Forest News

Georgia ForestWatch Quarterly Newsletter Winter 2022

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From the director

Utilizing the voice of our membership

J.D. McCrary
Executive Director

As Georgia ForestWatch (GAFW) moves into its 38th year, we are looking to expand upon our solid base of grassroots support for the Chattahoochee Oconee National Forests (CONF). Since our inception, GAFW has been a leader in enhancing the health of Georgia's 867,000 acres of National Forest by protecting our forests and streams, advocating for natural processes, and identifying opportunities to improve Forest management. In fact, we are the only organization with the specific mission of engaging with the U.S. Forest Service (USFS) to promote a healthy CONF. Thankfully we are not the only organization who has the goal of ensuring our forests remain healthy and largely free of commercial logging. GAFW takes pride in collaboration and knows success comes from partnering and teamwork.

Traditionally GAFW has focused its limited resources on monitoring both proposed and implemented projects undertaken by the USFS, which has been a fruitful and productive strategy resulting in many wins. A significant part of our success stems from the USFS knowing that GAFW is here to support positive projects and provide critical ecologically sound feedback on other projects that involve activities such as commercial logging, herbicide use, and road building. What cannot be calculated is the effectiveness of GAFW in suppressing poorly designed and ecologically unfriendly projects that never see the light of day. Know that GAFW is here to amplify your voice against less well thought out projects. Thankfully, federal regulations such as the National Environmental Policy Act (NEPA) require the federal government not only to internally review the environmental impacts of proposed projects but also ensure the public is informed of, and has a say in, those projects. As is often stated – the price of democracy is external vigilance – and GAFW's grassroots founding is defined by vigilance.

The forests in Georgia, and those who care for them, have much for which to be appreciative. The news-driven challenges of forests in our western states often focus on uncontrollable wildfires, the overgrazing of livestock, mining, and other challenges in keeping forests intact and healthy. These are challenges that we thankfully have not traditionally faced in the CONF since our founding. This is not to say we do not have our own challenges: commercial logging, preservation of old growth, road building, and more importantly lack of road maintenance leading to stream sedimentation. There is also the need for increased protections across the forest to keep these threats at bay, and these are priorities of GAFW.

The multi-step NEPA process is a valuable tool, but is not the only one we have in our toolbox. As a last resort we have also been a part of litigation when we feel strongly the situation and project warrants such a response. However, in between the formal commenting process required by NEPA and filing a lawsuit there are other options that GAFW is looking to expand upon to increase our effectiveness. Specifically, we are looking at greater involvement in public policy and advocating at the local, state, and federal levels for increased protections for areas such as the Georgia Mountain Treasures, taking a closer look at the agreements between the Georgia Department of Natural Resources and the USFS for logging and wildlife management, ensuring elected officials have scientifically-based ecologically-sound information to make decisions, and ensuring that legislators know GAFW exists and the policies we support.

GAFW plans to accomplish these goals by utilizing the voice of its membership and community and providing you with the knowledge and opportunities you need to make your voice heard. You may have already seen a shift in our strategy to enhance our toolbox with these tools in a nonpartisan manner, and we plan to continue building the capital needed to be an effective advocate for the forest.

Wheels for Boots on the Ground

Thanks to you, our supporters, we have raised over $10,000 in previous appeal efforts for a new-to-us vehicle to replace the antiquated truck that met its demise in 2020. GAFW is still in need of a vehicle for the organization to conduct field work; however, we are opting to temporarily halt fundraising for a vehicle due to the increasing costs of both new and used vehicles. We will hold the amount raised in an interest-bearing reserved account until further notice, and thank you to all who gave to this important initiative.

In the interim, if you have a vehicle you would consider donating to the organization, we would be very interested in speaking with you further about how you can use this tax deduction to support GAFW.

2021 Outings: That's a wrap!

by Andrew Linker : Outreach Coordinator

As we look back at another year of ForestWatch Outings, it is always a treat to realize how priceless these experiences can be. Educational outings that took place in our national forests not only allowed the public to connect safely in person during the pandemic, they helped us stay connected with the beautiful and wild parts of the natural world during times when it was needed most.

