

Data Submitted (UTC 11): 1/10/2020 7:07:39 PM

First name: Becky Starr

Last name: Silvis

Organization:

Title:

Comments: Hello,

I am writing to express my dismay by the draft EA for the Foothills Landscape Project. I am an Environmental Engineer with a background in water quality, land management, erosion control, and environmental law. This project is large enough in scope that it requires a full EIS to be completed per NEPA requirements.

There is ample evidence and research that details the deleterious impacts on ecology, water quality, and biodiversity of heavy use of herbicides. The Foothills Project is located in biologically diverse and sensitive areas. The use of herbicides must be reduced if not eliminated.

The Foothills Project appears to be a commercial tree farm project. The forestry practices detailed do not promote forest health or ecosystem health. I do not agree with removing native broad leaf forest with many species of trees, shrubs and herbaceous species to an even aged stand of commercial trees. This is not a use of public lands that should be allowed. The negative impacts of this kind of management are wide and varied, while positive impacts are only on the pocketbook of a few individuals and companies.

The Foothills Project MUST preserve the 630 acres of existing old growth in the Chattooga River watershed. This is a sensitive and highly valuable watershed. One which the intent was to protect when the Chattooga was made Wild and Scenic.

Furthermore, there needs to be more public input opportunities throughout the duration of the project. There is a lack of site-specific information about proposed actions. Ecological restoration does not mean crop tree management. I have both a BS and an MS that incorporates ecological restoration from an engineering perspective. The goal of ecological restoration is not forestry activities. It is, by definition, "the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecosystems are dynamic communities of plants, animals, and microorganisms interacting with their physical environment as a functional unit". Reduction of diversity with the goal of crop production does not meet that definition. In fact, the Foothills Project as it stands degrades, damages, and destroys native ecosystems and all the abiotic and biotic members of that ecosystem.

Sincerely,

Becky Starr Silvis, MS PE