Data Submitted (UTC 11): 8/11/2021 2:16:37 PM
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Comments: Thanks to the Forest Service for this opportunity to provide feedback about how our public lands are managed.
I appreciate the Forest Service for using a programmatic EA--for committing to use a two-step analysis for this project (first considering potential effects broadly before coming back to conduct site-specific review and public engagement before taking any on-the-ground actions).
I am immensely grateful that the Forest Service has committed to designate areas to manage for old-growth. The Forest Service has committed to following their own internal guidance that requires a minimum area in each watershed be managed for old-growth attributes, essentially left alone. Protecting old-growth forests are critical for biodiversity, wildlife refuge, soil quality, carbon sequestration, and beyond.

I'm asking the Forest Service to please avoid gridlock by narrowing the project to focus on issues with broad support. The project currently tries to manage all areas, activities, and resources at once, including many areas and activities that will be contentious. The Forest Service could gain efficiency, do more, and gain support for a broad program of future work by excluding areas that will stir up disagreements and are widely acknowledged as being healthier than other areas. For example, the Forest Service should limit the scope of the project to:
-Exclude Georgia's Mountain Treasures from commercial timber harvests
-Restrict commercial timber harvests to "fire adapted" forest types. Those forest types cover 77% of the Foothills Landscape and include the areas where most people agree active management is most needed.
-Exclude areas more than half a mile from a road. "Temporary roads" actually last decades to centuries, and regardless of any good that logging accomplishes, access roads disrupt ground water, fragment habitat, and destroy soil.
-Not cut all trees in attempts to regenerate southern yellow pine. In some southern yellow pine stands, the Forest Service plans to cut most of the trees then come back later and cut the rest of the trees. The second harvest is unnecessary and damages forest structure and wildlife habitat value.
-Not to thin (cut half of the trees) in mesic (moist) forests. Forests on moist sites naturally have dense canopies. The Forest Service does not even attempt to justify their plans to thin these areas, and there is no ecological justification.
-Manage forests the way they really work: Southern Appalachian forests naturally contain trees of many different ages, species that typically live over 200 years, and young trees growing in response to the death of one or a few trees. In contrast the Forest Service manages as if all the trees in a stand should be the same age, trees are old at 80 years, and that disturbances typically wipe out entire stands of trees.
-Choose Alternative 3. Alternative 3 excludes areas that the Forest Service's own plan identifies as "unsuitable" for "timber production."