29 Outings were coordinated across 8 counties.

ForestWatch Outings range in difficulty, topic, and locations, stretching across the entire national forest on a regular basis. They help the public discover lesser known trails and areas to explore, which is becoming more and more valuable as popular trails see record numbers of visitors. Granted, we did visit a few popular trails in our forests last year including: Yonah

Board member Melanie Vickers leads the Winter Solstice Hike to Raven Cliff Falls

Mountain, Raven Cliffs, Brasstown, and Blood Mountain. These areas need to be monitored for their intended use and sustainability too! The fact that these Outings are open to the public and free of registration costs, makes this program one of the best kept secrets of North Georgia forests.

(continued on page 8)

Contributors: ForestWatch thanks the following team of staff members, board members, and volunteers who collaborated to produce this issue of the newsletter: David Govus, Sue Harmon, Anne Heikkila, Robin Hitner, Lyn Hopper, Patrick Hunter, Andrew Linker, J. D. McCrary, Nick Nichols and Cliff Shaw.

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Georgia ForestWatch is a 501(c)3 nonprofit educational corporation.

Georgia ForestWatch sees a future where people can enjoy forests that have reached their full majesty, where intact natural processes support healthy ecosystems and thriving biodiversity, and clean streams supply water to millions of Georgians. We believe this future requires the protection and appreciation of Georgia's national forests, and the watersheds, native plants and wildlife they encompass.

Our mission is to enhance the health of Georgia's 867,000 acres of National Forest by protecting our forests and streams, advocating for natural processes and identifying opportunities to improve Forest management.

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Changing timber harvest technology affects our forest

by David Govus : District Leader

In case you missed the GAFW spring 2021 newsletter (gafw.org/newsletter-archives), we are reprinting a photo of a salvage timber sale shot by Dave Blackley using a drone. A windstorm blew down timber over a few acres adjacent to GA Highway 60 near Cooper Creek. This was a non-event that should have been ignored, but the Forest Service (FS), always looking for timber cutting projects, quickly arranged a salvage sale. Even though several of us visited the site afterwards, I did not appreciate how much damage the skidders and feller bunchers used in harvesting had done to the area until I viewed Dave's picture.

Until 100 years ago logs were removed from the forest using draft animals such as horses, mules, and cattle, which had a minor impact on the forest floor. In the 1920s and 1930s loggers started using relatively small tractors outfitted with a winch. The tractors did not traverse the entire area, as the cable on the winch could be carried out a great distance to reach cut logs, and these lightweight tractors produced minimal compaction where they did travel. A logging operation in those days employed a number of people, including sawyers who cut down the trees, a person to drive the tractor and someone to extend the cable out to the cut log so that the winch could drag the log in behind the tractor to be skidded to the log landing.

In the 1970s, tractors were replaced with skidders, much larger machines, still fitted with winches, that could drag several logs at once. Still requiring two people, these larger, heavier machines required larger skid trails, and they ran over and damaged much more vegetation and greatly increased soil compaction. Back in the 1970s it was common to hear old-time landowners say "I want to have my timber cut but I won't let a skidder on my land. They just tear everything up." Within a few years, landowners had no choice, as the loggers remaining in business all used skidders.

By 2021, cable skidders were replaced by grapple skidders. Operated by one person, this bigger machine has to drive to the cut log or logs and drop a grapple on the logs. Trees are no longer cut by hand but

Photo credit: Dave Blackley

Skid trails criss-cross the Toccoa Salvage Project

by feller bunchers. Larger than skidders, these machines have cutting shears on the front of them. As they have to drive up to every tree that is to be cut, they also impact a large area, trampling small trees and shrubs and compacting the soil.

