

## Decision Memo

### Fiscal Year 2009 Prescribed Burning Project

#### USDA Forest Service

Oconee Ranger District, Chattahoochee-Oconee National Forest  
Putnam, Jasper, Jones, Greene, and Oglethorpe Counties, Georgia

### DECISION

#### Description of Decision

My decision is to implement the actions proposed in my October 16, 2008 scoping letter entitled **Fiscal Year 2009 Prescribed Burning Project**. Those actions include burning approximately 25,476 acres and the creation of new fireline, as necessary. The acres have been slightly modified to correct some errors, to protect newly planted trees, and to take better advantage of existing firelines.

Prescribed fire has long been used as a tool on the Oconee District in achieving multiple objectives. The Land and Resource Management Plan for the Chattahoochee-Oconee National Forests (Forest Plan) sets an objective of burning approximately 16,000 acres per year on the Oconee within the red-cockaded woodpecker (RCW) habitat management area (OBJ-8.D-06) in order to meet the guidelines provided in the U.S. Fish and Wildlife Service's Recovery Plan for the species. Under the Forest Plan, an average of 30,000 acres per year across the Chattahoochee and Oconee Forests combined is to be burned as fuels treatment to reduce the risk and consequences of wildfire (OBJ-58.3) on the Forest and adjacent private lands. Fuels include anything that would readily ignite, e.g. pine needles, dead trees, and broken limbs, that have accumulated over a period of time. Reduction of fuels through the use of prescribed fire also has several other beneficial effects: it improves the quality of forage for many wildlife species, including the RCW; it increases species diversity in the understory; and improves visual quality and access for wildlife viewing, hiking and hunting. In areas of the Oconee where fire is used as a tool, the goal is to burn the areas every 3-5 years. Burning approximately 20,000 acres a year would allow the Forest to meet this goal.

The Oconee District is in the midst of a drought and is recovering from a severe southern pine beetle (SPB) infestation. More acres are planned than are actually expected to be burned to allow flexibility to respond to weather conditions, to burn safely, and to minimize smoke production. Typically, between 10,000 and 20,000 acres are burned each year. Site specific burn plans for each area identify the allowable parameters for burning including wind speed/direction and soil/fuels moisture.

Each prescribed burn is designed to maximize use of natural and existing human created firelines (existing firelines, creeks, roads, and trails) and minimize the need for new dozer created control lines. In some compartments, it may be necessary to

establish a fireline around openings created by recent southern pine beetle suppression actions to protect new growth. Almost all predominantly pine stands on the Oconee District are routinely burned every 3-5 years, generally in the late winter/early spring (February-April), although burning can occur at any time of the year that conditions are favorable.

### **Actions Included in This Decision**

Actions include burning approximately 25,476 acres of predominantly pine stands on the Oconee Ranger District using both aerial and ground ignition. Table 1 summarizes the compartments and acres planned. Maps displaying the compartments where prescribed burns are planned are also attached. Any incidental new fireline needed, will be bladed using a bulldozer. Most refurbishment of existing firelines, or creation of new firelines, occurs after leaf off. Burning, although possible at any time of the year conditions are favorable, occurs primary in the late winter/early spring (February through April). A map showing the location of the compartments currently planned for burning is attached. Additional information regarding each burn proposed is included in the burn plan for that unit, including site specific maps for each unit. All standards in the Forest Plan will be applied. Georgia Best Management Practices (BMPs) for Forestry, Planning and Water Quality, and Streamside Management Zones (SMZs) will be implemented in all operations.

### **Connected Actions**

There are none.

### **Extraordinary Circumstances**

There are none known. A biological evaluation and analysis of the effects on heritage resources is contained in the project file and indicates that there will be no effect on listed species or heritage resources. Specifically, a majority of the acres planned for burning in this decision will provide a benefit to the federally listed, endangered RCW and will allow the Forest to move toward meeting the goals identified in the Forest Plan and the U. S. Fish and Wildlife Service's Recovery Plan for the RCW.

### **REASONS FOR CATEGORICALLY EXCLUDING THE DECISION**

I have determined that this decision may be categorically excluded from documentation in an environmental impact statement or environmental assessment because there are no extraordinary circumstances related to the proposed action and the proposed action is within a category listed in 36 CFR 220.6(e). My conclusion is based on information presented in this document and the entirety of the project file.

