The following statements and comments are presented on behalf of the Georgia Council of Trout Unlimited.

Georgia TU has enjoyed a long and productive partnership with the Forest Service, as we move forward into the coming years, we hope to continue and enrich this partnership to continue to maintain, restore and enhance our cold-water fisheries and the supporting habitats. We want to thank the USFS for considering our prior input and incorporating many of Trout Unlimited’s interests in the EA draft. We overall support the Alternative 2 project plan.

Our comments on the Foothills Landscape Project EA are as follows:

* The concept of the “tool box approach” is fundamentally critical to this project. Adaptive management measures to ensure a flexible approach over the course of this project in regard to work projects is an excellent idea. There is no doubt that all aspects of this project may not go as planned and that natural events always play a role, to add the ability to adapt to these changes is paramount.
* In regards to the four areas of organization:

a) Biologic Diversity- all healthy streams and lakes display the need for complementary bio-diversity. As there are some streams in this project area that contain populations of Southern Appalachian Brook Trout, extreme caution is advised to maintain these populations as such and inhibit the introduction of non-native competing species such as Rainbow and Brown trout.

b) Resilience to Disturbance- it is obvious to those of us that work on and recreate in the streams within this project area that erosion, sedimentation and siltation are ongoing at an alarming rate. Any mitigation to alleviate this harmful impact would be well received. Large, wood debris (LWD) introduced by the “chop and drop” method seems to be fundamentally sound and improved habitat for our cold-water species has been observed. This will continue to help with the siltation concerns. Other necessary options are to: maintain a healthy stream buffer to prohibit sediment from entering the stream bed. Continue to make repairs to existing trails and roadways that are in contact with or in the proximity of cold-water fisheries. Be diligent in the application of herbicides and insecticides along corridors of impacted streams and during times when runoff could have a negative effect on the fisheries.

Knowing that logging and prescribed burns are and have been part of the US Forest Service management plan, we recommend that these practices be done with respect to natural cycles that may adversely impact a sound fishery. Notably during times of fish reproduction and when heavy rainfall is anticipated or predicted.

1. Connectivity- The necessity to establish and maintain proper connectivity of project streams, is critical to the long-term health of the fishery. The implementation of Aquatic Organism Passage (AOP) standards would be primary to further this goal. Removal of perched and failed culverts would be instrumental in this process. Because cold-water streams have less diversity, available food and reproductive resources than warm-water streams and lakes, the ability of the cold-water fishes to migrate would greatly enhance their overall sustainability. Again, caution should be exercised to protect our native Brook Trout from non-native encroachment as is possible.
2. Water Quality and Soil Productivity- water quality is the foundation of a vibrant fishery and healthy forest. Combined with sound soil productivity, this gives us the hallmark of a sustainable ecosystem for now and the future. Trying to establish and maintain good water quality is at the root of the Trout Unlimited ideal. From earlier comments, sedimentation and siltation are taking a toll on our cold-water streams, any and all measures to alleviate this would be desirable. If the possibility to ad filtering socks to drainage only culverts, in order to avoid sediment runoff is possible, we would find this most desirable.

* In the course of stream habitat improvements, any pond or similar structures should include the ability to have a bottom discharge within the impoundment. GA Trout Unlimited has invested years into research about top discharge impoundments and the adverse impact on cold-water species. The thermal gain on these impoundments has an immediate and long-distance negative influence on an abundance of downstream species. Implementing a bottom discharge outlet during construction and/or restoration is cost effective and advisable.
* Eastern Hemlocks- duly noted that ongoing attempts to protect our existing trees and replanting of additional hemlocks is in the project plan. The loss of these overstory trees has been devastating to the entire East Coast of the United States. By preserving these and the reestablishing of the additional native trees in the project area should bode well for the future.
* Angler Access will be a high priority where feasible. Allowing those with age or mobility issues access to the project area waterways is good use of time and funds. Fishing piers and additional aspects of stream access will no doubt cut back on erosion in certain areas as noted and provide a more enjoyable recreational experience for all.
* Georgia Trout Unlimited supports environmentally sound forest and timber management. These practices could provide additional labor and revenues to maintain forest roads, trails and reduce stream sedimentation. We support the USFS fuels reduction proposal, this program should be able to limit catastrophic wildfires and associated stream degradation.

Thank you for allowing us all to comment on this vast and far reaching project. We look forward with enthusiasm and hope for our National Forests. Georgia TU is ready, willing and able to partner with the Forest Service on many of these projects, most notably; water quality, habitat improvement and angler access.