Maintenance level 1 roads;
* Decommissioned, unauthorized or temporary, or forest roads that are identified for decommissioning in a previous decision document, or identified as likely unneeded in a travel management plan (36 CFR 212.51) or a travel analysis;
* Areas with forest roads that will be reclassified to maintenance level 1 through a previous decision document, or as identified in a travel management plan (36 CFR 212.51) or a travel analysis;
* In eastern national forests, maintenance level 2 roads "that are identified as closed to motor vehicles yearlong in a previous decision document."

Ch. 71.22a.

Because the Cooper Creek project does not contemplate new road construction it will not disqualify any of the areas that currently qualify for the potential wilderness inventory at least according to the road criterion.

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<td>The final inventory criterion is &quot;other improvements.&quot; Ch. 71.22b. The two most applicable to areas within the Cooper Creek project area are vegetation treatments and timber harvests. Id. Whether &quot;improvements&quot; serve as disqualifying features turns on whether they are &quot;substantially noticeable.&quot; Id. In other words, the question is not whether vegetation treatments and timber harvests have occurred, but whether when viewed in light of the impact to the area as a whole, they are substantially noticeable. See id. Additionally, vegetation treatments and timber harvests in eastern national forests must be viewed in light of the &quot;potential need to provide for passive or active restoration of wilderness character in previously modified areas, consistent with the intent of the Eastern Wilderness Act.&quot; Id. Further assessment is necessary to confirm the presence of any &quot;substantially noticeable&quot; &quot;improvements&quot; which could invalidate portions of the currently qualifying areas but we are not aware of any at this point. However, several aspects of the Cooper Creek project would likely disqualify portions of areas. Widespread commercial harvest, particularly regeneration harvest to create ESH, and associated access road construction could disqualify areas or portions of them. The impact of ESH creation on an area's qualifications to be considered for the potential wilderness inventory must be disclosed under NEPA. On the other hand, treatments, particularly non-commercial, that are actually restorative may not disqualify any portions of an area from the inventory. Consistent with the directives, treatments in eastern national forests which seek to restore areas should not be considered &quot;substantially noticeable&quot; because they are justified as returning the land to a more natural condition. See The project don't cover any Roadless areas in the forest. The effects of logging and road construction is disclosed in the EA.</td>
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id. Therefore, some of the appropriate non-commercial treatments proposed for this project should not disqualify any portion of these areas from the next inventory.

The Forest Service should avoid implementing actions in these areas which may preclude their inclusion in the next potential wilderness inventory and consideration for appropriate protection during the next forest planning process. At the very least, NEPA requires the EA to recognize, disclose and fully consider that these actions would probably adversely affect the special attributes of these areas (see 66 Fed. Reg. 3244,3245 (Jan. 12, 2001)).

Topa, Mary

XIV. CLIMATE CHANGE

As the Draft EA acknowledges forests play a critical role in addressing climate change by acting as major carbon sinks. The Draft EA points out that forests can offset 10% or more of the nation's CO2 emissions, and also acknowledges that Alternative 2, and presumably Alternative 3, will lead to increased carbon emissions. While this admission is appreciated, the depth of analysis is disappointing and insufficient in that it relies on generalized and conclusory statements. Federal law and policy recognize the urgent threat posed by climate change and require federal agencies to take serious steps to avert further climate disruption. The Forest Service should conduct a more detailed analysis of how much the project will increase carbon emissions and by how much it will reduce the carbon sink aspects of the forest, so that the Forest Service and the public can truly understand the full impacts of this project. The Forest Service should also consider mitigation strategies and the cumulative effects this project will have on climate change.

Thank you for your comments. The anticipated effects of project activities on climate change are analyzed in Section 3.6 of the EA. The proposed action includes timber harvesting and prescribed burning to meet multiple resource objectives. This action would temporarily reduce carbon storage in the analysis area; however, forest land-use and forestry practices continue to be a net carbon "sink," with carbon storage gains exceeding carbon losses (U.S. EPA 2012).

The impacts of the proposed action on global carbon sequestration and atmospheric concentrations of CO2 are miniscule. Forest and forest products currently serve as a major carbon sink, offsetting 10 percent or more of the nation's CO2 emissions. Predicted changes in climate patterns and associated increases in frequency and intensity of disturbances have the potential to reduce the carbon sequestration capacity of our forests. Forests that are more resilient to climate change impacts could help sustain carbon storage potential. Proposed activities included in this action alternative would make the forest more resilient and resistant to predicted climate change impacts.
Late last year, North Georgia experienced record high temperatures, serious flooding, and significant erosion that left many roads in the Chattahoochee National Forest impassible. Around the same time, President Obama, Secretary of State John Kerry, and the world came together to draft an historic agreement to combat climate change. The Paris Agreement urges parties to "take action to conserve and enhance, as appropriate, sinks and reservoirs of greenhouse gases as referred to in … the [United Nations Framework Convention on Climate Change], including forests."

The Forest Service has aligned itself with this international mindset in its own publications, including its Climate Change Performance Scorecard guidance document, which explains that "[i]n addition to adapting to climate change, the Forest Service is contributing to worldwide efforts to mitigate climate change and reducing greenhouse gas emissions from its land management activities." That document further reiterates that "[o]ur nation's forests and grasslands play a critical role in storing carbon and helping to reduce the amount of greenhouse gases that are released into the atmosphere. We as an Agency continue to play a strong role in helping to mitigate greenhouse gas emissions by conserving and restoring forest and grassland ecosystems."

The document then stresses the importance of carbon assessments and explains that they can help the Forest Service to implement management activities with the potential to reduce carbon emissions. The document also warns that climate change may "cause [the Forest Service] to reconsider whether our current goals and objectives can be met using our current management activities. Treatments may need to
be adjusted in time and place, or different treatments may be needed to achieve the same goals. In some cases, goals and objectives themselves may need to be re-evaluated."

The document then lays out several strategies the Forest Service may use to better manage the forest to adapt to climate change. These adaptation actions include a) resilience, which "is the degree to which systems ... can recover from one or more disturbances without a major (and perhaps irreversible) shift in composition or function," b) resistance, or "the ability of an organism, population, community, or ecosystem ... to withstand perturbations without significant loss of structure or function. From a management perspective, resistance includes 1) the concept of taking advantage of and boosting the inherent (biological) degree to which species are able to resist change, and 2) manipulation of the physical environment to counteract and resist physical and biological change," and c) approaches that facilitate transitions, which "are strategic actions that work directly with the changes that climate is provoking and ease transitions to future states by mitigating and minimizing undesired and disruptive outcomes while maintaining essential functions." The actions can be included in project plans.

Climate change is a function of the impacts of not just one isolated project but of the cumulative impacts from actions across the forest and around the world. NEPA regulations promulgated by the Council on Environmental Quality describe a cumulative impact as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can..."
result from individually minor but collectively significant actions taking place over a period of time." Further, courts have explained that the "impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."

CEQ regulations make clear that "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." In this light, courts have required considerable quantified information as necessary to constitute the hard look of cumulative impacts required by NEPA.

The Draft EA's climate change analysis fails to meet any of these requirements. The brevity and the conclusory nature of the analysis suggests a lack of concern for the threat posed by climate change and stands in stark contrast to the tone set by national and international leaders. Specifically, the Draft EA provides no data about how much carbon emissions can be sequestered by the forest beyond the national 10% number referenced above, and no estimate of how much the cutting detailed in either Alternative 2 or Alternative 3 will reduce the forest's capacity to sequester carbon. The Draft EA makes no estimate of how much the project will add to greenhouse gas emissions beyond the vague admission that it will lead to an increase, and while stating that climate change is one of the top threats to water resources in the project area. Rather than analyze the impacts this project may have on the climate, the Draft EA merely references general narrative comments that are not specific to this project, and the monitoring plan does not mention climate change. We recognize that this is a complex issue and that these estimates are difficult to predict, but the analysis has also overlooked an important carbon sink,
soil carbon. Of particular concern is how frequent prescribed burns and moderate to high intensity fire will ultimately reduce this critical carbon storage pool. The litter layer is the precursor to the dynamic duff layer, and if this litter layer is burned with no replacement, the duff layer will diminish in size and so will its carbon storage potential.

Further, no detailed explanation is provided as to the differences in climate impacts posed by Alternative 3. Instead, the Draft EA merely states that it is similar to Alternative 2 and not thought to lead to a significant difference.

The analysis is also lacking in its discussion of adaptation actions. While it is repeatedly mentioned that Alternative 2 will make the forest more resilient, this conclusion is difficult to accept in light of the definition for resiliency given above. In other words, it is hard to understand how creating habitat that may have never existed in the project area, like woodlands, could prevent a "major ... shift in composition." The Draft EA also references resistance, and indicates that the previously approved burning could make the forest more resistant by reducing the fuel load, but no approaches to facilitating transitions are discussed.

Rather than discussing how the project might facilitate transitions, this project seems to be designed in spite of climate-change driven transitions. Since Northern Georgia has historically hosted only the southernmost extreme of ranges of several species, including ruffed grouse and some song birds that this project is purportedly designed to protect, it would be reasonable to assume that climate change might push these ranges out of the Chattahoochee National Forest; but the climate change analysis in the Draft EA fails to discuss
this possibility.

The cumulative effects of this project are dismissed by suggesting that they are very small when viewed globally, which stands in direct contrast to federal regulations requiring agencies to consider the cumulative impacts of even "individually minor" actions, and the only past, present, or reasonably foreseeable actions mentioned are 9,693 acres of burning that took place over the last decade. Other projects currently underway or being analyzed on the forest are ignored, and other relevant projects that might have or will occur outside of the Chattahoochee National Forest are not mentioned.

Overall, the climate change analysis is very superficial and conclusory, and it fails to insure that adequate information about the climate change effects of this project is publicly available.

