

# **Draft Comments/Outline on Draft Environmental Impact Statement for Vegetation Treatment Using Herbicides**

Submitted by Jan Wroncy, on my own behalf and on behalf of Canaries Who Sing, Gaia Visions, Coast Range Guardians, Residents of Oregon Against Deadly Sprays and Smoke, and Citizens Environmental Protection Alliance.

Dear Sirs:

## **1. Comment Deadline:**

There is some confusion about the extended deadline of January 4, 2010, therefore I am herein submitting a brief outline/draft today, December 1, 2009, but retain the right to submit final comments on or before January 4th next year.

## **2. Incorporate by Reference:**

I hereby incorporate by reference, the excellent comments submitted by Doug Heiken for Oregon Wild, and Jay Lininger for Center for Biological Diversity; by the Northwest Coalition for Alternatives to Pesticides, by Lisa Arkin of Oregon Toxics Coalition; and by Samantha Chirillo for various groups, and by Maya Gee.

I will be incorporating by reference other groups by the extended deadline of Jan. 4, 2010.

I also incorporate by reference my previous scoping comments, my previous comments to the BLM for the 17 Western States Vegetation Management Environmental Impact Statements, and my comments submitted for the older EIS for 13 Western States.

## **3. Opposition to Alternative 4, the BLM Preferred Alternative to use more herbicides:Support No-Herbicide Option/Restore Native Ecosystems Alternative:**

I and the groups I am submitting comments for are opposed to the use of herbicides on BLM lands in Oregon for all the reasons stated in the above referenced comments. We are therefore opposed to the BLM Preferred Alternative, No. 4.

## **4. False premise used to justify toxic chemicals: Invasion Biology**

See: [INVASION BIOLOGY: Critique of a Pseudoscience](#) by David I. Theodoropoulos, 2003.

In addition, I would like to point out that herbicides always do more damage to native plants than to "noxious weeds" or invasive species. Therefore continual, large scale use of these toxic chemical herbicides will always select for stronger weeds, thus leaving nothing alive that can compete with the weeds, and therefore never be able to eliminate weeds. Since the chemical herbicides are very persistent, and in fact last much longer than the BLM would care to admit, they will sterilize the soil for long periods of time, thus additionally disfavoring natural, native vegetation communities. Using toxic chemical herbicides not only contaminates the environment, but also poisons whole ecosystems.

## **5. "Inert" and Secret "undisclosed" ingredients in pesticides and pesticide adjuvants:**

If the BLM does not reveal all the "inert" other ingredients in the formulations proposed for use, and all the ingredients of adjuvants added to tank mixes or batches, the BLM will not comply with NEPA by providing pertinent information for decision makers to review, and therefore also for the public to review. The public is rightfully reluctant to approve plans full of "secrets", especially toxic chemicals that we are being asked to accept exposure to.

See: Unidentified Inerts by Caroline Cox, 2006

See also: <http://www.pesticide.org/inertspetition2006.pdf>

See: **EPA Seeks to Disclose Hazardous Pesticide Inert Ingredients**

at: <http://www.epa.gov/opprd001/inerts/>

## **6. Toxic active ingredients, and adjuvants: Need to identify exact formulas and analyze impacts of formulas and tank mixes**

See: PORPHYRIC PESTICIDES: Chemistry, Toxicology, and Pharmaceutical Applications , Edited by Stephen O. Duke and Constantin A. Rebeiz, an American Chemical Society Symposium Series 559, 1994.

See also "Suicide Inhibitors" in: RATIONAL APPROACHES TO STRUCTURE, ACTIVITY, AND ECOTOXICOLOGY OF AGRICHEMICALS, edited by Wilfried Draber and Toshio Fujita, 1992.

See: MECHANISMS OF CHEMICAL-INDUCED PORPHYRINOPATHIES, Edited by Ellen K. Silbergeld and Bruce A Fowler, 1987.

See: THE COLOURS OF LIFE: An Introduction to the Chemistry of Porphyrins and Related Compounds by Lionel R. Milgrom, 1997.

See: RISKY BUSINESS: Genetic Testing and Exclusionary Practices in the Hazardous Workplace by Elaine Draper, 1991.

**7. Failure to comply with NEPA:** Uninformed decision-makers, cumulative impacts, etc.

**8. Failure to comply with FIFRA:** Mislabeled, false claims of safety, Label violations

**9. Violations of: 7 USCA Section 136j Unlawful acts [FIFRA section 12]: unlawful testing on humans.**

**10. Failure to comply with the CWA: NPDES Permits**

**11. Discrimination against disabled people/Disparate Harm to disabled people/Denial of Access:**

**12. Violations of Human Rights:**

See: Documents by Dr. Tom Kerns regarding herbicides, insecticides, and human rights, etc.

**13. Violations of Native Americans rights:** traditional medicines, wild crafting, native habitat, traditional and new food sources.

**14. Arbitrary and capricious labeling of plants as weeds,** undesirable vegetation, noxious plants, and invasive species/Denial of beneficial and medicinal uses:

See: Comments by Maya Gee

**15. Violations of the Endangered Species Act/Unnecessary threats to Endangered Species: Salmon, owls, etc.**

**16. Failure to correct past land management practices that substantially cause the vegetation problems:**

See: **SACRED COWS AT THE PUBLIC TROUGH** by Denzel and Nancy Ferguson, 1983.

The BLM proposal utterly fails to put prevention first. The BLM proposal for massive spraying of herbicides on 100's of thousands of acres in Oregon will result in massive devastation to the public lands, and massive poisoning of the public.

Respectfully submitted by

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