

DECISION MEMO

Lathan Loop and Brady Hill Prescribed Burns

USDA Forest Service – Chattahoochee-Oconee National Forests – Chattooga Ranger District – Stephens County, GA

1. DECISION

I have decided to approve the proposal to prescribe burn approximately 325 acres in two sites of existing and potential open woodland habitat on the Chattooga Ranger District in Stephens County, Georgia. Prescribed burning will reduce the woody shrub layer, and help create more open conditions over time. This type of habitat is necessary for optimal growth of the rare smooth coneflower (*Echinacea laevigata*) and associates, such as the Georgia aster (*Symphotrichum georgianum*) and Fraser loosestrife (*Lysimachia fraseri*). Approximately 310 acres in Compartment 213, identified as the Lathan Loop Prescribed Burn, and 15 acres in Compartment 211, identified as the Brady Hill Prescribed Burn, will be burned.

The prescribed burns will be accomplished primarily using existing roads and creeks as boundaries, and will require the establishment of only two short, bladed fire lines and a minimal amount of hand-constructed fire line. Site-specific burn plans have been written for the two sites and burn parameters will be followed as specified in the plans. The 310-acre burn will require approximately 0.2 miles of bladed line and 396 feet of hand-constructed fire line. The 15-acre burn site will require approximately 330 feet of bladed line and 66 feet of hand line.

Additional details of the existing conditions, the proposed action, and location of the sites, can be found in the Project File at the Chattooga Ranger District office.

2. PURPOSE AND NEED FOR PROPOSED ACTION

The purpose of the proposal is to begin restoring the area to a landscape of open woodland-savanna habitat that will provide conditions for an entire suite of rare species, including the federally listed smooth coneflower, Georgia aster, Fraser's loosestrife and curlyheads (*Clematis ochroleuca*). Historically, habitat for the coneflower and associates consisted of dry woodlands, savannas, or grasslands that were maintained in an open condition by lightning-caused fires or by indigenous peoples burning the woods and fields. Due to lack of fire, much of the forest in the proposed burn areas has an extensive woody, shrub layer which prevents the establishment of the coneflowers and associated plants, and does not currently provide this open, woodland condition.

The need for the project is generated by goals and objectives from the Chattahoochee-Oconee National Forests Land and Resource Management Plan (LRMP pp. 2-6 and 2-12 to 2-15) that specifically address open woodland, savanna and grassland restoration, and federally listed and other rare species (Objectives 3.4, 15.1 and 18.1). The need for the project is also generated by the requirement of the Endangered Species Act that Federal agencies "utilize their authorities in

furtherance of the purposes of the Act by carrying out programs for conservation of T&E species”. Because one of the greatest threats to this habitat and these plants is lack of fire (NatureServe 2005), prescribed burning as part of a program for restoring habitat for the coneflower and associates will contribute to conservation of the species.

3. PROJECT EFFECTS AND MITIGATION MEASURES

Prescribed burning will be conducted only under an approved burning plan to meet specific resource objectives, and under the supervision of a qualified burning boss. The plan will plot the trajectory of the smoke plume, identify smoke-sensitive areas, predict fire behavior, and set parameters for burning conditions to minimize risk of resource damage or fire escape. The prescribed burns will not be initiated if the smoke plume will impact a smoke-sensitive area, or when the mixing height is less than 1,640 feet (500 meters) or transport wind speed is less than 9 mph. To control fire intensity, burning is implemented under specific fuel and weather conditions. Burning is allowed when the KBDI (drought index) is 350 or less, fuel test stick moisture is between 7 and 15 percent (for 10-hour fuels), relative humidity is higher than 25%, air temperature is less than 75 degrees, and the 20-foot wind speed is less than 16 mph.

Soil and water quality protection

The CONF’s Forest Plan standards, which meet or exceed Georgia Best Management Practices (BMP’s), will be implemented to protect water quality and prevent erosion. Only two short, bladed fire lines will be needed, and one of them follows an old, existing roadbed. The majority of the burn area will use existing roads and streams as the fire lines, thus requiring no ground disturbance. Burning plans are designed to retain litter and/or duff material on at least 85% of the burn area. If a post-burn evaluation determines that more than 15% of the area has exposed soils, the site will be evaluated regarding the actions needed to mitigate erosion effects.

Air quality

Each prescribed burn will be conducted to adhere to internal Forest Service guidance for air quality and the pollution control methodologies prescribed by federal and state agencies. This includes adherence to the State Implementation Plan to meet the National Ambient Air Quality Standards.

