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Organization: Congressional Sportsmen's Foundation
Title: Southeastern States Assistant Director
Comments: January 10, 2020

Betty Jewett, Forest Supervisor
Chattahoochee-Oconee National Forests
1755 Cleveland Highway
Gainesville, GA 30501

RE: Foothills Landscape Project

Dear Ms. Jewett,

On behalf of the Congressional Sportsmen's Foundation (CSF), please accept the following comments on the draft Environmental Assessment for the Foothills Landscape Project.

Founded in 1989, CSF's mission is to work with Congress, governors, and state legislators to protect and advance hunting, angling, recreational shooting, and trapping. CSF has a strong track record in Georgia, working with the Georgia Legislative Sportsmen's Caucus and conservation partners to protect and advance Georgia's sporting heritage by supporting pro-sportsmen legislation and state fish and wildlife management objectives defined by the Georgia Department of Natural Resources.

CSF works on behalf of Georgia's sportsmen and women, the chief funders of state-based conservation efforts and significant contributors to Georgia's economy, that rely on access to National Forests in Georgia to pursue their outdoor pastimes. In 2019 alone, Georgia's sportsmen and women contributed $54.56 million to conservation funding generated through hunting and fishing licenses and excise taxes on sporting-related goods, the "user-pays, public-benefits" structure known as the American System of Conservation Funding. Additionally, Georgia's 1.059 million sportsmen and women have a significant economic impact in the state spending more than $2.3 billion, supporting more than 39,640 jobs, and generating more than $216 million in state and local taxes.

CSF supports Alternative 2 to improve forest composition and structure, improve habitat for game and nongame wildlife by increasing forest successional diversity, increase forest resiliency, improve habitat connectivity for aquatic organisms, and improve access for sportsmen and women.

Specifically, we support the proposed:

*Commercial treatments and prescribed fire to support Southern yellow pine maintenance and restoration;
*Commercial treatments and prescribed fire, as appropriate, for oak and oak-pine maintenance and restoration;
*Commercial treatments to create canopy gaps;
*Commercial treatments for pine and oak woodland habitat restoration;
*Wetlands/bogs restoration;
*Stream and lake habitat improvements;
*Culvert replacements;
*Hazardous fuel reductions in the WUI including prescribed fire, mechanical treatments and other methods;
*Prescribed fire to improve ecological integrity;
*Commercial treatments to create young forest;
*Maintenance, expansion and construction of wildlife openings;

*Construction of fishing piers; and
*Road system improvements.

We have concerns about the proposed decommissioning of roads and suggest road system improvements be considered in lieu of closures as roads are important for sportsmen's access and for maintaining management capabilities.

Additionally, we encourage the Forest Service to increase the amount of acreage proposed for young forest creation. Young forests are critical for many species of wildlife that are declining on the forest, including ruffed grouse, black bear, white-tailed deer, chestnut-sided warbler, prairie warbler and monarch butterfly. The existing 292 acres of young forest out of the 157,625 acres in the analysis area, or 0.19%, is far below low habitat requirements needed to sustain wildlife species that depend on young forests. While the acreage proposed for young forest creation would increase the percentage to more than 6% if the treatments occurred in the same year, the treatments would occur over time and with succession taking place, the actual percentage of young forest on the landscape would be much lower than 6%. Thus, we recommend a significant increase in the acreage of young forest creation.

In summary, we would like to reiterate our strong support Alternative 2 with the above caveats regarding the decommissioning of roads and the amount of young forest creation.

Thank you for considering our comments.

Sincerely,

John Culclasure
Southeastern States Assistant Director
Congressional Sportsmen's Foundation