

**Chattooga Conservancy • Georgia ForestWatch • Sierra Club • Southern Environmental Law Center**

*Via Electronic Mail*

December 6, 2019

Ms. Betty Jewett  
Forest Supervisor & Foothills Project Deciding Officer  
Chattahoochee-Oconee National Forest  
1755 Cleveland Highway  
Gainesville, GA 30501  
[betty.jewett@usda.gov](mailto:betty.jewett@usda.gov)

**Re: Foothills Project EA Comment Period**

Dear Ms. Jewett:

We write to formally request that you delay until January 2020 initiation of the 30-day comment period on the Foothills Landscape Project Environmental Assessment (EA).

Your staff has obviously put a great deal of work into preparing the EA which we commend. By our count, the EA including its appendices and embedded specialist's reports exceeds 1,000 pages. Reviewing and processing this material will take a substantial amount of time.

Even setting aside the volume, by the agency's own admission the material is complex and reflects a departure in practice from past analyses completed by the Forest Service. The project purposefully seeks to be more comprehensive than past projects and is likely the largest single project proposed in the history of the Chattahoochee-Oconee National Forest. There has been very little public engagement on the project over the last two years. For those who have been involved from the beginning, reading back into the project and understanding how it has changed will take time, and for those who are new to the project, simply understanding what is being proposed will be a considerable undertaking.

Further complicating matters, the Forest Service has proposed starting the 30-day comment period during the second week of December which means the bulk of the comment period will fall over holidays at the end of 2019 and early 2020. You must know that this is the least convenient time for the public to digest the material and provide the feedback the Forest Service has requested. People will rightfully be busy spending time with family and friends, not reviewing environmental documents from federal agencies.

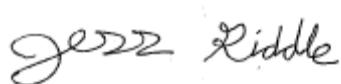
The Forest Service has repeatedly stated that it values public feedback on this project. Initiating the comment period just before the holidays – the hardest time of year for the public to meaningfully participate – seems inconsistent with that position. Just as it has taken the agency

time to develop its analysis, it will take the public time to review and provide feedback on that analysis.

We understand that the agency is eager to move forward with this project. But the project has been in development for a number of years and we can think of no reason why a modest two or three week delay of the comment period will have any meaningful impact on the project schedule. Please let us know if we are wrong about that.

In its online recap of the public meetings held this week to unveil the EA, the Forest Service explains that the “best way to be informed about what’s in the project is to read the Environmental Assessment.” We are simply asking for time to make that happen. We have witnessed numerous members of the public make this same request informally in public meetings. We would very much appreciate your consideration of their concerns and ours.

Sincerely,



Jess Riddle  
Executive Director  
Georgia ForestWatch  
81 Crown Mountain Place  
Bldg. C, Suite 200  
Dahlonega, GA 30533  
(706) 867-0051  
[jriddle@gafw.org](mailto:jriddle@gafw.org)



Patrick Hunter  
Attorney  
Southern Environmental Law Center  
48 Patton Ave., Suite 304  
Asheville, NC 28801  
(828) 258-2023  
[phunter@selcnc.org](mailto:phunter@selcnc.org)



Jessica Morehead  
Director  
Sierra Club, Georgia Chapter  
743 E. College Ave., Suite B  
Decatur, GA 30030  
(404) 607-1262  
[jessica.morehead@sierraclub.org](mailto:jessica.morehead@sierraclub.org)



Nicole Hayler  
Executive Director  
Chattooga Conservancy  
9 Sequoia Hills Land  
Clayton, GA 30525  
(706) 782-6097  
[info@chattoogariver.org](mailto:info@chattoogariver.org)

cc: Ken Arney, Regional Forester for the Southern Region  
[SM.FS.Foothills@usda.gov](mailto:SM.FS.Foothills@usda.gov)