

Data Submitted (UTC 11): 1/8/2020 6:33:23 PM

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Comments: The 148 page Vegetation Plan that supports the Foothills Environmental Assessment calls for herbicide applications on over 65,000 acres. Some limited applications are necessary and understandable, for example to treat infested hemlock and ash trees, but the sheer amount of forest that will be treated with chemicals under the Foothills plan is disturbing and shocking.

The Forest Service (FS) references the US EPA as its guide for what chemicals are safe to use and how to use them. However, the fact that our EPA has not banned a chemical does not make it OK for our forests. And furthermore, the FS is required to do an independent assessment of the safety of pesticides rather than relying on EPA and FIFRA registration alone. (Ref. USFS website page on Pesticide Management and Coordination).

Knowledge of the impacts of chemicals on our ecosystem grows, and new knowledge must be considered. For example, the significant chronic risk of the widely used herbicide Atrazine on amphibians, fish, mammals, birds and terrestrial plant species was finally recognized and reported by the EPA in 2016. This illustrates how important it is for the FS to recognize and use current science in its decision-making and before implementation. However, although the FS states that it uses "best available science" in its plans and risk assessments, the most current science that it references is the 2011 risk assessment methodology developed for the FS by Syracuse Environmental Research Associates. With the pace of research, knowledge and legal judgments concerning pesticides and herbicides, even a layman knows that 2011 science in this area is not necessarily the best available science.

Another aspect of the forest that the FS has not considered in its Foothills planning is the underground network of fungus and microbes that permeates the forest floor that was discovered only 15 years ago. Research in the years since is beginning to unravel the importance of mycorrhizal networks in forest survival, growth and defense. We do not know the potential damage to these network from the types of logging and chemical application the FS plans in the 157,000 acres of Foothills Landscape. The FS has goals to achieve, but in driving ahead to achieve its goals we hope that it will consider how little it knows about the potential impacts of its actions.

Thank you for your consideration of my concerns and for your care for our forest.