877 Paul Nicholson Rd
Blairsville, GA 30512
January 28, 2016

USDA-Forest Service
Andrew L. Baker, District Ranger
Blue Ridge Ranger District
2042 Hwy 515 W
Blairsville, Ga 30512

RE: Coopers Creek Watershed Project (CCWP) #44385—(Hand Delivered)

Dear Mr. Baker:

Please accept the below updated comments on behalf of the Mountain High Hikers Club, Inc. The club maintains a membership of over 180 members from southwestern North Carolina, northern Georgia and eastern Tennessee. These comments are based on the revised draft environmental assessment (EA) dated December 2015 which includes modified proposed action information and alternatives.

The revised draft EA represents a comprehensive document which appears to be inclusive of the multi-scope layers of this massive project and contains updated data and references. While lengthy in content, the revised EA denotes a thoughtful approach to a massive amount of information. In particular, the inclusion of Alternative #3 is an effort by the Forest Service to be cognizant of citizen's deep concerns regarding the original proposal for the CCWP, in particular the commercial harvest of mature trees and reduction to the overall scope of the project.

However, there are environmental and ecological consequences related to the project which remain as critical concerns:

1. While it has been documented that the use of **herbicides** as a management tool will be limited to "aquatically labeled herbicides", there are still toxicity and relevant water/soil interactions which remain questionable. Based on the CCWP, the suggested herbicide *Triclopyr* appears at first glance to provide ecological protection. While certainly not as toxic as other agents, this chemical remains in the soil for 30-90 days and one of the degradation by-products of this breakdown *is trichloropyridinol.* This particular product can remain in the soil for up to one year and there is currently no scientific information regarding the toxicity profile. In addition "run-off dynamics" occur when the herbicides enter the water drainage system potentially threating other non-targeted plants and organisms. Traces of triclopyr residues have been found at soil depths of 45 cm as late as 477 days after application (Newton et al. 1990).[1]
   The Forest Service includes the use of "Best Management Practices" (BMP) for the use of herbicides; however the elements of unknown interactions and natural events place the use of herbicides as a poor management tool to be used in this environment.

(Kreutzweiser et al. (1991)[2] suggest that water bodies can remain at risk of high contaminant levels in slow moving water bodies and shaded streams due to poor photodegradation. While the number of acres documented for herbicide application has been reduced from 3,251 acres (Alternative 2) to 1,327 acres (Alternative 3), the use of herbicides should be removed from all Alternatives.

2. Appendix I- Monitoring includes a list of potential issues and the type of monitoring to be included for this project. Testing of water bodies/soil/sediment/fish for herbicides should be included in this chart and conducted at the 3 month interval after herbicide application. Additional testing should be included as necessary.

3. As documented in the draft EA, there is concern in regards to the enormous impact that will occur in the environment through commercial harvesting and thinning on such a large scale. One major impact is the construction and use of temporary roads (up to 3 miles) needed to handle commercial harvesting. Field studies included in the EA describe that the existing soil/sediment condition as *moderate* with the following notation: "Most of this disturbance is the result of past management activities such as timber harvesting, road construction and maintenance, fire and recreation use. Ground-disturbing activities from forest management practices have the greatest chance in impacting soil productivity through erosion, compaction, rutting, and soil displacement." This useful background observation offers a good monitoring perspective of previous actions and represents direct risk limitations to proposed future actions.

   The balance between the focus of returning this forest area to a healthy and *sustainable* condition carries inherent environmental risks to soil/sediment and water interactions. The reduction of those risks could be gained through the removal of herbicide application and the reduction of scope in alternative 3 to a new Alternative 4 .

MHH appreciates this opportunity to provide comments regarding this important project.

Sincerely,

Judie Kean, Conservation Director
MHH Club, Inc.

Notations
1&2: Weed Control Methods Handbook, the Nature Conservancy, *Tu et al.*

C: Thomas Shope, President MHH