All of this can be seen in Dave's excellent photo. A huge amount of the project area was compacted and trampled. Compaction can destroy soil porosity, increases runoff and erosion, inhibits root growth and revegetation and damages existing trees. Of course, all of these machines running adds carbon dioxide to the atmosphere, and the living trees run over and destroyed reduces carbon capture.

Photo credit: US Forest Service, National Archives

Cattle skidding a peeled tulip tree log in north Georgia in the early 1900s.

Photo credit: USDA

Rubber tire grapple skidder

Photo credit: David Govns

Feller buncher, grapple skidder and dozer

This costs the taxpayers money, as the timber sales cost more to arrange and administer then they bring in for the Forest Service. The timber cut is negligible compared to the 11 to 12 million acres of well-managed private timberland along the flat coastal plains of the Southeast.

With modern logging's substantial impacts to forest resources, climate change, and its unsound economics, we all need to continue questioning and challenging the Forest Service's active timber management program. ■

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Around the forest

by Robin Hitner : Conasauga Ranger District
by Nick Nichols : Blue Ridge Ranger District

Conasauga Ranger District – Robin Hitner and David Govus, District Leaders

West Conasauga District – Armuchee area (Walker, Chattooga, Floyd, Whitfield, Gordon counties) : Since our last newsletter, timber is being cut on the Ponder Creek and Dick Creek plots that are part of the Armuchee Healthy Forest Project in Walker and Chattooga counties. Per Daniel Morrill, Timber Management Assistant, the sites are currently not active due to it being outside the operating season. The contract prohibits logging from December 15th to March 15th during the cold and wet season unless ground conditions exist to operate and not cause any damage to the resource. This is a contracting officer decision. If allowed, all erosion control measures must be kept up to date in case conditions change and the logger must pull off until conditions become satisfactory.

Blue Ridge Ranger District – Dave Blackley, Nick Nichols, and Larry Winslett, District Leaders

After 12 years as District Ranger, Andy Baker has accepted a new position with the Forest Service. Towdy Tipton, Recreation Manager, will serve as Acting Blue Ridge District Ranger.

The Union County Gun Range adjacent to the Brasstown and Mark Trail Wilderness Areas and 1 mile from the Appalachian Trail (A.T.) has been approved by the USFS for construction. A single construction bid was submitted at $3.2M, 30% over the $2.4M budget, and the project will be rebid. Environmental organizations may be meeting with the USFS so that mitigation measures will not be eliminated as a measure to reduce potential costs.

The site is within the Mark Trail (extension) of a Georgia Mountain Treasures Area and will have a perpetual adverse impact on visitors to the area and hikers on the A.T. Georgia ForestWatch, Southern Environmental Law Center and others vigorously opposed and fought this project for over three years. It is the only project in Georgia filed for appeal under E.O. 13990 (review of environmental permit approvals under the previous administration).

Land Tracts Nominated for Acquisition
Response to GAFW member comments on the USFS's land parcels recommended for purchase and addition to USFS lands:

"Thank you so much for supporting our FY23 Land and Water Conservation Fund nomination. Your letter has been included as part of our submittal and will be reviewed by a regional and national panel. You have directly supported our Forest in acquiring high-value conservation lands. I am grateful for your continued support and we look forward to updating you on our successes herein.

Sincerely, Ed Hunter, Forest Supervisor"

Update: Lake Winfield Scott Recreational Improvements
The Blue Ridge Ranger District re-posted the scoping notice for Lake Winfield Scott Recreational Improvements, and GAFW members re-submitted comments. The following is part of an email from the Acting Blue Ridge District Ranger:

"I wanted to thank you for being so thorough with your comments. It certainly helps when writing the final document. The Lake Winfield Scott project is HUGE. I don't ever recall an opportunity like this to basically restore a campground and make improvements for visitors. It's very exciting and I'm glad you took the time to respond. We don't always get positive responses to projects, even though most are in favor of them. Thank you again for taking the time to be so thorough and for your interest in the project.