The impacts this project might have on climate change should be reconsidered, and provide specific, quantifiable details should be provided about how the project will affect the balance of greenhouse gas emissions and sequestration. This analysis should be provided before any decisions are made or any actions are taken. Adaptation actions should be specified so as to be sure that they are actually responsive to the realities of climate change, and the monitoring plan should be updated to take climate change into account. The cumulative impacts this project will have on climate change must be taken into consideration.

Topa, Mary

XV. EIS/REVISED EA IS REQUIRED
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Under NEPA, an EIS is required if this project "may" have a significant effect on the quality of the human environment. 42 U.S.C. § 4332(2)(c) (include environmental impact statement on proposals for "major Federal actions significantly affecting the quality of the human environment"); 40 C.F.R. § 1508.3 ("'Affecting' means will or may have an effect on."). The purpose of an EA is to "provide sufficient evidence and analysis for determining whether to prepare" an EIS or a finding of no significant impact ("FONSI"). 40 C.F.R. § 1508.9. An EIS "must be prepared if substantial questions are raised as to whether a project . . . may cause significant degradation of some human environmental factor." Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1149 (9th Cir. 1998)), overruled, in part, on other grounds Lands Council v. McNair, 537 F.3d 981 (9th Cir. Idaho 2008) (internal citation omitted) (emphasis in original). "If an agency decides not to prepare an EIS, it must supply a convincing statement of reasons to explain why a project's impacts are insignificant. The statement of reasons is crucial to determining whether the agency took a 'hard look' at the potential environmental impact of a project." Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998) (citations omitted). A decision not to prepare an EIS is unreasonable "[i]f substantial questions are raised regarding whether the proposed action may have a significant effect upon the human environment." Save the Yaak Committee v. Block, 840 F.2d 714, 717 (9th Cir. 1988) (internal citations omitted).

"Human environment" includes "the natural and physical environment and the relationship of people with that environment." 40 C.F.R. § 1508.1. Determining whether a project may "significantly affect" the human environment is the "threshold question" in determining whether to produce

The draft EA haven't found a significant effect on the quality of the human environment considering the context and intensity of impacts. Thus, an environmental impact statement will not be prepared. An EIS is not necessary because there will be no significant effects on public health and safety, or on unique characteristics of the area (historic and cultural resources, park lands, prime farm lands, wetlands, wild and scenic rivers). This project will have no adverse effect on sites eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historic resources. It will not adversely affect any endangered or threatened species or habitat that has been determined to be critical under the Endangered Species Act of 1973. It will not violate Federal, State or local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (Biological Evaluation and Biological Assessment in the project record).
In determining whether potential effects are significant, agencies evaluate their "context" and their "intensity." See 40 C.F.R. § 1508.27. The Council on Environmental Quality regulations provides a list of factors to consider when evaluating "context" and "intensity." A court may find substantial risk of a significant effect based on just one of these factors. See Ocean Advocates v. U.S. Army Core of Eng'rs, 402 F.3d 846, 865 (9th Cir. 2004). This project implicates many of those factors, yet the EA has not adequately addressed impacts to these resources or put forth convincing reasons why effects on them would not be significant, leaving "substantial questions" about the project's effects and necessitating an EIS. See Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1213-14 (9th Cir. 1998) (EIS required to address multiple inadequacies in an EA).

In fact, the draft EA has not assessed these factors at all. An EA is meant to assist the agency if it is unclear that a project may significantly affect the human environment. See 40 C.F.R. § 1508.9. If the district has actually considered the question of whether an EIS needed, that analysis is not included in the draft EA and has not been disclosed to the public. This violates NEPA the requirement that the public be entitled to an opportunity to comment in an informed and meaningful way before decisions are made. NEPA has two central purposes: first, to ensure agency decision-makers consider accurate, high quality environmental information and, second, to make this information available to the public and to encourage public involvement in decision-making. Robertson v. Methow Valley Citizen's Council, 490 U.S. 332, 349 (1989); Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 443, 446-48 (4th Cir. 1996). To this end, federal

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<td>an EIS. 161 F.3d at 1212. In determining whether potential effects are significant, agencies evaluate their &quot;context&quot; and their &quot;intensity.&quot; See 40 C.F.R. § 1508.27. The Council on Environmental Quality regulations provides a list of factors to consider when evaluating &quot;context&quot; and &quot;intensity.&quot; A court may find substantial risk of a significant effect based on just one of these factors. See Ocean Advocates v. U.S. Army Core of Eng'rs, 402 F.3d 846, 865 (9th Cir. 2004). This project implicates many of those factors, yet the EA has not adequately addressed impacts to these resources or put forth convincing reasons why effects on them would not be significant, leaving &quot;substantial questions&quot; about the project's effects and necessitating an EIS. See Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1213-14 (9th Cir. 1998) (EIS required to address multiple inadequacies in an EA).</td>
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agencies' "NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." 40 C.F.R. § 1500.1(b). These "mandatory" regulations "require that an agency give environmental information to the public and then provide an opportunity for informed comments to the agency." Sierra Nevada Forest Protection Campaign v. Weingardt, 376 F. Supp. 2d 984, 990 (E.D. Cal. 2005). The agency should re-notice a revised draft EA with an assessment of the "context" and "intensity" of the proposed action alternatives and allow the public to evaluate that analysis. The analysis of the significance of the project's environmental effects is not only essential to inform public understanding and comment on this proposal, but such analysis is an express purpose of an EA and explicitly is required by the Forest Service's own regulations. 40 C.F.R. § 1508.9(a) (defining EA in part as a "public document" which provides "sufficient evidence and analysis for determining whether to prepare" an EIS or a FONSI); 36 C.F.R. § 220.7(b) (Forest Service regulations implementing NEPA state that an EA "must include," among other provisions, the evidence and analysis required by § 1508.9 and "[s]hall describe the impacts of the proposed action and any alternatives in terms of context and intensity as described in the definition of 'significantly' at 40 C.F.R. § 1508.27."). A draft EA that does not include evidence and analysis assessing the significance of the effects of the proposal and alternatives is adrift from its fundamental purpose, is not complete, and cannot provide an adequate opportunity for public comment.
### Response to Comment (By Comment Author)

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<td>Re-noticing a revised EA, for public comment, is necessary for other reasons as well. Just as the public is entitled to review the agency’s determination over whether an EIS is necessary, the public is also entitled to an opportunity to review and comment on the BE and on EA analysis that has been informed by the BE. Releasing a draft EA that sets forth two action alternatives, rejects other less damaging alternatives that we suggested, and supposedly analyzes the projects’ effects before completing the actual analysis of PETS and rare species (particularly without analysis of a significant rare species here, the hellbender salamander) puts the cart before the horse, in violation of NEPA’s procedures for environmental analysis, public participation and informed decision-making.</td>
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<td>Finally, for these same reasons, re-publication of a draft EA with the requisite Roads Analysis Process, or RAP, is necessary to allow the public to meaningfully assess and comment on the roads analysis in the EA and potential changes to the forest transportation system. The ability to review and comment on the BE, RAP, consideration of EIS factors, in combination with the EA analysis of these issues, is a necessary part of informed and meaningful comment on this project. The lack of other information and analysis discussed above compounds the incomplete nature of this draft EA. Without an opportunity to review these documents in combination with the related analysis in the EA and make an informed and meaningful response to it, the public comment period is not adequate. A more thorough, revised draft EA should be provided for public comment before a draft decision is developed and released.</td>
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<td>Based on the information that is in the EA however, it is apparent that the agency must complete an EIS to implement</td>
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this project. Brief analysis of the context and intensity factors as required by the CEQ regulations, § 1508.27, is addressed below:

(a) Context: The significance an action "must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting . . . ." § 1508.27(a).

The context for this project is addressed throughout these comments. The context of this project is more significant than others due to multiple reasons including: impacts to hellbenders (see, supra, Section X); potential harvesting of old-growth (see, supra, Section IV); and harvesting in the unsuitable prescription which marks a significant departure from past agency practice as well as commitments made during the previous forest plan revision (see, supra, Section VIII(i)). The project is also one of the largest on the CONF in recent memory, targeting some of the least departed, healthiest stands.

(b) Intensity: "This refers to the severity of the impact." § 1508.27(b). This project implicates a number of the intensity factors:

Beneficial Impacts - "Impacts may be both beneficial and adverse." § 1508.27(b)(1).

As discussed previously, the proposed activities are likely to have significant impacts on the forest, terrestrial and aquatic species, and soil and water resources, even if the Forest Service believes that, on the whole, the project will be beneficial.
Unique characteristics - "Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas." § 1508.27(b)(3). This project is likely to affect unique characteristics of the area and ecologically critical areas, such as: the Forest Plan-designated outstandingly remarkable Cooper Creek and the Regional Forester-designated Cooper Creek Scenic Area, by logging hundreds of acres upstream of these stream sections and Scenic Area; the most important habitat in Georgia for the imperiled hellbender salamander; Riparian Corridors by conducting significant harvesting as close as twenty-five feet from stream banks; wetlands and/or floodplains; some of the last remaining old growth in the area; areas that may qualify for inventory as potential wilderness areas during the next forest plan revision; and further downstream the plan-designated outstandingly remarkable Toccoa River. The project is also located near the congressionally-designated Coosa Bald National Scenic Area, as well as the Appalachian Trail Corridor.

Controversy - § 1508.27(b)(4) - The effects of this proposal are highly controversial. There are different elements on this controversy. First, the project is publicly controversial as demonstrated by press coverage and the high number of commenters at the scoping phase (and likely EA phase as well). The project is also scientifically controversial in that it seeks to "restore" woodlands to inappropriate areas without justification. As discussed above (see, supra, Section IX(iii)) this approach is being question by at least one expert biologist. Finally, the project is also controversial because it involves a distinct change in management of the CONF by planning repeated entries into areas labeled as unsuitable for
timber production under NFMA (see, supra, Section VIII(i)).

