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Comments: Dear WNF Revision Team,

Thank you for your efforts to date with respect to working on the Draft Assessment (DA).

I am writing to express my deep concern about the exclusion of previous comments that I provided to the DA Team via the Biodiversity Working Group. I devoted quite some time to conducting library research on the topic of ecosystem effects of herbicides and effects on human health. This is an issue that crosses boundaries of both Biodiversity and Water.

A search of the PDF document reveals only three uses of the word "herbicide" in the entire 124-page Draft Assessment: a footnote re mussels on page 17, and two references with respect to pollinators on page 27.

My understanding was that the purpose of this stage of the DA was to assess what has changed since the previous assessment and this one. The answer to this is simple: THE SCIENCE HAS CHANGED. There is a rapidly growing body of biological and epidemiological data (in peer-reviewed journals, to which I provided citations) over the last decade that now fairly conclusively note that there are breakdown products within virtually all herbicides (including our beloved RoundUp TM) that are making their way into the water supply, impacting soil microbiota, and causing cancer in humans (along with a myriad of other effects that have not yet been studied).

I have worked extensively in the area of invasive species ecology, published numerous articles in the peer-reviewed literature, and even applied herbicide to NNIS myself. Unfortunately, the data are overwhelming at this point. The application of these chemicals on the landscape is likely doing more damage to the ecosystem than the NNIS. It is time to STOP using these herbicides. I have no doubt that this suggestion comes with great skepticism and trepidation. Moreover, it removes a heretofore important tool for land managers. But, there is simply no way to justify its use any longer. Ignoring this issue is not a solution.

Strategic Objective D, "Provide Abundant Clean Water," is a central tenant of the of the USDA FS 2015 Strategic Plan FY2015-2020 (FS-1045). There is simply no way to justify the continued use of herbicides on the landscape in light of this mandate. These facts needs to be discussed and reflected in the WNF Draft Assessment.

Respectfully,

Brian McCarthy