

Dear Sirs,

I am a 63-year old Professional Engineer with over 40 years of (global) experience in watershed management and river restoration. I am still very much involved as a river restoration specialist on the West Coast of the US, as is my wife Dr Christine Perala Gardiner, a botanist and geomorphologist. She is a native Oregonian who has extensive experience and knowledge of the many West Coast issues that have arisen over the last 30 years. Frankly, we find it difficult to believe that the BLM plans to carry out aerial spraying for invasive plants on the scale proposed, when there is so much at stake. There are known adverse effects of at least some of the herbicides to be used, while insufficient research has been undertaken into the possible effects of multiple herbicide use; Rich Nawa has covered this issue in his response on behalf of the Siskiyou Project. We are particularly interested to know in detail how Alternative 1 can lead to a decrease in water quality, compared with either the No Action or other options.

We also fully support and echo the comments from Oregon Wild's Center for Biodiversity, which cover a number of issues we would want to highlight ourselves.

On a personal level, we are deeply concerned that ourselves, family and friends may be exposed to these poisons while enjoying the unique regional landscapes in Oregon. As a botanist who recently wrote the WeedWise program for Clackamas County, my wife is appalled at your dismissal of either prevention or other (environmentally sound) means of control. She is well aware of the issues and their appropriate means of resolution, many of them novel and perhaps not considered sufficiently by the BLM.

We are very concerned about the impacts of clear-cutting (even leaving a few trees standing, which of course are likely to fall without the support of their forest) on the geomorphology, flora and fauna of our valuable river systems. Any increased justification for pesticide use in areas that are subject to (near) clear-cutting is simply throwing tax dollars away on a false premise - while compounding the problems.

We have only just now seen the summary EIS, having been away on business elsewhere since August. We ask to see that part of the draft EIS concerning the economic justification for this decision. I have long been involved with economic justification and have taught it in relation to the need for more sustainable river basin and watershed management. Essentially, I am highly skeptical that you have proved the case on economic grounds without externalizing significant social and environmental costs; are you claiming to have done so?

From my wife's recent (research) work, we know that there are several satisfactory but not generally well-known ways to remove invasive weeds while practicing sustainable forestry and protecting environmental resources, not least water quality. If you have any doubts about this, we would be happy to advise on how the BLM might achieve greater sustainability while maintaining - and enhancing - its credibility.

We look forward to hearing from you in this matter, and request replies to my inquiries before you consider final decisions

Yours faithfully,

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