Dear CONF Forest Supervisor Jewett

I have read/reviewed the Foothills Landscape Project Environmental Assessment and attached documentation and appreciate the extraordinary effort that you and your staff have put into this project. I also attended several Foothills public meetings and related field visits in past years to better understand your goals and intentions. I’ve observed that the FS staff is well intentioned and extremely professional in approaching this project and fostering public participation in the Foothills. Nonetheless, I have significant concerns about the

Foothills EA and these are organized below for your consideration.

1. Future Public Involvement

Going forward, I’ve noted in the Foothills Process Guide that the FS will hold annual meetings in each District to present draft of its out year action plan and any collaboration opportunities. It will also have at least one field trip per year that the public can participate in. It will track and monitor its activities for subsequent reporting and public information. I appreciate your intention to keep the public informed. However, the public wants to be involved as well and the present degree of interest and comments about Foothills is a strong indication of this. We the public want to know that if Foothills implementation calls for treating a Forest stand that we value, then our voices will have standing—legal standing if need be. I am deeply concerned that the Process you propose for Foothills will cut out that future public standing that NEPA provides, once this general Environmental Assessment is approved. Please consider altering the “process” to allow for public review and FS due consideration of public comments before FS implementation of treatments on selected Forest stands. Do not sideline the public in your process.

Data drives the FS in its approach to selecting areas where it has identified conditions that will dictate the “treatments” that it will apply on our Forest. Its database approach and associated decision trees in Foothills documentation are logical, however the context for FS action is omitted from the Foothills Plan. By Context I mean: the presence of streams, rare plants (that botanical surveys may have missed), rare animal habitats (like the Hellbender salamander), old growth that was previously not recognized, oak stands with outstanding qualities, etc. Without Context, the Forest Service cannot fully understand the impact of their actions. So to drive ahead for the next 10 to 20 years with a data-based plan that will continue until the FS goals are achieved is unwise at best and potentially a disaster.

Local people and others who spend a significant time in the Forest can be called upon to provide the “context”. I hope that you will respect and take seriously our input before deciding where you will do logging, burning, chemical applications, and temporary road-building that goes along with these activities.

2. Foothills Plans for Logging the Forest

There is a massive amount of logging that is described within the Foothills Landscape Project Environmental Assessment (EA) and specifically the Vegetation Plan.

As I read it, the FS plans to log vast amounts of Oak and Pine forest as part of the Foothills Landscape Project. For example, I understand that over 50,000 acres may to be logged, taking out half the tree cover in order to open up the canopy. The extent of thinning threatens to leave these Forest areas looking like messy, unkempt urban park—not the North Georgia Forest we know and value. Foothills This is not something I want to see or a legacy we should leave.

An additional 8,300 acres of mid-age and late age (100 years old) Oak and Pine are proposed in the EA to be logged (85 to 90% canopy removal) in order to let the very young trees thrive better and create a young forest habitat. This sounds like the FS is approaching Forest management like a farmer—to get even aged stands, perhaps for future harvesting. This was a mistake 50 years ago and would be a mistake today.

There is a legitimate need for young forest and I understand the FS has young forest goals you want to accomplish in the Foothill. However, perhaps better solutions than cutting older mature trees would be to a) plant young Oaks on pine plantation land that the FS wrongly created many years ago and now wants to re-engineer for the Foothills Project; and b) culture desirable young trees on Forest land that has already been degraded.

The FS poses a number of reasons for cutting vast acres of healthy older forest, but the validity of these reasons is questionable. For example, in the EA the FS says that young trees will be more resistant to stress and disease – but there is no scientific basis for this assumption. I have searched but found no science that supports such an assumption for our Forest.

The FS may also have exaggerated in its expectation of Oak decline, perhaps with an objective to strengthen its case to create early successional habitat and open woodlands that will appear more park-like. The Foothills EA documentation provides no strong evidence of Oak decline that is a reasonable excuse for logging.