Uncertainty - "The degree to which the effects on the human environment are highly uncertain or involved unique or unknown risks." § 1508.27(b)(5). Based on the analysis put forth so far in the EA, aspects of this project are highly uncertain. The potential site-specific effects of the project, such as probability of landslide or the volume of sediment likely to be produced from proposed activities have not been studied, quantified, and disclosed. The information that is provided about soil and slope conditions suggests conditions are risky, yet does nothing to dispel the uncertainty that follows. Additionally, given the District’s efforts to create woodlands at Brawley Mountain, and the at best inconclusive results thus far, there is significant uncertainty about whether the District can be successful here. Implementing experimental treatments such as woodland creation without data to show that it can be successful must be supported by analysis in an EIS.

Precedential value - "The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration." § 1508.27(b)(6). This project may establish precedent for future actions with significant effects including continued woodland creation on the CONF and timber harvesting in areas labeled unsuitable under NFMA. Additionally, the midstory treatment in particular represents a decision in principle about a future consideration - whether or not to implement regeneration harvest in those stands.

Cumulative Impact - "Whether the action is related to other actions with individually insignificant but cumulatively

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<td>timber production under NFMA (see, supra, Section VIII(i)).</td>
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<td>Uncertainty - &quot;The degree to which the effects on the human environment are highly uncertain or involved unique or unknown risks.&quot; § 1508.27(b)(5). Based on the analysis put forth so far in the EA, aspects of this project are highly uncertain. The potential site-specific effects of the project, such as probability of landslide or the volume of sediment likely to be produced from proposed activities have not been studied, quantified, and disclosed. The information that is provided about soil and slope conditions suggests conditions are risky, yet does nothing to dispel the uncertainty that follows. Additionally, given the District’s efforts to create woodlands at Brawley Mountain, and the at best inconclusive results thus far, there is significant uncertainty about whether the District can be successful here. Implementing experimental treatments such as woodland creation without data to show that it can be successful must be supported by analysis in an EIS.</td>
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<td>Precedential value - &quot;The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.&quot; § 1508.27(b)(6). This project may establish precedent for future actions with significant effects including continued woodland creation on the CONF and timber harvesting in areas labeled unsuitable under NFMA. Additionally, the midstory treatment in particular represents a decision in principle about a future consideration - whether or not to implement regeneration harvest in those stands.</td>
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<td>Cumulative Impact - &quot;Whether the action is related to other actions with individually insignificant but cumulatively</td>
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significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. " § 1508.27(b)(7). The cumulative impacts associated with this project are discussed in detail, supra, Section IX(iv).

Scientific, cultural, and historic resources - Many of the unique or ecologically critical resources discussed above also have significant value for science, local culture, or natural heritage, e.g., old growth forest, hellbenders and their habitat (scientists use the Cooper Creek population for research), the outstandingly remarkable streams (high quality streams are often important reference sites for scientific study), and the Cooper Creek Scenic Area (a prized area since it was set aside by the Regional Forester in 1960).

Legality - "Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment." § 1508.27(b)(10). As explained elsewhere this project threatens violation of Federal law, specifically the National Forest Management Act, and as currently drafted, the National Environmental Policy Act.

We have raised substantial questions about the significance and intensity of this proposed project. The district has refused to consider reasonable alternatives we proposed that would avoid and/or reduce effects to less-than significant levels. If the district wishes to avoid preparing an EIS, the district should develop and choose a scaled-down action alternative which avoids these impacts. As currently designed, the project will very likely have a significant effect on the human environment. Even so, in the absence of a complete assessment of environmental impacts from the alternatives...
under consideration, there is no rational basis for the Forest Service to conclude the potential effects are insignificant. See Save the Yaak Committee, 840 F.2d at 717 (finding a decision not to prepare an EIS unreasonable if the agency fails to "supply a convincing statement of reasons why potential effects are insignificant"). Given the significance of the project in several respects, an EIS must be prepared.
Topa, Mary

Three of the Sensitive animals and plants that were found, or could exist, within the project stands are associated with streams or riparian areas: the star-nosed mole, the rough sedge, and kidney leaved twayblade. EA at 134-135. The Draft EA claims there will be no impacts to the mole or its habitat or to these plant populations, because streams and riparian areas will be protected by the riparian prescription 11 and BMPs. EA at 134-135. As discussed further elsewhere in these comments, considerable logging is proposed within the riparian prescription 11. See, supra, Section VIII(ii)(2). Therefore, it cannot be relied upon to protect these species and their habitat.

One Sensitive tree and severally Locally Rare plants and trees were found in project stands. The Draft EA asserts they will not be harmed at all, because logging will avoid them and they will be protected by a buffer. A revised EA should disclose the size of the buffer and explain how it will be adequate to protect these sites. Moreover, it appears that each species was found in only a few the stands, all in mesic, north-facing slopes or riparian areas. EA at 135. We expect there is considerable overlap among the stands supporting these rare plants. The EA should disclose how many stands, total, contain these species and should consider an alternative that drops them from tree cutting entirely. These may be among the highest-quality stands, from an ecological standpoint, in the project area and should be considered for complete avoidance. These stands may also be good candidates for inclusion in small old-growth patches, as well.

Topa, Mary

Additionally, there are two Sensitive fish, the wounded darter and the olive darter, and at least four locally rare fish, the tangerine darter, blotched chub, banded darter, and bigeye.

Both the Water Analysis and the Aquatic Habitats Analysis identify the Cumulative Effects Analysis (CEA) area as the three sixth level HUCs that the project occurs in. These sixth
chub, that occur downstream of the project area, in the Toccoa River Watershed, into which Cooper Creek flows. EA at 112. These species are not considered further because the area of cumulative effects analysis was cut off at the Cooper Creek watershed. This cut-off was not adequately supported and seems questionable (as discussed below and elsewhere in these comments). While the reason given for the cut-off - that cumulative effects on water quality "begin to be diminished" once water flows from a "6th level" watershed, such as Cooper Creek, into a larger watershed, such as the Toccoa River - may be generally correct, it does not fully deal with the problem.

First, "begin to be diminished" does not mean zero, therefore, there obviously is likely to be some cumulative impact on the Toccoa River, and perhaps on these species and their habitat, which should be described and assessed more specifically. A revised EA should conduct further analysis of: the proximity of Sensitive and Locally Rare aquatic species in the Toccoa River to the mouth of Cooper Creek; the condition and vulnerability of these populations; the estimated quantity of sediment that may be delivered to the Toccoa River and its cumulative effects on the water quality and rare aquatic species and habitat, given current conditions (e.g., existing sources of sediment, current sediment loads, water flows, etc.). Further consideration of the potential cumulative effects on the Toccoa is needed before it can be assumed that the cumulative effects of sedimentation on rare aquatic species and their habitat will be insignificant.

1) Hellbender Salamander

The most significant at-risk aquatic species in the Cooper level HUCs are Cooper Creek 25,290 acres, Coosa Creek, 14,364 acres and Youngcane Creek, 20,717 acres. Under Alternative 2, which has the most silvicultural treatments 8% of Cooper Creek would be treated, 13% of Youngcane Creek would be treated and none of Youngcane Creek would be treated (Youngcane Creek only has prescribed fire treatments). The Aquatic Habitat and Fauna Analysis indicates that there is the potential for negative cumulative effects to aquatic habitat and associated species under Alternatives 2 and 3, especially in drainages where treatments are concentrated, but through the use of BMPs and mitigation measures the potential for negative cumulative effects to aquatic fauna and habitat would be minimized (DEA pg 118). The Aquatic Habitat analysis also indicates that cumulative effects from sediment would be localized and short term (DEA pg 80). As mentioned in the analysis the areas of concentrated treatments are Bryant Creek and Pretty Branch and as both analysis state this is where effects could occur, neither analysis indicated cumulative effects would be seen outside the designated CEA area. If the expected cumulative effects in Cooper Creek are minimal we do not expect cumulative effects further downstream and these analysis justify the selection of the CEA.

The eastern hellbender is on the Chattahoochee-Oconee National Forests' Locally Rare list and it does occur in the Project Area. Eastern Hellbenders could be negatively impacted by sediment introduced into streams as could all the other species listed in these comments that occur outside the project area. As mentioned in the DEA Waters (1995) provides an extensive overview of the negative effects sediment can have on aquatic habitat and organisms. The eastern hellbender has a global rank of G3G4 which means it is vulnerable to apparently secure in its range and it occurs from
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<td>Creek watershed probably is the hellbender salamander. Although the Draft EA acknowledges that hellbenders exist in Cooper Creek, it contains no detailed analysis of the project's effects on hellbenders in particular or on the viability of hellbender populations in the Cooper Creek watershed and in the CONF. Thus the EA is not adequate under NEPA and does not demonstrate that the Forest Service has fulfilled its obligations to maintain viable populations of native species, such as the hellbender, in the CONF, as required by the NFMA and the Forest Plan.</td>
<td>New York south to Georgia and west into Kentucky, Indiana, Illinois and Missouri. In her letter dated November 3, 2016 to Ms. Sarah Francisco from the Southern Environmental Law Center, Ms. Kimberly Terrell, Director of Research and Conservation at the Memphis Zoo (see Project File) indicates that the Forest Service acknowledges the hellbender is known to occur in Cooper Creek and that there is a risk to hellbenders from sedimentation into streams. Ms. Terrell also writes there are no published studies that quantify the effect of sedimentation on eastern hellbenders and it is impossible to know how a population will respond to any specific increase in sediment load. We agree with this information in Ms. Terrell's letter, but we also think because of BMPs hellbenders will not be negatively impacted in the PA. Finally, the Cooper Creek Project would not affect the viability of the eastern hellbender species. The EA has been modified to include analysis for the eastern hellbender.</td>
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<td>a) Hellbender Salamanders</td>
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<td>Hellbenders are the largest salamanders in North America, and their plethora of colorful common names attest to their ability to capture the public's imagination. The species is a member of the family Cryptobranchidae, an ancient group of salamanders believed to have diverged from other amphibians over 160 million years ago. Even within the family, hellbenders have long been isolated from their closest living relatives, Asian giant salamanders. Divergent evolutionary lineages have less genetic overlap with other taxa and more unique features, so they contain a disproportionate share of total biodiversity. This evolutionary uniqueness makes divergent species, such as hellbenders, a high conservation priority.</td>
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<td>The IUCN lists hellbenders as &quot;near threatened&quot;, and the species is near &quot;vulnerable&quot; status. Hellbender are rapidly declining, and many populations have few or no juveniles. As habitat specialists with small territories, they have limited ability to respond to environmental disruptions. They require large flat rocks to live under and gravel bottom streams.</td>
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Stream sedimentation, such as that produced by logging, can destroy hellbender habitat and is seen as a major threat to hellbender populations.4,

Cooper Creek is known for having "the largest and most stable populations" in Georgia. In comprehensive surveys of Georgia hellbender populations, the relative status of Cooper Creek was described as "excellent" and "certainly one of the most productive hellbender streams within the species' range". Of particular note, juveniles "appear to be common" and Cooper Creek had the "highest relative abundance of hellbenders out of all streams surveyed." None of this information is disclosed and considered in the Draft EA.

