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Comments: Forest Managers

Please accept these comments on the Foothills Project (the project) proposed actions . I have been an active participant in the Collaboration and attended many meetings. In theory I support some of the proposed actions but not on the scale proposed and not without an opportunity to visit the exact areas (stands) where the proposed activities would take place. At the moment the public is expected to comment once on a project that contemplates timber harvest and herbicide use on tens of thousands of acres for a number of reasons . Yellow Pine maintenance and restoration , Oak and Oak Pine maintenance and restoration , Understory thinning and Woodland "Restoration."

These projects would be performed over a period of many years but the only opportunity to comment is now without any idea of exactly where the activities will take place. Many of these treatments contemplate regeneration cuts that involve harvesting mature oaks and pines. Harvesting mature Oaks and Pines to promote maintenance and regeneration make no sense at all. The regeneration cuts performed by the Agency in the 70s and 80s were a total failure that permanently reduced the amount of Oaks in the regenerated Forest. The Agency has acknowledged this . This time it will purportedly be different because the agency will find an unspecified source of funds to scour the countryside for sites with advance regeneration, or failing that plant Oak or Pine seedlings and then remove unwanted competition either mechanically or most often with herbicides. Where will the funds come from in an era of declining budgets ? All of these treatments are experimental and this Forest can point to no projects of this type of any scale that have been successful. Pine plantations created in the 70s and 80s have failed because of lack of maintenance tho the science of managing Pine Plantations is well known. Personnel turnover in the Agency is high and projects that were a priority at one time were either forgotten or abandoned or could not be funded. The only sensible way to proceed in restoration and maintenance of Oak and Pine is to identify exact areas to be treated on a small scale. Announce the plan, accept comments and then measure success before embarking on additional projects. This would allow the public to comment again with the benefit of being able to visit completed projects and thus make fully informed comments which is the intent of NEPA.

This project propose 7,400 acres of Woodland "Restoration". Restoration is a poor choice of words as there is no evidence that naturally occurring woodlands ever existed in this area in this geological era. Small areas with unusual soil conditions such as the ultra mathic site at the Buck Creek Barrens are natural woodlands. Small ridge top areas with rocky soils exhibit woodland characteristics. At one time European woods burning and cattle grazing created woodlands but surely the Agency does not intend to attempt to duplicate that. The one woodland project attempted at Brawley Mt. has been a failure despite frequent burning and herbicide use. While viewing the area just a few days ago one does not see a grassy understory but a stump sprout thicket. Perhaps the agency will have to burn the area every year ,at great expense, to accomplish its goal. The site was poorly chosen and the soil too rich to have ever been a woodland. Despite this the public is now expected to comment on 7400 acres of new expensive woodland creation with no idea of where they would be created.

Bog and Canebrake restoration are commendable goals and the areas to be worked on are identified. As most evidence points to Beavers as being responsible for bogs it is somewhat disappointing that reintroduction of Beavers is not contemplated with the caveat that when they don't impact other resources they will be "left uninhibited". The Georgia DNR still allows unlimited killing of Beaver year round.

Fuels reduction and resiliency are admirable goals but the use of prescribed fire , while reducing the duff layer to some degree, actually adds top killed but not consumed fuels to the forest floor. The major fires that have

occurred in the Southern Appalachians have resulted from the tops and laps left from timber harvesting. Very few structures have ever burned in North Georgia and if there is a concern about WUI it is centered around new ridge top developments. Once again specific areas of concern should be identified and the developers and owners of the project should bear some responsibility for fire proofing their communities.

It is disappointing to read that "carbon sequestration is not a direct purpose[hellip] of the project" . If there is an interest in Forest health and resiliency carbon sequestration must be a concern. Prescribed fire and timber harvesting will result in less carbon uptake contrary to statements in the proposal. The proposal states that precipitation should remain the same as the climate warms but the correct interpretation is that it will become more variable with droughts followed by deluges as we have already experienced. Violent rainstorms, such as those that have swept roads away in the forest recently, make the large scale timber harvesting(with the attendant land disturbance) contemplated in the project dangerous . Restricting the public's ability to comment now for projects that may occur for a decade make it impossible to account for changing weather patterns.

