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Organization: Protect Oregon Watersheds
Title: Registered Agent, Member Board of Directors
Comments: RE: Siuslaw National Forest proposal for invasive weed management, Project #66006

Protect Oregon Watersheds supports the Forest Service's proposal to develop a comprehensive approach to treating invasive weeds in the Siuslaw National Forest. We strongly oppose drone spraying of herbicides or adding new herbicides to those already being used.

The existing Siuslaw Forest Plan already permits the use of glyphosate, which the Forest Service states it uses regularly, and other toxic chemicals that are listed by the Oregon Department of Agriculture as pesticides of statewide concern. Unlike private timberlands that can be logged and sprayed solely for profit under the liberal standards of the Oregon Forest Practices Act and pesticide product labels, we as citizen owners and stewards of our National Forests and other public lands have a responsibility to advocate for what we believe best protects and preserves those lands, their flora and fauna, our watersheds and our communities. We need fewer herbicides in the Siuslaw, not more. And we need more transparency from the Forest Service about their use of herbicides and other pesticides: what, when, where, how, and why such chemicals are used, made available in a form easily accessible by the public.

We certainly don't need or want herbicides to be sprayed by drones or other aerial means. It is well known that pesticide spray, dust, and vapors can drift beyond targeted and buffer areas. The National Park Service, acknowledging that airborne contaminants travel on the wind and can pose serious health threats to wildlife and humans, has found measurable amounts of contaminants in snow, water, vegetation, fish and lake sediment at all eight of the core Western U.S. parks it studied, some of our most cherished public lands extending as far north as Gates Of The Arctic National Park. The U.S. Environmental Protection Agency acknowledges that such drift can affect people's health and the environment and has stated that it will now analyze the hazards of potential pesticide drift more closely and during a pesticide's approval process rather than waiting sometimes fifteen years after a pesticide is approved for use.

Protect Oregon Watersheds appreciates the Forest Service acknowledging that prevention is the most effective means of controlling invasive plant species. We believe the best way to reduce opportunities for invasive species to establish themselves in natural forest areas is to minimize disturbances to soil and native flora. That means preserving the integrity of mature forests and allowing previously logged forest areas to mature with minimal disturbance. Accordingly, we encourage the Forest Service to focus its efforts on the overall nourishment and preservation of healthy, mature forests, rather than using chemicals, as the best means of preventing and controlling invasive weeds and protecting our public lands and the environment.

Thank you,

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