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Chattahoochee-Oconee National Forests

**RE: Foothills Landscape Project #52509**

Dear USFS,

Thank you for the opportunity to comment on the Foothills Landscape Project. I concur with the USFS proposal of Alternative 2 to improve biological integrity, increase resiliency to disturbance, maintain and restore connectivity, and improve soil and water quality. Critical to threatened and endangered wildlife is the goal to increase young forest composition to 5%. I also commend USFS for focusing on science based conservation in the face of overt threats of litigation by groups that ignore the consensus of peer reviewed wildlife and forest habitat research.

It is imperative that USFS reinstate the historic disturbance regime that existed for millennia prior to fire suppression. Fire and mechanical disturbance are crucial to restoring public forest to the historic range, diversity, and health of forest types and ecosystems. The scope of prescribed burning and mechanical disturbance is a much needed step toward ensuring survival of numerous disturbance dependent plant and wildlife species on the brink of extirpation.

Here are follow up questions and comments:

* What are the near term and long term fire frequency regime objectives, appreciating that a more frequent regime is initially required to reverse the effects of decades of fire suppression, including mesophication or replacement of fire dependent vegetation with shade tolerant species?
* What is the approximate acreage of bog habitat to be restored for benefit of the endangered Bog Turtle?
* What is the USFS public communication strategy on prescribed burning? Not only does communication forewarn the public of burning activity, but it also represents an opportunity to educate the public on the importance of burning for forest health and wildlife diversity.
* Not only was fire more historically frequent on the landscape, other disturbance activity not mutually exclusive of fire was also more prevalent and should be mentioned. Historical disturbance in the Appalachians included girdling and browsing beaver, elk and bison; millions of roosting passenger pigeons; and indigenous people practicing agriculture. **1** Thus, the mechanical treatments prescribed in the project plan are a necessary replacement for absent physical disturbance that existed for millennia.
* It should be mentioned that there are other benefits of this project associated with improved forest health and diversity, including more robust watershed and carbon storage and sequestration. **2,3**

Thanks for your consideration,

Dan Gehring

Oconee County, SC resident, avid outdoor enthusiast, and member of conservation groups including The Nature Conservancy, Friends of Lake Keowee Society, National Wild Turkey Federation, and the Ruffed Grouse and American Woodcock Society.

1 Greenberg and Collins, 2016, *Natural Disturbances and Historic Range of Variation: Type, Frequency, Severity, and Post-disturbance Structure in Central Hardwood Forests*

2 Lovett et al 2004, Lovett and Mitchell 2004, Christenson et al 2009, Fitzhugh et al 2003a and 2003b, Templer et al 2005; W.T. Swank, J.M. Vose, K.J. Elliott, 2001, *Forest Ecology and Management* 143: 163-178

3Harmon, 2001, *Carbon sequestration in forests: addressing the scale question*. Journal of Forestry, April: 24-29; USDA FS 2014b, *Baseline estimates of carbon stocks in forests and harvested wood products for National Forest System units*, Eastern Region Whitepaper; Brandt et al, 2014, *Central Hardwoods ecosystem vulnerability assessment and synthesis: a report from the Central Hardwoods Climate Change Response Framework project*, Gen. Tech. Rep. NRS-124.