Vegetation including rare plants

The two fire line routes (i.e. areas that will receive ground disturbance) were inventoried in August 2005, and do not contain any rare plants. Burning will be conducted during the dormant season to protect the rare plants that are present within the burn areas (but outside of the fire lines).

A biological evaluation to document any potential effects of this project on Endangered, Threatened, or Sensitive (TES) species or their habitats was completed by the Forest Ecologist/Botanist. There will be no negative effects to any rare plant species present (see Biological Evaluation for details). As a result of the prescribed burns, beneficial effects to vegetation associated with the open woodland-savanna habitat are expected. A project resulting in a beneficial effect to a federally listed species (the coneflower in this case) requires written concurrence from USFWS. Written concurrence dated February 14 was received by the Forest on February 15, 2006.

Terrestrial and aquatic fauna including rare species

Direct mortality of animals from fire is negligible on a population or landscape scale, especially in the case of a low intensity, dormant season fire. Most animals can escape fire by fleeing, finding shelter (e.g. rocks and rock outcrops), or burrowing. Many species such as mourning doves, wild turkeys, owls and other raptors, songbirds and woodpeckers are attracted to areas after a burn due to the well-documented beneficial effects on wildlife habitat. These effects of burning include increased sprouting, fruiting, palatability, and nutritional value of browse species, as well as increased insect production.

Terrestrial TES species such as Rafinesque's big-eared bat and Diana fritillary (butterfly) were considered in the evaluation. Both species have a potential to occur almost anywhere in the Forest and the butterfly is known to occur in the burn areas. No negative impacts to either species are expected as a result of this project (see Biological Evaluation for details).

Aquatic fauna such as fish, mussels, crayfish, and aquatic insects should be unaffected by prescribed burning due to adherence to mitigation measures and Best Management Practices protecting water quality and soils. No rare aquatics are known to occur in the burn sites (see Biological Evaluation for details).

Cultural resources

A Memorandum of Understanding between the Forest Service and the Georgia State Historic Preservation Office concerning the management of historic properties on the Chattahoochee-Oconee National Forests states that: "Prescribed burning in areas which have been previously burned or in areas of predicted low site probability will not likely affect prehistoric sites". The proposed fire line routes were inventoried and no cultural resources were found in the routes. Cultural resources that are present in the burn area outside the fire lines will be flagged prior to burning and fire kept out of sites per recommendations by the Forest Archaeologist.

Scenery Management

Management activities are designed to meet or exceed Scenery Integrity objectives (SIO), which vary by Inventoried Scenic Class. A portion of the Lathan Loop burn (Management Prescription 9.H) area is in Scenic Class 1 and the other portion is in Scenic Class 2, with a SIO of "high" and "medium", respectively. The Brady Hill burn area (Management Prescription 4.D) is in Scenic Class 2, with a SIO of "high".

The mitigation applicable to this project for achieving the appropriate SIO in these areas will be used:

- Consider scheduling work outside of major recreation seasons

Public impacts

The Forest Supervisor's office, Georgia Forestry Commission, County Sheriff's office, County 911 office, local radio stations, and adjacent landowners will be notified prior to ignition of any prescribed burn. The burning parameters in the burning plans are designed to prevent safety problems due to smoke on roads, highways, and in other smoke-sensitive sites in the vicinity of the burn areas. Prior to ignition, reasonable efforts will be made to ensure that no forest visitors are within the burn areas.

4. MONITORING

Before, during, and after the implementation of the burns, the potentially affected resources will be monitored to determine whether the project objectives were met, whether the actual effects agreed with the predicted effects on the environment, and to determine if follow-up action is needed. Monitoring plots have been established to track vegetation changes to determine if the objectives for eventual establishment of woodland-savanna habitat and improved habitat for the coneflower and associated species are being accomplished.

All bladed fire lines will be re-inspected periodically after burning to ensure adequate erosion prevention. Follow-up mulching and fertilizing will be used as needed. All of this monitoring will provide important information for future prescribed burning projects.

5. PUBLIC INVOLVEMENT

Scoping letters were mailed to approximately 21 individuals, agencies and public organizations on December 5, 2005. Scoping both internally and externally raised no concerns that were determined to be extraordinary circumstances. Three responses were received, with two in favor of the project and the third stating they did not need to comment due to the location of the project.

