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Dear U.S. Forest Service,

Forest Keeper is a national conservation nonprofit with thousands of members and hundreds of business partners throughout the East. On behalf of our members and coalition partners, we object to the Foothills Landscape Project and its attempt to circumvent the National Environmental Policy Act. We are especially concerned about how the Foothills Landscape Project attempts to prevent public comment from site-specific projects on the Chattahoochee National Forest.

The Foothills Landscape Project would allow the Forest Service to log, burn, build [temporary] roads, and close or reroute trails at undisclosed locations within a massive 157,000-acre project area—roughly twice the size of the city of Atlanta—without input from members of the public who visit and love those lands. Ultimately, this large-scale landscape project gives the Forest Service free rein to implement potentially detrimental projects for decades to come.

The Foothills Project proposes to use a new [condition-based] analysis approach to try to bypass basic requirements of the National Environmental Policy Act (NEPA), one of our country's most important and foundational environmental regulations. Last summer, the agency proposed to create new, massive loopholes to NEPA including specific authority to pursue the [condition-based] approach the agency is using with the Foothills Project. Those loopholes have not been finalized yet, and they have face significant legal hurdles. The public resoundingly spoke out against that proposal by submitting over 100,000 comments that overwhelmingly opposed cutting out public notice and comment. The agency clearly didn't listen, because it's now proposing to do precisely the same thing here in Georgia's most visited tract of public land.

The Foothills Project would allow logging without any public involvement at the project level and without the obligation to consider alternatives that would avoid unnecessary harm. This conditioned-based analysis cuts the public out of site-specific project analysis and violates both the letter and spirit of NEPA. The law requires every government agency to look for less harmful ways of meeting its goals. To that end, all agency projects must be based on solid science and made in the sunlight of public accountability.

Instead, the Foothills Landscape Project intentionally limits public comment and environmental analysis to a time period before any specific projects have been proposed—an absurd and illegal approach to forest management. How can the public comment on a proposal without knowing where specifically timber harvests or other management may be used? And how can the U.S. Forest Service conduct real environmental analysis without knowing specifically where projects will take place?

It's clear that the Forest Service is single-mindedly pursuing one goal with the Foothills Landscape Project: cutting more trees by cutting out public participation.

At the very least, the Foothills Landscape Project should require a NEPA public comment period for each specific project proposal. Without project-specific NEPA public comment, the Foothills Landscape is doomed legally and politically. Forest users of every political background want their voice to be heard, and the Foothills Landscape Project would exclude them from commenting on the places that matters most to them.

Rather than adopt the Foothills Landscape Project, the Forest Service should focus its efforts on revising the Chattahoochee National Forest Plan. The Foothills Landscape Project violates the current Chattahoochee National Forest Plan, and it is attempting to function as a forest plan by shaping management decisions for decades. A more sensible and widely supported approach would be to focus on the Chattahoochee National Forest Plan revision, which is due to begin this year.

The Forest Service is already attempting to minimize public comment by releasing this project proposal over the holidays and refusing to offer any comment period extension. It clearly shows the intent of the Forest Service to limit public comment on this Project and through this Project.

We are especially concerned about the impact that this project could have on beloved recreational areas that attract hundreds of thousands of visitors each year, including:

- * Wild and Scenic Chattooga River
- * DeSoto Falls
- * Warwoman Dell
- * Dicks Creek
- * Bartram Trail
- * Pinhoti Trail

Many other world-class recreation and conservation areas could also be affected, but the Foothills Landscape Project is so vague and undefined that we don't know exactly what other trout streams, trails, waterfalls, and scenic views may be affected.

The Project also proposes up to 60,000 acres of commercial timber harvest with total commercial and noncommercial harvest reaching over 80,000 acres—an alarming and unprecedented increase in logging that exceeds all timber harvests in the George Washington, Jefferson, Pisgah, Nantahala, and Cherokee National Forests combined for the past decade.

The public also has a right to be informed about and to comment on the 50,000 acres of prescribed burning, 360 miles of new bulldozer paths to facilitate prescribed burning, 74,500 acres of herbicide application and the rerouting of up to 111 miles of trail. These are publicly owned resources that belong to all Americans, and the fundamental tenet of public lands is that the American public participates in their management.

Keeping the public in the dark about how their lands are managed and where their lands will be affected is illegal, unethical, and deeply anti-American.

Without more robust public comment opportunities at the project level, this project will be strongly opposed by the public and face many legal challenges. It will also further alienate the Forest Service from its users and build a relationship of distrust and antagonism.

Fortunately, it's not too late for the Forest Service to change course. We hope that the Forest Service will reconsider its approach and draft a more inclusive project that includes NEPA public comment opportunities at the project level.

Thank you for the opportunity to comment. I hope that public comment remains a vital and healthy part of the forest planning process, especially on the Chattahoochee National Forest.

Sincerely,

Will Harlan

Executive Director

Forest Keeper

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