While extensive logging does not necessarily guarantee the demise of Cooper Creek hellbenders, the logging and other sediment-generating activities proposed in this project clearly puts them at risk in ways not considered in the Draft EA. Particularly if precipitation events overwhelm mitigation measures, the resulting influx of sediment could irreparably damage habitat by silting in the spaces underneath the large rocks hellbenders rely on.

Water samples from Bryant Creek have also tested positive for hellbender DNA. The Draft EA does not consider the impacts on hellbenders in Bryant Creek at all. Given that sediment in the tributaries, such as Bryant Creek, is more likely to negatively affect aquatic species and habitats (EA at 113) and given the concentration of treatments in Bryant Creek watershed, sedimentation is likely to significantly negatively impact hellbenders in Bryant Creek, and any failure of erosion controls could easily eliminate that sub-population. None of these effects and risks are disclosed and considered in the
Prescribed fire and letting natural stand development processes proceed provide an alternative means of addressing all of the claimed forest health issues in the Cooper Creek area without putting the state's best population of this rare and important species at risk.

b) Impacts on Hellbenders and on Hellbender Viability

The Draft EA does not contain the thorough disclosure and analysis of the potential impacts to hellbenders, and consideration of alternatives and mitigation measures that would avoid or reduce those impacts, that is required by NEPA and by the NFMA and Forest Plan.

Under the NFMA, national forests must be managed to provide for wildlife and fish and to provide for the diversity of plant and animal communities, among other purposes. 16 U.S.C. § 1604(g)(3)(A)-(B). To implement this direction, the 1982 NFMA regulations instructed that fish and wildlife habitat be managed to maintain viable populations of the native vertebrate species existing within the forest. 36 C.F.R. § 219.19. A viable population was defined:

"as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area. In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area." Id.
The 2004 CONF Forest Plan incorporated this direction and established several goals, objectives and standards to provide for the viability of native species on the Forest, particularly rare species.

According to the Plan, the forest's terrestrial and aquatic ecosystems must be managed to maintain viable populations of all existing native species on the CONF. Plan at 2-4 (Goal 1); Plan at 2-6 (Goal 4); Plan at 2-12 (regarding rare species, "[t]he Forest Service is charged with creating and maintaining habitat conditions suitable to maintain viable populations of all species native to the planning area.); Plan at 2-21 (Goal 26: "Restore and/or maintain aquatic ecosystems in amounts, arrangements, and conditions capable of supporting viable populations of all native and desired nonnative species of aquatic flora and fauna within the planning area." ); Plan Appx. B-72 (defining viable population).

Particular attention should be paid to species of viability concern, state-listed species, and species that may warrant listing under the ESA. Plan at 2-13 (Goal 19: "Contribute to the conservation of State-identified locally rare species in cooperation with the Georgia Department of Natural Resources."); Plan at 2-12 (Goal 15: "...contribute to avoiding the necessity for federal listing of other species under the Endangered Species Act."); Plan at 2-13 (standard FW-029 protecting all sites supporting T&E species or individuals needed to maintain viability of a species; management occurs within such sites only when compatible with recovery of T&E species or maintenance of individuals needed to maintain species viability on the Forest.

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<td>Because this viability directive is not limited only to designated PETS species, it applies to the hellbender as well. Although the Eastern Hellbender Salamander is not currently a Forest Service-designed Sensitive Species in Region 8, it is a Sensitive Species in Region 9. In Georgia, the hellbender is state-listed as Threatened and the Georgia Division of Natural Heritage characterizes its status as &quot;imperiled&quot; in Georgia. Therefore, it obviously is an at-risk species that warrants detailed analysis and consideration in the EA (and BE) and the Forest Service must maintain its viability on the CONF. The current Draft EA, however, contains no detailed discussion of hellbenders and the project's likely direct, indirect, and cumulative effects on them. The Draft EA merely briefly acknowledges that hellbenders are a &quot;notable&quot; species present in Cooper Creek and that hellbenders would be adversely affected by increased sediment. (EA at 110, 112, 115). The Draft EA admits that, even with the use of BMPs and mitigation measures, logging and road construction would cause &quot;some sediment&quot; run-off into aquatic habitats in Cooper Creek and its tributaries, particularly during storm events when water flow would be increased due to the removal of canopy cover (EA at 74-75,117-118). Once deposited in streams, sediment &quot;would likely persist for a number of years,&quot; prescribed burning could deposit more sediment on an ongoing basis, and temporary roadbeds will &quot;continue to negatively affect aquatic habitat&quot; (EA at 113-115, 117). The Draft EA claims, however, that mitigation measures will &quot;reduce&quot; sedimentation (EA at 114-115), so sedimentation &quot;is not expected to be enough to negatively impact aquatic resources.&quot; (EA at 115). The Draft EA makes no effort to specify, quantitatively or qualitatively what the sediment effects might be, beyond the vague remarks that sediment...</td>
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negatively effects aquatic habitats and species, that a "slight increase . . . probably would not be detrimental to aquatic fauna but a larger increase would be," and that the project will deliver "some sediment" into these streams, but "not enough" to negatively impact aquatic species and habitat.

This is not adequate analysis of this rare and important species under NEPA nor does it give sufficient attention to the District's obligations to the hellbender and its viability under the Plan and the NFMA. The Draft EA contains no analysis whatsoever of impacts particularly on hellbenders, the condition or viability of the Cooper Creek population, and the species viability on the CONF. There is no presentation of information and analysis needed to assess these impacts, such as: the status of the hellbender population at Cooper Creek (e.g., existing impacts, estimated conduction of the population and its numbers and trends, etc.); whether, and how many, individuals could be harmed without negative effects on this population's long-term viability; how this project is likely to affect individual hellbenders and this population; the number and status of hellbender populations on the CONF; the relative health or importance of the Cooper Creek population compared to other populations; and the importance of the Cooper Creek population for the species' overall viability on the Forest. A revised EA should disclose, analyze, and consider all of these issues.

Cumulative impacts on hellbenders are also entirely unaddressed, but must be considered to comply with NEPA and to adequately analyze impacts on species viability under the Plan and NFMA. (For additional discussion of cumulative impact requirements see, supra, Section IX(iv)). The Draft EA acknowledges that, while Cooper Creek is a high quality
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Stream that supports a diversity of aquatic species, there are existing negative effects on water quality, including increased sedimentation and increased water temperatures from existing roads and disturbance of the riparian corridor from recreational uses. (EA at 110-111). There is no analysis of this project's impacts (e.g., increased sediment, increased water temperatures) in combination with other existing and likely ongoing negative impacts (e.g., impacts from roads (EA at 108, 110-111); recreational activities that disturb the riparian corridor (EA at 111); and intentional harm from humans) on this very sensitive species. Nor are cumulative impacts on hellbender populations from other sources considered, such as negative impacts from forces beyond the Forest Service's control, such as acidification of streams and increasing temperatures due to climate change. The EA should consider how the Cooper Creek hellbenders and other populations in the Forest are likely to be impacted by these forces and consider the significance of the project's negative impacts in light of all of these cumulative impacts. Even if the Forest Service believes this project's negative impacts will be relatively small, those impacts may still be significant for a species already imperiled and under stress from a number of other factors.

Hellbenders should be fully considered in the BE and EA, in order to comply with NEPA obligations to disclose, analyze, and consider effects on this significant rare species and its viability on the CONF, and in order to address the project's compliance with the mandates of the NFMA and the Forest Plan to contribute to the viability and conservation of the hellbender, not undermine it.

In particular, the EA must consider whether the hellbender
populations in Cooper Creek are necessary to the viability of the species on the CONF. Plan at 2-13. If it is or may be, then the project must be brought into compliance with the Plan standard requiring that sites supporting individual animals that are needed to maintain the species' viability on the Forest are "protected from detrimental effects caused by management actions. . . . Management activities occur within these sites only where compatible with . . . maintenance of individuals needed to maintain species viability on the National Forest."

Plan at 2-13. For example, the EA must consider whether and how the project should be changed or whether additional protective measures are needed to protect hellbenders here. Plan at 2-13 ("Site specific analysis of proposed management actions will identify any protective measures needed in addition to Forest Plan standards, including increasing the width of protective buffers where needed.").

In such analysis, obvious changes to the project that should be considered include: dropping all commercial timber cutting within riparian corridors, to reduce the risks of sedimentation and of increased water temperatures; dropping all tree cutting, whether commercial or non-commercial, within riparian corridors, to maintain all existing shade for streams; dropping or reducing all commercial logging in the Cooper Creek watershed; and dropping or reducing commercial logging in Bryant Creek watershed. A detailed, complete analysis of hellbenders in a revised EA might identify additional alternatives and/or mitigation measures that should be considered.

