



STATE OF ALABAMA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
WILDLIFE AND FRESHWATER FISHERIES DIVISION

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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.

M. N. 'CORKY' PUGH
 DIRECTOR

FRED R. HARDERS
 ASST. DIRECTOR

February 10, 2009

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

Rick Claybrook, Supervising Wildlife Biologist,
 DIV.
 Ericha Nix, Wildlife Biologist
 ADCNR, DWFF, Wildlife Section
 1820 Glynwood Drive, C
 Prattville, AL 36066

RE: MARTIN DAM PROJECT (P-349-150)

Dear Secretary Bose,

On January 7, 2009, the Alabama Department of Conservation and Natural Resources (ADCNR) and other stakeholders attended the Martin Project P-349-150 Final Study Plan Meeting hosted by the Alabama Power Company (APCo). ADCNRs comments with regards to the study plans and discussions at the meeting are as followed.

MIG 1: Study Plan 7 - Wildlife Study Plan for APCo Project Lands

- ADCNR requests specific baseline compartment and stand data to evaluate wildlife habitat on the project lands. Data needed for each compartment:
 - ❖ Current timber and wildlife management plans.
 - ❖ Stand history to include past management objectives and silvicultural treatments.
 - ❖ Stand composition and structure.
 - 1 . Age class of each forest type.
 - 2 . Basal Area of Pine (for Pine classification break down longleaf pine or other pine)
 - 3 . BA of Hardwood - broken down into Basal Area of soft and hard mast species.
 - ❖ % ground cover broken into cover groups (forbes, legumes, grasses and woody stems). (If not available a study should be conducted).
 - ❖ Maps to show the spatial arrangement of forest types in each compartment or tract.
 - ❖ An explanation of data collection methods for all data collected.

- As per Alabama Power Company, they asked that we (ADCNR) be as detailed as possible in the management plan structure. ADCNR's recommendations regarding the Wildlife Management plan for the project should contain the following structure:
 - ❖ **Introduction**
 - Purpose of plan
 - Background Information on history of the Martin project.
 - ❖ **Broad Statement of Project Goals and Objectives**
 - ❖ **Size of Property and Acreage of Habitat Types**
 - ❖ **Stand and Composition Data**
 - Past History of Land Use
 - Include past habitat management practices conducted (Where when and how much brush control, for example, has been implemented, and by what method (burning, mechanical, chemical, etc.).
 - Any other land use practices that have directly impacted or altered the land or plant life.
 - Description of the Habitat.
 - Stand and plant data (% cover data), Invasive plant species present, etc.
 - Specific Stand and Wildlife Goals
 - Target Wildlife Species.
 - RTE Management Actions - The presence or potential presence of federal or state listed species.
 - Habitat Management Recommendations
 - Identify habitat management practices (be specific such as prescribed burning, mechanical brush control, chemical applications, disking, etc.) specific to the project lands goals and objectives and beneficial to the entire spectrum of wildlife and wildlife habitats that occur (recommendations of practices should affect the basic wildlife requirements – food, cover, water and special arrangement of the listed components).
 - If a management practice is not an option, such as prescribed burning on a particular compartment or tract, a clear alternative should be stated such as the use of herbicides.
 - Invasive plant control plan.
 - Define BMPs so that other stakeholders will know what was followed.
 - Adjacent Lands – Management agreements (if applicable).
 - Implementation timeline of management practices projected for the next 5 years and updated every 5 years.
 - ❖ **Present a yearly report to update stakeholders on habitat management progress as a way to monitor and measure on-the-ground management productivity.**

MIG 4: Study Plan 13 – Shoreline Management Plan

ADCNR and other stakeholders discussed the need of protective measures to lessen negative impacts to terrestrial and aquatic wildlife species such as herpetofauna associated with the riparian and shoreline areas on the project lands when development is permitted. This would include the establishment of a minimum natural buffer zone for the project site and development of BMPs specifically for riparian and shoreline areas, with penalty provisions that mandate proper implementation.

It was discussed at the meeting with FERC, U.S. Fish and Wildlife Service, Alabama Department of Conservation and Natural Resources, Alabama Power Company and others, that a complete buffer zone analysis study should be conducted to determine the best course of action. The study should ask two questions. 1. What terrestrial and aquatic wildlife species utilize these riparian and shoreline habitat types (i.e. Rocky outcrops, red clay banks, pine forested habitat, hardwood forested habitat, elevation of shoreline habitats – steep to gently sloping, etc.)? 2. What size of buffer zone is best for these wildlife species? We also recommend that sampling be conducted on developed versus undeveloped areas to make a comparison between the two.

MIG 5: Study Plan 14 – Recreation Plan

Provide public access to *all citizens* to Lake Martin through APCo properties for fishing, camping, and other recreational opportunities.

Increase Public hunting opportunities. The Alabama Power Company at one time provided *all citizens* public access to its properties associated with the project for hunting at no cost.

OTHER:

A new publication that could be used to help guide habitat management activities for amphibians and reptiles in the southeast is the *Habitat Management Guidelines for Amphibians and Reptiles of the South Eastern United States*. Technical Publication HMG-2, created by Partners in Amphibian and Reptile Conservation (PARC). These guidelines are regionally specific, use the best science available, present measures to help maximize compatibility with existing management objectives, or to optimize management actions specifically for herpetofauna, and provide guidance on the management and restoration of habitats such that amphibians, reptiles, and many other wildlife species may benefit. Guidelines are based on the best available science, peer reviewed expert opinion and published literature.

A copy of this publication can be purchased from their website by contacting Delinda Franklin @ High Cotton, dfranklin@highcottonusa.com, phone: 1-877-838-2345, fax: 205-836-5587, web address: http://www.parcplace.org/habitat_management_guide.html

Thank you for your consideration of these comments.

Sincerely,



Rick Claybrook
Supervising Wildlife Biologist,
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Ericha Nix
Wildlife Biologist