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Comments: I strongly oppose and object to the use of all pesticides of any kind whatsoever on our public lands, and strongly believe and know there are far better solutions here, now, and around the corner.

To create more ecological damage and risk is NOT a solution, nor is it acceptable. To create options that increase human health risks is backwards thinking, also unacceptable. Any and all pesticide use does not equate to a "clean slate". We don't get to poison our way out of this puzzle.

Speaking of poison and wildlife, doesn't the Siuslaw NF have endangered salmon and martens to protect? Wouldn't pesticides put these species at risk for exposure, not to mention nearby residents?

The old saying goes "two wrongs don't make a right", and as hopeful as I am that more attention is being paid and that appropriate action is potentially taken to address these specific ecological circumstances, I do not believe this invasive plant management project/proposal/plan set forth by the Siuslaw National Forest goes far enough; nor that the Department of Forestry has demonstrated enough wisdom, foresight, accountability, or transparency, historically and scientifically to show that it has our environment as a dynamic whole, nor its inhabitant's short and long-term health and well being in the forefront of its plans and projects. The mere fact that it is the year 2024, and only now a "contingency" treatment plan is potentially forming, speaks volumes itself.

"Currently the Siuslaw National Forest has no comprehensive strategy for prioritizing and treating invasive botanical species across the landscape."

Why is that? How can that be?
How can the forest service be deemed responsible, competent 'managers' of these lands when its taken 100-120 years to even strategize comprehensively against threats and impacts of invasive plants, to which has led us to this 'over-run'/'if-we-don't-act-now-we-wont-be-able-to-keep-up' point they are telling us, and only now be pressed by executive orders{{?}} to formulate a strategy?

I find this proposed pesticide/chemical element approach extremely shortsighted, reckless, desperate, for cheap's sake; behind in its scope, the times, and timing; lacking absolute sustainability, and missing the mark by failing to address the wider ecological context of which invasive species are a part. We can all agree invasives did not just come online recently by themselves in a vacuum.

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I think many here have already covered the threats and risks associated with pesticide use and exposure {{namely Carol VanStrum amongst others}}, so I'll touch on a few other concerning components to this puzzle.

Whats wrong with the larger picture?

Treating ecosystems like the dunes or the coastal mountain range forest itself as part-industrial extraction resources {{which USFS is in part mandated to do}}, part mono-cropped tree farms, part recreational tourist attractions, and or part carbon emitting amusement rides are not solutions either. Off highway vehicles and forest machinery move seed around, displace wildlife species, increasing noise pollution, and contribute to further contamination and degradation to public lands. Target shooting leaves lead and plastic behind. Logging disturbs

soils, completely destroys or at least fragments ecosystems, requires roads and their banks and culverts built and maintained opening the door for illegal dumping, and spreads and invites long lived viable invasive seed-banks to come in, establish and reestablish themselves over and over wherever logging, travel, and soil disturbance occurred or occurs. Tourists and forest visitors pick up seeds and take them all over the country, into neighborhoods and deeper into other environments.

In otherwords, the actions but also inaction of the USFS, historically and now, along with 'progress' of urban development, conventional agriculture, and tourist generated revenue streams seem to have and continues to pave the way, laying out the 'red carpet' for invasives…

As long as soils are disturbed, roads are built and prioritized, forests are clear cut, forest products are shipped all around, dunes are stabilized, utility corridors are mismanaged and vessels brought in and through by travelers, locals, or workers, invasives will find a way to hitch a ride, pervade and proliferate via opportunistic conditions these practices create.

Furthermore, through which what many deem as widespread mismanagement of our public forests and lands starting from their inception, removing indigenous people and their mellenia of stewardship practices, prioritizing commodities such as "board feet" over ecosystems health, function, and resiliency; putting economics before environment, to the very blatant introduction and spread of so many invasive species, {{many times intentional as in Scots Broom and beach grass on the dunes, or through other unintentionals, like}} the building roads with contaminated gravel and machinery, to the ongoing continuous disturbances of the forest soils, to the clear cutting and decimation of forest itself; time and time again the forest service both nationally and regionally has shown insufficient regard for the effects of their own practices.

Transparency

On the another related aspect, larger attention must to be paid to accountability and reliable record keeping of these chemicals spread on public lands, for it seems, according to a study in 2016 by researchers at the University of Montana (UM) found a lack of government data and accountability on the use of herbicides on public lands to kill invasive and non-native plants. The report raises serious questions about the widespread management practice, which the researchers say may be causing more harm than good. We need more transparency from the Forest Service as well as BLM about their use of herbicides and other pesticides: what, when, where, how, how much, the costs and why such chemicals are used. More oversight is needed to ensure taxpayer dollars are being used wisely and effectively.

We can do better

I do support the Forest Service's proposal to develop a comprehensive approach to mitigating and managing invasive weeds in the Siuslaw National Forest. However I strongly oppose any application of pesticides, certainly including adding more to those already typically being used.
We need to use zero herbicides in the Siuslaw, not more.

I encourage the forest service to reassess and include its own "management" practices, past and present, as to how much of a factor itself contributes to the invasive species proliferation problem.

I encourage the forest service to implore absolute sustainability practices and transition to organic land management, as well as deferring to local indigenous tribes in the decision making process of land management.

I encourage USFS to install boot brushes at all trailheads and campgrounds/staging areas, and wheel washing stations or automation in all public access areas.

"Caring for the Land and serving people" is the USFS motto. I would like the USFS to reevaluate and define what it means exactly to "care for" and "serve", as well as identify which, if not all 'people' it is actually serving.

I encourage the forest service to find more creative ways to 'care' without chemicals, and spare serving the people, plants, pets and wildlife hazardous toxins to contend with.

Regardless of this proposals outcome, I expect the USFS to provide detailed information, including full environmental and human health risks to every single pesticide chemical that is to potentially be used in this management project that I am in strong opposition to, along with their combined impacts and risks.

Lastly can the USFS clarify and explain the difference below between:

"...treatments designed on a project-by-project basis" and "a prescription for treatment will be developed considering the biology of the invasive species, size of the population, success of past treatments, feasibility of treatment options, consistency with Forest Plan standards and guidelines, and sensitivity of the area."?

They read as if they are the same thing, but the former is claimed to lead "to inconsistencies and limiting the Forest's ability to treat newly discovered populations in a timely manner or to take advantage of partnership opportunities" and the later is the proposed process. Below are what is stated on the projects own website.

"Currently the Siuslaw National Forest has no comprehensive strategy for prioritizing and treating invasive botanical species across the landscape.
This results in treatments designed on a project-by-project basis, leading to inconsistencies and limiting the Forest's ability to treat newly discovered populations in a timely manner or to take advantage of partnership opportunities."

"Site Selection & Treatment Prescriptions"

"Treatment areas will be identified based on established priorities. This includes invasive species that are both widespread and limited, have a high probability of spreading and that occur in sensitive areas, such as Scenic Botanical Areas."

"Once identified, a prescription for treatment will be developed considering the biology of the invasive species, size of the population, success of past treatments, feasibility of treatment options, consistency with Forest Plan standards and guidelines, and sensitivity of the area."