COMMENTS /OBJECTIONS ON THE FOOTHILL LANDSCAPE PROJECT ENVIRONMENTAL ASSESSMENT

COMMENT – According to the FLP EA, Alternative 2, there are 21,143 acres of mesic hardwood but only 500 acres are planned for treatment over a 15-20 year period. This is only 33 acres (15 years) 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 in the FLP the last 25 years.

***OBJECTION/RECOMMENDATION-Increase the acreage during the project time frame to the maximum allowed in the Management Prescriptions to address the lack of forest ESH.***

COMMENT-The size of the Canopy Gaps seems to vary in the FLP EA.

Page 47-1/2 to 1 acre: Page 50 -1/2 acre: Page 52 Up to ¾ acres.

***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. 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 to another looking for prey particularly nesting wildlife or broods. There is also the issue of soil disturbance created by the roading required to harvest, skid and haul from the multitude of openings required to make a viable commercial timber sale.***

***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 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. Perhaps I did not fully understand the apparent reason for varying BA after vegetative treatments (Page 50-15-25 BA ad Page 53 20-40 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 EA proposes to decommission 15 miles of roads at various level of maintenance.

***OBJECTION/RECOMMMENDATION-Daylight all decommission roads preferably through commercial timber sales followed by planting and maintaining to the limits of budget and personnel.***

COMMENT- The FLP 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, wilderness, scenic area, corridors along the AT, etc.***

Comment-The FLP proposes to thin stands down to 40-60, 40-70, 60-80 BA depending on site, stand species.

***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.***

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

***OBJECTION/RECOMMENDATION- Create the maximum canopy gap acreage allowed to create the sorely needed forest ESH***

COMMENT - The FLP 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 forested habitats for increasing wildlife populations and diversity.***

COMMENT-The FLP EA proposes to create up to 520 miles of new firelines.

***OBJECTION/RECOMMENDATION-Where those are bladed firelines, seed to wheat, oats, rye, etc. to maximize winter forage for game species.***

 Thank you for the opportunity to comment on the FLP 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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