

Data Submitted (UTC 11): 8/13/2021 1:46:38 PM

First name: Sharon

Last name: Pauli

Organization:

Title:

Comments: I have been to New Zealand and seen widespread forest management for commercial use. It can be tempting to think a lot is being done in a plan by doing one thing over a large area and repeating in many places. That is not the management needed or sustainable in our southern forests.

I wholeheartedly support Georgia ForestWatch as an informed and active local group with long-term involvement in this area and with an interest to work collaboratively. Since they are so involved, I endorse their work and will pick from their recommendations those that I personally see as valid in many circumstances of commercial involvement in public land:

I thank the Forest Service for:

Using a programmatic EA. The Forest Service has committed 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.

Committing 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.

I ask the Forest Service to:

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. For example, the Forest Service should limit the scope of the project to: Exclude Georgia's Mountain Treasures from commercial timber harvests and 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.

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.

Exclude areas more than half a mile from a road. "Temporary roads" last decades to centuries, and regardless of any good that logging accomplishes, access roads disrupt ground water, fragment habitat, and destroy soil. THIS IS SO SIMILAR IN EFFECT TO THE LAYING OF PIPES IN MARSHES WHICH BEGAN THE BREAKUP OF THIS PRECIOUS ECOSYSTEM.

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.

Choose Alternative 3. Alternative 3 excludes areas that the Forest Service's own plan identifies as "unsuitable" for "timber production."