



Integrated Weed Management Plan Comments

Most recent comments are shown first. There are 218 comments.

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Comment #218

Jeffrey Milburn

Boulder

May 20, 2024

I was shocked to learn that The Boulder County Parks and Open Spaces Draft Plan uses herbicides as it's main tool for managing weeds --especially Bayer/Monsanto's Rejuvra and aerial spraying with drones.

Experts in environment/ecology are instead advising commissioners to adopt the CU Professors' chemical free Weed Plan and Tess McDonald's Weed Guide for 3 years until the next state required review.

Please vote with Commissioner Ashley Stolzmann and 81% of the public (according to BCPOS's recent survey) to not use toxic pesticides in Boulder County.

In the 6 decades that I have been in and around Boulder it was startling for me to find out that herbicides and pesticides are even being considered as they are a direct contravention of the commissioners oath of office to serve the public good and public safety - especially children and the elderly who are the most vulnerable to these toxic substances.

In addition, their use invokes serious liabilities for the county as well as the commissioners who vote for their use.

This decision should not be taken lightly as this reckless course of action can easily lay the groundwork for major class action lawsuits on the behalf of large numbers of Boulder County residents against the county and especially the commissioners who voted for their use - think Monsanto and Glyphosate.

When considering that there are natural and non-invasive alternatives that have been publicly provided

as an alternative choice - the liability only increases against those who would approve their use.

Public well-being is the priority of a commissioners oath of office and must take center stage in this pivotal decision.

In the 12 years when my father was the Boulder County Treasurer - I cannot recall one vote by the commissioners that veered off course so far from protecting the public safety. It is unimaginable that standards have fallen so precipitously.

Vote no on herbicide and pesticides use and be on the right side of history - your legacy depends on it.

Jeffrey Milburn

Comment #217

Jesse Manno

Boulder

May 20, 2024

Dear Commissioners and Advisory Committee members-

Thank you for your service, and for taking seriously the majority of the public's resistance to use of chemical herbicides on our Open Space. It seems clear to me that a well researched, scientifically sound, and very reasonable alternative is being proposed, and I strongly encourage you to try it out for 3 years, even if there are difficulties and strained relationships with corporate suppliers, investors, and a minority of voters. It's the right thing to do for the County. Thanks!

-Jesse Manno (40 year resident) and Lulu Delphine.

Comment #216

Betsy Neely

Boulder

Apr 20, 2024

Dear County Commissioners,

I am writing to request that you take immediate action to stop the use of toxic herbicides on Boulder County Parks and Open Space natural lands. Please do not approve the recent version of the Integrated Weed Management Plan as drafted.

I am particularly concerned about aerial spraying of herbicides on the county's high biodiversity areas, e.g., Rabbit Mountain and Heil Valley Ranch. These natural areas are irreplaceable on a global scale (ranked by the Colorado Natural Heritage Program at CSU) and absolutely should not targeted for aerial spraying of herbicides with unknown long-term impacts to address a species (cheatgrass) that is not even a major problem in this area or a high priority species (List C) for control in the county. (Why not address cheatgrass with early livestock grazing as tested and demonstrated by ARS scientists?).

According to experts, Indaziflam/Rejuvra is known to sterilize the soil, reduce soil microbes and invertebrates, area toxic to aquatic organisms, small mammals and have unknown longterm impacts on pollinators. Note the results of the recent Colorado Native Pollinating Insects Health Study. Do not be swayed by Bauer or other chemical companies promoting and/or funding the use of these chemicals. According to local scientist Dr. Hunter Lovins, Bayer's warning on the label says do not graze or feed livestock after grazing-what about impacts on our native deer, elk and other mammals and birds?! Please incorporate the expertise of well-respected CU Professor Emeritus Dr. Tim Seastedt and other local exerts into the County's weed management planning. I am very concerned about the impact of herbicides and pesticides on our pollinators, native plants, natural communities, wildlife, soil and human health, particularly in the face of a climate change crisis.

The citizens of Boulder County have voiced their strong opposition to aerial spraying of herbicides and support for scientifically based approaches to protecting our natural lands, addressing biodiversity loss and restoring ecosystems. These include targeted goat and cattle grazing; prescribed burns followed by seeding of native species, and manual or mechanical control and restoration, and long-term monitoring.

Thank you for taking immediate action toward regenerating the health of our county lands by halting the use of toxic herbicides. Let's be the leader in sustainable management of our natural lands!

Sincerely,
Betsy Neely
Boulder, Colorado

Comment #215

Genevieve Thomas

Lyons
Apr 17, 2024

I attended the meeting on April 16th in Boulder.
I left with a resounding feeling that we MUST MAKE PEOPLE MORE IMPORTANT THAN PLANTS.
Let nature manage the weeds. And let weeds do their job

Please make the use of herbicides an illegal practice.
Let us set an example for the country and the world.

Comment #214

Alex Markevich

Nederland
Apr 16, 2024

Staff is using a classical chemical industry marketing script to push the treatment of cheatgrass with Indaziflam, which chemical companies want to profitably spray across all rangelands in the West. Here is the script:

Marketing Step 1: Create a dire need

Staff has chosen to make eradication of cheatgrass a goal.

The Public and the State of Colorado understand that cheatgrass, as a List C Species, needs to be managed, but its management is not a dire emergency.

Marketing Step 2: Promote only the upside of your solution and ignoring any downsides

Staff points to invasives as a threat to biodiversity.

The Public understands that pollution, including pollution with toxic herbicides, is a greater threat to biodiversity and the environment.

Marketing Step 3: Claim your solution is safe because it is EPA approved

Staff points to EPA approval of Indaziflam.

The Public knows this is the same EPA that approved glyphosate in 1974 and is just now starting to reconsider the approval only after courts have awarded billions of dollars in health damages. Most mechanisms for ecological and health damage, particularly longer-term impacts, are not considered in the EPA approval process.

Marketing Step 4: Show visuals of the upside

Staff shows pretty pictures of nature and takes people on tours to "successfully" treated sites.

The Public knows that staff is selecting only the best-looking locations. There are plenty of other locations where treatments led to obvious ecosystem degradation. And pictures do not show the microbiome damage and water pollution resulting from treatments with toxic herbicides.

Marketing Step 5: Provide testimonials only from your friends

Staff cites chemical-industry-funded studies and brings only chemical-oriented academics and land managers to testify.

The Public knows that independent studies are the only ones that honestly look at holistic ecosystem impact and that independent ecologists are the ones with the relevant ecosystem restoration expertise.

Marketing Step 6: Claim yours is the only solution

Staff claims only herbicides can do the job.

The Public knows that the job is much better done with ecologically sound ecosystem management and that Staff does not have this expertise, but the Community does have the expertise and experience to implement ecologically sound ecosystem management.

