

To: Betty Jewett

ATT: Angie Bell

Please see and consider the following comments on the proposed action for the Foothills Landscape project. (FLP) . Before I start, let me comment on two issues, neither of which will fall within the parameters of the approved comment area. But I still want to comment. First, I am deeply concerned with the focus on one small area of the Forest. In our county, Rabun, in which the Federal Gov. owns approximately 60% of the land base, only about one fourth is being considered for management under this plan. It eliminates some of the best grouse habitat, a bird that is in serious trouble in Georgia, and some of the more mature forest types. If this plan moves forward, these areas are in danger of no vegetative management for decades. **This is not acceptable.** Second, the statement that states **“recovery of ecosystems that have been degraded, damaged or destroyed”** is simply out of line in terms of what has occurred on this Forest. Yes, it might apply to specific ecosystems, shortleaf pine/hardwood, but in general the employees of the USFS have dedicated their working lives to restoring this forest. They have been hard at work for over one hundred years trying to bring this forest into a productive resource for the public. They did a good job and the results can be seen on the ground. Consider restating this statement. As is, it implies an insult to past dedicated employees, and this is not acceptable or true. You are using a buzz word/statement. You and I may understand what is ment by the statement, **but the general public does not.** Now on to comments that apply to the Plan.

Southern Yellow Pine - Creating and developing shortleaf pine stands is difficult at best. They demand an open seedbed and will not tolerate a lot of competition while developing into pole timber. It requires a heavy impact on the area to be treated. You must use clearcut or cut to a very low BA. Then the stand must be treated with a herbicides, and probably released. If you are not willing to do this, you are wasting time and public money. The Stumphouse District has some of the best examples of shortleaf regeneration stands I have seen. Also, Shirly Grove, on the Chattooga District is about 30 years old and well done. This is not an easy task, but needs to be done, as shortleaf is native to this area and develops some of the best timber. Do not attempt to do this where white pine is established on good sites. It cannot be done unless you go to extreme measures and expense, and you will probably still fail. Just manage the stand in place. You must pick your sites carefully. I support this effort if it is done with care and reason.

Oak and pine Community – This also includes white pine. Do not ignore this species. Some of the best examples of pine/oak communities consist of white pine and oak. White Pine is easily managed with selection harvest, which creates openings allowing younger oaks to develop and also, start development of pine seedlings. Leave an overstory of older oak. Fire is not a cure all for this.

Unique and Threatened species habitat – Encourage harvesting to thin to the lower limits of the proposed 15-20 BA with commercial harvest. Why is grouse not mentioned in this plan. The populations have dropped to extremely low levels. This should be a focus area in the plan, even though this is not the best area for the bird, due to elevation limitations. It will take some special efforts to create habitat that this bird needs. There is a serious problem with this bird and the forest continues to ignore it. It is very concerned with other species, so again, I ask, why is this not a animal of special concern. This is a serious mistake, and the plan should address it directly.

Woodland Community Restoration – Encourage the maximum harvest to the lower limit of 20-40 BA accompanied by PB to create the best wildlife habitat and commercial timber production.

Pollinator Habitat Conservation - Although I certainly favor creation of pollinator habitat, I strongly discourage converting existing wildlife openings to meet this need. The grass/forb habitat is a tiny percentage of area on the forest and meets critical needs for grouse and turkey brood habitat. This type of habitat can be created by other means such as PB and timber harvest roads and decks. Also, too much public money has been invested in creating existing openings to do away with them.

Pine Plantation treatments – Thin these stands that exist, as they are declining in growth and exhibiting mortality. Grow these stands out, and use good forestry practices to develop into sawtimber for commercial harvest. I also encourage non-commercial treatment where needed.

Connectivity – Strongly encourage the maximum of young forest creation up the to 9,500 acres identified in the FLP. Add small Clearcuts to the plan where needed as a prescriptive tool. To restore shortleaf, you will need this. Small cuts of this type, in areas away from public view, will, in most cases be accepted. I suggest cuts in the 15/20 acre range. This needs to be in the tool box. Stop ignoring it.

Also, please add selective harvest as a tool in the White pine/ hardwood stands. It creates excellent stem diversity both in species composition and vertical diversity. This works!!!! Please at least add it to the tool box. Also, one other small factor, it is accepted by most of the public as a harvest method due to the lack of visual impact on the forest. This just might be important in implementing a plan.

Old Growth – Not sure there is such a thing on our forest, and I suspect if there is, we have plenty of it on top of the ridges, in stands of white oak. Just walk along the AT. What is the definition of old growth here? It is not the same as the west coast. If we must add a few acres, select areas that are already out of the timber base as designated by the FMP. Remember, we do have a FMP that addresses these issues. Mature stands are not old growth. Many non professional look at old, big trees and declare them to be old growth. Not so. Identify stands on areas too steep to harvest, areas in riparian zones, areas on top of ridges, areas declared out of the timber base, etc, use common sense here and do not bow to political pressure from groups like forest watch. You already have plenty of opportunities, if you simply use what you have on the books.

Recreation – Why is this even in the plan? You have a FMP that cost millions to develop. Use it. Stop wasting public money.

Decommissioning of Roads- take advantage of this to develop strip wildlife areas by day lighting and planting them for wildlife, and to stop erosion. Do not destroy the road beds as they may be needed after this forest team passes on. Time does move, and objectives and focus will change. Just look at the USFS history in this area to see the truth in this statement. Also, carefully pick your choices, as the public has the right to use the forest, and roads are necessary.


Fire – Expanding the role – the numbers you have in the plan are unreasonable and unattainable. Your budget and personnel cannot do this. Also, just throwing fire around in the forest to meet acre objectives does not meet specific needs in many cases. An example of this would be the burning of closed canopy stands. The results are short term and really do not meet wildlife objectives. That said, fire is important, but should be used in very site specific areas where you can get the very best results for both silviculture and wildlife needs. The fire program needs to take a very close look at what it is doing, and what it is actually achieving. This is not being done at this time, and adding acres is not the answer. Removing leaf litter does not achieve the results you would like to get.

IN CLOSING - In general, I support this plan. I do reserve judgment . This forest has a reputation for planning and not implementing. This reputation is in both local communities, and within your own organization at higher levels. You have two FMP plans, and have several other smaller plans on the books (warwoman, etc). None of them have been implemented. None. There has been almost no timber management or harvest since 1994, with the exception of some plantation thinning. This is not acceptable. **The FLMP objectives have not been met.** As a result , this forest and the surrounding communities have suffered. An example of this would be the slashing down of acres of timber on the Warwoman WMA , when we have a commercial chip plant ten miles away. This type of management is insane. This type of management by the USFS has not gone unnoticed by local government, or the people in our communities. Thus, your reputation for not meeting your goals.

In general, the public wants to see their forests managed in a reasonable and sustainable way. Here is your chance to prove to them that the leadership of the USFS is able to meet their responsibilities. It is way past time to meet and implement your FLMP objectives and stop planning.

Sincerely, /s/ Jim Kidd – Box 1990, Clayton, Georgia 30525

770-297-3062

A handwritten signature in black ink, appearing to read "Jim Kidd". The signature is written in a cursive, flowing style.