## **Category of Exclusion**

Specifically, this project falls within category 6 of 36 CFR 220.6(e): *Timber stand and/or wildlife habitat improvement activities which do not include the use of herbicides or do not require more than 1 mile of low standard road construction.* Examples given include prescribed burning to control understory hardwoods in stands of southern pine and prescribed burning to reduce natural fuel build-up and improve plant vigor.

## **PUBLIC INVOLVEMENT**

Public scoping included listing in the Forest's Schedule of Proposed Actions, and mailing 74 scoping letters to the District's mailing list. A legal ad was published in the Eatonton Messenger with responses requested by November 7, 2008. Four letters and three phone calls were received regarding this project on or before the close of the comment period (project file). A phone call was received on the project after the comment period.

All comments received were considered in the analysis for this project. Most of the comments received were general support of the use of prescribed fire, citing benefits to wildlife and reduction in fire hazard. Several of the comments were more selective in their support. A response to concerns expressed is contained in Attachment A.

## **FINDINGS REQUIRED BY AND/OR RELATED TO OTHER LAWS AND REGULATIONS**

My decision will comply with all applicable laws and regulations.

## **ADMINISTRATIVE REVIEW OR APPEAL AND IMPLEMENTATION DATE**

This type of decision is subject to a higher level of administrative review or appeal pursuant to 36 CFR 215.8. However, no negative comments were received that necessitate initiation of an appeal period. Consequently, this particular decision is not appealable. Implementation of this decision may begin immediately.

## **CONTACT PERSON**

Further information about this decision can be obtained from District Ranger, Oconee Ranger District, 1199 Madison Road, Eatonton, GA 31024; (706) 485-1776, ext. 102.

**SIGNATURE AND DATE**

*/s/ Erin M. Bronk*

November 20, 2008

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ERIN M. BRONK  
District Ranger

\_\_\_\_\_  
Date

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TABLE 1: FISCAL YEAR 2009 PRESCRIBED BURNS PLANNED  
(by Compartment, Forest Plan Management Prescription, and Watershed)

<b>Comp.</b>	<b>Management Prescription(s)</b>	<b>Watershed</b>	<b>Acres Planned</b>
4	3.B, 4.D, 4.H, 8.D, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	349
5	3.B, 4.D, 4.H, 8.D, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	48
9	3.B, 4.D, 4.H, 8.D, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	476
10	3.B, 4.D, 4.H, 8.D, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	317
107	2.B.2, 6.B, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Big Sandy Cr.	1,632
108	2.B.2, 3.B, 4.D, 4.H, 6.B, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Cr./Big Sandy Cr.	671
110	3.B, 4.D, 4.H, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	1,347
111	3.B, 4.D, 4.H, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	1,263
114	3.B, 4.D, 4.H, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	898
117	3.B, 4.D, 4.H, 8.D.1, 9.F, 9.H, 11	Ocmulgee River – Rum Creek	798
135	4.D, 4.H, 7.3.1, 8.D, 9.F, 9.H, 11	Big Cedar Creek	1,386
137	4.D, 4.H, 7.3.1, 8.D, 9.F, 9.H, 11	Big Cedar Creek	1,080
139	4.D, 4.H, 7.3.1, 8.D, 9.F, 9.H, 11	Big Cedar Creek	993
142	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	827
145	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	1,450
146	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	1,427
147	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	637
150	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	480
152	4.B.1, 4.H, 6.B, 7.E.1, 8.D, 9.H, 11	Murder Creek	1,896
153	2.B.2, 5.A, 8.D, 9.F, 9.H, 11	Little R. -- Lower	946
155	2.B.2, 5.A, 8.D, 9.F, 9.H, 11	Little R. -- Lower	1,084
162	2.B.2, 5.A, 8.D, 9.F, 9.H, 11	Little R. -- Lower	999
165	3.B, 4.D, 4.E.1, 7.E.2, 9.H, 11	Oconee R.–Big Cr.	993
166	3.B, 4.D, 4.E.1, 7.E.2, 9.H, 11	Oconee R.–Big Cr.	1,806
174	3.B, 4.D, 4.H, 5.A, 7.E.2, 9.F, 9.H, 11	Oconee River – Greenbrier Cr.	819
182	3.B, 4.D, 4.H, 5.A, 7.E.2, 9.F, 9.H, 11	Oconee River – Greenbrier Cr.	854
<b>Total</b>			<b>25,476</b>

