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*The mission of the Wildlife and Freshwater Fisheries Division is to manage, protect, conserve, and enhance the wildlife and aquatic resources of Alabama for the sustainable benefit of the people of Alabama.*

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***VIA Electronic Filing***

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington DC 20426

RE: MARTIN DAM PROJECT (P-349-150), Final Study Plan 7 - Wildlife Management Plan

Dear Secretary Bose,

The Alabama Department of Conservation and Natural Resources (ADCNR) received the final Study Plan 7: Wildlife Management Plan from Alabama Power Company (APC) regarding the Martin Project P-349-150. ADCNR's comments with regards to the final Study Plan 7 - Wildlife Management Plan are as follows:

- 1.0 INTRODUCTION**
- 2.0 PURPOSE OF THE PROGRAM**
- 3.0 BACKGROUND AND EXISTING INFORMATION**
- 4.0 WILDLIFE MANAGEMENT OBJECTIVES**

ADCNR approves of the language as stated in the above mentioned sections of the management plan.

**5.0 MANAGEMENT ACTIONS**

**5.1 Longleaf Pine Core Area:**

ADCNR requests more detailed information regarding the acres in the 2 core management areas. Of the 7454 acres of project lands, ADCNR would like to know how many acres are in the "Longleaf Pine Core

Area?” Of the project lands in the “Longleaf Pine Core Area,” how many acres are in the desired forest condition of longleaf pine?

APC states that the objectives are to enhance and restore longleaf pine in the core management area (4.0 Wildlife Management Objectives). Under 5.0 Management Actions, 5.1 “Longleaf Pine Core Area,” APC states that they will manage toward a desired forest condition that is consistent with good quality foraging habitat (GQFH) as described in the US Fish and Wildlife Service Red-Cockaded Woodpecker Recovery Plan (USFWS, 2003). Therefore, prescribed burning is both an essential and critical component of this management plan and ADCNR recommends adding a prescribed burning section under 5.1 “Longleaf Pine Core Area” that further details the management of these core acres. Specifically, ADCNR recommends increasing the annual burn acreage target. This should be, at least, 1/3 of the desired forest condition longleaf pine acres - annually. During the restoration phase (because it is fire suppressed), burning should/could be accelerated to 1/2 the area annually. Once restored (duff reduced), burn rotations can be extended to 1 burn every 3 years, and moved into the growing season.

ADCNR has concern relating to the current harvest cycles stated on page 9 of the Wildlife Management Plan. Management strategies in longleaf pine communities, particularly those being managed for RCWs, should strive to retain the largest and oldest pines during each harvest entry cycle. These trees can become future cavity trees because they are the most attractive for natural cavity excavation, especially after they reach 80-100+ years old. For this reason, ADCNR recommends that the rotation age for longleaf pine be set at 100+ years, with the largest and oldest longleaf pines being favored for retention during harvests. Basal area reduction, to progress towards the definition of GQFH, will still require the removal of longleaf pines that are younger than 100 years. The US Fish and Wildlife Service Red-Cockaded Woodpecker Recovery Plan, criteria “a” under GQFH addresses the retention of older, larger pines.

ADCNR approves of the language on pages 13 and 14 describing the specific characteristics of GQFH and possible enhancement efforts taken from the US Fish and Wildlife Service Red-Cockaded Woodpecker Recovery Plan.

## **5.2 Irwin Shoals “Secondary Management” Area:**

APC states the goals of the Secondary management area are to maintain water quality buffers and wildlife habitat (page 11 of Wildlife Management Plan). ADCNR recommends that language be inserted that states the desired forest condition for Irwin Shoals, Natural Undeveloped lands to follow the same format as the 5.1 Longleaf Pine Core Area. ADCNR also recommends that language be inserted that states timber harvest would not be conducted within 300 feet of the streams to protect wildlife habitat.

## **5.3 Addition of Public and/or Handicapped Hunting Areas:**

Regarding the physically disabled hunting area, ADCNR appreciates the good faith effort expressed in the plan to support hunting opportunities to individuals with physical disabilities. We recommend firm dates for when these locations will be available.

ADCNR strongly supports the inclusion of hunting on project lands for *both* big and small game wildlife species. ADCNR understands that weapon choice could be an issue in some areas but the use of shotguns, primitive weapons, and archery equipment are viable alternatives or solutions to this concern. Another benefit of public hunting to the landowners of Lake Martin is the nuisance wildlife

consideration. For example, in the absence of adequate hunter harvest of white-tailed deer, deer numbers will exceed carrying capacity. As carrying capacity increases, damage will occur to the habitat that negatively impacts multiple wildlife species. Not only will wildlife habitat be damaged, homeowners will also experience increasing nuisance wildlife encounters. Hunting is the most efficient management tool that will help to better control this continuing growing wildland / urban interface issue.

#### **5.4 Bald Eagles:**

ADCNR approves of the language as stated in this section of the management plan.

#### **6.0 IMPLEMENTATION TIMELINE:**

ADCNR approves of the language as stated in this section of the management plan *except* for the number of prescribed burning acres stated. See above comments in 5.1 Longleaf Pine Core Area.

#### **7.0 CONSULTATION AND REPORTING:**

ADCNR agrees with meeting annually to discuss status of wildlife management activities and progress.

Thank you for your consideration of these comments.



Ericha Nix  
CWB®

#### **REFERENCES:**

United States Fish and Wildlife Service (USFWS). (2003). Recovery plan for the red-cockaded woodpecker (*Picoides borealis*): second revision. U.S. Fish and Wildlife Service, Atlanta, GA. 296 pp.