Data Submitted (UTC 11): 1/11/2020 2:30:43 AM
First name: Sue
Last name: Murphy
Organization:
Title:
Comments: Supervisor Jewett:

As you filter through the comments submitted for the Foothills Landscape Project, please note the value placed on being able to comment on USFS activities and plans for our National Forests. After all, National Forests are the property of all US citizens, to be managed by the USFS in the best interest of all the people, so all of those people should have and continue to have an opportunity to provide input and oversight to the project planning process. Over the past four decades this input has helped to drive change in forest management practices, creating a more healthy and diverse environment across the Chattahoochee/Oconee National Forest.

Portions of the Foothills Landscape Project document are puzzling, for they seek to remedy problems that do not exist on the Forest. Gypsy Moth was addressed and eradicated in Georgia in the 1990's. Weather conditions and natural predators also played a part in controlling the spread of this pest in the forest. Thinning and daylighting in hemlock conservation areas using commercial harvest methods is not a sound practice. Since hemlocks are found in riparian areas, extraction practices associated with commercial timber harvest would be counterproductive, to say the least. The wooly adelgid is being successfully restrained in areas where there are still viable hemlock populations be a combination of predator beetles, treatment of individual trees with imidacloprid and weather conditions. Periods of extreme cold and heat seem to have caused extensive mortality in the adelgid population. Both hemlock thinning and mature oak thinning plans are simply a cover for opportunities to commercially harvest timber from the Forest. Younger populations of oak will take decades to achieve mast production equivalent to that of mature oaks.

These two examples serve to highlight the need for public input at the project level. Currents trends within the agency seek to circumvent legislated mandates for public involvement. NEPA has yet to be repealed or rendered ineffective by subsequent legislation. The requirements for public comment outlined within the NEPA process should continue to apply to the USFS at the project level, according to provisions within that legislation. No doubt a judicial remedy will be sought in the future if NEPA provisions are not followed, since the USFS will breach the law by excluding the public from the project planning process. Categorical exclusions do not serve as cart blanche for implementing projects based on poor science or unsound reasoning. Past experience on this Forest has demonstrated the usefulness of public input in protecting forest resources for future generations.

Please take this opportunity to be bold. Make the right choice for this proportionally tiny piece of contiguous wild lands in the State of Georgia. Test new ideas for forest management on an extremely limited basis before painting the landscape with potential ecological failure, further damaging the resource. Our Forest is under increasing stress from changes in climate that we don't even know how to understand. Let's work together to learn and advocate what is best for the land under our stewardship.