

From: [Tom Sahlin](#)
To: [FS-comments-southern-chokeee-watauga](#)
Cc: [marm@frontiernet.net](#); [Joe Morris](#)
Subject: [External Email]Pond Mountain Project
Date: Friday, February 17, 2023 3:01:12 PM

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February 17, 2023

To:
Keith Kelley
4400 Unicoi Drive
Unicoi, TN 37692
SM.FS.r8cherwatcom@usda.gov

Concerning:
Proposed Pond Mountain Project

Mr. Kelly,

First please confirm receipt sent via email on February 17, 2023 at 3:00 p.m.

I am writing to question the proposed Pond Mountain Project. I understand there will be timber harvesting, prescribed burns, and chemical treatments.

First I will say Dennis Cove and the Pond Mountain Wilderness is a place near and dear to my heart. It was the first place I remember hiking as a boy scout over 60 years ago. I remember hiking from Dennis Cove Road up to Frog Level as well as to Laurel Falls. It was a very special place and I remember the rail road ties still on the trail which are almost all gone now.

I have been recently informed that the forest service has plans to harvest mast bearing timber. First I will question that from several standpoints. Laurel Fork is a game preserve and as such needs trees mast producing trees. It feeds turkeys, deer, bear, squirrels, and smaller animals that feed hawks, owls, and other small animals such as foxes, weasels, and such. Bear in particular need the mast to survive as well as deer. If the mast fails they starve or tend to go to lower elevations where they can get in trouble in traffic or invading residence garbage cans. If those mast producing trees are removed where are those animals supposed to find food?

I question also the harvesting of timber close to the Appalachian Trail. I am a hiker as well as a trail maintainer. I covered 500 miles of the trail from the Virginia state line to Sams Gap in 2023. I probably have that many for 2022, 2021, 2020 and possibly earlier years. I have hiked to Laurel Falls so many times I have lost count with probably over 100 times. I have shown the area to new residents that move here as well as other residents in the area. It is a beautiful area that is just as beautiful as Rocky Fork. It attracts many hikers all year long. There are so many in summer months that it is not possible to find a parking place at many trail heads. Many of those hikers come from states other than Tennessee. They come, they hike, they spend money. Spoiling the beauty of the Pond Mountain Wilderness and surrounding area will keep them from coming. Also if timber is harvested close to the trail at

White Rocks Mountain are you going to take precautions to keep from spoiling our hard work building trails which include, bridges, turnpikes, water diversions to stop erosion, rock and wood steps, and clearing of blowdowns over trails. It is a continual process involving hard work and many who put in many hours to keep the Appalachian Trail not only passable but a beautiful place to walk.

I question also the use of chemical spraying to lessen the amount of rhododendron. Rhododendron and Laurel is beautiful. When hiking it gives shelter from the cold winds and in summer it provides cool shade. It gives the trail a garden like beauty that appears to have a gardener tending it all year long. It rewards us with beautiful blossoms each spring which attract many people to admire the incredibly beautiful blossoms. They come. They see. They spend money. There is even a festival dedicated to their honor named the Rhododendron Festival. You may have heard of it. Roan Mountain is famous for it. To spread poisons over it is unconscionable. Not only does it ruin the beauty of it but it leaves residual chemicals in the water and soil. It protects the soil from erosion. You plan on using Imazapyr which when it breaks down one of the chemicals it releases is nicotinic acid which is highly toxic to pollinators from bees to butterflies. I read that it can persist in soil for 1 to 5 months and in water for 3 to 8 days. What will that do to fish and amphibians? I request that you analyze and disclose all potential effects of herbicide overspray and/or run-off on all fish, amphibians, and aquatic macroinvertebrates. What will it do to the animals that drink that water? What about the hikers that drink the water that come from the springs on the trail? What will it do to crayfish in the beautiful clear streams of Dennis Cove and Pond Mountain? I know you can restock fish but will you restock crayfish? There are some crayfish in Tennessee that are threatened or endangered so will you restock those if they are there? Will you filter the water to catch any that die to see how many you need to restock? How are you going to apply these chemicals? Aerial spraying or some other method? How will you protect humans from the application of the chemicals?

I also understand that you will be applying glyphosphate. How will you protect insects such as butterflies from the application? Glyphosphate I read can cause permanent eye damage as well as lung inflammation. How will you protect hikers from those chemicals? Will you insure that the other chemicals that go with that application such as POEA which breaks down the cuticle of the leaves to allow it to go into the plant and is toxic to fish even more than the glyphosphate? Glyphosphate is banned in Europe and in California because it is classified as a carcinogen. How will you protect the residents from that carcinogen? How will you protect the hikers? There are 5 hostels in area and a bed and breakfast. How will you protect those? Will you protect their water supply since I understand glyphosphate persists in soil for 1 to 5 months and in water 3 to 8 days. I read that it is not broken down by sunlight or water and can leach into ground water. When it does break down formaldehyde is one of the chemicals formed and we know that it is a carcinogen. Will the forest service pay for any cleanup?

During the prescribed burns how will you protect not only the trail structures but also the hikers? Will you be transporting hikers around the areas that are on fire or still smouldering? Will you be protecting endangered, threatened, and candidate species? Will you be protecting bear cubs and deer fawns from being burned alive?

Your description states that you will be eliminating non-desirable species of plant growth. Is that part of bio-diversity? What species will be eliminated? The area includes endangered Gray Bats, and Indiana Bats. I request that you analyze and disclose the presence of all endangered, threatened, and candidate species of plants and animals in the area of the

proposed action and analyze the potential effects of the action on those species. Is there a provision to protect them if they are there? Will you look for them before the burning and spraying? Also Roan Mountain Bluets and Rock Gnome Lichen is on the map for this area so will those be protected? Will you protect the Hemlock trees that are thriving in the area?

When thinning the trees how much will be thinned. I have heard that thinning does not protect the trees left because it makes them vulnerable to strong wind events and ends up being more like a clear cut than thinning. I am concerned that the proposed stocking density of residual tree stands is so low that the residual trees will be at high risk of windthrow and/or snow and ice damage. How will you minimize that risk? The trees are already having a tough time with the winds. I have cleaned up many over the trail. Will the harvesting of the mast producing trees be a clear cut? I have seen areas that were cut and they are now ugly. I am agast that you would consider doing that right next to the Appalachian Trail. It gives Tennessee a black eye. We used to have a motto Keep Tennessee Beautiful. Is that dead? Another one was Keep Tennesse Clean and Green. Is that one also dead? Will the contractor that does the job be charging to put in roads to collect the timber? If so will the money all be eaten before the timber is even sold and thus it equates with giving our timber away for little or nothing? Then we are left with mountaintop removal like those in Kentucky and nothing but an ugly mountain?

In addition to my comments above, the extensive use of potent herbicides makes this project highly controversial and highly likely to adversely affect the human and natural environment. This fact alone warrants preparation of an Environmental Impact Statement instead of an Environmental Assessment. I suggest you skip the EA and move directly to an EIS. If so how can it be accessed by the public? These are public lands and the public has a right to know. I expect you to fully analyze and disclose all potential effects of this project to the public.

Please add my name and e-mail address to the notification list for this and all other NEPA actions in the Watauga Ranger District.

Thank you for you time and I hope you will think long and hard before spoiling our beautiful Pond Mountain Wilderness including the wonderful Dennis Cove and Appalachian Trail.

Tom Sahlin

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