

November 15, 2024

I object to the aerial (plane, helicopter and drone) application of any herbicides (and or pesticides) in any of our forest, public lands and private lands.

I live in Washoe Co, NV; my background was in the pesticide department for the state of New Hampshire, reviewing and certifying that all pesticides used in the state of NH had complete and compliant labels.

We know that the studies on the impact on human health after exposure to aerial application of herbicides has not been done. We know that the studies of the impact on animals are limited. For instance, a study was done following quail for 8 days of the herbicide Imazapic. This product has a half-life that, based on environmental factors, can extend up to 451 days according to the manufacturer. That is much longer than a year and it stands to reason that this may become an repeated herbicide application to target areas. Therefore, the exposure will be indefinite and has clearly not been tested for this length. Even studies up to 2 years will not reflect the cumulative effect of this herbicide on the environment indefinitely. The lack of testing of this product should not be considered a green flag for unlimited use.

We know that this product is adversely toxic to dogs and to bees and that aerial spraying can affect un-intended areas and species up to 8 miles away. We know that aerial spaying accuracy is dependent on the pilots and the weather, and human error and technology errors in the case of drones cannot be discounted. There is a guarantee of unintended consequences.

We also know that exposure to herbicides has been shown to damage the microbiome of animals, which will harm them long term, as well as changes and mutations to DNA, even if their 8-day to 2 year study doesn't reflect that long term change. The benefit to the planet does not outweigh the damage done by aerial spraying of herbicide and there is no data showing otherwise.

We do know that other herbicides like glyphosate have been classified as carcinogenic with more adequate testing and that the payouts in damages are factored into the manufacturers cost of doing business.

The proposed goal of the aerial application of this herbicide is to destroy cheat grass to help prevent the spread of wildfires. Fire is a mechanical way that can help eliminate cheat grass. Fire is going to happen regardless of cheat grass presence because other plant fuel will be present as there are no fire-retardant plants, and the goal of this application is to have native plants present. We do not know the impact of a wild fire, or if and when or where it may occur. We do know that there is a guaranteed environmental impact for spraying toxic chemicals into the air, which will impact all the plants, animals and insects it contacts in perpetuity. It does not make sense to do this. Also, it is said that the purpose of this is to encourage native plants instead of the cheat grass, because the animals and insects depend on the native plants. Native plants grow with and beside cheat grass. If we really care about the animals dependent on the native plants, let's not douse them in unnecessary harmful chemicals. By conducting aerial spraying of these chemicals on our native lands, we are ensuring the harm of the plants, animals, and insects that reside here and potential threat to humans who come in contact with this. This is not a good use of our intelligence, not good stewardship of our planet, and will most certainly not prevent wild fire. Also, when these chemicals

are heated by fire, as they will be in the case of wild fires because the other plants are also flammable, they create toxic gas which will exacerbate the situation. We know this from the product's MSDS sheets.

The aerial spraying of toxic chemicals on the earth is not reversible. Chemicals can take a very long time to fully break down and the mechanism for this breakdown is outside of human control. The effects of this is infinite. We can't go back and fix it.

By doing aerial spraying of chemical herbicides, or pesticides, we guarantee irreversible harm to the planet and all it's inhabitants. The fact that the studies have not been done to show the long term effects of products, does not give us the right to spray them around in ignorance. Eliminating cheat grass does not eliminate wild fire spreading. Adding chemicals to inevitable wild fires does exacerbate the situation. Willingly spraying unnecessary chemicals on plants and animals and insects does negatively effect them.

Aerial application of herbicide is being proposed as a mechanism without acknowledging what kind of herbicide specifically is going to be used. Let's not forget that agent orange was also a chemical defoliant applied by arial application to the detriment of all below for generations.

I object to the aerial spraying of herbicide in our country and specifically Nevada. It is reckless endangerment of all life.