Wildlife openings have existed for decades on the Forest and there have been many attempts to improve them and they all have failed. The majority of them feature low nutrition fescue and invasives. Specific food plots should be identified and rehabilitated and the effects studied and comments accepted before wasting more money. Low value fescue patches are not Early Successional Habitat (ESH). The best and cheapest way to create ESH is to allow the forest to age and create canopy gaps as it has always done prior to European conquest . Barring that old clearcuts, now in the pole sapling stage with no ecological benefit, should be slashed down . Under no circumstances should mature Oaks and Poplars be cut to create ESH. Oak mast is a critical food for wildlife and Oaks need to be over 50 years of age to produce mast and can produce for hundreds of years. Fallen Poplar flowers , as demonstrated by Forest biologist James Wentworth, are an important spring food source for Deer, an in demand species.

Herbicide use is contemplated in nearly every treatment and the herbicides to be used are noted. However the public is expected to comment now for projects on unspecified locations that will last for a decade. Over the past 70 years since the development of chemical herbicides and insecticides many substances that were regularly used such as DDT , Agent Orange, Imadicloprid and now Glyphosate have been found to have serious side effects. Much of the work done to raise the alarm about these and other compounds has been done by individuals or non regulatory agencies. Despite this the public is being given one opportunity to comment on a project that will dispense herbicides on unspecified tens of thousands of acres for a decade.

The project contemplates many road closures and restrictions and this is commendable. In this instance the roads to be closed are specified and not described as "somewhere in the foothills landscape". The Agency budget has not and will not be sufficient to maintain the existing road system. In many cases it appears that gates will be used to close roads. From discussions with staff it appears that there is not enough money available to buy and maintain the gates currently needed let alone a large increase. Berms and Boulders are expensive to build or transport and berms are frequently driven over. Gates are regularly torn down. The Conasauga District has pioneered the use of robust timber blocks to close off illegal trails and close roads in the Cashes Valley area. Not one or two trees but a dozen, preferably fallen one on top of another. Inexpensive and effective.

As I have indicated many of the treatment have admirable goals but the project has one main flaw and that is that it does not obey NEPA. The Agency's own handbook states as noted below.

11.2 - Proposed Action, Purpose and Need, and Decision Framework

A proposed action is a proposal by the Forest Service to authorize, recommend, or implement an action to meet a specific purpose and need. All proposed actions have five parts that comprise their whole: who, what, how,

where, and when.

WHO is proposing the action?

WHAT is the action being proposed?

HOW will the action be accomplished?

WHERE is the action being proposed?

WHEN is the action being proposed?

The "who" is the Forest Service, even in the case of external projects. When the Forest Service accepts an external proponent's proposal (like a powerline or ski resort) it becomes an Agency proposal to authorize the action. The "who" may also be the title of the responsible official, such as "The Quemado District Ranger proposes to[hellip]"

The "what" refers to the proposed activity or activities and all their parts. Note that the "what" is almost always plural. In stating the "what" of the proposed action, focus as specifically as practicable on describing the activities. Connected actions (sec. 05) are included as part of the proposed action. Consider carefully the inclusion of similar actions (sec. 05) which may be included as part of the proposed action. Only those similar actions that are closely related to the proposal and have similar purposes and effects should be included.

The "how" is an integral part of the "what." If a fuels reduction project is proposed, describe how it will be done: thinning, burning, or both; mechanical means or by hand?

The "where" refers to the geographic location of the project. In stating the "where," describe the location as specifically as possible. A map is often the best way to illustrate the "where" instead of trying to describe it solely in a narrative format. Several scales of maps might be needed (whole district and project units).

This project does not even begin to conform to the "where" of NEPA . Stating that a project may occur somewhere within 120,000 Acres is not specific. The public needs project units.

Regards

David Govus