Respectfully, Towdy Tipton, Acting District Ranger"

The above responses demonstrate that your personal comments can have an impact on USFS proposed projects. To sign up and view comment opportunities, see: https://www.fs.usda.gov/projects/conf/landmanagement/projects ■

WELCOME NEW MEMBERS! (November – December 2021)

Laurie Alvord
Ann Aultman
Karen P. Beasley
Graham Burkhalter &
Solyee Kim
Stefanie & John Carroll
Gary Crider
Jason DiMonda
Ke'Andre Foster
Sarah Gallaher
Cathy Hires
Deborah Kramb
Bob Lusher
Lindsey Mann
Karen Martin &
Tom Parrish
MLFung, Inc.
Joseph Paprocki &
Cathy Carlisi
Lee Pettis
Beth Riley
Kristi Romuald
Dominique Rouvet
Suzanne Smith
Terry Stewart
Jacob Weston

Board member spotlight: Irenee Payne

by Anne Heikkila : Board President

Growing up on a cattle farm in Blairsville, GA, Irenee Payne spent the majority of her childhood outdoors. Her family's farm is mostly forested, and she would roam the woods with her family, most notably her grandmother, learning about the local flora and fauna. Because of her upbringing, she became interested in botany at a young age.

Irenee majored in biology at Young Harris College with the idea of entering the medical profession. However, she reconsidered her choice of profession when shadowing an ophthalmologist and fainting in the operating room. Irenee returned to her love of plants and went on to study the biology of our native plants here in Georgia. Upon graduation, Irenee worked in research at Oak Ridge National Laboratory in TN. Over time, however, she realized that she preferred being out in the field rather than the laboratory setting and decided to further her studies.

Irenee went on to graduate school, and in 2020, she received her master's degree in Environmental Science from Oregon State University. While completing online classes, she conducted research through the University of Georgia and the USFS. She studied how fire impacts decomposition rates and soil fauna communities in the North Georgia mountains.

Irenee currently works as the Pollinator Coordinator for Georgia Association of Conservation Districts. She establishes pollinator habitat across the state in parks, schools and agricultural land. She conducts outreach events in the realm of pollinator conservation as well.

Recently, Irenee learned of ForestWatch through meeting our outreach coordinator, Andrew Linker. She led a pollinator hike for us and attended our Fall Retreat that was held in 2021 at Lake Winfield Scott. She was impressed by how passionate our staff, board and membership are at GAFW, and she was drawn to GAFW's mission of protecting the Chattahoochee and Oconee National Forest ecosystems.

In addition to becoming a member and hike leader, Irenee is currently serving on our board of directors. We are fortunate to have Irenee step up in leadership and appreciate her depth of knowledge and passion for our forest ecosystems.

Join us in welcoming Irenee to the ForestWatch family. By attending one of her pollinator hikes, you'll have a fun day in the forest and come away with a knowledge of and appreciation for Georgia's native pollinators.

According to Colleen Dilenschneider, in an article titled Here are the Four Best Reasons to Join a Nonprofit Board (https://www.colleendilen.com/2018/04/11/fellow-millennials-four-best-reasons-join-nonprofit-board/), when you serve on the board of directors for a nonprofit organization "you get a valuable seat behind the wheel of a major organization, and you play a key role in strategizing." GAFW currently has two seats open on our board of directors, and if you are interested in board service, please send us an email to info@gafw.org. You do not need a science background or degree, just a love of our forests and a passion to protect them. ■

Save the Date!

The Georgia ForestWatch Fall Retreat will be held at

LAKE WINFIELD SCOTT PAVILION

on

Saturday, October 15th, 2022

Plan now to attend for informative programming, good food, and plenty of fun and fellowship with other ForestWatchers.

Let us know if you'd like to reserve a campsite at either Vogel State Park or Lake Winfield Scott.

You can email us at info@gafw.org or call 706-867-0051

2021 Outings: That's a Wrap!

(continued from page 3)

The Outings program is unique because members, leaders, and specialists within the community are the ones sharing their passion for an area or topic. From wooly adelgids and bladderworts to geology to Native Americans, there is always more to learn and explore. This community building is important in helping to advance our mission while being just plain fun!

