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First name: Marie
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Organization:
Title:
Comments: Dear Supervisor Hunter

I have reviewed the most current the Foothills Landscape Project Environmental Assessment and attached documentation and appreciate the effort that you and your staff have put into this project and in particular some of the adjustments that have been made for clarity and to ensure public involvement and input throughout the future of the FLP. I participated in several FLP Collaborative Working Group seminars this past Spring/Summer and remain hopeful for this process. I have also continued to work with our District Ranger in the Chattooga District and appreciate the time and efforts that he and his staff have put into the land, waters, roads, recreation areas and the latest FLP initiative over the past year.

Public participation
One of my main FLP concerns in the past has been in the area of public participation. With the adjustments made in the current EA I am willing to keep an open perspective and trust that NEPA will be followed and that the collaborative working group and/or subsequent public feedback will be given full consideration by the FS to (as stated in the EA)"further influence the scope, scale and exact locations of specific treatments within the project area" and "may result in modifications to timing, methods and monitoring requirements within the FLP." I will continue to stay involved and support the work of the Collaborative Group and will encourage my community to do so as well.

Forest logging
I expressed serious concerns in the last EA regarding the vast number of acres planned for logging. I understand the desire and need to open up canopy and the need to have a diverse Forest of diverse age. We all want a healthy Forest. However, the goal to thin 10,000 acres of late successional forest is a harsh one that may not be necessary to support FLP purpose and need. Although the Agency considers stands of trees uniform and to be old aged at 80 years, in fact, I and many others have observed that these stands are not uniform but contain trees of different ages. My time in the Forest has shown that over time these stands will become more complex as a result of natural mortality and wind throw.

The FS has young forest goals you want to accomplish in the Foothills and there is a legitimate need for young forest. However, perhaps rather than cutting older mature tree, consider: a) plant young Oaks on pine plantation land that the FS wrongly created many years ago and now wants to re-engineer for the Foothills Project; and b) culture desirable young trees on Forest land that has already been degraded.

The FS poses a number of reasons for cutting vast acres of healthy older forest, but the validity of these reasons is questionable. For example, in the EA the FS says that young trees will be more resistant to stress and disease - but there is no scientific basis for this assumption. I have searched but found no science that supports such an assumption for our Forest.

I truly wish that the FS would take more of an ecosystem-centered perspective with regard to "treating" our National Forest. Forest health should involve maximizing resilience, recurrence and biophysical processes which lead to sustainable ecological conditions, with the goal of sustainable natural ecological conditions. I would love to see the FLP adequately address and value restoration of a true native forest connected across the landscape and help provide migratory corridors for plants and animals to adapt to changing habitats.

Herbicide Treatments

This EA continues to call for herbicide treatment of up to about 65,000 acres of Forest (with Appendix B note that this size would not necessarily all be treated with the chemicals). This part of the plan continues to be disturbing and shocking to me. The risk assessment by Syracuse Environmental Research Associates from 2011 continues to be referenced in this EA to legitimize this part of the plan.

Knowledge of the impacts of chemicals on our ecosystem grows and new knowledge must be considered-and I am certain there is a lot of new knowledge since 2011. We have a lot to learn about the subtle long-term indirect, synergistic and cumulative stressor effects of glyphosate in forested environments. So it is important for the FS to recognize and use current science in its decision-making and before implementation. Although the FS states that it uses "best available science" in its plans and risk assessments, a 2011 risk assessment may not be the best available.

The FS has goals to achieve, but in driving ahead to achieve its goals I hope that it will consider how little it knows about the potential impacts of its actions when it comes to applying herbicides extensively on our Forest lands. There are so many stressors to our Forest-climate change, invasive species, the over-loving public. Please find ways to minimize the use of added chemicals when "managing" our Forest.

Climate Change

I observed that the new EA has very little to say about climate change and the role of our Forest in sequestering CO2. Given the recent United Nations report on this matter and given the current Administration's commitment and priorities on this subject, I find it curious and disheartening that the FS gives minimal attention in the FLP EA-except as a rational to cut down older trees ("older trees with slower growth will cause rate of carbon accumulation and sequestration to decline.").

You must admit, it will be a long time before your baby trees sequester as much CO2, and the amount of CO2 added in the process of cutting and hauling timber from our Forest is not negligible.

I hope that the Agency will give more attention, assessment and action to finding valid ways to support all of our climate change goals.

In conclusion, thank you once again for all of your hard work and many hours preparing this new EA. I hope that you will consider my comments and I look forward to continuing to work in concert with the FS for a healthy Forest.

Sincerely,
Marie K. Dunkle