Boulder County Commissioners: Listen to your Public, not to the chemical marketers on POS Staff. Reject the use of Indaziflam! Reject the use of other toxic herbicides! Force Staff to seriously engage with the Community to adopt ecologically sound ecosystem management approaches at scale!

Comment #213

Megan Bowes

Lafayette

Apr 16, 2024

I would like to voice my support of Boulder County's draft Integrated Weed Management Plan. Many of us recognize the importance of the potential use of the full and integrated suite of IPM tools, which include biological, cultural, mechanical and chemical control methods, in the conservation and enhancement of functional native ecosystems. Much of the public discourse has been made about the concerns of synthetic herbicides and I applaud Boulder County's pledge to reduce overall herbicide usage and eliminate the usage of a specific suite. However, it should be stated again that alternative methods are not the panaceas suggested by anti-herbicide enthusiasts. (In addition to the competing science from both/all sides on herbicide impacts and efficacy, just this evening, Commissioner Levy reminded us to be realistic in what we can expect volunteers to do; to that I would add realistic expectations on what results mechanical and cultural efforts can/will affect.) As a plant ecologist concerned with ecosystem conservation and human health, I recognize that limited, judicious use of specific herbicides must be a land restoration tool used wisely in conjunction with the like use of biological, cultural and mechanical controls. As such, I encourage Boulder County Staff and the public to continue the dialogue, and I respectfully ask the County Commissioners to support the staff Integrated Weed Management Plan at this time. Thank you.

Comment #212

Anne Brown

Longmont

Apr 16, 2024

Please stop spraying herbicides Glycosate and Indaziflam on Boulder County open spaces. Please stop all types of aerial spraying and manual application and replace with natural methods such as utilizing grazing animals and human volunteers to remove manually and prescribed burns. Thank you

Comment #211

Ruby Begay

Boulder

Apr 16, 2024

Boulder has been recognized as a leader in climate action and has always valued being environmentally responsible. The use of toxic methods of weed control goes directly against our values and creates a lasting negative impact on people, land, and wildlife. Therefore I urge you to live the values that we hold

by stopping the use of toxic methods of weed control. Instead, let us turn to methods that have lasting positive impacts on people, land, and wildlife.

I urge you to:

1. stop using toxic herbicides on Boulder County natural lands in order to stop the degradation of our local natural ecosystems
2. stop the use of Glyphosate and Indaziflam
3. Stop all aerial spraying, from helicopters and drones

Instead let's:

1. use targeted goat and cow grazing
2. use prescribed burns followed with seeding of native species, in line with the natural processes of our fire-adapted ecosystems
3. use manual restoration, using local community resources to connect and empower our community.

Let's lead by example and leave a legacy of positive change for future generations and the health of this beautiful place we get to call home.

Thank you for your time.

Comment #210

Jim Krick

Longmont

Apr 16, 2024

Dear Commissioners,

I am an 18-year natural resources management professional that works for a municipality in Boulder County and I write to express my support for the draft Boulder County Integrated Weed Management Plan as it was presented to the Parks & Open Space Advisory Committee on March 28th.

The County's ecosystems are under constant threat from habitat degradation and extreme droughts, floods, and wildfires exacerbated by climate change. Invasive weeds play a major role in these threats whether by direct competition and replacement of native species, reducing resiliency to disturbances, or directly contributing to less soil carbon and releases of carbon dioxide into the atmosphere. The United Nations recently reported that more than a million species of plants and animals worldwide face

extinction. The World Wildlife Federation states that 42% of threatened and endangered species are at risk due to invasive species. As humankind is directly linked to our environment, we too are under threat from invasive species and their management is essential. The draft Integrated Weed Management provides sound, science-based guidance to combat these threats.

The career ecologists of Boulder County Parks & Open Space share a deep passion for environmental protection with the public that has entrusted them to do so. They have made it their life's work to protect and restore our ecosystems. While there is no Hippocratic Oath for ecology, professionals in this field believe in a similar principle to not inflict intentional harm and follow a professional standard. The International Principles and Standards for the Practice of Ecological Restoration are as follows:

1. Engage stakeholders.
2. Draw on multiple types of knowledge: practitioner experience, traditional knowledge, local knowledge, and scientific discovery.
3. Be informed by native reference ecosystems.
4. Support ecosystem recovery processes.
5. Have clear goals and objectives with measurable indicators.
6. Seek the highest level of recovery possible.
7. Utilize a continuum of restorative activities.
8. Gain cumulative value when applied at large scales.

An ethical ecologist will not prescribe a management action that will do more harm than good. Like in the medical field, some prescriptions may have side effects but ultimately will help the patient, in this case the ecosystem, recover to a healthy state. Similarly, prior to prescribing chemical solutions, other methods are evaluated. However, there are some conditions where the only viable treatment is chemical. Try as one may, you cannot get rid of some weeds by mowing, grazing, or hand pulling alone. It is also must be considered that due to other circumstances like scalability, cost, or topography, a specific type of control like aerial chemical application may be necessary. Think of it like a tumor found on the spinal cord where surgery is too risky and thus chemotherapy must be used.

Ecology is extremely complex and so is management of ecosystems. Management is not a monolith and is dependent on specific circumstances. When it comes to invasive species management, integrated management is nuanced. The removal of a specific herbicide from the toolbox is not always as simple as replacing it with another herbicide or control method. Some species and some situations have very few viable options for control. The draft integrated weed management plan makes it apparent that Boulder County Parks & Open Space has thoroughly evaluated all control methods while utilizing the whole of the science. The evaluation and plan for how to control invasive weeds is not just in line with other municipalities and counties across the State but is also how agencies across the nation and the world conduct integrated weed management.

It should also be addressed that the species on the State Noxious Weed list have all been reviewed critically for listing by scientists and practitioners for their detriment to the environment and our agricultural and economic livelihoods. Regardless of being a list A, B, or C species, they are all deemed a significant threat. Categorizing as a list A, B, or C species is based on abundance and not on magnitude of threat. In other words, a list C species is no less a concern than a list A species, it is just more widespread. Thus, cheatgrass should not be considered unnecessary for control just because it is on the

C list.

I urge the Boulder County Commissioners to take the threat of invasive species seriously and to trust in the dedicated stewards of Boulder County Parks & Open Space and the scientific and ecological management practitioner community that supports them.

Sincerely,

Jim Krick, Certified Ecological Restoration Practitioner

Comment #209

Alex Markevich

Nederland, CO

Apr 15, 2024

The only way to get POS staff to seriously investigate how to do ecologically sound ecosystem restoration is to absolutely forbid them from using any chemical herbicides. Then POS staff will have to learn the new approach to weed management that residents are overwhelmingly demanding, or POS staff will have to be replaced with real ecologists.

