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First name: Alex
Last name: Brown
Organization:
Title:
Comments: The massive Foothills Project requires preparation of an Environmental Impact Statement.
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.
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.
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.
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.
The Foothills Project should not use prescribed burning that far exceeds natural fire cycles (15 -20 years or more).
The Foothills Project should not employ the heavy use of herbicides that many scientists believe have carcinogenic properties.
Disagree with the Forest Service's in-house ecological modeling that specifically promotes crop tree management disguised as ecological restoration.
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.
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.