Topa, Mary

XIII. TRAVEL ANALYSIS

There are two types of travel analysis: "Travel analysis for
purposes of identification of the minimum road system [and] travel analysis for purposes of designation of roads, trails, and areas for motor vehicle use. " FSM 7712. Both are implicated as part of this project. Each national forest was required to identify the "minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands" by the end of fiscal year 2015. 36 C.F.R. § 212.5(b)(1). That process resulted in recommended changes to the forest road system which Alt. 3 in this project plans to implement. For that same reason - the proposed changes to the forest road system - "travel analysis for purposes of designation of roads, trails, and areas for motor vehicle use" is also necessary.

As an initial matter, we request that the agency produce two documents. First, the Cooper Creek EA references and implements the Chattahoochee-Oconee Transportation Analysis Report (TAR) and Transportation Analysis Plan (TAP). EA at 177-178. To the extent those are different documents, neither have been produced as part of the project record. In fact, we are not aware that either document has been made widely available to the public at all. The most recent version of the TAR we have been able to obtain is labeled "draft" and dated May 2013. If the Forest Service is going to rely on and incorporate those documents as part of its analysis of this project it must release those documents to the public for review. It is impossible for us to square the recommendations in the TAR/TAP with the changes to the transportation system considered in Alternative's 2 and 3 without being able to review and reference the agency TAR/TAP.

Second, to comply with the requirements to conduct travel analysis "for purposes of designation of roads, trails, and areas for motor vehicle use" it must release those documents to the public for review. It is impossible for us to square the recommendations in the TAR/TAP with the changes to the transportation system considered in Alternative's 2 and 3 without being able to review and reference the agency TAR/TAP.

The Chattahoochee - Oconee National Forest has made a forest-wide effort to identify a future transportation system through the Transportation Analysis Planning Process (TAPS). The TAPS allows the agency to balance scientific information, public needs, safety and environmental protection, and funding levels when determining the size, purpose, and extent of the future Forest Transportation System and any specific road reconstruction or construction activities.
areas for motor vehicle use" (FSM 7712) "[a]ny change to
[road] management [will] be evaluated through the Roads
Analysis Process (RAP) during the decision-making and NEPA
process;" in other words, this process. Draft CONF TAR at 5;
see also Draft CONF TAR at 16 ("Completing a RAP on each
road that was evaluated in the TAR process was not
accomplished since it will be completed during the next step
of evaluating the TAR implementation."); id. ("A roads
analysis for each watershed will be completed as part of the
NEPA and decision-making process"). We are not aware that a
RAP has been completed for this specific project or
watershed. If not, it must be completed to comply with the
Travel Management Rule and the Forest's TAR/TAP. If it has,
we ask that it be released immediately. NEPA requires public
dissemination of relevant agency documents which mandates
that the TAR/TAP and RAP be released for public review.

Unable to review the RAP, most of our comments focus on the
implications of the forest-wide TAR/TAP for this project. We
commend the District for implementing many of the
recommendations of the TAR in Alternative 3. These changes
will help produce a more practical road network that can be
maintained in good condition while still meeting administrative
and public access needs. We are particularly pleased that the
district has recognized that even the recommendations in the
TAP would leave a maintenance budget shortfall and has
identified additional maintenance level reductions.
Permanently or seasonally closing Mark Helton Branch,
Duncan Ridge Branch and Dixon Branch roads are the kind of
changes needed to ensure that more important roads can be
kept in good condition and ensure safe public access. We
believe these actions, in addition to those recommended in
the TAP should be included in every project alternative.
However, more is needed to achieve a sustainable road system here. The road system in the project area is deteriorating, leading to adverse environmental impacts and jeopardizing public safety. "Many of the roads within the project area do not meet current standards for safety or environmental protection." EA at 174. "Much of this transportation system does not meet Forest Service design standards and would not sustain continued motorized use at current levels. Poor drainage, encroaching vegetation, and lack of adequate surface material have created conditions that limit vehicle access for public and administrative uses and have contributed to sediment loads through erosion." Id. at 175. If no action is taken, "road conditions would continue to worsen to an eventual point of catastrophic failure and/or extensive resource damage in locations" including "posing a chronic threat to water quality." EA at 176.

In light of the funding shortcomings identified in the TAR and Draft EA and the deteriorating roads discussed in the Draft EA, we particularly question the reasonableness of upgrading roads to facilitate commercial timber harvest in the unsuitable 7.E.1 Prescription. See EA at 174 ("current funding levels are not adequate to maintain existing roads to the standards originally planned"). Because these roads access an unsuitable prescription, where periodic timber access is not expected, it seems unlikely they will be utilized for timber harvest again. Additionally, increasing road size to accommodate import of heavy machinery and potentially tractor trailers seems incompatible with the "dispersed recreation" values the 7.E.1 Prescription is to be managed for. A better use of taxpayer money would be to concentrate road improvements on roads
that are causing the most adverse resource impacts, and likely to be frequently used both now and in the future. We question whether this expenditure of funds meets the requirement to "direct" [(c)onstruction and maintenance work on forest transportation facilities . . . to what is necessary and economically justified for protection, administration, development, and multiple-use management of the federally owned lands and resources served.] 36 C.F.R. § 212.4(a).

Improving aquatic organism passage in the project area should also be a focus of transportation funding and an alternative which improves aquatic organism passage should be assessed as a reasonable project alternative under NEPA. Construction and maintenance of forest roads are exempt from Clean Water Act § 404 permit requirements but only as long as those "roads are constructed and maintained . . . to assure that flow and circulation patterns and chemical and biological characteristics of the navigable waters are not impaired . . . and that any adverse effect on the aquatic environment will be otherwise minimized." 33 U.S.C. § 1344(f)(1)(E). Failure to adequately provide for aquatic organism passage violates this requirement leading to loss of the Clean Water Act exemption. The Forest Service should prioritize ensuring that appropriate aquatic organism passage is provided for at all stream crossings.

Finally, for a variety of reasons the CONF TAR itself was inadequate. See Letter from Sam Evans and Hugh Irwin to Tony Tooke (June 12, 2015)(attached). Most problematically, the CONF TAR failed to set forth a minimum road system that "minimizes adverse impacts" while "reflect[ing] long-term funding expectations." 36 C.F.R. § 212.5(b)(1). Under the best case scenario, the CONF predicts it will have only 38% of
the necessary budget to maintain the existing road system. As admitted in the Draft EA, failure to balance expected budgets with actual maintenance costs will lead to "road conditions [which] continue to worsen to an eventual point of catastrophic failure and/or extensive resource damage in locations." EA at 176. This is unacceptable and likely violates the Clean Water Act and National Forest Management Act. Similarly, reductions in user access to the forest should be minimized or avoided. Nevertheless, to balance its budget the agency will have to decommission and reduce the maintenance level of significantly more roads than are identified in the current TAR. While we hope and expect that the TAR will be brought up to standard, in the meantime the work of identifying the additional, needed changes to the road system must now be completed at the district level on a project-by-project basis. We are pleased to see that this work has begun; the district must continually take a hard look at its transportation system and close or downgrade those roads with the least use, particularly those with low use and high impacts. Priority in keeping roads in a sustainable condition should be given to high traffic roads that receive significant recreational use; not roads which only or mainly serve to extract timber from the forest including those intended for upgrades which access the 7.E.1 Prescription and other unsuitable areas.

Topa, Mary

Finally, as we noted in our June 2014 scoping notice response (attached), temporary roads can have both dramatic immediate impacts and long lasting effects. Temporary roads in this project are particularly pertinent to the TAP, because several of them appear to be managed as de facto system roads. The roads proposed for daylighting in these project lead to permanent wildlife openings, and the roads in the
The access routes to wildlife openings are closed year-round to public vehicular traffic and are used periodically by farm tractors for maintenance of these openings. They are different than temporary roads that are used for short-term access and are closed to all vehicular traffic after use. As a result of past management activities, there are numerous old temporary road templates throughout the project area. As described in the Proposed action (Section 2.2.2 of the EA), of the 5 miles of temporary road construction proposed, the majority will use previous temporary road templates. Approximately 3.5 miles of old temporary roads will be reopened and utilized. No activities are proposed for any of the other closed temporary roads. They will remain closed and will not be disturbed.

