



www.americanwhitewater.org

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Submitted electronically via: <https://cara.ecosystem-management.org/Public/CommentInput?Project=52509>

January 10, 2020

Re: Foothills Landscape Project #52509

Dear Chattahoochee National Forest,

American Whitewater is a national nonprofit organization with a mission of protecting and restoring our nation's whitewater rivers and enhancing opportunities to enjoy them safely. We are a membership organization that has a significant number of members that regularly enjoy paddling rivers flowing through the Chattahoochee National Forest, including but not limited to the Wild and Scenic Chattooga River. Our members are primarily whitewater kayakers, rafters, and canoeists. Decisions made on the management of the Chattahoochee National Forest directly affect our membership through changes to public access, scenery, water quality, biodiversity, and other facets of the nature-based recreation experiences our members value.

Even though American Whitewater has a long history of involvement in river management issues on the Forest we were not contacted or aware of this project until very recently. With this said, we have reviewed the Environmental Assessment for the Foothills Landscape Project #52509 and we do not support this project moving forward, and certainly do not feel that a Finding of No Significant Impact is merited.

While the projects that could be carried out under this landscape scale assessment could have significant benefits, so too could they have significant impacts. We see nothing in the EA that gives us confidence that the place-based scale of analysis and public input needed for a successful project to be implemented on public lands will be carried out. Quite the opposite. With this scale of analysis, opportunities for multiple-use benefits will be missed, impacts on non-target uses will needlessly occur, and the result will not likely be in the public interest.

As an example, the Foothills Landscape Project appears to give carte blanche approval to add Large Woody Debris (LWD) to over 1,000 miles of streams, for the stated purpose of benefiting brook trout. Nowhere in the EA or supporting documents are the potential catastrophic impacts to river paddling considered, avoided, or mitigated. We have seen on rivers like the Chauga that place-specific collaboration triggered by project-scale NEPA analysis is vital for public engagement and improving proposed

LWD projects that would otherwise cause undue harm to river recreation. Nor is it acknowledged that the ongoing stocking of non-native trout is often the limiting factor to the recovery of native trout regardless of LWD. Without public involvement and detailed project-scale NEPA analysis, broad assumptions of agency staff can lead to projects that are a waste of funds, needlessly impact other Forest uses, and either fail to improve forest conditions or actually erode them.

Likewise, the proposal within the Foothills Landscape Project to allow significant changes to the recreational infrastructure within the Wild and Scenic Chattooga River corridor is unacceptable in its lack of rigor and public input. We want to support positive changes in the corridor, but we feel more analysis and collaboration is needed to ensure that changes in infrastructure actually fix the problem and don't lead to more problems.

We are confident that the large scale of logging, road building, herbicide treatment, fire-line construction, Large Woody Debris additions, trail closures, infrastructure changes, and other actions proposed in the Foothills Landscape Project will have significant impacts on sustainable recreation, and other non-target Forest uses and values. We find the reduction or elimination of true project-scale public involvement folly at best, and are confident it will lead to significant impacts, lost opportunities, and outcomes that are not in the public interest.

Please change your approach on this proposed project, and at a minimum conduct a full Environmental Impact Statement that includes the specific locations of all proposed actions, a process for soliciting and integrating ongoing public involvement, and considerations of the issues brought forward in this letter.

Thank you for considering these comments.

Sincerely,



Kevin Colburn
National Stewardship Director
American Whitewater