



Westport Municipal Advisory Council

P. O. Box 307, Westport, CA 95488
www.westportmac.org

March 9, 2011

Tim Meyers
Forest Practice Division
California Dept. of Forestry & Fire Protection
135 Ridgway Ave
Santa Rosa, CA 95401

Re: THP 1-10-139-MEN (Howard Creek)

Dear Mr. Meyers:

We offer the following comments on proposed use of the herbicide Imazapyr in the cited plan. Public testimony on this issue was received at our March 1, 2011 meeting from Aimee Maxey, Dorine Real, Beck Regalia, Lois Senger, Lee Tepper, Victoria Williams, Nancy Williams, Juliana Van Meter, and Kerry Reynolds. Additional input was later supplied by Jenny Shattuck. We invited John Anderson of Mendocino Redwood Company, who was not able to attend. Local RPF Tom Kisliuk came at our request to explain why and how herbicides are applied and took no position on the matter.

The community recognizes it is desirable to restore Type A species. However, there is unanimous concern about using herbicides to accomplish that objective. Key concerns include water quality, human health impacts, and the effects of herbicide runoff on the environment and organic food crops grown downstream. Specific concerns were raised about the persistence, mobility, and environmental and health consequences of Imazapyr as discussed by Carolyn Cox in the *Journal of Pesticide Reform* (1996, Volume 16[3]:16-20). This herbicide was used in the watershed before and one person living there in 2000 said she experienced adverse health effects after it was applied near her home and domestic water supply by the hack and squirt method.

The unanimous view of those offering testimony and the WMAC is that alternative methods like manual removal of tanbark oak should be considered. Sale of the material as firewood was suggested. The THP should specify how much Imazapyr will be used, analyze how much persists as hazardous waste in the plan area, restrict application to July, and specify reasonable setbacks from watercourses and domestic water sources (at least 150 feet horizontally; greater uphill). The preferred solution is not to put our community at risk with this very potent chemical. Please advise us how you plan to address this issue prior to approval of the THP.

Sincerely,

A handwritten signature in cursive script that reads "Chuck Eyerly".

Chuck Eyerly, Secretary