Data Submitted (UTC 11): 12/22/2017 5:00:00 AM
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Comments: To Forest Supervisor Betty Jewett: ATTN: Angie Bell

I appreciate the opportunity to comment on the Proposed Action of the Foothills landscape Project (FLP). First, let me thank you and your staff for the time and effort it took to produce such a well written and thoroughly researched document. You and you staff are to be congratulated on undertaking and completing this task. I will try to be succinct and organize my comments by subject matter.

Not to start out on a negative note but I was a little confused by the comment in the beginning of the document which states "Recovery of ecosystems that have been degraded, damaged, or destroyed#. would have no problem understanding this statement If this was written just after acquisition of the Forest in the early part of the twentieth century, but it in my opinion it implies there has been no management but mismanagement of the Forest over the last 60 years as the Forest moved from restoration to management. Perhaps this is a generic statement tied back to the LMP that accompanies all proposed management since completion of the LMP in 2004.

SOUTHERN YELLOW PINE RESTORATION AND MAINTENANCE

There are a number of SYP stands in the FLP that have never been treated since harvest and planting and are demonstrating the lack of management. Thinning them to the lower end of the proposed 40-60 BA along with PB would create some unique and sorely needed wildlife habitat in the FLP as well as providing wood fiber to the communities. VP stands respond better to thinning and PB than hardwoods in creating wildlife habitat in the early successional stages.

OAK AND OAK PINE COMMUNITY MAINTENANCE AND RESTORATION

Encourage the Forest to thin to the lower limits of the proposed 15-25 BA with commercial harvest. This would create maximum vertical stem density which is almost non-existent on the FLP. I would recommend the maximum harvest done commercially be undertaken. Follow this thinning of oak and oak-pine thinning with PB to encourage the best results for wildlife habitat versus just the thinning. ,

UNIQUE AND THREATENED AND ENDANGERED SPECIES HABITAT

Fully support by whatever means the maximum acreage available to restore/create In the FLP open woodlands, savannas, and grasslands.

WOODLAND COMMUNITY RESTORATION

Would support and encourage the maximum up to 7,400 acres and to the lower limit of 20-40 BA accompanied by PB to create the best wildlife habitat and commercial timber production.

POLLINATOR HABITAT CONSERVATION

I am certainly in favor of the creation of Pollinator Habitat. However, I would strongly discourage converting existing wildlife opening to Pollinator Habitat. Although it certainly Is preferred over

woodland habitat for diversity and some wildlife species, it is not the same as a grass/forb habitat currently in

most wildlife openings. The grass/forb habitat is such a small% currently on the FLP, elimination of any would decrease critical habitat for game and non-game species, particularly habitat for grouse and turkey broods as well as forage for black bear and white-tail deer. Pollinator habitat can be created thru additional wildlife openings as a result of a viable timber sale program and the corollary daylighted roads and log landings. Where possible repeated PB and thinnings or a combination of both to the point of decreasing the understory and overstory to a level to encourage Pollinator Habitat can be created.

RESILIENCE TO DISTURBANCE

Expanding the Fire Role

The FLP mentions the possibility of PB up to 50,000 acres in the FLP. This is over a third of the FLP. Quite ambitious considering your current budget, personnel levels, and small number of days in the burning windows in the mountains. You would have to average 5,000 acres per year over ten years. I would encourage you to PB where you get the best results generally where the overstory has been reduced to a level to get a response from PB and not just removing the leaf litter. Numerous smaller PB less than 200 acres are more conducive than a larger 1,000 acre PB in creating a mosaic of desirable wildlife habitat. If what I have been told there is no PB targets then this needs serious consideration. Although certainly some of this is a need for WUI it, does little for long term ESH creation if you are simply burning the leaves off every few years.

Pine Plantation Treatments

Strongly encourage thinning to the maximum of the 13,800 acres of yellow and white pine stands. As stated earlier, there are a number of pine stands, particularly white pine stands because of age and lack of any management since creation are experiencing accelerated decline in growth and accelerated mortality. I would also encourage the maximum non-commercial thinning on the 3,500 acres identified in the FLP.

CONNECTIVITY

Forest Structural Diversity

Strongly encourage the maximum of young forest creation up to the 9,500 acres identified in the FLP particularly in the mesic sites which yield the best vertical stem density. Although, I could have missed it there appears to be no mention of EAM thru complete removal (i.e. clearcutting) of all the overstory. It is a proven vegetative and wildlife success story in FLP. It should be in your toolbox. I could write pages on the benefits of it thru less reading, better stumpage prices, unique and vanishing wildlife habitat, etc. I am highly recommend it be used for timber harvest whenever possible.

Old Growth Communities

I fully understand the need to satisfy certain Forest constituents for OG and I fully support the level proposed by the FLP with caveats. However, there are truly no Old growth (OG}} dependent species or significant stands of OG on the Forest. There are species that utilize and maybe even prefer 0G and

patches of trees on the Forest that have OG characteristics. With a Forest that is aging rapidly and the majority in an age class that is approaching almost 100 years of age OG is being created thru default. There are thousands of acres that in the FLP for whatever reason that can't be effectively managed for wildlife or timber. They are in affect defacto OG since they will never be actively managed. I know that Forest Watch has identified numerous stands that supposedly demonstrate OG characteristics. I would strongly encourage that they be field surveyed by FS personnel to make sure they even meet OG characteristics and not simply mature stands or worse some favorite area to remove from active management by Forest Watch. Where possible the Forest should take those

stands too steep, do not meet the standards of fully stocked stands, etc. and put them into OG rather than potentially manageable stands of vegetation.

I even have a radical idea for OG creation. Take immature stands that FS personnel could identify that for some reason may never be managed and allow them to become OG over time. Does this not better satisfy the requirement to identify and manage a variety of stands with different ages/soils/elevation/aspect/remoteness/moisture regimes/. ?

CANOPY GAP CREATION

Recommend you use the upper limit of suggested 2 acre openings to take full advantage of ESH created thru this technique by allowing the maximum sunlight in the opening to encourage vertical stem density and discourage growth of shade tolerant tree species in the created opening.

RECREATION

Recommend you essentially decommission the same number of trail miles as you expand other systems. The Forest can't maintain the trail system to standard they have now.

DECOMMISSIONING OF ROADS

Take advantage of any opportunity to create wildlife strip openings when roads are decommissioned thru daylighting by commercial or where not feasible, non-commercial vegetation management. The public will certainly accept this much better than simply pushing a mound of dirt up or a gate.

In closing, it is time to begin managing this Forest and particularly the FLP for timber and wildlife. Vegetative management has essentially been non-existent since 1994. Even after the LMP was signed in 2004 it has never even remotely come close to the goals and objectives for wildlife and vegetative management. Although we can never recover the opportunities that were missed to create age class diversity and wildlife habitat over the last 24 years regardless of how much the Forest does In the future, it is time to reverse this trend with the FLP. This Forest is well known for planning but not implementation. Let's reverse this trend and begin implementing projects in the FLP area. Again thanks for the opportunity to comment and if there is anything I can do to assist you with this endeavor please