The effects of temporary road construction are disclosed in multiple sections of the EA including Section 3.3 Soils, 3.4 Water, and 3.11 Aquatic Habitats. The project includes several soil and water design features to ensure that related once the temporary roads are no longer needed, they would be properly blocked and closed to vehicle traffic including ATVs (See Table 2.4.1).
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<td>Trottier, Beverly</td>
<td>district will do if they are not effective; and the effects of illegal ATV use if the measures are not effective, especially given the difficulty in controlling illegal ATV use once it is begun and the sensitive nature of the soil and water resources in this project area. NEPA requires such analysis.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>Trottier, Beverly</td>
<td>If followed, it will be at the expense of the wildlife living within the forest and certainly the forest itself (as proven by the Brawley Mountain project.)</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Trottier, Beverly</td>
<td>The plan outlined in the article breaks my heart because it indicates, once again, that man feels compelled to be the overseer of everything natural....invariably to man's own benefit; usually to the detriment of everything natural</td>
<td>Thank you for your interest in the project. This comment is outside of the scope of this project. License fees in the state of Georgia are set by Georgia DNR.</td>
</tr>
<tr>
<td>Trottier, Beverly</td>
<td>The article implies that the forest service will gain more $ from additional hunting/fishing licenses (Forest Service determined that much of the forest &quot;isn't healthy&quot; because deer, ruffed grouse, and wild turkey populations have declined (hunting /aka hunting licenses are down???), as well as the logging.</td>
<td>Thank you for your interest in the project. This comment is outside of the scope of this project. License fees in the state of Georgia are set by Georgia DNR.</td>
</tr>
<tr>
<td>Trottier, Beverly</td>
<td>How can logging &quot;rejuvenate&quot; an old forest?</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
</tr>
<tr>
<td>Truelove, Nolan</td>
<td>I just wanted to send you an email to let you know that I am in support of Timber harvest in the CNF. I live in Lumpkin county which has a tremendous amount of NF in it. Harvesting of timber sections would benefit the game and the hunter in the end. I support any effort to harvest old growth timber and early growth timber to help achieve a diverse habitat. The Coopers Creek project is a good start. Please consider other areas especially areas in Lumpkin County</td>
<td>Thank-you for your Support</td>
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<td>Tullis, Marcus</td>
<td>After a review of the plans and proscribed actions for the Coopers Creek Watershed Project, I applaud the Forest Service for taking a proactive stance to rectify the issues facing the nearly 30 thousand acres under consideration. It is refreshing to see true conservation in action rather than a response to alarmist activists. We members of the Board of Directors of North Georgia Trout Online have weighed this plan against our organization's mission statement, and find that it meshes nearly perfectly with our goals of improving cold water fisheries in our state, as well as promoting a general well being of our state's natural environment. Since no official vote has taken place among our directors, we cannot at this time declare an official stance. However, the Directors are in agreement that we will strive to support the Forest Service in its endeavor to implement this plan.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Turner, Glenn</td>
<td>I am For this Anything To Get Our Wildlife Back In The Areas That Is Not Producing Good Hunting. No Deer No Grouse When You Hunt For 4 Days In The National Forest And Don`t See a Deer Something Wrong. I Consider Myself A Very Experenced Hunter And Love The National Forest Hunts, But There Is No Wildlife Left Please Do Something To Bring The Wildlife Back That I Grew Up Loving To Hunt.</td>
<td>Thank-you for your Support</td>
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<td>Author(s)</td>
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<td>Vandiver, Dwayne</td>
<td>I think that we, as a society, have proven many times over that we do not do as good a job of taking care of the environment as Mother Nature is. Man should stay out of things he is not very good at.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
</tr>
<tr>
<td>Vinten-Johansen, Peter</td>
<td>Until last year, we owned a seasonal home near the Moose River watershed on the north side of the Minas Basin, Bay of Fundy. Much of the forest there is privately owned; companies were brought in to clear cut huge swaths which produced horrific silting of the Moose River. In subsequent years, helicopter spraying of industrial-strength round-up destroyed many hardwoods beyond the target zones. This area was part of our 10 km square plat for a five-year breeding bird survey, and the drop-off in numbers of nesting species was staggering, including species that specialize, so to speak, in feeding on insects that prefer conifers. By contrast, your colleagues in the Forest Service managed a selective timber harvesting program along John Smith Road, West -- very near our primary residence. The company selected to undertake the first pass of selective cutting did a marvelous job -- marked trees were removed with limited damage to ecology of the area. Nearly two years on, a healthier forest is emerging.</td>
<td>This comment is outside of the scope of the project.</td>
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<td>Author(s)</td>
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<tr>
<td>Vinten-Johansen, Peter</td>
<td>We understand that forests should be managed properly, but we plead with you to avoid time-worn, industrial-efficient methods such as clear cutting and mass herbicide spraying. Instead, undertake selective cutting and provide many more jobs to men and women in our area instead of large firms that use few workers manning super-expensive equipment.</td>
<td>This project is too enhanceecological restoration and conserve the natural resources the Forest Service manages, and will involve a variety of treatments.</td>
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<tr>
<td>Vorsatz, Philip</td>
<td>I am writing to provide my input and object to the US Forest Service proposal to cut the 1,500 acres in the Cooper Creek watershed. Cooper Creek is where my 4 year old son learned to fish, and is still his favorite fishing location at the ripe old age of 30. I have been camping in this watershed for over 30 years. Cooper Creek is already threatened by overuse and any additional impact from clearcutting would hurt it even more. This area of the Chattahoochee National Forest provides much needed &quot;natural&quot; recreation space for the residents of Atlanta and North Georgia.</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) tominimize potential effects to recreational users.</td>
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<tr>
<td>Vorsatz, Philip</td>
<td>The proposed action would threaten some of the best trout streams in Georgia</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td>Vorsatz, Philip</td>
<td>I request the FS consider options other than clear cutting mature oak forests and limiting logging impact from access roads and pulling out timber. I know you are often pulled by conflicting priorities, but this is a very special watershed that needs very careful consideration of the impacts of any proposed logging.</td>
<td>Public comments received in response to the Proposed Action provided suggestions for alternative actions. Some of these alternatives may have been outside the scope of the project, duplicative of the alternatives considered in detail, or determined to not achieve the purpose and need. These were the alternatives considered but eliminated from further detail: Alternative that: avoids any existing old-growth forest; does not cut other mature oak trees; avoids commercial logging or activity in preparation for future commercial</td>
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<td>Logging in prescription 7.E.1; avoids tree cutting in the riparian corridor prescription 11; does not allow whole tree removal; focuses solely on sound, scientifically supported ecological restoration which is appropriate for the site proposed. No impacts to existing old-growth forests or whole tree harvesting are proposed. The restrictions on forest management activities proposed in this alternative would not meet the purpose and need for the project for a number of reasons including: 1) eliminating the cutting of mature oaks would limit the ability to provide early successional forest habitat and create young oaks stands for the future 2) Commercial logging and non-commercial activities are permitted in Management Prescriptions 7.E.1 (Dispersed Recreation Areas) and 11 (Riparian Corridors) to meet Forest Plan Goals and Objectives which would be substantially reduced if restricted in this manner.</td>
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<td>Early Successional Forest Habitat should be created by cutting down existing 30-40 year old clearcut stands. The cutting of these young stands is not commercially viable due to the small diameter of the trees to be cut. As a result, this would be a non-commercial operation with the material left on site. Cutting and leave in these stands would not meet the purpose and need of the project related to the creation of early successional forest habitat for a variety of reasons including 1) the large quantity of material left on the ground would substantially impede the regeneration of the stand limiting its value as early successional forest habitat and 2) this material on the ground would also restrict the movement of wildlife into the stands limiting their utility to wildlife.</td>
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<td>Clearcutting utilizing cable harvest should be included to allow harvest on steeper slopes. Given appropriate site conditions, cable logging can be a very efficient and</td>
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<td>Waldrop, Nancy</td>
<td>Your definition of &quot;improving&quot; the area around Cooper Creek as being to cut 85% of the trees in 2,591 acres and thinning concentrated in a 5,100 acre area is very warped. I know of no one who frequents the National Forest that would ever believe that cutting mature oak trees would benefit the forest or the streams contained therein. I am amazed that the forest service has not progressed any further than clear cutting, thinning, and herbicide use in the last 50 years.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>walker, larry</td>
<td>I support the Cooper Creek Watershed plan (44385) as presented</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Wall, Eric</td>
<td>Coopers Creek ecosystem</td>
<td>Thank-you for your Support</td>
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<td>Walters, Jeffery</td>
<td>I want to express my support for the proposed project. As an avid angler that regularly fishes in this watershed I fully support the plan of the USFS and hope that it is allowed to move forward.</td>
<td>Thank-you for your Support</td>
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<td>Wammock, Chad</td>
<td>I thoroughly encourage the logging as it helps the entire ecosystem, as well as creates jobs and brings revenue to the region. I encourage the logging to expand throughout the entire Chattahoochee and Oconee national forests. It is so beneficial to wildlife species such as deer and grouse and songbirds. Please take my opinion under consideration and don't hesitate to contact me if you need additional information. Thank you, Chad Wammock</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Wammock, Fred</td>
<td>Our wildlife needs the benefits of select cutting. I fully support this proposal.</td>
<td>Thank-you for your Support</td>
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<tr>
<td>Washburn, Morning</td>
<td>* protect and preserve old growth trees and their habitat</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Washburn, Morning</td>
<td>maximize conditions for groundwater recharging</td>
<td>Project activities will reduction in site transpiration and will likely result in increased sub-surface baseflow in the short term.</td>
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<tr>
<td>Washburn, Morning</td>
<td>prevent soil erosion</td>
<td>The EA (Section 3.3 Soils) analyzed the adverse impacts to the soil resource in the project area.</td>
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<tr>
<td>Washburn, Morning</td>
<td>reduce the need for and use of herbicides</td>
<td>We have taken a hard look at where to apply herbicides. This should be evident in Alternative 3 where the treatments were reduced in particular where herbicide would be utilized. Herbicides will be used a tool to help promote desired natural oak regeneration and planted oaks to help them establish themselves rather than be overrun by off site white pine and yellow poplar.</td>
</tr>
<tr>
<td>Watson, John</td>
<td>Please proceed with the work! The project has my vote!</td>
<td>Thank-you for your Support</td>
</tr>
<tr>
<td>Whitman, Martha</td>
<td>I am writing to urge you to leave old growth forests in the Cooper Creek Drainage alone</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Whitman, Martha</td>
<td>As much as loggers might be instructed to leave a buffer in the riparian zones, there will be major negative impact</td>
<td>Riparian protections zones are identified in Table 3.4.3. Project design features are listed in section 2.4. Ground based equipment would be excluded from the RPZ a specified width based on the water feature. Thinning treatments would be permitted in protection zone up to 25’ of the water feature for the purpose of meeting the project goals and objectives identified in Section 1.6 of the EA. Silvicultural treatments such as thinning in the RPZ would occur to improve riparian resources. Canopy cover in the treated portion of the protection zone would leave a minimum of 50 square ft of basal area. Only low intensity burns would occur in the SMZ. This would result in minimal ground disturbance next to surface waters and minimize the risk of sediment transport to a channel. Preservation of at least 50 square feet of basal area in the protection zone at 25 feet from the water feature and the innermost 25 feet of canopy in tact would not reduce the shade to the water feature.</td>
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<tr>
<td>Whitman, Martha</td>
<td>Pesticides should not be used in this old growth forest.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<tr>
<td>Whitman, Martha</td>
<td>Water temperatures in our creeks are already rising due to higher ambient temperatures. Bryant Creek and Pretty Branch will be further impacted by so much canopy removal, endangering Brook Trout.</td>
<td>Georgia Best Management Practices for Forestry (Georgia Forestry Commission, 2009) will be adhered to for the Cooper Creek Watershed Project. Around trout streams there will be a 100 foot Streamside Management Zone (SMZ) that includes a 25 foot no-harvest zone adjacent to the stream. Harvest can occur within the next 75 feet of the SMZ, but an average of 50 square feet basal area (BA) or at least 50% canopy cover must remain. Bryant Creek’s average width is 12-14 feet (DEA pg. 110) and Pretty Branch is smaller than Bryant Creek, so a 25 foot buffer should be sufficient to maintain cold water steam temperatures (DEA pg. 115). Wilkerson et al. (2006) looked at the effectiveness of various riparian buffer strips in Maine and they concluded that water temperature in small headwater streams is protected from the effects of clearcutting by an 11-m buffer (with &gt;60% canopy retention). During this study timber harvest was conducted in the buffer strip with the BA being reduced to approximately 60. The Cooper Creek Watershed Project has a 25 foot no-cut zone adjacent to the stream and then a 75 foot strip where the lowest the average BA can be reduced to is 50 BA. We believe this is more than sufficient to maintain water temperatures for trout and other cold water aquatic organisms.</td>
</tr>
<tr>
<td>Whitman, Martha</td>
<td>Many southern Appalachian forests naturally have a dense canopy due to the fertile soil and abundant rainfall. Letting nature take its course with tree thinning due to lightning strikes and aging trees’ falling over will gradually thin forests and allow wildlife to adapt over time.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<tr>
<td>Whitman, Martha</td>
<td>If your goal is increasing the amount of young forests, I prefer that you do replanting of some areas that were clear cut in the last few decades.</td>
<td>The Forest Service has looked at the many of these stands for management opportunities. Some are feasible to propose a treatment and were, while others were simply not feasible for this entry.</td>
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Wilkes, Jordan  
My apprehension regarding this timber cut is for the health of the Cooper Creek watershed. Mature trees in a riparian area, such as Cooper Creek, are vital to stream health. Riparian forests provide shade for the stream, which cools the water to a healthy temperature. Stream temperature directly correlates to the amount of dissolved oxygen in the water. A healthy mountain creek should exhibit low turbidity, high dissolved oxygen, cold temperatures, and the presence of pollution intolerant macro-invertebrates. These conditions must be present to nourish and sustain Brook, Brown, and Rainbow Trout (the three species of trout that can be found in northeast Georgia). I recall the first rainbow trout that I caught out of Cooper Creek; it was a thing of beauty. Thus, a timber cut of this scale would be detrimental to the health of Cooper Creek and the greater watershed. To diminish a healthy ecosystem, operating largely in an intact, native order, would be an act of ecological malpractice. I urge that the Forest Service consider the weight of this action and opt against a timber cut in the Cooper Creek Wildlife Management Area. For the health of the flora and fauna and for future generations of recreationist, it is the ethical course of action!