12 Partner organizations made it possible last year.

Of course, the Outings program incorporates adventurous components of exploring our forests, too. With over 1200 miles of Forest Service roads, many of the roads that lead us to lesser known areas are gravel and degrade over time. Sometimes, our favorite hike or area gets overused, and funding for basic road maintenance isn't always top priority for our land managers. Access to these areas that we experience and grow to love is a key component of educating about and experiencing our forests. We greatly appreciate coordinating with Outing Leaders who have scouted the route, providing a more enjoyable experience in our national forests. Once comfortable with an area, we can often find additional opportunities to extend the adventure further to known waterfalls, vistas, and big trees.

These adventures we embark on together help support an ever-growing network of those who care deeply about our forests. Thanks for helping keep an eye on our forests!

Over 325 attended Outings, exploring over 140 miles of national forest.

- Invite your friends to sign up for Outing notices at gafw.org/signup, but keep in mind, ForestWatch members get first notification! You can become a member at gafw.org/membership.
- Have an Outing Leader you want to recommend? Email Andrew at alinker@gafw.org.

New board member Ireneee Payne shares the tiny wonders of fall pollinators on a hike up Blood Mountain

Photo credit: Mei Lee Fung

Hikers enjoy the interesting geology of Keown Falls

Mallory Pendleton of Chattahoochee RiverKeeper leads a group to the source of the river

District Leader Robin Hitner and volunteer Leslie Phillips cleaning up the Conasauga River

Hear what folks enjoy most about Georgia ForestWatch Outings program:

Georgia ForestWatch Outings take me to inspiring places in the company of people who care deeply about our forests.

– Mark Ogilvie

Georgia ForestWatch Outings are the icing on the cake of its great advocacy work with the U.S. Forest Service: a chance to learn not only names of plants but also how our forest works.

– Dr. Bill Witherspoon, Geologist

ForestWatch Outings are well-planned and educational.

– Charles Brown

The trips I attended provided great opportunities to learn about aspects of the Forest beyond simply hiking (stream ecology and geology of the NW part of the state). Thanks!

– Bob Anderson

I got to hike on two different sections of the Bartram Trail with Georgia ForestWatch last year. Both hikes were on sections I would not otherwise have known about or been able to find on my own.

– Jane Trentin

ForestWatch Outings opened the forest to me.

– Sue Harmon

I especially enjoyed the Yonah Mountain hike, because it was led by a geologist, Dr. Bill Witherspoon. So in addition to a great hike with wonderful views, we learned some geology, too!

– Bob Lusher

The diversity of Outings and caliber of Georgia ForestWatch Leaders, who offer their time and knowledge, provide the foundation for my exponential appreciation for our forests and all the unique aspects that encompass an ecosystem. These experiences also spark a flame to learn more, to participate more, to share, and continue to pass down the knowledge to others. Thank you!

– Leslie Phillips

There's nothing like safely exploring trails I've not hiked before with knowledgeable leaders and fellow hikers.

– Susan White

Hikers enjoy an open-air ride back to their cars after hiking the Bartram Trail

Volunteers learn new ways to help monitor our national forests

Participants learn about invasive pests on our native hemlock trees with Stacie James of University of North Georgia's Ecological Protection Lab

Thank you.

by The Board and Staff of Georgia ForestWatch

It is only through the generosity and support of our membership and community that Georgia ForestWatch (GAFW) can continue its vital work. Thank you to all who gave so charitably during our 2021 year-end appeal. Our initial goal for the appeal was a modest $33,000, but based on the success of our fundraising in December, we increased our goal to $43,000 on the final day of 2021. We are thrilled to report that thanks to you we have surpassed our fundraising goal.

Last year was a time of transition for GAFW, and 2022 will be a rebuilding year, with the goal of significantly expanding our membership and resources to address the increased challenges of commercial logging, stream sedimentation, increased recreational use, and overreliance on herbicides in our national forests. Even as we grow and enter our 38th year, we are still at heart an agile grassroots organization that needs the engagement of our members and contributors to be effective.

