

BLUE RIDGE

Therapeutic Wilderness

Forest Supervisor Betty M. Jewett
Chattahoochee-Oconee National Forests
1755 Cleveland Highway
Gainesville, GA 30501

January 10, 2020

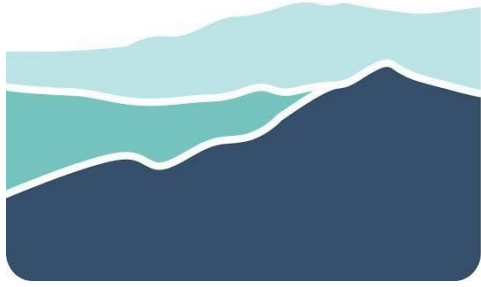
Dear Supervisor Jewett-

I am writing on behalf of Blue Ridge Therapeutic Wilderness / Second Nature Blue Ridge. We are a licensed treatment program that serves adolescents and their families. We use the wilderness setting to provide a clinically-focused intervention, teaching clients accountability, communication skills, and healthy emotional and behavioral habits. We operate in the Chattooga and Blue Ridge Ranger Districts of the Chattahoochee-Oconee National Forest under a Special Use Permit for Outfitting and Guiding. Since 2008, we have paid \$2.6 million in permit fees and our staff and participants have donated countless hours of volunteer trail work and trash clean-up. We are deeply invested in the health and conservation of our forests, and committed to co-existing with other users to the maximum benefit of all.

We recognize that some level of management is needed to protect the watersheds, native species, recreation, and scenic value of our public lands. We witnessed firsthand the risks of fire in the 2016 season and were deeply appreciative of the incredible work done by the Forest Service and supporting agencies to manage those fires. We utilize Forest Service roads on a regular basis to bring supplies and personnel to our groups out backpacking. We are delighted to see stream restoration efforts protecting our drinking water, without which we could not operate. We appreciate and respect the active role that the Forest Service takes in managing these precious shared resources. That being said, we have grave concerns regarding the proposed Foothills Landscape Project.

Some of the areas slated for logging, prescribed burns, and other treatments are in the heart of our field area. This could have a significant effect on our ability to operate. The way the proposal was formulated, it is very difficult to determine exactly what treatments are being prescribed in what areas. Therefore, we are unfortunately limited in how specific we can be with our comments and concerns. With that in mind, we do have some generalized concerns about how this proposal could affect our operations.

Although we understand the Forest Service operates under the EPA guidelines for herbicide use, research into the effects of these chemicals is developing rapidly and we are concerned that policies are not keeping up with the most current research on potential human health effects. The basis of our program is backpacking, so we filter our drinking water from the creeks and springs. Potential large scale herbicide application upstream of our water sources could have significant adverse effects on the safety and health of our participants and staff.



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We are also concerned about the scale and methods of logging proposed and the effectiveness of the intended planting and regeneration efforts. There is simply not enough information available to make specific comments. We are concerned that, as the project stands now, we will not have future opportunities to comment as more specific plans become available. Secondary concerns like traffic and road damage from logging trucks are also a factor for us.

We are proud of our long-standing partnership with the Chattahoochee-Oconee National Forest; we would not be here without it. We believe that this project is too large and too undefined, and we are deeply concerned that we will be cut out of future decisions. We believe it is imperative that this large project is broken up into smaller projects to be rolled out over a reasonable time frame with more specific and detailed EIS for each proposed area. This would improve our ability as stakeholders to participate in a meaningful manner and support our ultimate goal of protecting the health and safety of our participants and staff, and our ability to operate as a program.

Abigail Miner

Field Director

236 File Street
Clayton, GA 30525