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Comments: The Georgia Canoeing Association shares and supports the concerns expressed by Georgia ForestWatch, the Georgia Chapter of the Sierra Club, and the Southern Environmental Law Center regarding the proposed Foothills Landscape Project. We feel that the lack of specific information in this proposed action has impaired our ability to provide constructive feedback, far more so than for previous projects. Site specific issues need to be addressed now. We believe that clearly stating the agency's constraints for performing work in the Foothills would channel discussions in a more productive direction. We support true restoration, but remain unsure of how the agency understands "restoration" when describing the Foothills Landscape project as a "restoration" project. We continue to believe that the agency should define its restoration goals using applicable guidance from the agency's 2012 Forest Planning Rule.

We appreciate the opportunity to comment on the Foothills project and that the agency sought public feedback on this project even before scoping the proposed action. But we remain deeply concerned about many aspects of this proposal, and we urge the agency to reconsider substantive parts of it and the procedure for getting from proposed to implemented project. We urge the agency to take a fully transparent and truly collaborative approach.

Respectfully submitted,
The Georgia Canoeing Association
Carol Reiser, Vice President