Comment #208

Deb Gardner

Longmont

Apr 15, 2024

Boulder County is known as a leader and innovator in Colorado and the world; especially with regard to environmental issues. Commissioners, as you know, leading is not easy but you also know the long term benefits outweigh the trials.

A chemical free Integrated Management Plan is the Best Outcome for Boulder CO.

Commissioners, you have a real chance to be a visionary for the future of Boulder County Open Space. Chemicals could be phased out over the next 4 years with interim goals in order to meet this objective. Eliminating chemical use is consistent with public opinion, where over 81 % of the 1076 people who responded to a public opinion survey called for the end of chemical use in the weed management program.

Eliminating chemical based weed management opens up new opportunities for partnerships and initiatives with local governments, groups, farmers, youth organizations and others that could come together to meet the County's weed management goals. There used to be a robust volunteer program with the County, but it has fallen on the wayside with the rise of chemical use.

Commissioners in support of updating the IVM Plan will become climate heroes, since the County will be

freed from chemical weed control and can focus on building resilient soils and healthy plant communities that store carbon and meet the County's climate goals.

This decision will be a defining vote for the future. There is intense public attention on this issue and you will likely feel the effects of whatever decision you make in whatever future role you may want to have in the County and beyond.

Thank you for listening.

My regards,
Deb Gardner

Comment #207

Hollie Rogin

Lyons

Apr 15, 2024

Hello,

The Town of Lyons Board of Trustees has not taken an official position on the proposed Weed Management Plan. Thus, I am submitting comments as an individual.

I so appreciate the work that has gone into creating this thoughtful draft and the opportunity for the public to comment on it. In brief, I urge you to adopt the chemical-free weed management plan for a three-year trial period. If that does not come to pass, I ask you to consider not spraying herbicides within a specified boundary of the Town of Lyons to limit the effects on our residents and our natural environment. Thank you so much for your consideration.

Comment #206

Ingrid Moore

Longmont

Apr 15, 2024

I am opposed to the aerial spraying of herbicides and pesticides under the current protocols. Until there is more adherence to science-based applications, depending on the weed and type of pest, time of life-cycle, and conditions under which use will occur, all use of aerial applications should be paused and re-evaluated.

This especially applies to annual weeds such as cheat grass and pre-emergents, which can harm soil organisms/biology and prevent native plant revegetation.

Comment #205

Justin Hartman

Boulder

Apr 15, 2024

I support the reduction of herbicides - stop using glyphosate

Thank you

Comment #204

Marcela Ot'alora G.

Boulder

Apr 15, 2024

Dear County Commissioners,

I am writing to request a stop to the use of toxic herbicides on Boulder County natural lands. I'm sure you all are well aware of the degradation of our ecosystems related to the use of herbicides. You must all be aware of the results of the Colorado Native Pollinating Insects Health Study -The impact of herbicides and pesticides on our pollinators affects all of us and is a serious concern.

Please stop all aerial spraying whether from helicopters or drones, and immediately stop the use of Glyphosate and Indaziflam.

Sincerely,

Marcela Ot'alora G.

Comment #203

Lodi Siefer

Boulder

Apr 14, 2024

Dear County Commissioners,

I am writing to request that you take immediate action to stop the use of toxic herbicides on Boulder County natural lands. I'm sure you all are well aware of the degradation of our ecosystems related to the use of herbicides. I am guessing you are also aware of the results of the Colorado Native Pollinating Insects Health Study - all of us should be very concerned about the impact of herbicides and pesticides on our pollinators since all of us eat.

As first steps please stop all aerial spraying whether from helicopters or drones, and immediately stop the use of Glyphosate and Indaziflam.

My neighbor is a volunteer naturalist for the county and has shared with me that there is interest in ecologically sound approaches to addressing biodiversity loss and restoring ecosystems. These include

targeted goat and cow grazing; prescribed burns followed by seeding of native species, and manual restoration. Let's use these methods! Many people would be willing to help!

Please take action to move toward regenerating the health of our county lands by stopping the use of toxic herbicides.

Thank you,
Lodi Siefer

Comment #202

Margot Iseman

Boulder

Apr 14, 2024

Dear Boulder County Commissioners,

I feel so strongly that using toxic herbicides to control weeds in the county is greatly harmful to our pollinators. Especially, please stop all aerial spraying, from drones or helicopters of Glyphosate and Indaziflam. There are other methods, like cow or goat grazing, prescribed burns followed by seeding of native species and manual restoration. Many people would be willing to help with this, so let's us these methods.

Thank you for consideration in stopping the use of toxic herbicides.

Sincerely,

Margot Iseman

Boulder

Comment #201

Gaia Mika

Boulder

Apr 14, 2024

Dear County Commissioners,

I am writing to request that you take immediate action to stop the use of toxic herbicides on Boulder County natural lands. I'm sure you all are well aware of the degradation of our ecosystems related to the use of herbicides. I am guessing you are also aware of the results of the Colorado Native Pollinating Insects Health Study - all of us should be very concerned about the impact of herbicides and pesticides on our pollinators since all of us eat.

As first steps please stop all aerial spraying whether from helicopters or drones, and immediately stop the use of Glyphosate and Indaziflam.

As a volunteer naturalist for the county I know that there is interest in ecologically sound approaches to addressing biodiversity loss and restoring ecosystems. These include targeted goat and cow grazing; prescribed burns followed by seeding of native species, and manual restoration. Let's use these methods! Many people would be willing to help!

Please take action to move toward regenerating the health of our county lands by stopping the use of toxic herbicides.

Thank you,
Gaia Mika

Comment #200

Ilene Flax

Boulder

Apr 14, 2024

Dear Commissioners:

When thinking about pesticide use in the county, it is important to distinguish between short-term targeted use for restoration of disturbed landscapes and long-term ongoing use that supports unsustainable landscapes.

In the first, land managers and property owners use pesticides as one tool among many in the stewardship of landscape-scale restoration. For example, treating stands of invasive cheatgrass and thistle that emerge following a wildfire or flood to reduce competition and allow native grasses to establish and flourish.

What does not make sense is a system in which pesticides are sprayed on a regular basis to maintain an irresponsible aesthetic or drive profits. Examples include rock landscapes where weed growth is eliminated by herbicides, genetically modified crops regularly sprayed with roundup, or homeowners routinely using pesticides on non-native lawns.

These are challenging and emotional conversations and I believe this nuance in the discussion might help reach consensus.

Thank you for your thoughtful consideration,
Ilene Flax, PLA

Comment #199

Allyn Feinberg

Boulder

Apr 14, 2024

Testimony to County Commissioners

[Download Attachment](#)

Comment #198

S L

N/A

Apr 12, 2024

Who is going to pay the legal fees when victims of chemical injury perpetrated by the County collectively sue the County?

