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National Forests In North Carolina All Units

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Dear Forest Service,

I appreciate the opportunity to comment on the proposed Southern Appalachian Watershed Resiliency Project. While I strongly support efforts to improve watershed health and resiliency, I have serious concerns about the proposed NEPA approach:

1. The proposed "landscape level" analysis appears to be an attempt to bypass proper NEPA processes. This is unacceptable, regardless of how critical or important the need for action may be.
2. The lack of specific proposed actions, locations, and methods in the "toolbox" EA makes it impossible to conduct the thorough analysis of potential environmental impacts required by NEPA.
3. The suggestion that "all necessary compliance will be done, just not upfront" is deeply troubling. If the level of effort is the same, there is no justification for deviating from established NEPA procedures.
4. The implication that site-specific projects may not require separate NEPA processes is alarming and likely illegal. NEPA requires site-specific analysis and public involvement for federal actions.
5. This approach seems designed for the Forest Service's convenience rather than to fulfill NEPA's mandates of informed decision-making and public participation.

I strongly urge you to abandon this novel approach and instead:

1. Develop a programmatic EIS that analyzes cumulative impacts across the landscape.
2. Follow up with site-specific EAs or CEs for individual projects that tier to the programmatic EIS.
3. Ensure full compliance with NEPA at both the landscape and site-specific levels, including robust public involvement opportunities.

The Forest Service must not subvert or circumvent NEPA processes, even for laudable goals. I request that you adhere to established NEPA procedures to ensure legal compliance, thorough environmental analysis, and meaningful public participation.

Thank you for your consideration.

Sincerely,

Nicholas Holshouser