

January 6, 2020

## COMMENTS ON FOOTHILLS EA

The basic problem of only looking at a small portion of a Ranger District exclusively, such as the Foothills Project, is that other areas in some cases needing far more attention, are ignored. A common response when pointing out such problems to district personnel is “we can’t spend time on issues outside the Project boundary until implementation of it is complete”. It’s a little hard to understand why a District Ranger position is even needed if he isn’t given the option of setting work priorities for the entire District. The concept of even setting up Ranger Districts is to justify a line management position that is responsible for an area smaller than an entire Forest. Such a position should be allowed to set needed work priorities for their entire allotted acreage without being completely hamstrung by unnecessary limitations from their immediate Supervisor who certainly has less knowledge of the District needs.

Two items from the Forest Plan should have been amended long ago. First is the Forest’s definition of Early SUCCESSIONAL Wildlife Habitat. You include permanent wildlife openings, R/W’s, pastures, and even Open Woodlands under this definition, although there is nothing successional about either habitat condition. These may provide important wildlife habitat, but do not serve the same purpose for wildlife as a regenerating forest stand. Second is a limitation established by Elizabeth Estill, a Regional Forester, several years ago. She sent out direction to the entire Appalachian Forests that timber harvesting for the purpose of providing timber products to the public would no longer be allowed. Only timber harvesting for wildlife or other purposes would be allowed. There are at least four Congressional Mandates specifically stating that the Forest Service will provide the public with a continuous and sustainable supply of timber products. In talking with other Appalachian Forests it appears that the Chattahoochee National Forest is the only one still following such direction. It is an unnecessary limitation on the timber management program and should be removed.

Major emphasis of the document appears to be on increasing the component of natural or native yellow pine in the timber stands. Shortleaf pine is the primary species emphasized since pitch pine was never a significant component of existing stands, and table mountain pine only occurs on a very few of the driest and poorest ridge sites on the Chattahoochee NF. Loblolly pine was planted fairly commonly in the past, but was not a natural component of pine stands in the Foothills Region. Management direction also favors shortleaf pine over white pine and virginia pine. It’s a little hard to understand why so much emphasis and effort is planned on increasing the amount of shortleaf pine, when you consider how much of the existing stands were killed by shortleaf disease and southern pine beetles in comparatively recent years. Based upon historical events, it’s almost a certainty that any increase of the shortleaf component will be reduced by the same limiting factors in the future. There are any number of management actions that should receive priority over increasing yellow pine occurrence.

Secondly, considerable emphasis is given to the premise or prognostication on future lack of oak regeneration. A 2013 Forest Service computer run of stand species shows a component of oak in the vast majority of existing stands, other than some cove sites. Since almost all of these stands over thirty years age are the result of clearcutting with no other special management techniques applied, it’s a little hard to understand just why prescribed burning and all the other management techniques required here are necessary to insure oak reproduction. The idea that you must prescribe burn on a rotational basis to insure oak regeneration in these mountain stands is highly questionable. The primary concern from both a wildlife and timber production standpoint in this EA is a lack of regeneration type harvesting (clearcutting or two age shelterwood), especially in hardwood stands.

Under your table of Proposed Actions in Alternative 2, the amount of regeneration type harvesting that would provide high quality wildlife habitat is literally insignificant when you consider the implementation is over a 15 year period. The 500 acres in mesic hardwood “suitable for grouse”, 500 acres of daylighted roads, and 2000 acres of oak and oak/pine amounts to roughly 200 acres annually. The 5800 acres of yellow pine and 1700 acres of pine

plantations regenerated should be of some wildlife value, but probably less than in hardwoods. Comparing this total to the following list of actions illustrates just how miniscule the regeneration schedule is.

- Yellow pine maintenance, thinning – 20,000 acres
- Oak and Oak/pine maintenance on moderate to high productivity sites, midstory reduction – 14,800 acres
- Oak and oak/pine maintenance on low to moderate productivity sites, thinning and midstory reduction – 9200 acres
- Oak where fire can't be used, expanding gap treatments – 14,600 acres
- Yellow poplar and mesic oak forests not suitable for grouse habitat, create canopy gaps up to  $\frac{3}{4}$  acre – 8100 acres (This is probably the best potential grouse habitat)

In your summary you show an objective of 7% early successional habitat. The only harvesting techniques that result in such habitat are clearcutting and two age shelterwood. Canopy gaps and prescribed burning do not qualify. How do you arrive with such a figure?

Canopy Gap harvesting will have serious drawbacks as evidenced by the old group selection technique, which appears to be basically the same type operation. Sale layout costs are significantly higher than clearcutting or two age shelterwood and the openings created have too much shade to be acceptable for regeneration purposes.

As pointed out in this document, the single biggest source of sediment to streams on the Forest are unpaved roads. Timber operations such as single tree selection, group selection, thinning, and canopy gap harvesting (1/2- $\frac{3}{4}$  acre max) maximize the amount of roading necessary.

Furthermore, the small size of cover provided by regrowth in canopy gaps tend to make them serve as predator traps from both wild and human predators. Wildlife has a far greater chance of survival if the cover is large enough that they can be flushed and still stay in cover rather than being exposed in more open surroundings.

From a wildlife and silvicultural standpoint, clearcutting provides the greatest benefit and least economic costs of any type regeneration harvesting, especially on slopes over 35% where cable logging is specified. On slopes less than 35%, two age shelterwood can provide similar benefits if leave tree specifications of 20 or less BA is retained as specified in original criteria provided by the Forest Service Experiment Station.

In summary, the single greatest need in the Foothills Project is significantly more regeneration type harvesting utilizing one or both of the two methods described in the paragraph above.

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