The county is especially vulnerable when when there no regard for established or recommended setback and notifications protocols.

Precedent points more and more to culpability on the part of those determined to put personal and corporate profit over the well-being of ordinary citizens.

Please answer.

Comment #197

T M

Lyons

Apr 12, 2024

Hi _____ and Commissioners,

Ms. Glowaki admitted on record at the end of the meeting that Derek Sebastian's father works for BCPOS. I'm her personal opinion, he in no way financially benefits from his son's patent. I don't think that's the point. The point is that commissioners and advisors should have been made aware of this conflict of interest, along with the fact that Scott Nissem has made money from Bayer/Monsanto. Then the leaders could have made their own distinction with all the information.

The other BIG RED flag is that this whole time BCPOS made us believe they had discussed cheatgrass and fire mitigation with expert scientists when in fact they made the whole propaganda campaign up! That's disturbing to me, making the public fearful! Again this whole thing has gone on too long, and we do not give our consent to be sprayed with toxins that, are not only ineffective, but cause harm. Please, we implore you.

Thank you,

Comment #196

J M

Longmont

Apr 12, 2024

The science is clear on this compound. Please ban it's use in BOCO open space.
Thanks.

Comment #195

E M

Boulder

Apr 12, 2024

POSAC members,

i've been very busy since the last meeting but wanted to follow up to say THANK YOU for all the time, effort, great questions, late nights, and listening you've done during this IWMP process. it was probably more than you thought you signed up for when you joined POSAC. 😊😂 we may not all come to the same final conclusion (though i am hopeful we are on the same page!) but you have been invested in a way some communities don't experience and that has been a great privilege for boulder county residents. i appreciate all of you.

as follow up for last week's meeting, i want to briefly reiterate a few things from the proposed changes... — i agree with many from the public and on POSAC that said the herbicide reduction goals must be fast-tracked. obviously i want a complete elimination of herbicides but a strategic reduction is preferable to the original plan.

— aerial spraying must be completely removed from the IWMP. drones may be said to be more targeted but drift happens and the community is very concerned.

— glyphosate must be completely removed from the IWMP. i covered why the inclusion of glyphosate on the WHO table 4 list should not be trusted because they ignored the advice of IARC. this is also a main ask from people who filled out the survey and participated in POSAC meetings.

— transparency must be part of any IWMP...increased accountability and access to all chemical use on public lands.

a couple comments/notes about the meeting... — i said this in my public comment but the peer agency presentations you were given were chosen because they agree with things POS staff want to continue and have deemed "vital" to the IWMP.

— there must be a full panel of natural weed management experts. the march 12th panel is not okay as it stands because it only features one chemical-free proponent. tess mcdonald proposed who should be on it in her public comment. if you don't have the desired list of participants, i can send it. POS staff isn't providing you with an unbiased panel so POSAC must insist or it won't happen.

— i found it curious that most of the ag lessees who provided public comment online said the same thing, as is they were given a script, "please listen to staff and accept their recommendations." i have a few suspicions but don't know who prompted or arranged for all of them to call in but it was planned to

sway your support for the draft updates. it is also important to note that most of the people who were asking for support of the IWMP use chemicals on their ag leased lands, which they may say are "essential" to their farms, so are biased toward pesticide use. something to consider...

again, i appreciate all your time. my immediate request is that the panel scheduled for march 12th be revised to include only natural land management experts and disinvite chemical proponents like dr. nissen, from whom you've already heard. a holistic view of land management solutions is important to your decision next month.

thank you,

Comment #194

K S

Lyons

Apr 12, 2024

Hello,

Just wanted to show you yet another example of an herbicide that kills; it's not just glyphosate, they are all dangerous. POSAC said last night that they would recommend banning glyphosate, but that is not helpful when another toxic chemical will be replaced. By the way, to correct Joe Swanson, all the countries mentioned (34 I recall) by the public last night banned glyphosate, not reduced it's use.

We need to stop using these dangerous chemicals now -- not in 6 years as POS proposes. That's what they said 10 years ago and that lasted about 2 months and the moratorium on (included GMOs) was reversed immediately. We need to listen to independent scientists who teach land management (and have worked as weed managers)and start using safe methods for weed management that they have put forth in their pesticide free weed management plan for the county--RX burns, targeted goat grazing, hand pulling, and mowing.

Below is an article about parkinsons and the herbicide paraquat. POS seems to use more Bayer/Monsanto products, but the point here is that as these products are studies over the decades, we learn how much damage has been done from it. I don't want to be having this conversation in 10 years about Rejuvra/Indaziflam -- Joe Swanson admitted last night and even last year that there are no long term studies on it. The professors also searched for independent studies and could find none.

----- Forwarded message -----

From:

Date: Fri, Mar 15, 2024 at 9:05 AM

Subject: Fwd: TAKE ACTION: This weed killer is linked to Parkinson's.

Hunter,

Farmworkers and agricultural communities face an increased risk of developing Parkinson's disease

because of the continued use of a highly toxic herbicide called paraquat. In response to a lawsuit brought by Earthjustice on behalf of farmworker, public health, and environmental organizations, the Environmental Protection Agency (EPA) is currently reevaluating paraquat's risks to public health and the environment.

Pesticide companies and industrial agricultural operations across the U.S. expose farmworkers, nearby communities and the public to millions of pounds pesticides each year, including more than 10 million pounds of paraquat. A single sip of paraquat can kill, and repeated exposures are linked to an increased risk of Parkinson's disease, a degenerative brain disease with no known cure. Multiple studies have found that farmworkers who used paraquat or people who lived near the fields where it was sprayed are far more likely to develop Parkinson's disease. Yet, despite its severe risks, paraquat use more than doubled in the United States between 2012 and 2018.

After an Earthjustice lawsuit, the EPA agreed to reconsider its analyses of paraquat's risks and benefits, including the connection between paraquat use and Parkinson's disease. This reconsideration gives EPA the opportunity to correct its past mistakes and to finally protect the public from paraquat.

However, EPA's preliminary reconsideration continues to understate paraquat's risks and to defend EPA's decision to authorize paraquat's continued use. EPA ignored the overwhelming scientific evidence connecting paraquat exposure to Parkinson's disease, among other flaws.

Chemical companies like Syngenta that produce paraquat are facing a surge in personal injury lawsuits claiming exposure to the pesticide is causing long-term health harms. The most effective way to reduce deaths and suffering is for the EPA to ban paraquat. Alternatives for weed control exist, making the continued use of this highly toxic pesticide unnecessary.

