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Title:

Comments: The mission of the forest service is, "to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations". In order to meet your own mission, you have to rethink this project. We are in a time of existential crises. Reversing climate change is the biggest challenge humans have ever faced, and the forest service is in a unique position to do something very positive in the fight against climate change. EVERY project the foest service undertakes should have that as its primary focus. Cutting, burning and poisoning should be the last things are your lists. We the people need as many trees as possible to sequester carbon. We need biodiversity. We need healthy ecosystems. We do not need more roads, more run off, or more timber harvests. Clearly, any move to make it harder for the people to whom the national forests belong, to review and provide input to forest service plans, is because the plans will be unpopular. Why is that? Because they are not addressing our needs and the needs of future generations. Please start following your own mission. In addition, please consider the following points:

- 1. The massive Foothills Project requires preparation of an Environmental Impact Statement.
- 2. The Foothills Project draft Environmental Assessment violates provisions of the National Environmental Policy Act (NEPA) by not providing the public with site-specific information about where proposed timber harvesting, burning and herbicide treatments would occur, as well as many other proposed actions including temporary road construction, trail construction and trail rerouting.
- 3. The Foothills Project violates NEPA by denying public participation opportunities guaranteed by law for the duration of the project, which could be 10-15 years or more.
- 4. I disagree with the Foothills Project's forestry practices, which are based on treatments to produce crop trees at the expense of native biological diversity. Much of the project proposes to convert diverse, native broad leaf forest-that has multiple layers of dominant and co-dominant trees, shrubs, herbacious Appalachian understory and ground cover-to a forest of even-age crop trees dominated by just a few commercial tree species.
- 5. The Foothills Project must preserve 630 acres of existing old growth trees as documented in the USDA Forest Service Study specific to the Chattooga River watershed (authored by Carlson et. al., 1995). In addition, the Foothills Project should incorporate the restoration of old growth stands connected across the landscape.
- 7. The Foothills Project should not use prescribed burning that far exceeds natural fire cycles (15 -20 years or more).
- 8. The Foothills Project should not employ the heavy use of herbicides that many scientists believe have carcinogenic properties.
- 9. I disagree with the Forest Service's in-house ecological modeling that specifically promotes crop tree management disguised as ecological restoration.
- 10. The Foothills Project must adequately address the importance of restoring a true native forest connected across the landscape, to mitigate the effects of climate change, and to help provide migratory corridors for plants and animals to adapt to changing habitats.
- 11. The Chattooga River watershed in the Rabun County portion of the project area is not even located in the Foothills Landscape ecoregion, as defined in Dr. Charles H. Wharton's seminal work, The Natural Environments of Georgia.