

Dear Board of Forestry and Fire Protection,

1/11/18

I am writing in support of the VTPEIR. I believe the proposed alternative will save time and money, reduce catastrophic fire risk, and put people to work protecting communities and restoring landscapes. While I have reservations about increasing the use of herbicides in our forests, especially the persistent biocides borax and imazapyr, I appreciate the work that has gone into writing the VTP in a way that would minimize their impacts. I also appreciate the withdrawal of 2,4-D from the VTP.

I still feel it is appropriate to remove the two most persistent remaining chemicals – the herbicide imazapyr, and the fungicide/insecticide borax -- from the VTP. This is purely because of their persistence and the resultant likelihood that they will accumulate in hotspots in the landscape over expected treatment intervals (even if, as in the case of borax, those intervals are many decades long). If this happens, the effects on aquatic microorganisms, the soil microbiome, invertebrates of all kinds, and amphibians are unknown because these organisms' reactions to these herbicides have not been well studied, as the EIR explains.

Applying persistent biocides when their long-term ecological effects are unknown is imprudent, it's been done enough, and it's not appropriate for Californian forests.

The rest of the VTPEIR is a welcome document. I hope it leads to Californians being able to get out and do a lot more work caring for their forestlands.

Thank you for your hard work on behalf of our forests.

Sincerely,

Wolfgang Rougle

Chico, CA