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First name: James
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Organization:
Title:
Comments: Dear Betty,

Thank you for the opportunity to comment on the Foothills Landscape Project.

I agree with much of the proposed actions, provided that the individual stands to be treated are identified within the scoping of the project. According to the Foothills Landscape Project, "The description of the range of actions includes the description of where the action would occur, how it would be accomplished, and how much (acres, sites, etc.) is being proposed." But I have not seen any such information identifying the stands (acres, sites, etc.) where the proposed treatments will be applied.

Southern yellow pine will be maintained on up to 12,400 acres with burning, thinning, and herbicide, but the Foothills Landscape Project does not the identify the stands to be treated. I am opposed to use of herbicides on the forest, but I understand that the Agency will use any legal herbicide in whatever amount is deemed appropriate, so I will not waste my time arguing the dangers of herbicides.

Southern yellow pine forest will be restored on up to 5,800 acres with two-aged regeneration harvest, burning, and herbicide treatment, but the Foothills Landscape Project does not identify the stands to be treated.

Oak-pine will be maintained on up to 14,800 acres with mid-story reduction using herbicide, but the Foothills Landscape Project does not identify the stands to be treated.

Oak will be maintained on up to 11,200 acres, including up to 2,000 acres of commercial regeneration harvest, but the Foothills Landscape Project does not identify the stands to be treated. I am opposed to large-scale regeneration harvest of oak (2,000 acres is very large-scale) until this treatment has been shown to achieve the desired outcome at a much smaller scale.

Where there are not enough oak seedlings and fire can be used regularly, commercial intermediate thinning or non-commercial mid-story reduction with herbicides will be implemented on up to 9,200 acres, but the Foothills Landscape Project does not identify the stands to be treated.

In collaboration with the Southern Research Station, an expanding gap method will be used in up to 14,600 acres of oak and oak-pine stands that cannot be burned regularly, but the Foothills Landscape Project does not identify the stands to be treated.

Up to 3,200 acres of immature oak forest may be treated with non-commercial crown-touching release and herbicides, but the Foothills Landscape Project does not identify the stands to be treated.

Woodland would be created on up to 7,400 acres, using treatments yet to be determined, but the Foothills Landscape Project does not identify the stands to be treated. The Brawley Mountain Woodland Project has shown how difficult it is to create woodland, especially on unsuitable sites. It would likely be somewhat easier to create woodland on more appropriate sites, but any attempt to do so should be small-scale until success of such treatment has been demonstrated.

According to the National Environmental Policy Act Handbook, "All proposed actions have five parts that comprise their whole: who, what, how, where, and when. [hellip] Where is the action being proposed. [hellip] The "where" refers to the geographic location of the project. In stating the "where," describe the location as

specifically as possible. A map is often the best way to illustrate the "where" instead of trying to describe it solely in narrative format. Several scales of maps might be needed (whole district and project units)."

The Foothills Landscape Project has things backwards. It decides what treatments to use and then looks for places (stands) to use them. But the stands to be treated will not be determined until after the scoping has been completed. Public stakeholders, such as myself, have no way of knowing where the various treatments to be used will be applied within the 143,500 acres of the project. The "where" is missing. Scoping without revealing which stands will be treated is not valid. Stakeholders must be given the opportunity to visit and see the stands to be treated and comment on them within a valid scoping.

James E. Walker