Data Submitted (UTC 11): 8/12/2021 1:22:39 PM First name: Larry Last name: Luckett Organization: Title: Comments: Comments on the FLP Project #52509 I recommend that Alternative 2 be selected for the proposed action for the FLP. Specifically comments below by areas of management are included.

## MAINTENANCE OF SYP STANDS

-When mechanically thinned, thin to the minimum BA allowed (40BA) in all cases where practical. Use commercial timber sales wherever possible.

# MAINTENANCE OF OAK FOREST STAND

- Thin to the lowest BA allowed 40 BA in stands available for fire to maximize the effects of both treatments. 40BA is the maximum in closed hardwood stands that are thinned to get any effective response from fire on the understory.

Where fire is not possible thin to the lowest BA allowed (50BA).

Thin the maximum available acres allowed during this 10 year planned period.

## COMMERCIAL AND NON-COMMERCIAL THINNING OF SYP PLANTATIONS

-Thin to the lowest BA allowed (80BA) and the maximum amount of acreage allowed

## IMPROVING FOREST STRUCTURE AND SUCCESSIONALSTAGE DIVERSITY

-Create the maximum amount of ESH primarily through commercial timber sales allowed during the 10 year period with concentration on the absolute maximum allowed during the first 5 years of this period.

#### DAYLIGHTING ROADS

-Where possible use commercial timber sales to accomplish this but in any case go to the maximum of 50 feet allowed in all cases where feasible to get the maximum effect for creating ESH

## RESTORING OPEN WOODS HABITAT

-Thin to the minimum allowed 20BA in all cases where feasible

## CANOPY GAP CREATION

-Use this timber harvest technique only where nothing else will be feasible either from a commercial timber sale opportunity or silviculturally sound. It minimizes understory response due to size, aspect and shading of openings created. It also maximizes the need for roads necessitating revegation, reducing the price of timber and retreatment. Where necessary reduce overstory to the minimum BA allowed.

#### TREATMENT OF MESIC STANDS

-Analysis shows 21,143 acres of Mesic Hardwood in the FLP. Maximize the treatment of these stands thru whatever silvicultural technique is best to to get the maximum response on these more mesic sites as more wildlife species utilize these areas due to forb and shrub layers created.

#### CREATE OR EXPAND WILDLIFE OPENINGS

-Maximize these opportunities where possible to get to the minimum of !% needed by wildlife species in a primarily late successional hardwood-pine or hardwood forests.

### OLD GROWTH

-Field check all stands recommended by Forest Watch for OG to make sure they meet the requirements of OG

and are the best ones suitable for this component in the FLP. These should meet FS objectives for the FLP and not FW or any other preservation group

Where feasible strive to create these OG stands in Not Suitable for Timber Management to minimize interferring with opportunities to manage vegetation in the Suitable Timber Management areas.

Take the opportunity to allocate mid age stands and carry them to OG to minimize interference with future maximizing of vegetation management in the FLP.

### **REPLACING CULVERTS**

-Where feasible combine this replacement with commerial timeber sales to maximize that opportunity

## IMPROVE FIRE AND FUEL CONDITIONS

- Where possible utilize fire in thinned SYP, SYP-Hardwood Stands, and Harwood Stands that have been thinned.

## DECOMMISSIONING OF ROADS

-Where possible take every opportunity to create ESH and permanent wildlife openings while doing this

## HERBICIDE USE

-Maximize the use of herbicides where proposed. This is a safe and effective technique for treating vegetation where other techniques are more costly and not as effective.

Thank you for the opportunity to comment.