COMMENTS /OBJECTIONS ON THE FOOTHILL LANDSCAPE PROJECT FINAL ENVIRONMENTAL ASSESSMENT

**COMMENT**-Select Alternative 2 on the Final EA for the FLP with the following exceptions.

**COMMENT** – According to the FLP FINAL EA, Alternative 2, there are 21,143 acres of mesic hardwood but only 500 acres are planned for ESH treatment. Depending on the length of this proposed treatment period,this is only 21acres (10 years) per year, 33 acres (15) acres per year and 25 acres (20 years) per year. This is woefully inadequate to create forest ESH on sites considering the lack of any significant timber harvest and the amount of ESH (291 acres)in the FLP the last 25 years.

***OBJECTION/RECOMMENDATION-Increase the acreage of ESH in during the project time frame to the maximum allowed in the Management Prescriptions to address the lack of forest ESH in mesic hardwood through silvicultural treatments other than Canopy Gap harvest techniques.***

**COMMENT**-The size of the Canopy Gap harvest technique seems to varies in the FLP FINAL EA from ½ to ¾ to 1 acre depending on timber/vegetative type.

***OBJECTION/RECOMMENDATION- Small openings such as this do not generally provide sufficient light for the desired species of regeneration(hickories/oaks) due to those species requiring full sunlight to reach maximum growth and mast production. This is particularly true where aspect and slope minimize sunlight on the forest floor. It also creates insufficient opening size for maximum utilization by forest ESH dependent wildlife species. They also act as predator traps due to insufficient size for escape cover and ability of predators to develop patterns of predation by going from one small opening or the edges to another looking for prey particularly nesting wildlife or broods. There is also the issue of soil disturbance created by the roading (whether skid or haul roads)required to harvest, skid, and haul from the multitude of openings required to make a viable commercial timber sale using the canopy gap harvest technique.***

***Increase the size of the canopy gaps to the maximum allowed by the FLMP. There is no maximum silvilcultural restriction to my knowledge.***

**COMMENT** – The FLP FINAL EA proposes under Alternative 2 to regenerate up to 2,000 acres of Oak Forest over the 15-20 year period.

***OBJECTION/RECOMMENDATION- Regenerate up to the maximum allowed under the FLMP per year to increase forest ESH.***

COMMENT – The BA that forest ESH needs to be reduced to allow sufficient vertical stem density suitable for ESH wildlife species according to research is 20 BA and more responsive at 15 BA.

***OBJECTION/RECOMMENDATION-Manage those stands to be treated with those appropriate silvicultural methods to a minimum of 20 BA on average and preferably to 15 BA on average.***

**COMMENT** -The FLP FINAL EA proposes to decommission 15 miles of roads at various level of maintenance.

***OBJECTION/RECOMMMENDATION-Look at opportunities where you can still accomplish the objectives for this management action to change these roads to ML2 by daylighting and seeding to accomplish that goal of 500 acres in Alternartive 2. ML 1 does not in the strictest sense of objectives/standards allow roads to be maintained for permanent linear strip openings where ML2 does.***

**COMMENT**- The FLP FINAL EA proposes to designate 5,050 acres in stands distributed in the various watersheds to Old Growth.

***OBJECTION/RECOMMENDATION- Most of these stands are recommended by Forest Watch. Before these are finalized, these need to be verified by FS personnel to make sure they meet R8 old growth standards and criteria and not simply stands desired by Forest Watch some of which would be better suited for timber harvest or other vegetative or wildlife management. Take every opportunity to designate Old Growth in those stands that are already “protected” such as those unsuitable for timber harvest, inaccessible, unroadable, wilderness, scenic area, corridors along the AT, etc.***

COMMENT-The FLP FINAL EA proposes to thin stands down to 40-60, 40-70, 60-80 BA depending on forest type, site, stand species,etc.

***OBJECTION/RECOMMENDATION-Where feasible thin to 40 BA for hardwood and 60 BA for pine to generate the most response for developing vertical stem density, forb production, foraging areas, escape cover, etc. This will also help to achieve viable commercial timber sales which are marginal for current loggers where thinning is primarily immature sawtimber.***

**COMMENT-** 8,100 acres are allowed to be created with Canopy Gap treatment over 15-20 years according to FLP FINAL EA.

***OBJECTION/RECOMMENDATION- Where the current LMP, management area ,and prescription allow, utilize other silvicultural techniques other than Canopy Gap treatment. As stated in a previous comment, these Canopy Gap openings under the size limitation listed in Alternative 2 are generally not sufficient in size to overcome the negative effects of slope and aspect due to shading in most circumstances. Because of slope and aspect it also favors regeneration and growth of shade or semi-shade tolerant species of trees.***

***Reduce this type of silvicultural treatment in all cases in mesic hardooods where it can be and use other more appropriate silvicultural menthods.***

**COMMENT** - The FLP FINAL EA proposes to create up to 1% permanent openings thru primarily timber sales.

***OBJECTION/RECOMMENDATION-Where the FLP allows along with budgets, personnel, partners, etc. create and maintain up to 5%, the minimum recommended by the wildlife literature in primarily forested habitats for increasing wildlife populations and diversity under Alternative 2 of the FLP.***

**COMMENT**-The FLP Final EA proposes to daylight and seed 500 miles of roads for linear wildlife openings by removing the tree canopy from 25-50 feet.

***OBJECTION/RECOMMENDATION-Unless the daylighted road is essentially on totally level ground with sufficient aspect for maximum daylight then 25-50 feet is insufficient for the purpose of creating permanent wildlife openings to sustain the forage planted to wildlife purposes. Because of varying slope, aspect, and the propensity for leaf fall to smother the planted forage within a short time.***

***For these reasons increase the tree removal width from a minimum of 50 feet up to 100 feet where commercial harvest is feasible. This creates maximum daylight on the planted road prism, increases the amount of ESH which is currently sorely insufficient (291 acres according to the FLP Final EA and creates a more viable commercial timber sale.***

Thank you for the opportunity to comment/object on the FLP FINAL EA. You and your staff are to be congratulated for all the hard work, time and perseverance needed to complete this thoroughly professional document.

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