William, Anon  
The only way at all I can stomach this project would only be if the Forest Service works in conjunction with the American Chestnut Foundation to replant the cutover areas in the Cooper Creek Project with American Chestnut trees. Chestnuts used to grow along hill and mountain tops which is where the clear cuts of the Cooper Creek project are being proposed so it may be a good chance to replant chestnuts in the area. Otherwise I feel the project is a bad idea.

Georgia Best Management Practices for Forestry (Georgia Forestry Commission, 2009) will be adhered to for the Cooper Creek Watershed Project. Around trout streams there will be a 100 foot Streamside Management Zone (SMZ) that includes a 25 foot no-harvest zone adjacent to the stream. Harvest can occur within the next 75 feet of the SMZ, but an average of 50 square feet basal area (BA) or at least 50% canopy cover must remain. Bryant Creek’s average width is 12-14 feet (DEA pg. 110) and Pretty Branch is smaller than Bryant Creek, so a 25 foot buffer should be sufficient to maintain cold water steam temperatures (DEA pg. 115).

Wilkerson et al. (2006) looked at the effectiveness of various riparian buffer strips in Maine and they concluded that water temperature in small headwater streams is protected from the effects of clearcutting by an 11-m buffer (with >60% canopy retention). During this study timber harvest was conducted in the buffer strip with the BA being reduced to approximately 60. The Cooper Creek Watershed Project has a 25 foot no cut zone adjacent to the stream and then a 75 foot strip where the lowest the average BA can be reduced to is 50 BA. We believe this is more than sufficient to maintain water temperatures for trout and other cold water aquatic organisms.

The Forest Service (FS) have been working closely with the American Chestnut Association and when seedlings become available the FS will look for places where we can use American Chestnut as the specie for reforestation.
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<tr>
<td>William, Anon</td>
<td>I feel this way because unlike this proposal there are a lot of indisputable forest restoration projects such as restoring the hemlocks, chestnuts, ash trees, etc which are still terribly underfunded. The Forest Service is wasting time, funding, and personnel studying the Cooper Creek logging project when it could be focusing more on devising projects to save our biodiversity under threat by invasive species. Until all hemlock stands on public land (not just those in conservation areas) are being treated with either insecticide or beetles and until there is an established effort to save our dogwoods and ash trees, not to mention also our beech trees, then we don't need to be doing projects for &quot;restoring our forests&quot; like this one in Coopers Creek. Also I'm at least a little concerned as to why the Forest Service is trying so hard to sell this project to the public going so far as to say in one breath that the Cooper Creek tree cover is made up of &quot;old growth&quot; trees that are centuries old (when in reality the trees are only 30 to 50 years old on average) and then in the next breath talking about how the forest is in need of mature trees which they claim let light get through to the forest floor. How can Cooper Creek have too much old growth and be in need of old growth at the same time?</td>
<td>This project was based on the ecological needs of the area, extensive modeling and ground examinations were conducted to produce an ecologically appropriate management plan. Timber sales are merely the ground tool that we can use to accomplish the objectives.</td>
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<td>Williamson, Marilyn</td>
<td>This project sounds abysmally unproductive. Whatever in the world did the forests and the wild animals do before the US Forest Service came along with ideas for improvement? Since forests are of major assistance in improving air quality, it would seem that we might wish to encourage and sustain forests rather than denuding the soil by removing the trees. I have a sneaking suspicion that the logging industry may be pushing for this project to come to fruition. Please save the trees for all of us, man and beast. Do not continue with these plans for the forest that belongs to all creatures great and small.</td>
<td>The effects of the project activities on wildlife populations are disclosed in Chapter 3 of the EA, primarily in sections 3.13 Threatened, Endangered, Proposed, Sensitive Species and Locally Rare Species and 3.14 Management Indicator Species.</td>
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<td>Willingham, Randy</td>
<td>I'm not a big fan of wilderness areas as has been done, but the Cooper Creek area would be my first choice for one. This area should be left alone forever for recreation and scenic beauty. Surely the few net dollars derived from cutting these trees won't make a dent in our national debt!</td>
<td>The effects of project activities on recreational opportunities are disclosed in Section 3.16 Recreation and Scenery. The project includes several site specific design features and mitigation measures (Table 2.4.1) to minimize potential effects to recreational users.</td>
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<td>Author(s)</td>
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<td>Wilson, Pat</td>
<td>I object, strenuously, to the proposed commercial logging, burning and thinning of the Chattahoochee National Forest. Not just at Coopers Creek, but anywhere in this forest. Has no one the memory of what happened 100 years ago due to commercial logging in the North Georgia Mountains? Deforestation on this level, involving thousands of acres, is not a positive project for anyone other than those who have monetary gains in mind. The puny amount the Forest Service stands to gain is minute in relation to the scale of damage which will occur to the soils, trees, the wildlife, the erosion and pollution/runoff and the years it will take for mature trees to once again rise to full heights. There are more varieties and species of plants and trees in the North Georgia mountains than in any other part of the state. This is ecologically sensitive land and it belongs to the public. I personally hike, birdwatch and photograph many parts of the Chattahoochee National forest, as well as own and live on a piece of land directly adjacent to the National Forest, drink water and watch trout in a stream on my property which comes directly out of the forest, and enjoy the peacefulness and serenity of the forest. Preserve the forest in its natural state, without burning, thinning, logging, creating crude roads with heavy equipment to do this proposed Coopers Creek project. Let it be.</td>
<td>The Forest Service has proposed treatments that would allow nature to more easily sustain itself and provide for greater diversity, structurally and vegetative.</td>
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<td>Winfield, Avis</td>
<td>I read through the section of the environmental impact study that pertains to rare and endangered flora and fauna within the targeted area. I feel that the report is superficial and dismissive as to possible direct and indirect negative effects on the habitat and on the wildlife. I believe the report understates the number of rare species. The AT section I monitor is eight miles south of the Cooper Creek WMA. There are six species of rare plants on my list; my co-workers in the other sections have their own lists that differ from mine. I think there are probably more rare species in the Cooper Creek area than those mentioned in the report. The claim that the herbicide used will not have an overall negative effect is simplistic. There is no mention of the immediate negative effects a pesticide will have on the macro- and micro-organisms in the soil, such as nitrogen fixing bacteria, michorizal fungi, invertebrate larvae, etc. that are essential in the complex network of interactions of biota and abiotia that make an ecosystem work.</td>
<td>The effects of the proposed activities on Threatened, Endangered, Proposed, Sensitive, and Locally Rare species are disclosed in Section 3.13 of the EA. The Biological Evaluation will on the selected alternative will be completed and made available to the public prior to the final decision.</td>
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<tr>
<td>Winfield, Avis</td>
<td>As climate continues to warm, there will be more violent storms and an increased amount of rainfall. What will happen to the watershed as a result the abrupt changes to drainage patterns and run-off as a result of cutting down so many mature trees?</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
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<td>Winslett, Larry</td>
<td>Over eighty percent of the stands in the watershed of Bryant Creek will be cut, threatening one of the best native trout streams in Georgia. Timber harvest activities, including the extensive road system that must be built to harvest timber, will increase soil erosion and raise water temperatures. We especially feel the issue of road impacts has not been given enough consideration. Today the &quot;temporary roads&quot; that would be opened are no more than woodland trails, their &quot;reopening&quot; will cause considerable damage that will take years to recover and greatly increase erosion concerns. (See attached photos,)</td>
<td>We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes. The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions and improve forest health (EA Purpose and Need pgs. 2-3). Improving aquatic habitat is not part of the Purpose and Need of the project and no improvements to Bryant Creek or any other stream in the project area are expected from the project although there may be a reduction in sediment delivered to some streams from the transportation management. The potential impact of erosion and sedimentation on the streams in the Project Area are discussed in both the Water and Aquatic Habitats Sections of the EA. Through the use of BMPs and mitigation measures the potential for sediment to be introduced into the streams will be greatly reduced and the cumulative effect to aquatic habitat and fauna if there are any is expected to be minimal. Burnett Creek contains considerably more sediment (fines) than Bryant Creek, but it also has a self-sustaining brook trout population (EA pg. 109, Table 3.11.1).</td>
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<td>Winslett, Larry</td>
<td>Commercial logging is proposed in an area that the Forest Service previously designated for dispersed recreation and &quot;unsuitable for timber production.&quot; This seems to be a contradiction in the Forest Service's own policy. As a matter of policy FOG is opposed to commercial logging simply to generate revenue on public lands. This seems to be the case here.</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Winslett, Larry</td>
<td>The Project proposes to cut some of the best examples of mature, healthy oak forests and towering white pines. This includes one of only two old-growth stands in the area. Mature oak forests have high wildlife value because acorns are an important food source for a wide variety of species. This doesn't appear to have any viable restoration objective and we question the extent of biological studies across the entire project area. Our highest concern is for any unusual, rare, threatened or endangered species and their habitats in the area. The proposal claims that a dense forest canopy is unhealthy, &quot;limiting hardwood tree diversity and wildlife habitat.&quot; Abundant rainfall and fertile soils do naturally lead to dense canopies on most Southern Appalachian sites. As these trees age, some fall and create small openings that provide wildlife habitat and high light for young trees to grow. This process is already happening in the project area, and will increase as the forest continues to recover from the last round of logging. This doesn't seem to have any basis in sound science.</td>
<td>The ECS model and Departure Analysis were tools used in conjunction with field surveys to maintain the stands composition within their natural range of variation where applicable.</td>
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<td>Winslett, Larry</td>
<td>We are also very concerned about the herbicide use, especially who will be applying it, how closely will they be supervised, and how will it be monitored. FOG is opposed to herbicide use except in extreme cases with no other viable alternative, that does not seem to be the case here.</td>
<td>During all phases of project implementation, Federal BMPs along with GA state BMPs will be followed. In addition, the potential effects are discussed in the EA, sections 3.4 Water and 3.19 Public Health and Safety.</td>
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<td>Winslett, Larry</td>
<td>As much as eighty percent of the trees on 720 acres will be cut to &quot;restore&quot; woodlands, defined as open stands with more sky than tree cover. However, there is no evidence that woodland ever occurred naturally in the area. Herbicides will be used extensively to prevent trees from growing back in these artificial woodlands. Again this doesn't have basis in sound science.</td>
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<td>wlr43, Anon</td>
<td>Lack of &quot;diversity&quot; in the Chattahoochee NF is appalling. Most species suffer and then disappear due to a lack of food (e.g. Ruffed Grouse). I have for many years advocated that 40-60-80 acres be clear cut across our mountains to achieve this goal. Yes--clear cuts are ugly, but, in my humble opinion, open areas, properly done, give the diversity needed for all wildlife. And besides that in just a few years, all is normalized again.</td>
<td>The number of acres and location of early successional forest habitat (ESFH) proposed for the Cooper Creek project was influenced by several factors. Standards in the Forest Plan limit the quantity of ESFH that can be created with each Management Prescription (MRx). For the Cooper Creek Project area, this ranges from a maximum of 10% in MRx 7.E.2 and 9.H and 4% in MRx 7.E.1. Issues of access, operability, and other resource conflicts also influence the location of acres proposed for ESFH. In response to concerns that many of the units proposed for ESFH were located on dry slopes, several adjustments were made in Alternative 3 to include stands on more mesic mid to lower slopes.</td>
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The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).

