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Comments: As a regular user of the public forests of the Southern Appalachian region, I am writing to express grave concern over the proposal to place 15-20 years of work into a single, broad Environmental Assessment. As a forest ecologist, I know the importance of performing detailed, site-specific assessments before making decisions about logging, road building, applying herbicides, burning, and other forest management activities.

The Southern Environmental Law Center reports that the Foothills Project is some 95 times larger than the average Forest Service timber project in the Southern Appalachian Mountains. Our forests simply cannot be scientifically managed with projects of this scale. Sweeping proposals of this nature erode public confidence in the agency which is supposed to use the best available science in making management decisions. It gives the appearance of an attempt to provide carte blanche for destructive practices without public involvement. Such behavior is completely contrary to the mission of the USDA Forest Service, and must be avoided.

The proposed project plans to harvest existing old growth, which is rare and critical habitat that should be protected, not destroyed. At least 630 acres of old growth in the Chattooga River watershed portion of the project area would be excluded from protection. Please change course and move to protect all existing old growth forest. It cannot be recreated in our lifetime.

As a forest ecologist, I cannot support the Foothills Project's proposed forestry practices, which appear to focus primarily on the desire 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, herbaceous Appalachian understory and ground cover to a forest of even-age crop trees dominated by just a few commercial tree species.

The Foothills Project proposes prescribed burning that far exceeds the natural fire regime of this region. Please provide peer-reviewed justification for a plan for prescribed burns aligned with this location. The Foothills Project should not employ the heavy use of herbicides that accumulate in biological systems and are known carcinogens.

I am not opposed to any and all resource extraction, but I have grave concerns that the Forest Service's ecological modeling promotes crop tree management disguised as ecological restoration. But don't take my word for it--try presenting this proposal at a meeting of the Ecological Society, or any academic setting where forest ecosystems and conservation projects are reviewed by practicing scientists. Seek advice from professional forest ecologists as you make plans to conserve and improve these natural habitats that belong to all Americans.
The Foothills Project must adequately address the importance of restoring native forests 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.

Above all, the Foothills Project threatens to violate NEPA by denying public participation opportunities guaranteed by the law. As proposed, it invites a lawsuit, which wastes time and taxpayer dollars. The agency should make a good-faith effort at science-based management on the front end, with site-specific planning that makes use of true public involvement.