Sent via ActionNetwork.org. To update your email address, change your name or address, or to stop receiving emails from The Juggernaut Project, please [click here](#).

Comment #193

J A

Louisville

Apr 12, 2024

Dear Board of Boulder County Commissioners,

My name is ___, and I'm your constituent from Boulder, as well as owner of Wild Heritage Gardens and Design, a natural landscape company and expert in chemical free landscape solutions. I am emailing today to express my support for the Integrated Weed Management Plan. Expanded local control would allow communities to protect water sources, create buffer zones to protect natural resources, and increase protections for vulnerable populations such as children.

I appreciate your desire to eradicate herbicide use, and changing to more natural weed management plans. Boulder County residents are very concerned about toxins. Our clients choose us because of our expertise, stance regarding, and commitment towards natural land solutions. We are a "Never A Chemical" company. They trust us with their landscapes for their health and safety, as well as that of the pollinators, our children, the water, animals, and all life.

Chemical toxins, such as Dicamba, have been shown to be harmful to the health of humans and even a cause of cancer. They are not selective, and they can eventually alter or sicken all life. Chemical herbicides are also known to kill the microbiome, which is responsible for a vast amount of Carbon Sequestration. In choosing to use chemical toxins, public health is put at risk by poisoning them, their land and crops, animal life, and their water. The runoff of rainwater kills fish, aquatic invertebrates and aquatic and semi aquatic plants.

There are many natural solutions that will keep residents and life safe. We urge you to make greater and faster progress towards these natural solutions. For example, goats are extremely effective, controlled burning, volunteer recruitment as is done with Myrtle spurge, and overseeding of native species that will establish and outcompete after the other solutions are employed. Working alongside environmentally sound landscape experts, such as Wild Heritage Gardens, is also an option.

Thank you for your time and for doing the right thing,

Comment #192

J T

Boulder

Apr 12, 2024

I'm so excited to hear that OSMP will not be using glyphosate! What a thoughtful and health-promoting decision for our community! Unfortunately, the use of continued aerial spraying is a hazard to animals and people alike. While people can read a sign and decide whether or not to visit an area that may have aerial spraying, animals cannot. This type of weed mitigation is not necessary as well as harmful to our soil's future ability to store carbon. Please eliminate the use of aerial spraying on our open space.

Comment #191

E O

Louisville

Apr 12, 2024

Dear Boulder County Commissioners,

Please immediately stop the use of herbicides and insecticides on our open spaces! As many of you know, these poisons are bad for the health of people, pets, wildlife, native plants and the soil biome,

basically the earth. In addition to upsetting the balance of nature, many of these chemicals adversely affect soil health. Our soils are important for sequestering carbon, a major part of the solution for climate change.

Especially please discontinue Restore Colorado 22 aerial spray program permanently and all other aerial spraying in our county and adopt the Nature-based Weed Management Plan and Weed Guide into all County policies. This Guide was developed by top experts in the field of plant and land management. I have been a volunteer "Weed Whacker" in Louisville for over ten years and have seen the results of consistent manual pulling of noxious weeds. The Canada thistle, common mullein, Scotch thistle, diffuse knapweed, and h mullein in Warembourg Open Space where I have been weeding are all under control. There is no need to use toxic herbicides to control weeds.

Thank you for your consideration of this important topic and I hope you will be an integral part of this vision for a better and safer county and ultimately a better world for us all.

Sincerely,

Comment #190

B F

N/A

Apr 12, 2024

As the founder of the Colorado State University's Native Plant Master Program, I am very familiar with both native plants and threats to native ecosystems from invasive alien weeds. I am writing to ask that the County Weed Management Plan eliminate the reliance on herbicides for weed management which can have negative effects on natives as well and the long term health of the soil, native pollinators and water systems on county lands. I would like to see a much greater emphasis on other aspects of Integrated Weed Management including bio and mechanical control.

Thank you for the opportunity to comment on the Weed Management Plan.

Comment #189

P B

Unincorporated Boulder County

Apr 12, 2024

Dear Commissioners Levy, Loachamin, and Stolzmann:

I am a resident of unincorporated Boulder County northeast of the city of Boulder and am writing in support of the county staff's proposed Integrated Weed Management (IWM) plan. I previously submitted comments to the POSAC on an earlier draft of the IWM plan. I am sending you additional comments regarding the most recent draft revised after the March 28 POSAC meeting. As background, for 27 years I have been a volunteer with the U.S. Forest Service controlling weeds on federal land in Boulder County. And for many years I also have performed volunteer weed control for the city and county.

I. The Environmental Damage of Non-native Weeds

The damage that non-native plants pose to the environment is well recognized. While the scope and magnitude of damage varies across locations and invasive plant species, non-native invasive plants can reduce biological diversity in Boulder County by: competing for limited natural resources, displacing native plants (including some very rare species) as they grow and spread rapidly over large areas, reducing food and shelter for native wildlife, including pollinators that require specific native plants and host plants of native insects, changing soil fertility, affecting waterways, and creating fuel for wildfires.[i] These impacts result because non-native invasive plants can more easily capture light, consume water and nutrients, and germinate and grow earlier in each growing season than native plants. Some non-native invasives like spotted knapweed and 'Cheatgrass' (*Bromus tectorum*), are especially detrimental as they create monocultures.[ii] In addition to affecting public and private open space and wilderness areas, many of these plants have invaded agricultural land and reduce crop yields and marketability.

II. Weed Control Strategies

The Boulder County Integrated Weed Management (IWM) Plan is based first on state law, which requires governmental agencies and private landowners to control noxious weeds and also is founded on objectives in the Boulder County Comprehensive Plan. State law requires the county to eradicate weeds on the state's A list and to manage B list species by either eradication, suppression, or containment. Management of species on List C is recommended by the state, though not required – because List C species, while no less hazardous to native plants and wildlife than those on Lists A and B, are widespread and therefore, from the state perspective, not as likely to be eradicated or contained. In addition to programs to manage List A and B weeds, however, the county, under state law authority, has established management objectives for 14 of these C List weed species in keeping with its purpose to preserve and protect native species, natural ecosystems and biodiversity. The plan includes specific objectives for A, B, and C list species on both county-owned and private property.

Integrated Weed Management comprises the spectrum of strategies from mechanical (mowing, seed collecting, hand pulling, prescribed fire), cultural (prevention through education, minimizing soil disturbance and seed transport, and revegetation), biological (grazing, insects and pathogens like fungi), and chemical (herbicides). Consistent with professional weed management practices, the county weed management staff decide which control tools to use based on each weed species, its prevalence, and its location, considering practical and economic factors. And the IWM plan specifically commits to minimizing the use of herbicides, which already are applied to a tiny fraction of open space property (under 3% of the 34,000 acres, and applications are made only on target weeds, so actual application acreage is even smaller).