6. REASON FOR CATEGORICALLY EXCLUDING THE DECISION

This project does not individually or cumulatively have a significant effect on the quality of the human environment, and therefore, is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The category identified in Forest Service Handbook 1909.15 “Environmental Policy and Procedures” is Section 31.2, Category 6 – “Timber stand and/or wildlife habitat improvement activities which do not include the use of herbicides.....” In this case prescribed fire will be the tool utilized to enhance habitat, not only for the federally listed coneflower, but also for a suite of other herbaceous plants that occur in association with the coneflower.

7. FINDING OF NO EXTRAORDINARY CIRCUMSTANCES

The District interdisciplinary team (ID team) screened these actions for the presence of any one of the extraordinary circumstances identified in FSH 1909.15, Section 30.3. The ID team found that no extraordinary circumstances exist that might cause the action to have significant effects on the quality of the human environment. Resource conditions that were considered in determining whether extraordinary circumstances related to the proposed action warrant further analysis and documentation in an EA of an EIS were:

- Federally listed threatened or endangered species or designated critical habitat, species proposed for federal listing or proposed critical habitat, or Forest Service sensitive species.
- Flood plains, wetlands, or municipal watersheds.

- Congressionally designated areas, such as wilderness, wilderness study areas, or National Recreation Areas.
- Inventoried Roadless Areas.
- Research Natural Areas.
- Native American and Alaska Native religious or cultural sites.
- Archaeological sites, or historic properties or areas.

The ID team found that no extraordinary circumstances exist that might cause the action to have significant effects. Therefore, these actions are categorically excluded from documentation in an EIS or EA.

8. FINDINGS REQUIRED BY OTHER LAWS

Forest Plan Consistency – I have found that these actions are consistent with the management direction and management requirements of the Forest Plan for the Chattahoochee-Oconee National Forests, as follows:

- The acreage that will be burned in Compartment 213 is within Management Prescription 9.H. This project complies with the Desired Conditions for 9.H (page 3-168) that states “management and/or protection of rare communities and species associates will be provided, along with management and/or protection measures for population occurrences of threatened, endangered, sensitive, and locally rare species”.
- The 15-acre burn in Compartment 211 is located within Management Prescription 4.D, identified in the Forest Plan as areas with an emphasis on perpetuating or increasing TES species, and perpetuating unique plant and animal communities. This project complies with the statement that a desired condition of the prescription includes “viable and increasing populations of threatened, endangered, sensitive, or locally rare species” (page 3-71) as well as “Active management to maintain habitat or increase the numbers or health of known proposed, endangered, and threatened populations commonly occurs with the written concurrence of the USFWS where a beneficial effect to the species has been established”(page 3-72).

Cultural Resources – The actions will not adversely affect any sites listed or eligible for listing in the National Register of Historic Places, nor will they cause the loss or destruction of significant, scientific, cultural or historical resources.

Endangered Species Act – Implementing this decision will not adversely affect proposed, endangered, or threatened species, nor will it result in loss of any other species’ viability, or create significant trends toward federal listing of the species under the Endangered Species Act. The project would have a beneficial effect on the federally listed coneflower. Written concurrence was received from USFWS on February 15, 2006.

Clean Water Act – State-approved Best Management Practices (BMP's) and Forest Plan Standards will be followed to ensure protection of soil and water resources.

National Forest Management Act - This project complies with the seven requirements of the National Forest Management Act related to vegetation management (36 CFR 219.27(b)).

9. ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES

A recent Federal Court decision in Earth Island Institute v. Ruthenbeck invalidated the provisions of 36 CFR Part 215 that excluded categorical exclusions from notice, comment and appeal. The District Court further clarified that its order is to be applied prospectively after July 7, 2005 nationwide. Since this project is now subject to the Court order, I made this project subject to a formal notice and comment period. A legal notice, describing the project and initiating a 30 day comment period was published in *The Northeast Georgian* newspaper on December 5, 2005. A letter containing similar information was also sent to organizations and individuals who provided scoping comments. Because only favorable comments were received, this decision is not subject to appeal.

10. IMPLEMENTATION DATE

This decision is planned for implementation in February or March of 2006, but weather or other constraints may postpone implementation of either or both burns. If unable to implement in 2006, these burns will be implemented as soon as possible within the next five year period during the months of February and March.

11. CONTACT PERSON

For additional information concerning this decision, contact Cindy Wentworth at 706-745-6928.

12. SIGNATURE AND DATE OF RESPONSIBLE OFFICIAL

/s/ 

DAVID SCOTT HILL
Deputy District Ranger

02-23-2006
DATE