The EA uses an argument that the Gypsy Moth is a great threat to our oak forest and states there will be a “probable invasion of Gypsy Moth.” But there is no evidence offered and there have been no significant outbreaks of infestation in our areas of the Forest to warrant logging thousands of acres of healthy Oaks. This does not appear to be a valid argument and basis for Forest management and achieving Forest logging goals.

The FS in the Foothills Plan also proposes to use a method they call “Expanding Gap Treatment” on 14,600 acres of Forest, as a solution to regenerate oaks and pines in areas where fire cannot be used. This appears to be a formula for combined tree cutting and herbicide application under research by the Southern Research Station. With all due respect, if this is an experimental approach to Forest management in our region, without proof of success or full understanding of impact, then it makes sense to try the approach out on a much smaller area than the proposed 14,600 acres in the Foothills.

3. Herbicide Treatments

The Vegetation Plan that supports the Foothills Environmental Assessment calls for pesticide applications on over 65,000 acres. Some limited applications may be necessary and understandable, for example to treat diseased Hemlocks and Ash trees, and support fuel reduction. But the sheer amount of Forest that will be treated with chemicals under the Foothills Plan is disturbing and shocking to me.

The FS references the US EPA as its guide for what chemicals are safe to use and how to use them. However, the fact that our EPA has not banned a chemical does not necessarily make it OK for our Forest ecosystem. I understand that the FS is required to do an independent assessment of the safety of pesticides rather than relying on EPA and FIFRA registration alone. (Ref. USFS website page on Pesticide Management and Coordination)., and it appears that the risk assessment methodology developed for the FS in 2011 by Syracuse Environmental Research Associates is serving as this independent assessment.

Knowledge of the impacts of chemicals on our ecosystem grows and new knowledge must be considered—and there is a lot of new knowledge since 2011. For example, the significant chronic risk of the widely used herbicide Atrazine on amphibians, fish, mammals, birds and terrestrial plant species was finally recognized and reported by the EPA in 2016. This illustrates how important it is for the FS to recognize and use current science in its decision-making and before implementation. Although the FS states that it uses “best available science” in its plans and risk assessments, a 2011 risk assessment may not be the best available.

Another aspect of the Forest that the FS may not have considered in its Foothills plans for chemical use on 65,000 acres is the underground Network of fungus and microbes that permeates the Forest floor. Research was brought to light about 15 years ago and research in the years since has demonstrated how the mycorrhizal networks work in forests. Current research is discovering the importance for forest survival, growth and defense. (Ref. Science Magazine 2019, Scientific American 2015, Smithsonian 2019). Increased knowledge of these networks should drive FS conservation management practices. We do not know the potential damage on this network from the types of logging and chemical application the FS plans on the 157,000 acres of Foothills Landscape, but this should be considered and “best available science” applied.

The FS has goals to achieve, but in driving ahead to achieve its goals we hope that it will consider how little it knows about the potential impacts of its actions when it comes to applying herbicides extensively on our Forest lands. Once the damage is done, you cannot undo it.

4. Effectiveness Reviews for Foothills Actions

For over 30 years I have done work professionally in the field of Environmental and Safety Management and I know that a key step in any management system is to review the effectiveness of actions before moving on with new or additional actions. But nowhere in the 1000 plus pages of Foothills documentation does the FS write about plans for Effectiveness Review for this project. How and when will the FS look at the results of its treatments to our Forest? When and who will determine whether the results are what we expect? And if they are not, who will stop ineffective or damaging action and reassess before any more action is taken? Where is the contingency plan that addresses stop work, mitigation of the problem and correction if aspects of the FS master plan for Foothills are flawed? To not have effectiveness review and to not consider contingency planning is simply not good management planning. In past history we have had many examples of bad Forest management in our Southern Appalachians. I do not want to see our Forest have to endure the ramifications of mismanagement, again. Please incorporate regular and meaningful effectiveness reviews for every aspect of Foothills implementation. Otherwise, this can be a waste of our taxpayer dollars and more importantly, an ecological mistake.

Thank you for your consideration of my concerns and for your care for our Forest.