Data Submitted (UTC 11): 1/11/2020 1:55:02 AM
First name: Laura Ashby
Last name: UNDERWOOD
Organization:
Title:
Comments: Foothills Landscape Project #52509-3202-1888

I am writing as a concerned citizen, self-employed business owner and mother of two sons living in Rabun County. My family moved here 17 years ago to enjoy and contribute to the forests and rivers here with our environmental respect and careful stewardship.

In Rabun County, one of the main reasons people choose to live either full or part time here is to enjoy the pristine beauty and solitude of the surrounding National Forest lands. The fact that Rabun County consists of over 60% National Forests is one of the biggest selling points for people relocating to the area.
People who visit here are SEEKING refuge in nature! Do not reduce the solitude quality for our economy will suffer! Economically, our National Forests help draw tourists who are attracted to our region for it's natural beauty and abundance of outdoor recreation opportunities directly tied to our National Forests. In fact, the largest economic sector in Rabun County is tourism followed by agriculture. Some of the Foothills Landscape Project proposed management practices have the potential to have grave and lasting impacts to our areas biggest asset which is the beautiful and pristine National Forest, its flora, fauna and abundance of fresh mountain streams, waterfalls and rivers.

I implore you to re-evaluate the proposed Foothills Landscape Project. Listen to the public who are voicing concern over some of your proposed management practices. Give us an opportunity to continue to be involved as a partner with the project so that together, we can ensure that the forests in this region are managed properly and sustainably for generations to come.

As I am of the ownership of this land,as a citizen of the United States, I absolutely request that Foothills Landscape Project MUST require 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. An Environmental Impact Statement needs to be produced to provide clarity regarding site-specific impacts especially in highly sensitive forest locations including natural bogs, and wild and scenic areas including the Chattooga River Watershed and it's tributaries. We live on and steward the Upper Chattooga West Fork, including Clear Creek and Overflow Creek. 60% of the Chattooga River flows from these tributaries.

As currently proposed, 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. Environments change, resources change and populations are rapidly changing in the subject area. The public should be given opportunity to provide input prior to each site-specific implementation. There are local resources who are more familiar with our local forests than some rangers managing the district and local input is imperative to promote proper guidance.
Our local landscape contains a vast and diverse population of deciduous hardwoods, evergreens and a rich and abundant understory of native plant species. Many of our "cove forests" and other under stories contain rare and endangered medicinal and edible plants. The proposed Foothills Landscape Project's forestry practices 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. This is obviously a for profit proposal rather than a conservation proposal. The Forest Service was originally enacted to maintain and conserve our National Forests not to profit from them.
The Foothills Landscape Project must preserve a minimum of 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. Personally, I would prefer to see ALL old growth stands protected and preserved rather than being cut down for profit.
The Foothills Landscape Project proposes implementing prescribed burns of up to 50,000 acres of forests in the defined region. This is being justified by using examples of wildfires located in the arid climates of the Western US forest regions. The proposed Foothills Project is contained within a deciduous rain forest that receives over 100 inches of rain annually on average. This proposed project should not use prescribed burning that far exceeds natural fire cycles (15 -20 years or more) and should re-evaluate the total acreage identified as proper for prescribed burn implementation.

The Foothills Landscape Project should NOT employ the heavy use of poisonous herbicides that many scientists believe have carcinogenic properties. There are more sustainable herbicide options that are non-toxic and equally effective in the management of slowing overgrowth. Plain white vinegar can be equally effective in many applications.

The proposed Foothills Landscape Project MUST adequately address the importance of restoring a true native deciduous 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. Again, as written, the current plan is more focused on the establishment of crop forests than natural habitats and this simply is not a sustainable plan for our beautiful native forests.
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. Ideally, the wild and scenic Chattooga River Watershed will remain the pristine, wild and scenic region that it was designated to be over 40 years ago.

PLEASE HEAR MY CONCERNS AS CONCERNED CITIZEN,CONTRIBUTOR TO SOCIETY AND MOTHER IN RABUN COUNTY.

Sincerely,
Ashby Underwood
Asa (age 7) Finneaus (age 13)