Wood, Kevin

I agree with this plan. Habitat improvement in the mountains is long overdue. Actually this needs doing across all WMA's and national forest in north Georgia.

We recognize that Coopers Creek along with its tributaries including Bryant Creek and Pretty Branch are popular fishing and recreation locations. We do not anticipate the Cooper Creek Project to have any effect on the public's ability to utilize this area for recreational purposes, especially trout fishing.

Woodel, Rosemary

I have an interest in retaining the trout-happy nature of Cooper River. I heard the ecologist from Forest Watch explain the ramifications of some of the current plans for change and feel that they should be reviewed much more intensely by people who understand that area the best. There is another area (already recently torn up) which would be a better location for planting oak trees. It is not so close to the river and would therefore not put run-off with intense storms like we have been having recently.

Pages 195 and 196 of the Draft Environmental Assessment lists the Forest Service ID Team Members that have worked on the Cooper Creek Watershed Project. It also lists individuals from other Federal and State Agencies along with individuals from Non-Government Organizations that were consulted during the development and analysis of the project. Members of the ID Team along with those consulted have a considerable amount of land management experience.
Worley, Jeff
Glad to hear some timber cutting will be done to provide some badly needed early successional habitat. I hope this is just a start and can continue all across the CNF.

WRybun@aol.com, Anon
I am supportive of your management proposal for this area.

The health and vigor of the forest is dependent upon management activities. Your proposal, as I understand it, focuses on restoration of the health of the forest for the purpose of enhance wildlife habitat, reducing the spread of off site species, and improving the overall health and vigor of the forest, while protecting the soil and water resources. This is to be accomplished through period thinning and prescribed fire. I am supportive of these management activities.

Overall, it is my contention that the Forest Service has more than adequately assed the condition of the area and has proposed a responsible and professional plan for the area.

Wurstle, Kurt
The proposed improvements to the Cooper Creek Watershed area through cutting old growth is unacceptable.

The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).
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<td>Wurstle, Kurt</td>
<td>The beauty of our mountain heritage is at stake. The influx of high spending tourists and summer home buyers depends on the beauty of the area. Don't ruin the economy of the area or its future by taking the best reason to be here. The richness of recreational use.</td>
<td>As disclosed in the EA, the project will not negatively affect fisheries (Section 3.11 Aquatic Habitats) or recreational opportunities and scenery (Section 3.16 Recreation and Scenery). The road improvements and parking lot expansions will enhance recreational access. In addition, the proposed activities will enhance conditions for a variety of wildlife species, enhancing opportunities for both consumptive (hunting) and non-consumptive wildlife uses (Section 3.14 Management Indicator Species). As disclosed in Section 3.17 Economic Analysis, the economic value of non-monetary benefits such as wildlife habitat improvement and enhanced recreation opportunities, would be realized in the addition of Resident and Non-resident visitor days. The result of these treatments and activities would likely have a multiplier effect on the local economy.</td>
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<td>Yamamoto, Julie</td>
<td>NASA has reported that 2015 was the hottest year on record since record-keeping started in 1880 (<a href="http://onforb.es/1nmJURe">http://onforb.es/1nmJURe</a>). Between 18 million to 32 million acres of forest are lost each year, and deforestation accounts for up to 20 percent of human greenhouse emissions. World wildlife populations have been halved in the past 40 years, and an estimated 1,000 known species of wildlife have gone extinct in the past 500 years. However, the extinction rate for unknown species could be as high as 10,000 per year. The earth has been warming since 1880, but the 10 warmest years have been in the past 12 years.</td>
<td>Thank you for your comment. These comments represent a general statement.</td>
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<td>Yamamoto, Julie</td>
<td>The old growth forests are earth's best hope for preserving a place to live for our children and our grandchildren. Do you want to see all of earth turned into a dessicated desert unfit for human life? No, this one project may not cause it, and it may not happen in our lifetime. But each tree we cut down is putting us on the path to that future more and more</td>
<td>The purpose of the Cooper Creek Watershed project is to restore native plant communities, enhance wildlife habitat conditions, and improve forest health. This action is needed, because many of the stands in the project area are dense and overcrowded, with limited understory or ground cover diversity. Due to limited use of prescribed fire over the last few decades, advanced oak regeneration is limited and white pine has encroached into many of the hardwood stands and now comprises a substantial portion of the understory and midstory. This action responds to the goals and objectives outlined in the Forest Plan for the Chattahoochee-Oconee National Forests, and helps move the project area towards desired conditions described in that plan (USDA, Forest Service, 2004).</td>
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<td>Yeargin, Patricia</td>
<td>Our family has a cabin on a large tract in Young Harris right next to the National Forest. Our tract was logged commercially, with promises made that were not kept. So many beautiful old-growth trees were removed that we nearly cried when we saw the damage. Even though it was 15 years ago, the forest has not yet recovered. And the issue with the hemlocks being lost to the hemlock woolly adelgid (HWA) only makes this problem much more serious. I'm sure that you'll be certain that any logging will be carefully supervised so as to leave a thick enough canopy and plenty of healthy, old-growth hardwoods, with something to replace the hemlocks near the creeks and streambeds. This area needs a lot of trees given its proneness to flooding and frequent rains.</td>
<td>Vegetation treatments will likely to increase runoff. This is primarily a result of reduced evapotranspiration and so the increase would occur primarily as a change to baseflow. As vegetation regrows, the runoff would trend towards existing condition or even decrease until growth slows. Staggering treatments lessens the magnitude of the effects at any given time. The percent change is dependent on many factors. Existing research provided a rough estimate in the change to runoff. Erosion would likely increase as a result of ground disturbance, and be temporary. This is further discussed in the water and soils sections of the EA.</td>
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