III. Herbicide Use

The most controversial features of the IWM plan seems to be whether and how to apply herbicides. I support the IWM plan's inclusion of herbicide use on weed species and in locations where other strategies are less likely to be effective or practical. For example, as demonstrated by the county's experience with 'Cheatgrass' in areas like Rabbit Mountain, use of Rejuvra (Indaziflam), which inhibits seedling emergence and root development, has dramatically reduced this weed's population with a single application, effects that have persisted over many years. And native plant species and wildlife have rapidly returned to these areas. Along with many members of the public, I attended two site visits to observe the inspiring native plant recovery in these treated areas in contrast to adjacent areas still

covered in *Bromus tectorum*. Examples of the impressive impacts of Rejuvra in open space areas also are illustrated in the "Story Maps" and case studies on the IWM website.[iii] It goes without saying that county staff use this and all herbicides as required by the EPA-approved pesticide label, with precautions about application rates, use near water, and concern for drift.

In my volunteer weed control work, I have pulled Mediterranean Sage (*Salvia aethiopsis*) on county property, musk thistle (*Carduus nutans*) on city property (Joder Ranch), and Myrtle Spurge (*Euphorbia myrsinites*) on public and private property (under city authority). This mechanical weed control has been practical because the plants are growing in relatively delimited and accessible areas, for which volunteers can be effective in short periods of time. We have been very encouraged to see native thistles (*Cirsium undulatum*) proliferate at Joder Ranch as we have removed the invasive musk thistle.

My work with the USFS on Canada thistle in 7 specific locations in the Middle St Vrain drainage (from 8400 to 10,200 feet in elevation) started in 1998 with relatively large groups of volunteers spending several days pulling thistle each summer. After 9 years, with some success in the higher elevation infestations but little impact on the most heavily infested lower elevation areas, the Forest Service staff realized that herbicides would be needed to eradicate the persistent populations (unlike most thistles that are biennials, Canada thistle is a perennial with an extensive root system so that long-living populations are difficult to manage by mechanical means, especially in remote areas). Once we began to use herbicides (spraying individual plants), the populations decreased dramatically and are close to eradication, though control has taken a few years due to the extensive root system in several of the infestation areas. Pulling is unlikely to come close to eradication of this weed. And, given the remote locations, there has been virtually no chance for continuing a large volunteer presence over the years.

My personal experience supports my judgment that all the IWM tools must be available to weed managers, especially stewards of public land. Herbicides are an essential tool for certain weeds in certain locations. Having seen the impressive evidence of the use of Rejuvra on Cheatgrass on some of the county's Habitat Conservation Areas, I want the county staff to have access to this important tool, confident that they will use it prudently, cautiously, and of course following the conditions outlined on the herbicide label. When volunteers can be recruited to pull some weeds, like the relatively limited populations of Med Sage, this strategy is worth undertaking. But it is not practical for all the weed species of concern.

IV. Conclusion

The County weed management staff have been extraordinarily responsive to concerns expressed by vocal members of the public. They have added to the plan a detailed explanation of its process for deciding when, where, and how to control invasive weeds with its "Decision Model." Due to public pressure, they have committed to reducing the already low herbicide use on open space property by 50% by 2030 (and by that same date to eliminate about 3000 acres of Cheatgrass). They have removed from the plan the use of helicopters and several effective herbicides. (I am especially disappointed that after the POSAC meeting the staff removed the option to use Glyphosate, the only practical chemical control to eradicate 3 List A species on irrigation ditches.[iv])

These policy changes limit some effective control tools and strategies, but the staff hope they can do their job with other available tools. They have committed to review of the IWM every 3 years and to report about their weed control work annually.

For each weed species of concern in the county, staff monitor extant populations, develop and execute a

treatment plan, and evaluate its effectiveness. As shown in the Story Maps, the county has reduced herbicide use in several areas as native species have recovered. And I have personally seen the impact of the county's use of Rejuvra to manage Cheatgrass in Rabbit Mountain. I urge the Commissioners to support the proposed IWM plan, including the use of herbicides for certain weed species in certain locations and with label use precautions. County staff have demonstrated that herbicides can be effective in controlling weeds and restoring native plants and that their use can be reduced as control is achieved. As all county residents should be, I am proud of – and grateful for - the skill, experience, and professionalism of the county weed management staff and want them to be able to do their jobs effectively.

Sincerely,

Comment #188

R P

N/A

Apr 12, 2024

Dear Commissioners,

President Biden just ordered the first ever limits on PFAS in drinking water. Many communities in CO including Boulder County are well above the limits.

And now what do we see? A proposed weed management program from BCPOS that includes the use of herbicides (on BCPOS properties) including neurotoxin Indaziflam that is toxic to all plants, animals and humans.

What in the world are you all thinking? Why would BCPOS wish to contribute to dumping harmful chemicals onto our properties?

We must implement a pesticide moratorium until the county establishes a science-based public process. That process must include scientists, local non profits, the public and BC staff.

Protect the land, the plants, the animals and us.

Comment #187

A C

N/A

Apr 12, 2024

Dear County Commissioners,

Firstly, I'd like to thank you for revisiting the whole topic of pesticide use in the county. I understand that there are mandates to control certain "weed" species, but there are no mandates requiring the use of lethal pesticides to do so.

In view of the recent, and disturbing, scientific reports on the drastic dwindling of most insect populations—with the suggestion that we have already lost at least a third or more of our insects—it seems to me to be reckless in the extreme to continue to use pesticides without fully understanding the many side effects. I especially hope you will consider not employing drones to deliver any lethal toxins, as drones offer only a scattershot approach with few safeguards for the health of our waterways.

The reason I am writing is also a personal one. I have conducted surveys of dragonfly populations on several county open space properties—county wide—every year since 2010 (fourteen years), reporting to the county each year. Over that period of time, I have logged a noticeable and worrying decline in the abundance of dragonflies. Where I used to see mass laying events in our ponds, the species are now scattered and sparse. So what? you might say. But this is a loss of an order of insects that, left alone, would consume huge numbers of mosquitoes, and the like. We cannot afford to treat them as collateral damage or by-kill, to our human "fixes," they are much too important to the healthy functioning of wetland ecosystems.

Please, for the sake of insect populations and functional ecosystems, be conservative in your approach and do not permit profligate use of lethal chemicals in the environment that nurtures us all.

Sincerely

Comment #186

S B

N/A

Apr 12, 2024

I oppose the use of pesticides by city or county on public Lands.
I support the CU professors guidelines for chemical free weed plan and guide.

Comment #185

M M

Boulder

Apr 12, 2024

Hi Commissioners!

