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December 20, 2017

Betty Jewett, Forest Supervisor

ATTN: Angie L. Bell

Chattahoochee-Oconee National Forests

1755 Cleveland Highway

Gainesville, GA 30501

Re: Foothills Landscape Project

Emailed to: FoothillsLandscape@fs.fed.us

I am writing to express and ensure that you have a record of my comments regarding the Foothills Landscape Project. I have reviewed the Project document and participated in several public meetings sponsored by the Forest Service. The work that you put into this is appreciated and I do understand the expanse of this undertaking. Additionally, your efforts to receive input from the varied stakeholders are appreciated and the challenges in doing so are recognized.

I consider our National Forest in NE Georgia my home, because indeed my home in Tiger GA is adjacent to it and I spend a goodly amount of time in the forest areas around the Chattooga, Stonewall Falls and Upper Tallulah areas. That is time in recreation, meditation, maintaining trails and cleaning up sites that have been desecrated. A considerable amount of time is also spent examining areas related to FS scoping notices and monitoring projects and conditions after FS approved activities. So, I am invested in these Foothills. I also bring a degree of professional understanding as I have worked in the environmental safety field for three decades.

In reviewing the Project I observed that the proposal is fairly specific with regard to plans for roads, trails and recreation areas. You have considered and shared well those aspects related to "Human conductivity" and recreational experience plans for improvements and controls. Good job. Plans for roads decommissioning and access plans offer a degree of specificity and as far as I observed these seem reasonable. Likewise, planned improvement activities for stream and lake habitat improvements appear to be steps in the right direction. Plans for a Chestnut orchard, Hemlock conservation and proposal to set aside 5,050 acres of old growth were fairly clear and provided reasonable information about where these initiatives would take place. I liked that and could support these initiatives.

However, where the Foothills Landscape Project becomes vague is in your plans for timbering, burning and herbicide use across the Project footprint. I'll first address my concerns about what I read from you concerning herbicide use.

Herbicide Application in Forest

I know that some herbicide use in our Forest may be necessary and reasonable, for example in treating invasive species and in association with a controlled burn. However, your proposal (pg 24 of Foothills Landscape Project) to permit spraying herbicides in utility right of ways, instead of mechanical means that have been used, is most disturbing. An area that may be slated for such herbicide use is the GA Power utility right of ways in the Stonewall/Saga Mountain area. The amount of chemicals that would be needed to substitute for mechanical measures could be very large given the utility lines in this area. My neighbors and I have personally witnessed the activities of GA Power contractors who are brought in from foreign lands and given the task of spraying herbicides. They have done so without understanding risks, without proper personal protection, and sprayed indiscriminantly in our neighborhoods[mdash]until we insisted they stop.

Using herbicides on such an extensive area is very risky, both to forest types and our watershed. How much herbicide an organism is exposed to can depend on more than just how much is applied to a particular acre. Animals and insects increase their exposure as more of the landscape is treated. Exposure to the people applying the herbicides is also of concern. In the not so distant past we were led to believe that most herbicides used on the forest are plant hormone mimics. We now understand that chemical similarity to a benign compound is no guarantee of a chemical being harmless. Furthermore, there are now examples of herbicides and pesticides that were used for decades and considered to be safe only to be banned or restricted when problems were identified. For example, the World Health Organization's research arm now advises that glyphosate, used for decades as an herbicide, is a likely carcinogen. And, even if the active ingredient in an herbicide turns out to be safe, that does not mean the herbicide is safe. Other chemicals are added to herbicides to make the active ingredient spread out or for other physical effects. These secondary chemicals may not be identified, and so we would not know what is being sprayed on our National Forest lands.

Furthermore, in my observations, crews applying herbicide have used it without knowledge or discrimination. Therefore, any intention of supporting species habitat or biodiversity becomes a mute point. Overall, managing right-of-ways with herbicides appears unlikely to improve wildlife habitat, poses a significant risk to ecosystems and should be avoided where possible.

Logging Plans for Forest

With regard to the Foothills Landscape Project plans to potentially log up to 90,000 acres (63% of the project area), this number seems excessive to me, and a significantly larger amount than the Forest Service has planned in the recent past. However, even more important to me is the question of where the logging and related treatments will take place. I have seen information that informs me about Forest Service general priorities and desired conditions, however without knowing where (i.e. the specific stands) I (and I expect others) am unable to envision what all this landscape "management" will actually mean and discern the impact, and unintended impact, on our National Forest.

I do support thinning pine plantations to reduce southern pine beetle infestation risk. I've observed that these stands are likely the most departed from the natural range of variability of all stands in the Foothills, and they should be restored wherever feasible.

I have been involved in "boots on the ground" examinations of areas (for example in the Warwoman Wildlife Management area) to consider proposed treatments for actual stands from a project scoping. This involved going to the field and looking at actual stands and considering impact of actions on forest, aquatics, recreation and neighbors before the first machine enters the woods. Forest stands are not interchangeable and site level examination and analysis and verification of FS data are important. Our National Forest deserves this and so do we, the public, who are its owners.

Without some specificity about the location of FS planned actions the public cannot make well-informed comment or alternative suggestions. Without knowing where forest management activities will take place or the amount of acreage in a given area I am left wondering[mdash]and deeply concerned, and not so supportive.

Prescribed fire

Having a safe and effective prescribed fire program is one of the most important management challenges facing the Foothills, and I am surely supportive of fire management. However, fire lines created by bulldozers can also produce significant negative impacts. Since the location of prescribed fire units is not disclosed in the scoping, the extent and location of these fire lines is unknown. This makes it difficult for me, and perhaps other informed neighbors, to give our full support to prescribed fire planning as described in the Foothills Plan.

NEPA Roundabout Concern

Of equal and related concern are possible changes in the public's opportunity to respond to the Foothills Project as guaranteed under the National Environmental Policy Act (NEPA). From observations during Foothills meetings I was left with the impression that the FS may be exercising tactics to avoid following NEPA requirements, yet I hope I am wrong. Those requirements force Federal agencies to explain what it is they seek to do, why they seek to do it, what the environmental impacts may be of their proposed action, and what alternatives might be available that might lessen environmental impact.

The sheer scope of the Foothills Project (90,000 acres of vegetation management) makes significant environmental impacts unavoidable. This work will occur across a range of (yet undisclosed) ecosystems significantly impacting forest ecology, terrestrial and aquatic species and soil and water resources. For example, even with best management practices (BMPs) soils are still degraded and sediment still enters streams as a result of logging operations, and wildlife populations are impacted to some degree. Therefore, no final decisions or actions should be taken with regard to vegetation management until the Forest Service performs site-level analysis, and as appropriate honors the NEPA process.

I have observed the Chattahoochee National Forest to be a complex and diverse environment--one that I deeply value and respect. I trust that you do as well and will give consideration to my comments and concerns. Thank you again for all your work on this important initiative.

Sincerely,

Marie K. Dunkle