

July 31, 2024

Jessie Howard, Project Coordinator
United States Department of Agriculture
Forest Service
Southern Appalachian Subregion

Submitted electronically.

Dear Ms. Howard:

The Nature Conservancy appreciates the opportunity to comment on the Southern Appalachians Subregion's proposal to initiate a Watershed Resiliency Environmental Assessment. The Nature Conservancy's Appalachians Program aims to catalyze a sustainable future for nature and people by enabling high-impact, continental-scale conservation solutions through thoughtful internal collaboration, inclusive partnerships, and equitable practices across communities, ultimately delivering maximum contributions to TNC's 2030 goals and solutions to our planet's biodiversity and climate crises. As such, we are hopeful that the Forest Service's efforts to approach land management and watershed restoration across administrative and political boundaries will enable more expeditious application of proven methods to ensure forest and watershed health and resilience in this uniquely biodiverse geography that millions of people depend on for water supplies, recreation, and a host of other ecosystem services.

The National Environmental Policy Act (NEPA) requires Federal agencies to assess the environmental effects of proposed major Federal actions prior to making decisions. The NEPA framework exists to ensure agencies consider the significant environmental consequences of their proposed actions and inform the public about their decision making.

A large proportion of watersheds in the Appalachian Subregion National Forests are classified as 'Functioning at Risk' according to the USFS's Watershed Condition Framework (Figure 1). The significant number of watershed restoration actions across the region demands a scientifically informed, technically sound, expedited process for meeting NEPA requirements.

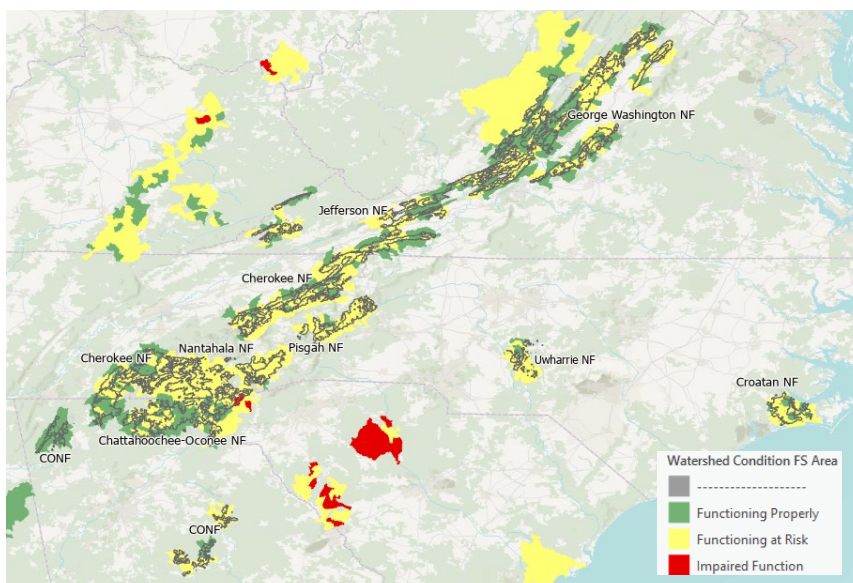


Figure 1: U.S. Forest Service Watershed Classification and Priority Watersheds overlay with National Forest units in Southern Appalachian Subregion. Source: USFS data

The Nature Conservancy led and facilitated a process to gather input from scientific and technical experts in watershed restoration methods from across the Subregion and reach consensus on a set of recommendations for the Forest Service to consider including in the Subregional Watershed Restoration Environmental Assessment (EA). The Southern Appalachian Aquatic Restoration Technical Advisory Board (SAARTAB) assessed the environmental impacts of the full suite of potential restoration approaches to ensure that environmental considerations would be integrated into the EA and informed by an understanding of the region's ecological complexities.

The holistic approach taken by the SAARTAB provides the Forest Service with the ability to focus on broader strategies rather than project site specifics. As described in the Forest Service's Watershed EA Project Scoping letter, the flexible toolbox approach informed by the SAARTAB process provides a framework to enable site-specific projects to be implemented expeditiously, while aligning project designs with existing conditions on the ground.

The Nature Conservancy fully supports the completion of the Subregional Watershed Restoration EA including the SAARTAB recommendations. Once in place, the EA will significantly improve the process of implementing critical projects, increasing certainty for project partners, Forest users and public interest groups, and ultimately benefiting the unique aquatic communities that depend on healthy, resilient watersheds in the region.

Sincerely,

A handwritten signature in cursive script, reading "Sara Gottlieb".

Sara Gottlieb
Appalachians Freshwater Director, South

cc: Stephanie Bland, Deputy Forest Supervisor, Cherokee National Forest
Linwood Butler, Forest Supervisor, National Forests in Alabama
Cavan Fitzsimmons, Deputy Forest Supervisor, National Forests in North Carolina
James Melonas, Forest Supervisor, National Forests in North Carolina
Joby P. Timm, Forest Supervisor, George Washington and Jefferson National Forests
Judy Toppins, Forest Supervisor, Chattahoochee-Oconee National Forest
Michael Wright, Forest Supervisor, Cherokee National Forest