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VIA Electronic Mail

Mr. Edward Hunter, Jr.
Forest Supervisor, Chattahoochee-Oconee National Forests
USDA Forest Service
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RE: Comments on Programmatic Draft Environmental Assessment for Foothills Landscape Project

Ed,

I am writing on behalf of the Chattooga Conservancy to submit additional comments regarding the Programmatic Draft Environmental Assessment (DPEA) for the Foothills Landscape Project that is proposed for the Chattahoochee-Oconee National Forests. Chattooga Conservancy has also joined as a signatory to the comments submitted today by SELC et. al.

We have been involved as an interested and vocal stakeholder since the very beginning of the Foothills Project initiative starting about 5 years ago, back in the winter/ early spring of 2016-2017. Chattooga Conservancy has participated in a multitude of workshops, meetings, presentations, field trips and commenting opportunities. Much of our previous input (including comments on the "Draft Restoration Plan for the Foothills Landscape Project, Section I: Existing and Achievable Future Conditions," dated March 19, 2017, and incorporated herein by reference) continues to be relevant and applicable to the DPEA.

Please accept these comments on the DPEA:

- Narrow and limit the scope of the project to focus on issues with broad support. Exclude known contentious issues that will surely generate disagreements. Establish firm, agreed-upon sideboards for project actions.

- Use selective tree harvesting techniques to restore a diverse native broad leaf forest, which has multiple layers of dominant and co-dominant trees, shrubs, herbaceous understories and ground covers.
- Don't use tree-cutting practices that call for repeated herbicides (that many scientists believe have carcinogenic properties) and burning treatments, to cultivate even-age stands of crop trees of pines and oaks—at the expense of restoring native biological diversity.
- Preserve all existing old growth stands in the project area, including at least 630 acres of existing old growth trees in the Chattooga watershed portion of project area. Further, cultivate and restore potential old growth stands that are connected in a mosaic of intact native forest across the landscape.
- Don't use a prescribed burning regime that far exceeds natural fire cycles in the Chattooga River watershed, which is a temperate rain forest. Natural fire cycles in the Chattooga watershed are 15 to 20 years, or more.
- The FLP must adequately address *restoring a true native forest* connected across the landscape to *mitigate the effects of climate change*, and to help provide migratory corridors for plants and animals to adapt to changing habitats.
- The Forest Service should not log, burn and construct roads in potential wilderness areas, *Mountain Treasures* areas, inventoried roadless areas, or in areas deemed “unsuitable for timber production.”

We appreciate this opportunity to comment on the Programmatic Draft Environmental Assessment for Foothills Landscape Project, and look forward to your response.

Sincerely,



Nicole Hayler
Chattooga Conservancy