While we are very thankful you have eliminated Dicamba, 2,4-D, Glyphosate and three other herbicides, I am hopeful we can eliminate Indaziflam and all of the other harmful pesticides that are in use on our

beautiful public lands. Managing weeds does not have to involve the use of toxic chemicals! Now is our chance to set an example for the rest of the state on how to protect our health, our soil, and our environment.

I would like to ask that we discontinue all pesticide use until BCPOS can establish a public process backed by science that incorporates knowledge and perspective from ecologists, other scientists, local organizations, community leaders, and staff - similar to the Fireside Working Group.

I am hopeful that we will not allow the use of drones for aerial spraying as it will have the same impact as spraying from planes.

If and when we do spray, we would like to consider the use of hand spraying and to have the spray sites monitored for impacts on water, insects, soil, drift, and aquatic organisms. The current draft IWM Plan does not list any protocols for studying short or long-term environmental impacts on water or non-target organisms. Has any water testing been done at spray sites with surface and groundwater?

Do we know how using pesticides impacts our soil health and how this aligns with our soil health initiatives?

As you know, Boulder County is a precious place unlike many other places in our own state or even country. We need to do what we can to ensure the health, safety, and longevity of our beautiful land. Toxins are not always the answer, even if they are seemingly the fastest or simplest solution. Let's show our leadership here and protect this land for future generations to come!

Thank you for all that you do - it is not an easy task, but it is greatly appreciated!

Comment #184

Adam Altschuh

Lafayette

Apr 12, 2024

Please stop using pesticides on public county lands. We run a small organic farm with county open space on either side of us, and are deeply concerned about the negative impact that pesticide use has on species diversity and pollinators that affect our way of life.

Comment #183

Marta ballen

boulder

Apr 12, 2024

please...please do not spray pesticides on our Mother earth lands...and specifically walker ranch and in boulder county. mySelf and also I know so many people who get very sick from pesticides on our food and also spraying of pesticides. There are alternatives for us how we live so that pesticides are not necessary . Insects in so much life are affected from pesticide spraying and application. Also the people that work in the factories that make it. And also the people that live near areas where it's sprayed and pesticides travel with the breeze and wind and also offgass landing in other areas.

Comment #182

Frederica Acora

Boulder

Apr 12, 2024

Dear Commissioners,

We need to rethink how we treat our Earth (our life support!) and other living things.

We are leaving our beloved Earth degraded and polluted.

Why do we have these "weeds" in abundance to begin with? Disturbed soil, mainly from humans.

They are naturally working to balance what we've done.

New ideas need to be implemented instead of using chemicals. If chemicals really worked we wouldn't have to keep spraying.

Let's be good stewards and come together to create health in our changing climate.

Thank you,

Frederica Acora

Comment #181

Jill St Aubin King

Longmont

Apr 11, 2024

Thank you for hearing input from our community about the Integrated Weed Management Plan under review. I am a resident of Longmont, frequent consumer of our county's Parks and Open Space and a landscaper by trade working within Boulder County.

The first draft changes to remove Dicamba, 2,4-D and Glyphosate from Boulder County chemical arsenal is an encouraging step toward sustainability; however continuing to allow ANY aerial spraying (via drones) as currently written falls short of alleviating problems associated with drift. ALL aerial applications of chemical pesticides should be eliminated from the final Integrated Weed Management policy.

Research from the Pesticide Action Network has shown that upwards of 95 percent of aerial applied pesticides miss their target, reaching nearby people and wildlife, waterways, soil and air instead. Even the

most calibrated drone cannot control what happens to pesticide droplets once they are released. Why risk drift when hand spraying involves the lowest level of drift risk when chemicals are applied?

Further, we must consider the dramatic increase in high wind days on the front range. Assuming Boulder County will follow responsible application protocol and NOT utilize drone applications on windy days, the effectiveness of aerial chemical weed control would likely be compromised. Often, application MUST occur at the optimal time of plant maturity. If weather prohibits safe aerial application, then chemical control via drone would be ineffective. The best solution is to adopt a comprehensive plan for manual application of pesticides when necessary to control specific invasive weeds.

I request that you remove ALL aerial applications of chemical pesticides from the final policy.

Comment #180

Kris Hill

Boulder

Apr 11, 2024

The revisions of the new IWMP are better than before, especially no helicopter spraying.

Still there needs to be a paradigm shift. We really cant continue using herbicides.

I would like to see more emphasis on local citizens getting involved with rejuvenating soil health, less emphasis on weed warriorship. More emphasis on overall ecological health of lands, including processes that enhance water cycling and re-hydrating landscapes. This will promote more resilient land. It will also help to protect us from wildfires.

Less emphasis on weeds. More emphasis on overall ecological health; I think our weed problem will lessen. Weeds tell us about whats happening in the soil. Lets use them to understand our situation better and what is needed for a healthy thriving ecosystem. sometimes weeds serve their purpose and then the next group of plants come along when we assist in creating the best environments for them to exist in. Part of this assistance should involve goats, possibly other grazers.

Fund experimentation and education, like the wood chip inoculation with indigenous fungi Boulder County is doing. The weed management cannot just be its own thing- it needs to be connected to a larger whole. If we keep having a weed management plan or weed management department then fighting weeds will be done without the intelligence of the whole.

It is all too common to use chemicals to get fast results; We need to look at how we have been conditioned to do so. Lets get in touch with processes that enhance ecosystems and use them for long term benefit, such as use of grazing animals like goats. NO to dependence on herbicide.

Now theres a newer product Indaziflam which we will only know all the consequences many years down the road. Lets not be wowed by spectacular results that could be achieved otherwise and more

holistically without chemical dependency- look at holistic management practices that rejuvenate the soil and plant life, and water-cycle earthworks and practices that re-hydrate the land. These are the resources that will be part of the resilient systems that help protect us from wildfire, holdback desertification, and achieve more productive healthy lands that do not encourage invasive species.

Comment #179

Stephanie Clark

Boulder

Apr 11, 2024

I believe Boulder should move away from toxic herbicides due to their negative effect on the ecosystem. Boulder needs to use natural ways to handle the issue of toxic and invasive weeds and should definitely not use helicopters or drones to dispense toxic herbicides. By alleviating the use of toxic herbicides, or only use them when absolutely necessary, will help to protect the insects, birds and animals of Boulder. I realize invasive weeds are a problem, but my hope is Boulder will use the most natural way possible to remove them.

Comment #178

Lyn Hicks

Longmont

Apr 11, 2024

I am in full disagreement of any lan that allows glysohate or the new product by Bayer which is even more dangerous to our earth and bodies. There are other solutions that do less harm. Pesticides kill humans too.

