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Comments: The Foothills Landscape Project is a large scale regional project which will have significant impacts on the ecological and human communities which reside in the area of the proposed project. The USFS must therefore produce an Environmental Impact Study (EIS) which will include more opportunities for public comment.

I am a member of American Whitewater, a national nonprofit conservation organization which advocates the enjoyment of wild streams, wild landscapes and their preservation. I am frequently kayaking on the Chattooga River and appreciate its significance as a National Wild and Scenic River.

I am concerned the proposed action does not adequately protect old growth forest from logging. Any action by the USFS should protect stands of old growth, and designate old growth restoration areas (no less than 20% of the project area). It should also strive to identify undisturbed habitats that can serve as connecting corridors between areas of old growth.

There is published scientific literature that identifies the Chattooga River Watershed as Blue Ridge Province ecoregion (Wharton, The Natural Environments of Georgia) rather than Foothills ecoregion. Therefore the USFS should identify and designate areas for restoration (areas that are in monoculture plantations) that could be moved towards a mixed oak-pine forest (in the valleys), and an oak-dominated and mixed hardwood forest (in the higher elevations) as is appropriate for this ecoregion. Reseeding with short leaf pine and pitch pine following timber harvest should not be the primary action taken in the project.

Poor water quality from sedimentation is a known problem within the Chattooga Wild and Scenic Corridor. Adequate forested buffer zones must be preserved around all tributary streams within the Chattooga River Watershed. These include but are not limited to Overflow Creek, Chattooga West Fork, Dick's Creek and Stecoa Creek. Similar buffer zones must also be implemented in the Tallulah and Panther Creek Watersheds. Like the Chattooga watershed, these are frequently used recreational resources. The USFS must decommission roads that have negative effects on water quality, or that create excessive road densities for forest interior species. Similarly, no new roads should be constructed. The Forest Service has a growing, \$8.4 billion road maintenance and reconstruction backlog, and receives only a fraction of the annual maintenance funding it needs to maintain its existing road system to environmental and safety standards.

The study area sees a great deal of recreational use. Given the large scale of Foothills Landscape Project, the timing of the public comment period (over the Christmas and New Years Holiday) is inadequate to allow all affected people to comment and should be extended by 60 days.

Thank you for the opportunity to comment.

Sincerely, Dr. Whitney Eure