

Data Submitted (UTC 11): 1/10/2020 6:23:18 PM

First name: Stephen

Last name: Lyons

Organization:

Title:

Comments: Your huge (approx. 95 times larger than average USFS timber projects in the Southern Appalachians) and is simply Unmanageable. The Foothills Project has many flaws that I would like to address, the first being a need for an Environmental Impact Statement as required by the NEPA. The reason for this EIP should be obvious but you do not provide the public with any information related to trail routing and construction (both permanent and temporary), locations of burns, the use of herbicide (and types) treatments and timber harvesting.

Clear cuts on mountain tops is never an ecologically sound practice and in general replacing the diverse ecosystem with an even-aged crop tree dominated species is not sound management.

Crop tree management should not be confused with ecological restoration. Commercially dominated species is not a sound practice and some methods of harvesting contribute to global warming - particularly a project of this size which has no controls except the bottom dollar.

Old growth trees must be protected! The old growth specific to the Chattooga river watershed has been studied (Carlson, et al, 1995) and there is no reason for its destruction, and in fact the Foothills Project should incorporate the restoration and connection of old growth stands throughout the area. This restoration should provide corridors for plants and animals to migrate in order to adapt to changing habitats.

Controlled burns should not exceed natural fire cycles which have been around 15-20 years. Heavy use of herbicides is totally unacceptable. They wash into lakes and streams and are known to have carcinogenic properties.

Protecting the Foothills environment is particularly important for Tourist Economy preservation. The incomes generated by our tourists impact local retailers, guides and outfitters, and hotels/housing/restaurants. Appropriate management is essential to the common good of local residents and for those who use this precious resource. I am a frequent visitor, have worked in the area and have many life-long friends who live work and play in this region.