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Objections to the “Southern Apps Subregion Scoping FINAL” Proposal

I am writing to express my objections to several aspects of the proposal letter addressed to “Interested Parties,” dated June 28, 2024, and signed by James Melonas, Joby P. Timm, Judy Tippins, and Michael Wright. As an “Interested Party,” my family and I frequently engage in recreational activities such as fishing, hiking, horseback riding, and camping on public lands.

After a thorough review, I remain unclear about the objectives of this unnamed project. The structure and wording of the proposal are confusing and obscure. A concise description of the project’s intent would greatly enhance public understanding and likely generate more beneficial feedback.

Lacking such clarity, my interpretation of the proposal letter can be summarized as follows:

“This project will provide for an analysis of watershed restoration and resiliency within the SAR to create a framework of pre-defined practices so that future site-specific projects can be implemented more expeditiously. This framework is comprised of the wide spectrum of proposed recommendations described within the referenced SAARTAB report.”

It is unclear but implied that such future site-specific projects may, for the sake of expediency, circumvent the public’s right to be notified and comment on any aspect of a project if it falls within this framework of practices. This is particularly concerning since the referenced report emphasizes only the negative aspects of public enjoyment of public lands.

If my interpretation represents the proposal letter’s intent, I have the following objections:

Public Comment and Oversight: I object to any provision in the proposed analysis, embedded or otherwise implied, that seeks to circumvent the requirement for public comment on National Forest site-specific projects. Public oversight and input are crucial for maintaining the integrity and accessibility of our public lands.

Use of SAARTAB Report: I commend the Southern Appalachian Aquatic Restoration Technical Advisory Board (SAARTAB) for their scientific expertise in producing the “Recommendation Report” published on May 17, 2024, prepared by Sara J. Gottlieb. It presents a broad spectrum of valid environmental issues and recommended actions for the Forest Service and should rightfully serve as a guideline when considering site-specific projects.

However, it lacks any level of prioritization, treating all issues and actions with the same sense of urgency. Additionally, it cites studies of global National Parks rather than SAR National Forests when alluding to the volume of foot and hoof traffic on SAR trails. Most importantly, the report does not address the public’s enjoyment of national forests, but rather, treats any human interaction with public lands, authorized and unauthorized, as yet another invasive species.

I object if the National Forest Service (NFS) utilizes the SAARTAB Recommendation Report as an umbrella for pre-approved practices regarding site-specific projects, minimizing public input and influence.

Thank you for considering my objections. I hope that the NFS will continue to ensure transparency and public involvement in all future site-specific projects.

Sincerely,

Gary E. Haver