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RE: draft Environmental Assessment for the Foothills Landscape Project

The Chattooga Conservancy is a signatory of the Southern Environmental Law Center's comments on the draft Environmental Assessment for the Foothills Landscape Project (FLP).

The Chattooga Conservancy submits these comments as well, for the record, as follows:

The Chattooga Conservancy is a non-profit conservation organization whose mission is *to protect, promote, and restore the natural ecological integrity of native Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands.* The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattooga River watershed, including the Chattahoochee-Oconee National Forest. Our organization's members, as well as staff and board of directors, participate in a wide range of activities on the Chattahoochee-Oconee National Forest, including those areas that would be impacted by the proposed FLP. We represent approximately 600 total members who support our work.

Generally speaking, we agree with the Chattahoochee National Forest's stated goal of "restoring the biological integrity, resilience to disturbance, connectivity, and soil and water quality across the Foothills Landscape." In addition, we would encourage efforts that are designed to "aid in the recovery of degraded, damaged and/or destroyed ecosystems and watersheds." We note that from October 2016 to the present, Chattooga Conservancy staff, and some board members and individual members, attended and participated in at least four (4) workshops, four (4) "community conversations" meetings; three (3) field trips, one (1) science symposium, one (1) public forum and one (1) meeting whose purpose was to discuss concerns with the FLP's compliance, or lack thereof, with the National Environmental Policy Act (NEPA) process.

We also submitted detailed written comments in December 2016, March 2017 and December 2017 addressing the *Foothills Landscape Collaboration* initiative, the *Draft Restoration Plan for the Foothills Landscape Project*, and the *Proposed Action for the Foothills Landscape Project*, respectively. Chattooga Conservancy has participated persistently and in good faith to offer input and feedback to Forest Service planners, Forest Service managers and other project stakeholders concerning the goals, considerations, implications and actions for each supporting draft of the FLP, which the agency has considered—or disregarded—in creating the project's current draft Environmental Assessment (EA). Therefore, Chattooga Conservancy incorporates herein our previous written comments by reference.

The Chattooga Conservancy recognizes the positive aspects of the FLP, including but not limited to protecting *some* old growth; planting an experimental plot of American chestnut trees; replacing

culverts to facilitate passage of aquatic organisms; adjusting forest roads and decommissioning trails and dispersed camping areas to restore soil and water resources; and, initiating a native river cane restoration project. We look forward to working collaboratively with partners at the Chattooga River Ranger District on these activities.

However, throughout the FLP's "collaborative" process as well as the ongoing NEPA process, we have identified a number of emergent and significant issues and unfortunately many contentions, that have not been adequately addressed, and/or have been totally excluded in the draft EA. We now submit these comments, as follows:

- The Foothills Landscape Project requires preparation of an Environmental Impact Statement.
- The FLP draft Environmental Assessment violates provisions of the National Environmental Policy Act (NEPA) by not providing the public with site-specific information about where proposed timber harvesting, burning and herbicide treatments would occur, as well as many other proposed actions including 350+ miles of bulldozed fire lines, temporary road construction, trail construction and trail re-routing.
- The Foothills Project violates NEPA by denying the public participation opportunities that are *guaranteed by law* (NEPA) for implementation of management actions for the duration of the project, which could be 10-15 years or more.
- The Foothills Project should not employ silvicultural practices that implement repetitive herbicide and burning treatments to cultivate crop trees of pines and oaks, at the expense of restoring native biological diversity. We disagree with most of the project's forestry treatments, which abandon the restoration of a diverse, native broad leaf forest (that has multiple layers of dominant and co-dominant trees, shrubs, herbacious Appalachian understory and ground cover) and instead are geared towards producing a forest of even-age crop trees dominated by a few commercial tree species.
- While the FLP draft EA purports to protect 5,005 acres of existing old growth *in the project area*, 970 acres of this is clearly not within the Foothills Project boundary. We note this incorrect quantitative statement in the EA and associated FLP summary documents, and request the preservation of all existing old growth stands in the project area.
- The FLP should preserve 630 acres of existing old growth trees in the Chattooga watershed portion of project area, as documented by the Forest Service study entitled *An Assessment of the Old Growth Resource on National Forest Lands in the Chattooga Watershed*, produced by the Chattooga Ecosystem Management Demonstration Project, USDA Forest Service Region 8, Carlson *et. al.*, 1995.
- The FLP should incorporate the cultivation and restoration of old growth stands, connected in a mosaic of intact native forest across the landscape.
- The FLP should not use a prescribed burning regime that far exceeds natural fire cycles in the Chattooga River watershed, which is a temperate rain forest. We hold that natural fire cycles in the Chattooga watershed are 15 to 20 years, or more.

- The FLP should not employ the repeated, heavy use of herbicides that many scientists believe have carcinogenic properties.
- We disagree with and question the Forest Service's in-house ecological modeling that specifically promotes crop tree management regimes disguised as ecological restoration.
- The FLP must adequately address *restoring a true native forest* connected across the landscape to mitigate the effects of climate change, and to help provide migratory corridors for plants and animals to adapt to changing habitats.
- The Forest Service should not log, burn and construct roads in potential wilderness areas, and in inventoried roadless areas.
- Regarding the FLP's intentions to restore a native rivercane ecosystem: As Forest Service planners must surely know, the Chattooga Conservancy has been working for several years in cooperation with the Andrew Pickens Ranger District, Eastern Band of the Cherokee Indians and Revitalization of Cherokee Artisan Resources, to advance a multi-year project to restore 29 acres of river cane along the Chattooga Wild & Scenic River near the Highway 28 Bridge in South Carolina. Based on direct experience gained from our ongoing project, we disagree that burning *must* be used as a component of a native cane restoration effort. In addition, there is no definitive science to support the mandatory use of fire for cane restoration efforts.
- Lastly, as Chattooga Conservancy has asserted on numerous occasions, the Chattooga River watershed in the Rabun County portion of the project area *is not even located in the Foothills Landscape ecoregion*, as defined by numerous authorities including Dr. Charles H. Wharton in his seminal work, *The Natural Environments of Georgia*. This is inextricably related to the range of native vegetation, as explained in previous comments.

Please accept these comments on the draft EA for the FLP, in order to truly work towards reaching consensus on protecting and restoring our native forest landscape, native fauna and aquatic resources. We look forward to your reply.

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