

Data Submitted (UTC 11): 1/6/2020 3:21:26 PM

First name: Tom

Last name: Colkett

Organization:

Title:

Comments: Although I understand that the impetus for this Foothills project is an attempt to increase overall forest health, I think there are some areas where it will have the opposite effect:

First: In your EA it is stated that "Sediment from nonpoint sources has been identified as one of the major impairments for sections of (the many creeks and rivers within the foothill parameters). Much of the sedimentation is...from the high percentage of poorly maintained roads located in riparian areas...". And yet the proposed project incorporates up to 360 miles of additional dozer lines to facilitate prescribed burning and an "unspecified" number of miles of new roads" needed for implementing the project overall. It is difficult to see this as consistent with promoting forest health when huge governmental budget cuts have been tying the Forest Service's hands for years as far as maintaining the roads already in place. This despite one of the projects "desired conditions" of reducing sediment delivered to streams.

Second: In past practice, the scoping process has worked very well to ensure public input before more local processes begin. It seems that the Forest Service, in its rush to "simplify" and "streamline" the projects, has decided to omit this community participation, or rather, load it all upfront without even specifying where the prescribed actions are to take place. Such a system seems almost designed to ensure that projects can move ahead quickly without public input under the guise of having gotten our input before we even knew what was going to happen. One can see the potential for awkward, time-consuming lawsuits as this process unfolds.

Third: Even though the National Park system is part of an entirely different department of the Federal government, I think the forests contained in those parks can be properly used as comparisons and/or models of forest management for health. Our neighboring Great Smokey Mountain National Park is a good indicator that human involvement with the natural forest processes can easily have the opposite of the desired effect of "forest health". The Park has done quite well without it, and is quite healthy and beautiful without our "management". The Park Service has worked mainly as a "people management process", doing their best to prevent human visitor destruction of the resources and letting the forest fend for itself. It seems to me that the Parks forest has done quite well with this sort of protection in its recovery process from the earlier clear-cutting/logging that was so devastating to the environment there. I suggest that this model would also work quite well here in Georgia.

Fourth: The plan calls for nearly 74,500 acres of herbicide application, using undisclosed chemicals next to private lands. There is so much potential here for negatively effecting people's gardens and fruit trees in neighboring properties, not to even mention the potential effects on hikers/bikers and other users of the forest. They have the right to expect that getting away from the cities to enjoy nature will not have untold negative effects on their health

And so, overall, I think this is an ill-conceived project that is best scrapped. I propose that we return to the process of carefully conceiving and designing much smaller projects and putting them out for public input on an individual basis. Hopefully, eventually, the Forest Service might adopt the National Park model of leaving the forest alone and resort to an LEO model that supervises human actions in the naturally occurring forest. Thank you for the opportunity to comment on this.