Based on staffing changes, such as adding a Communications Coordinator, and increasing costs, our budget is growing from under $200,000 in 2021 to over $270,000 in 2022, and while we are starting the year on a high from our year-end fundraising, we still need your support. Donations from individuals accounted for 72% of our income in 2021, and while we are increasing our grant writing output, we will always be an organization who needs the support of individual contributors such as yourself.

Start planning now for how you want to make an impact this year. There are many ways to support Georgia ForestWatch, several of which offer attractive benefits for you while supporting our important work.
Here are some ways to help this year:

Give cash. Cash is the most expedient way to give to support our current needs. Please go to our website at www.gafw.org or PayPal to make an online donation, or mail your check to GAFW, 81 Crown Mountain Pl #C200, Dahlonega, GA 30533. Even better, go to PayPal and schedule a monthly recurring donation.

Join or Renew your Membership. GAFW is a membership organization whose constituents drive the organization. As a member, you will receive our newsletter each quarter, first opportunity to register for our events, opportunities to use your voice to promote healthy Chattahoochee Oconee National Forests, and the tranquility that comes from knowing you are an integral part of watching over forest activities and projects. Go to www.gafw.org to renew or join online.

Give a Gift Membership. Share your interest and support of the Forest with a neighbor, a young person, or a loved one with a gift membership. Student memberships start at $20 and can be a powerful gift for those who love the Forest. Send an email to info@gafw.org and we can guide you through the process.

Give appreciated stock. When you give appreciated stock, we'll sell it and you'll eliminate all the capital gains tax you would have paid had you sold it. Your gift will be deductible at full fair market value (assuming you have held it for more than one year).

Lead an Outing. GAFW traditionally coordinates approximately 24 outings each year, but we look forward to increasing outings, work days, and/or public educational presentations.

Donate an insurance policy. A gift of a life insurance policy makes a perfect donation. To qualify as a deductible gift, GAFW must become the policy owner. For most types of insurance policies, your tax deduction is usually the cost basis or the fair market value of the policy, whichever is less.

Join us at our annual Retreat. Save the date for our annual retreat at Lake Winfield Scott on Saturday, October 15, 2022. If you are interested in a reserving a camp site during the retreat, please contact Office Manager Lyn Hopper at lhopper@gafw.org. Stay tuned for more information.

Join the Board of Directors. GAFW is always looking for active and engaged board members who can lead the growth and direction of the organization. To learn more, please send an email to Board Chair Anne Heikkila at anne.heikkila@icloud.com.

Contribute to the newsletter. GAFW strives to produce a newsletter each quarter that is both educational and enlightening. We are seeking writers and authors to contribute short and medium length newsletter articles on topics relevant to the GAFW community. Please contact jdmccrary@gafw.org to discuss a submission.

Host a Facebook Fundraiser. Go to https://www.facebook.com/fundraisers/ and follow the prompts to choose GAFW as a recipient. Facebook makes it easy to host, and 100% of donations go directly to GAFW.

Make a gift from your IRA. If you are 70½ or older, you can transfer any amount up to $100,000 annually directly from your IRA. The transfer doesn't generate taxable income or a tax deduction, so you benefit even if you do not itemize your tax deductions.

Choose GAFW on Amazon Smile. AmazonSmile is a simple way for you to support your favorite charitable organization every time you shop, at no cost to you. AmazonSmile is available at www.smile.amazon.com and can be activated in the Amazon Shopping app for iOS and Android phones. When you shop with AmazonSmile, you'll find the exact same shopping experience as Amazon.com, with the added benefit that AmazonSmile will donate 0.5% of your eligible purchases to GAFW.

