

4260 Laurel Brook Drove  
Smyrna, Georgia 30082

December 19, 2017

Betty Jewett, Forest Supervisor  
1755 Cleveland Highway  
Gainesville, GA 30501

Attn: Angie L. Bell

Subject: Your File No. 1950  
Scoping Notice of Oct. 30, 2017  
Foothills Landscape Project

Dear Ms. Jewett:

Thank you for your scoping letter of October 30<sup>th</sup>, subject project.

My awareness of this project precedes the Community Conversations event held in Gwinnett County on October 29, 2016, which I attended.

I have reviewed the Proposed Action for the Foothills Landscape Project document, and submit comments on it as follows:

On page 6, Under the title “Adaptive Management Approach”, you state “with a few exceptions, the descriptions do not include the exact stands or locations where implementation would occur”. The exceptions I found were Forest Service roads, recreational sites, and some old growth stands. There, and there only, you were specific. Elsewhere in the document, you state what you propose to do, with no certainty regarding locations in the 143,500 acres of the landscape.

FSH 1909.12 Chapter 40, section 41, describes adaptive management as “a structured, iterative process for decision making to reduce uncertainty through structured hypothesis testing and monitoring of outcomes.” While that is roughly what you describe, particularly in the last paragraph under that title, the degree of uncertainty that exists with the lack of where information will force the iterative

process into near countless steps. You will need to put some boundaries on this thing somewhere.

The scoping notice letter indicates that an environmental analysis in preparation. I hope that is a slip of the pen, and you mean environmental assessment. "Uncertain" appears in the decision diagram I have for the NEPA process. Uncertainty is very much an element of this proposed project. A proper EA for this project should be the next step. Please include in that document where you propose to do what.

Yours truly,

A handwritten signature in black ink, appearing to read "Denny Rhodes". The signature is stylized and somewhat cursive.

Denny Rhodes

770-435-2445