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First name: James
Last name: Sullivan
Organization:
Title:
Comments: I am thankful for all the opportunities I have had to visit, recreate, volunteer, study and teach in the Chattahoochee/ Oconee National Forest. I am also thankful for the opportunities to be engaged with the Forest personnel in management discussion and decisions over nearly 4 decades. The National Forest is part of my neighborhood.

I have been on the margins of this Foothills Project, but trying to understand where it would lead us. Looking at the summary, all the activities proposed could be implemented under the current Land and Resource Management Plan. So, why the extra level of planning and public involvement? At the end of it all what will be different is that the public will no longer be involved in site specific, project level discussions and decisions.

This is another incremental change in planning and public involvement added to many over the years since the first Land and Resource Management Plan making it more difficult for the public to influence management decisions on our public forests. Categorical exclusions, changes to the appeals process and now this elimination of public involement at the project level. Using one of your terms, these are cumulative effects on our access to USFS decisionmaking. The one thing that hasn't changed is your publishing a huge draft decision and EA right before the Christmas and New Years holidays with a short deadline. Federal agencies are pretty consistent about that.

I will not know where those miles(how many miles?) of temporary roads will disturb the forest until the dozers are on site. Will they be built to specs that can accomodate large trucks for whole tree hauling, as is the trend these days? Much longer culverts and more stream disturbance needed to get those long loads around the ravines sure will be at odds with your concern over too much sedimentation in the Foothills. Many of our existing roads cannot accomodate these vehicles. Given the amount of road reconstruction and temporary roads to do all the acres of silvicultural treatments proposed reeks of cumulative impacts, especially impacts on streams.

I will not know where all the changes in canopy composition and structure for resilience to gypsy moth will occur until the trees are falling. Is gypsy moth really a problem in the southeast? Sure we have had a few infestations that were treated one or two seasons with Bt or mating disruption. That level of treatment does not eliminate gypsy moth as shown in the Great Lake in recent decades. Why do we not have gypsy moth popping back up at these sites? I think it is probably a combination of variable winter weather causing cycles in egg development and eventually egg mortality as well as all the egg predators we have here(anoles, fence lizards, mice active arboreally throughout the winter). Right now, this winter, gypsy moth larva would be emerging in January with not a thing to eat.

Oak decline is certainly an issue, though not well understood. I can tell you that frequent fires removing the leaf litter, creating drier soil environments, stress oaks enough to have an increase in hypoxylon canker. Hypoxylon canker is a chief component of "oak decline" in our forests. It is especially noticeable is sites that have had multiple burns in the last decade.

I do understand that regenerating an oak component in our forest is difficult. How to do it is not well understood. This is not news, we've known this for a few decades. Yet there have been far too little in the way of silvicultural experiments addressing this problem. Now is the time to start with moderate, well documented and monitored silvicultural treatments to bring a younger, healthy component of oak species to Foothills forests. We have time to do this. Oak decline is not going do away with all the oak in the next few decades. It is not the time to apply poorly tested treatments across a landscape.

Except on a non-native invasive plant species we should not be using foliar spray of herbicides at all. I feel that the use of herbicides by contractors is often poorly supervised and administered. The more of this that is done by USFS personnel the better. I understand that herbicides will be a tool to creat a desired forest composition, but we need to see an effort to minimize herbicide use where possible and find ways to minimize the amount of chemical used to achieve results.

There is probably a hundred more things I'd like to address and would if I could have had 90 days as would be typical for a document of this size and scope.