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Organization:

Title:

Comments: Greetings,

this submission to the USDA Forest Service constitutes my feedback to the plans of the Foothills Landscape Project, relating to the public comment period that ends on January 10, 2020.

Comment #1 "Limited opportunity to comment":

I want to express my dismay at the limited time permitted to prepare my response. Tight schedule is an especially significant hindrance to such preparation, since there was zero opportunity given at the public meeting in December at the Clayton Kingwood facility to ask specific systemic and management related questions. Diversion of the attendees to manned stations, which restricted specific questions to some individuals of the Forest Service, appears to be purposely arranged to avoid more 'penetrating' queries from the public. Thusly, systemic, organizational, managerial and overall project matter was not addressed at all. This is not the way to invite public comment!

Comment #2 "Unwarranted separation of foothills landscape":

The naming of 'foothills' and separating these landscapes from the Northern equally mountainous areas appears inappropriate, since in every way their topographic and ecological nature is directly tied to those Northern landscapes. A specific example of sameness are both sides of the Warwoman valley in Rabun County. Why designate the Southern portion 'foothills' and not the Northern area, is hard to fathom, since their character is the same? Why should management and re-scoping of both landscapes be treated differently?

Comment #3 "New Wilderness creations":

I question why there is no attempt made to expand and find new lands of wilderness. This is especially significant, since wilderness already exists near the borderlines of the foothills project. An example of such a wild state and potential wilderness designation is the Grassy Mountain tract, which has nearly 2000 acres of old growth forest. Please remember that wilderness areas in the US are not being created, rather, they tend to be encroached on. Therefore we should take full advantage of such obvious candidate areas to be so designated. It would appear that this is the best and most beneficial use for the general public.

Comment #4 "Tool to explore Wilderness creation":

In conjunction with the content of comment #3 I urge the Forest Service to review the proposed wilderness expansion landscapes in the 'Georgia Mountain Treasures' by the Georgia Forestwatch. This organization has created an interactive map, which combines all designated outlines of the Foothills project, the Mountain Treasures tracts and those, that are designated for sale under the Land Adjustment Act. Please visit <http://gafw.org/interactive-webmap/> to help explore such expansion of wilderness.

Comment #5: "Waterways flora and fauna endangerment by herbicides"

It seems incredible that a huge area of 74,500 acres will be subject to herbicide application, without expecting a significant ecological impact.

Especially the use of glyphosate and its surfactant components pose a predictable serious endangerment. Here is why:

the glyphosate itself and in conjunction with surfactants and the surfactants themselves have shown serious damage, as evidenced in various research papers\*)

Macroinvertebrates, microalgae, crustacea, tadpoles, fish larvae, rainbow trout, etc. are affected. Folmar stated that toxicity increased markedly as fish enter the sac fry and early swim-up stages. Rszymski stated that also bottoms of lakes and rivers are affected; further, that such herbicides bioaccumulate in organisms like carp (which probably could readily be assumed for other fish). Rszymski urges that strict limitation should be placed on herbicide application.

Comment #6: "Steep topography and dense leaf layer aggravate herbicide contamination"

It is my opinion, from observing water run-off pattern in nature, that spray herbicide contamination is enabled and propagated in steep mountainous landscapes and into narrow creek and river valleys, especially in view of annual high rainfall of locally 60 to 100+ inches.

Unlike some description of limitation of glyphosate penetration to 15 cm soil layer (which might well be applicable to level terrain) it would appear that run-off can readily carry glyphosate into riparian zones and waterways, by the combined mechanism of

steep terrain quick run-off

layering of leaf cover providing sheeting effect

surfactants facilitating the flowing of liquids

I have not found any reference material that has studied the effects of steep terrain induced herbicide spread.

This fact infers that prudence in planning and implementing such herbicide application would be well advised.

Such a concern is especially important in view of the vast zone of affected 74,500 acres. In fact, one must question the sanity of such an expansive, potentially dangerous endeavor.

<http://forestinfo.ca/flags/are-glyphosate-based-herbicides-harmful-to-aquative-organisms/>

Rszymski et al (2013)

Tsui et al (2003)

Folmar et al (1979)

Please give my comments sincere consideration, and hopefully act on them. I would be happy to discuss this matter in any way or form.

Dietrich Hoecht, P.E.

January 5, 2020