Contact us at info@gafw.org or 706-867-0051 for any assistance with processing your donations or to learn more about our work. ■

Carbon storage in the Chattahoochee Oconee National Forests (CONF)

by Patrick Hunter : Southern Environmental Law Center

In the recent objection to the Forest Service's Foothills Landscape Project, the Southern Environmental Law Center crafted a compelling narrative on behalf of a coalition of partners, including GAFW. One of the components of the objection centered on the role of our forests in storing carbon and the requirements of the Forest Service to incorporate the evaluation of carbon storage and releases as a result of planned projects. We found this portion of the objection so profound and well written we wanted to share it with you as an excellent example of the important role our forests play in countering climate change.

The Forest Service falls short ... to forthrightly disclose the effects of its action on carbon emissions. This problem culminates in the Forest Service's conclusion that the "action alternatives will likely result in overall lower carbon releases and higher elevations of sequestration overtime [sic] than the no action alternative." This conclusion is misleading, if not factually incorrect.

Forest Service analysis shows that on the CONF, tree stands sequester carbon at increasing rates through approximately 35 years of age. That rate then slowly declines over several decades to approximately 2/3 of the maximum rate which the stand then maintains for a century or more. For example, around age 35 an oak/pine stand would reach a maximum sequestration rate of approximately 8 tons of carbon per year per hectare. That rate would decline to approximately 5 tons of carbon per year per hectare around age 120 and then maintain that rate for decades. By age 100, this stand would be storing over 500 tons of carbon.

The agency also estimates that in the decade after a stand is harvested at least half of its stored carbon is emitted to the atmosphere. This percentage could increase significantly depending on the end-use of the harvested wood.

As a result, harvesting the oak/pine stand would emit at least 250 tons of carbon to the atmosphere in the first decade. A new stand planted to replace the harvested stand would not sequester 250 tons of carbon for 35-50 years despite the fact that younger stands sequester carbon at a higher overall rate than older stands.

The bottom line is that the action alternatives evaluated in the Final EA will result in increased levels of carbon release for multiple decades at precisely the time when it is most critical that we reduce carbon emissions. The agency may choose to release that stored carbon through timber harvest but it must forthrightly disclose that effect to the public. The Final EA Climate Change Report's assertion that the "action alternatives will likely result in overall lower carbon releases" can only be true if we look at a timeframe of many decades to centuries. The assumption that "harvesting and regenerating forests can also result in net carbon sequestration in wood products and new forest growth" is similarly only true on a many-decades-to-centuries timescale. But in the near term, these statements are misleading and understate the project's likely contribution to climate change in the near term.

To support its conclusion, the agency assumes that "the potential for future carbon accumulation in forests is uncertain as projected increases in disturbance rates such as fire and large-scale insect mortality may release a fraction of existing carbon stocks." Therefore, "in some cases ... removing carbon from forests for human use can result in lower net contributions to the atmosphere than if the forest was left unmanaged." But the agency has not shown that these generic assertions are true in the Foothills project area. To the contrary, separate agency analysis predicts that through 2060, the ecoregion province where the Foothills project is located is likely to see a decline in total area burned through wildfire. The agency is also candid that that the CONF is affected "by frequent natural disturbances such as drought, fire, wind and ice storms, insects and disease, and hurricanes." But of the forest disturbances forest that affect carbon stocks, 83% are attributable to timber harvest and only 3% each are attributable to fire and insects.

To be clear, the Objectors do not dispute that climate change will affect wildfire regimes and the frequency of insect outbreaks on the CONF. But we are aware of no evidence – and the Final EA does not include any evidence – suggesting that those events will become so destructive that "removing carbon from forests for human use [will] result in lower net contributions to the atmosphere than if the forest was left unmanaged." Timber harvest is the leading cause of carbon emissions from the forest and additional harvest is unlikely to result in "lower net contributions to the atmosphere than if the forest was left unmanaged."

To meet its hard look requirement, the agency must forthrightly disclose that its action is likely to increase carbon emissions along any timescale relevant to avoiding the worst impacts of climate change and only has the potential to "result in overall lower carbon releases," as compared to no action, over decades or centuries under the best-case scenario. ■

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