Data Submitted (UTC 11): 8/10/2021 9:19:36 PM First name: Sue Last name: Harmon Organization: Georgia ForestWatch Title: Comments: Foothills Comments

I appreciate and thank the Forest Service for listening to the public in the last round of comments on this project. I am particularly happy to see the USFS commit to using a programmatic EA, i.e. a two-step analysis which will include both site-specific review and public engagement before taking any on-the-ground actions. I also commend the USFS for recognizing the importance of managing a minimum area in each watershed for oldgrowth attributes.

I urge the Forest Service to focus on project work that has broad support in order to gain efficiency, get more done, and keep the trust of the public. This means excluding work in areas that will stir up disagreements and areas which are widely acknowledged to be healthier than other areas. Ways to do this: Exclude all Georgia's Mountain Treasures areas from commercial timber harvests. Restrict commercial timber harvests to "fire adapted" forest types, which most forest stakeholders agree are areas that most need active management. Exclude areas more than half a mile from a road. Don't cut all the trees in a stand in an attempt to generate southern yellow pine. Such a process damages forest structure and wildlife habitat value. Don't thin trees in mesic forests as these forests naturally have dense canopies. And most importantly let's start managing these forests the way they really work. Our Southern Appalachian forests naturally contain trees of many different ages, yet the Forest Service seems dead set on creating even-age forests and seem to think 80 years is old for a tree when the tree's life span is 200 years. Disturbing these mixed age, complex forests is a mistake and makes no sense ecologically.

Lastly, I support the choice of Alternative 3, which excludes areas that the Forest Service's own plan identifies as "unsuitable" for "timber production."

I am so proud of how the USFS has listened and responded to the public on the Foothills Project and I hope this new openness, responsiveness and flexibility will continue.