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Title:

Comments: Foothills Landscape Project #52509

Dear Sir/Madam:

Thank you the opportunity to comment on the proposed project. Due to the massive 464-page E.A. document and 30-day comment period, I respectfully request that the USFS grant an extension to the review period. This would allow the concerned public the time necessary to better develop and present their comments, arguments and suggested solution, thereby reducing future back-n-forth and clarification.

The USFS must recognize that the original 206-page SOPA, 212-page GAFW response (alone) and the 1000s of pages of other comments, combined with the current 464-page current E.A. do not allow for adequate review and response in a 30-day period. It will only prolong the E.A. completion process, while creating numerous opportunities for protracted legal challenges.

I appreciate that the Forest Service heard and listened to the public in the previous round of comments on this project. I am also pleased that the USFS has committed to use a programmatic EA, a two-step analysis which will include both site-specific review and public engagement before taking any on-the-ground actions. Previously, the USFS had planned to generically describe the kinds of places that they might harvest, burn, apply herbicide, etc. This generic approach could have been applied anywhere within the landscape for decades without further public notice or input.

I also commend the USFS for recognizing the importance of old growth areas. It appears that 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 and essentially left unmolested.

The project currently attempts to manage all areas, activities, and forest resources simultaneously, including many conflicting areas and activities. The Forest Service could gain efficiency, accomplish more, and gain support for a broad program of future work by excluding areas that will create major issues and that 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 areas 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 one-half mile from a road. "Temporary roads" actually last decades to centuries, and regardless of any benefit 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 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 in a manner that 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 uniformly 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."

There are numerous other issues associated with the proposed action. The current E.A. is a vast improvement over the previous document. The USFS could continue to improve the project through active public engagement.

Thank you for the opportunity to comment on this phase. Please continue to include me and to provide future notifications of opportunities to remain involved.