## ATTACHMENT A: RESPONSE TO COMMENTS

A summary of some of the comments received/concerns expressed and our response follows, in no particular order:

- **Make sure that existing wildlife populations (especially any rare, sensitive or endangered populations) and surrounding private property are not negatively impacted by the burning activities.**

A biological evaluation for this project, contained in the project file, found that there would be no negative effects on any listed species. The U.S. Fish and Wildlife Service Recovery Plan for the federally listed, endangered RCW mandates the use of prescribed fire as an integral part of maintenance and enhancement of habitat for the species. The Forest Plan recommends that 16,000 acres of prescribed burning occur within the Recovery Area for the RCW. Following strict burning parameters, as detailed in the burn plan for each unit, facilitates burning the National Forest without adverse effect on surrounding private property. Regular burning reduces wildfire hazard to the surrounding areas and minimizes smoke production.

- **Concern that, even though the Forest is more likely burn on a shorter fire return interval, not all locations need to be burned on a 1-10 year return interval. The Forest Plan suggests that compartments/stands should be burned on a 3 to 5 year rotational basis in perpetuity. It is important to allow ecosystems or individual stand/compartments to naturally build organic soil matter through decomposition and decay as part of an intermittent management sequence. Deviation from the suggested 3-5 year return interval should be exercised to preserve site integrity.**

Historic documentation for the area seems to indicate that the average fire interval for the period prior to 1840 was 2.6 years, the period of 1840 – 1915 was 1.2 years, and from 1915 to the present has been 11.6 years. The effect of the longer burning interval has resulted in a documented decrease in species diversity. It has been pointed out to us that research indicates burning as infrequently as every 3-5 years is continuing to have a negative effect on species in the Piedmont uplands. The soils in this area were highly degraded by the time of Forest Service acquisition with much of the top soil layer missing. Decades of forest management have greatly improved soil fertility in the area. Low intensity prescribed fire does not have a detrimental effect on soil fertility; conversely, it allows a more rapid release of nutrients into the soil. An intermittent burning cycle would allow the fuel loading to build resulting in much hotter prescribed fires. That would result in less organic material on-site to decompose and increased smoke production. Species diversity would suffer as undesirable species such as sweetgum overtopped other species.

- **Limit use of fire to places that have poor soil and areas that are not mesic. Help threatened and rare plant and animal species, both fire dependent and fire intolerant. Limit adverse affects to sensitive waterways and watersheds, especially 2.B.2 management areas in the Forest Plan.**

No negative effects are expected to waterways or watersheds as a result of the prescribed fire program. BMP's are followed in reseeding firelines. Little soil movement has been documented as a result of prescribed burning in the Piedmont region. While fire is not typically initiated in riparian areas (which contain much of the mesic soils found on the Oconee), it is also not eliminated. By burning under strict moisture regimes, these areas retain enough moisture to extinguish low intensity prescribed fires before they proceed very far and without the use of man-made firebreaks. The diversity of species which currently exist on the Oconee have evolved in the presence of fire.

- **Using fire to meet budgetary incentives or for protection of citizens in a Wildland Urban Interface area is not always an appropriate or objective course of action or management approach.**

Prescribed fire is currently the single most efficient and cost effective tool that we currently have available to meet a variety of forest health objectives. Protection of citizens and their property within the Wildland Urban Interface is not only an appropriate course of action but is mandated by our regulations and is keeping with the direction provided in our Forest Plan.

- **Improving visual quality in a forest for wildlife viewing, hiking, and hunting are not legitimate uses of prescribed fire due to the fact that they are strictly anthropocentric and are not ecologically oriented objectives. Tax dollars shouldn't be spent increasing understory diversity for common species, even as a by-product.**

Not all objectives are required to be ecologically oriented. Under the Multiple Use Act, the National Forests exist for use and enjoyment by the public. Caring for the land is the other half of our mandate. That includes all native species, not only those currently designated as sensitive, rare or endangered. The dual objectives of caring for the land and serving people are not mutually exclusive.

- **How is this project being coordinated with the current Large Scale Assessment you are currently undertaking?**

As we said at the start of the Largescale Assessment process, work will continue on the Forest while that Assessment is in progress. The current decision is limited to one year's program of burning in deference to that process.