

February 7, 2006

Brian Amme  
Vegetation EIS Project Manager, BLM  
P.O. Box 12000  
Reno, NV 89520-0006

Dear Brian Amme:

1 I am writing to express my concerns and disapproval regarding the Bureau of Land Management's proposal to increase the use of herbicides on our western U.S. forests. The fact is there are no safe pesticides—regardless what you or others may choose to believe.

2 Nineteen years ago, my 9-year-old niece (and Godchild) was on a school field trip when her legs gave out and she was unable to get up again. She was diagnosed with a rare autoimmune disease. Three doctors (including an immunologist) determined that pesticide toxicity was the cause of her immune system disease.

3 Like most normal families, my niece's parents used the usual over-the-counter herbicides, pesticides and insecticides around and in their home. They also had professional exterminators come periodically. This routine was discontinued when my niece's diagnosis was given. But we were soon to learn that this was only part of the exposure to pesticide chemicals we all, and especially children, potentially experience everyday.

4 Pesticides, herbicides, insecticides and fungicides are used in schools, fields, parks, playgrounds, on roadsides, parking lots, and inside school classrooms, cafeterias, gymnasiums and restrooms. They are also used in most public buildings, libraries, hotels, in most yards and homes, and, of course, on our foods. Children are the most vulnerable because of their less developed immune systems. No one can credibly use the excuse that there is no danger to any single exposure because everyone's potential for daily *multiple* exposures is assured in today's society.

5 There really are no safe pesticides when you consider all of the places and situations in which exposure exists. Add to this the fact that the Environmental Protection Agency does not require full testing or disclosure of the potential health hazards of the chemicals contained in *thousands* of over-the-counter products. The EPA also does not make it mandatory for manufacturers to list the inert ingredients in pesticides. With over 2,500 inert ingredients added to pesticides that are not disclosed on product labels and over 25% of these classified as hazardous by federal, state and international agencies, the dangers of these herbicides outweigh any claims about their safety. According to what I've read, only a few of the many inert ingredients in triclopyr products are publicly known or listed.

6 Several years ago, the EPA began a campaign to retest thousands of these chemicals because they have been identified as possible hormone disrupters, immune suppressors and neurotoxins. It is becoming common knowledge that many of these chemicals mimic estrogen in the human body, posing a significant cancer threat. This in itself is a serious concern. This testing is ongoing and most of the pesticides and

herbicides currently being called “safe” by manufacturers may, in fact, be harmful. Therefore, it would be irresponsible and disingenuous to simply accept the claims of product manufacturers without thoroughly reading the readily available information on the serious dangers regarding these chemicals.

7 There is a lot more to my niece’s story than I can express here. Because of important choices her family made in the treatment of her disease, we are extremely fortunate to still have her with us today. She graduated from the University of Environmental Science and Forestry (ESF) in Syracuse, New York—and currently works for the forest service in Colorado. Should we be concerned that the environment she works and plays in may become hazardous for her because our national forests are starting to actively use herbicides again? There is a reason a moratorium took place in the national forests here in California. Have you researched the history regarding the Trinity National Forest? The dangers of herbicide spraying in our forests have not been eliminated—and we do not need to be repeating history before we learn this.

8 We should be able to expect our forests to remain safe, wild, and pristine. Every effort should be made to keep them this way. Fire danger is not reason enough to aggressively turn up the use of herbicides. Aerial spraying is *not* an alternative to ground spraying. This method is fraught with problems—most especially “drift”. Ground applications have also proven to drift, causing damage beyond the target sites.

9 I am strongly opposed to the increased use of herbicides in our wild areas. I feel it is worth every effort and expense to pursue any and all alternatives to spraying these potentially dangerous chemicals in our forests. There is just too much at risk.

Thank you.

Sincerely,

Debra Craig

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