Comment #177

melanie gisler

Boulder

Apr 11, 2024

PLEASE DO THE RIGHT THING! and consider major health risks and halt the degradation of our local natural ecosystems and keep Boulder pesticide free - we know these are devastating to all Life - there are many alternatives - there have been law suits based on these products already - you do not need this on your consciences

Comment #176

Marcy Miller

Boulder

Apr 10, 2024

Hi -

I would love to see the county stop the use of toxic herbicides on Boulder County natural lands in order to stop the degradation of our local natural ecosystems!

Please stop the use of Glyphosate and Indaziflam.

Please stop all aerial spraying, whether from helicopters or drones

I would love to see more ecological solutions such as targeted goat and cow grazing, prescribed burns followed with seeding of native species, in line with the natural processes of our fire-adapted ecosystems, manual restoration, using local community resources to connect and empower our community.

Let's preserve this valuable environment and consider our health, the health of our children and Mother Earth.

Comment #175

Heather Christiansen

Lyons

Apr 10, 2024

Stop the use of toxic herbicides on Boulder County natural lands in order to stop the degradation of our local natural ecosystems

Stop the use of Glyphosate and Indaziflam

Stop all aerial spraying, whether from helicopters or drones

Furthermore, encourage the use of ecologically sound approaches to ecosystem restoration in order to address biodiversity loss and the climate crisis:

Targeted goat and cow grazing

Prescribed burns followed with seeding of native species, in line with the natural processes of our fire-adapted ecosystems

Manual restoration, using local community resources to connect and empower our community

Boulder County Parks and Open Space must ensure the success of ecologically sound approaches to ecosystem restoration by incorporating perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff to prioritize both community and ecosystem health.

With all of these other options I don't want helicopters spraying poisons on my beautiful valley! Please move towards more ecological friendly practices for our health and that of our planet!

Comment #174

Terri Hitchcock

Longmont

Apr 10, 2024

Hello. Addressing this issue is painful because I feel that no one is listening. We put up "No Poisoning, we love our dogs more than our lawn" signs to keep the City from spraying poison all around us but then, here come the drones! We're trying to be organic and that takes seven (7) years of no poison to achieve that status. Spray downtown and water the trees that you plant just to let die due to water! There are several in my subdivision!

Comment #173

Susan Berman Berman

Boulder

Apr 09, 2024

Eliminate the use of toxic pesticides, no drone spraying. Please use safe products that are not harmful to species.

It's imperative we change our approach to landscape to work with plants and species without the use of chemicals.

Comment #172

Ilyse Streim

Lafayette

Apr 09, 2024

-Stop the use of toxic herbicides on Boulder County natural lands in order to stop the degradation of our local natural ecosystems

-Stop the use of Glyphosate and Indaziflam

-Stop all aerial spraying, whether from helicopters or drones

I support targeted goat and cow grazing

THANK YOU

Comment #171

M. Adaline Jyurovat

Boulder

Apr 09, 2024

Re: Boulder County Retarded Approach to Weed Management

How many decades will it take for the information to sink in to the Boulder County Staff that deals with issues on Open Space and elsewhere?? The dangers of using glyphosate, for example, have been publicized for a long time, decades. However, those staff members who went to CSU may have been taught in departments that were funded by corporations like Monsanto, now embedded in Bayer. Ft. Collins started using goats instead of pesticides many years ago. I cannot find that data, but here are two links. One shows CSU even talks about it:

<https://sam.extension.colostate.edu/wp-content/uploads/sites/2/2018/06/goats-weeds.pdf>

<https://www.reporterherald.com/2016/10/05/fort-collins-uses-goats-to-eat-weeds-at-natural-area/>

You are carrying on the long tradition of using toxic products on County land, as did Ron Stewart. The profits made by corporations selling their pesticides to Boulder County over the past few decades is enormous. There must be a reason why the staff ignores the more people friendly, environment friendly options, decade after decade.

April 9, 2024

Comment #170**Abigail Wright**

Longmont

Apr 09, 2024

There are far better alternatives to "weed management" than poison. None of them are silver bullets, but on the other hand, none of them perpetuate the lie that killing unwanted plants benefits anyone - except the chemical companies of course. We've known this for decades. The "better" herbicides, touted to be so much safer, only benefit industrial agriculture and at a fearsome cost.

All alternatives take thought, ingenuity, and persistence, but they don't require sending toxins into the sky to rain down on us and our children.

Please consider the future when you make decisions about "weeds". I can guarantee you that in one hundred years people will look back on this era of chemical agriculture in profound disbelief.

Comment #169**Jack Heimsoth**

Longmont
Apr 09, 2024

I hope the decision makers exercise wisdom, and enact policies that minimize harm to life by specifically forgoing the use of toxic herbicides. It is insane to use carcinogens into the environment in order to control a plant which is not carcinogenic, for the nominal goal of controlling the distribution of plants deemed "noxious". It would be more accurate to label the humans who do this as "noxious" and I know we can do better.

Comment #168

JoAn Knudson

Boulder
Apr 09, 2024

Stop the toxic pesticide spraying! You are poisoning us!

Apply composting and organic nutrients so the soil is healthy and no need for killing the bugs, worms, and people.

There should be a law against using any type of toxic material in our air, water, and soil.

We live and breathe and eat and absorb all these toxic substances. Enough already.

Comment #167

Elizabeth Astor

Boulder
Apr 09, 2024

Hello, I live in North Boulder. I would like to ask the committee to please stop the use of toxic herbicides on Boulder County natural lands in order to stop the degradation of our local natural ecosystems, including the use of Glyphosate and Indaziflam.

Please stop all aerial spraying of these known neurotoxins, whether from helicopters or drones. Boulder has the opportunity to be a lead in ecologically sound approaches to ecosystem restoration in order to address biodiversity loss and the climate crisis, such as targeted goat and cow grazing, prescribed burns followed with seeding of native species, and manual restoration, using local community resources to connect and empower our community.

Thank you for protecting our health, land and water!

Comment #166

Laura Terpenning

Boulder

Apr 09, 2024

As a pediatrician and a grower of food using biodynamic practices, I am concerned about the County's use of herbicides, although I am grateful that many have been removed from the list in the latest version. It is good that aerial application has been stopped, but we must also eliminate drone application. Please look to the future and do the best for Boulder County rather than being tied by old theories.

Comment #165

Gerard Kelly

Boulder

Apr 07, 2024

Boulder County Nature Association (BCNA) very much appreciates having the opportunity to comment on the County's draft Integrated Weed Management Plan. We also appreciate the improvements in the draft plan, especially the elimination of four herbicides and the use of helicopters and airplanes. However, BCNA wants the County to minimize the use of all herbicides, especially Glyphosate and Indaziflam, and to significantly increase the use of non-herbicide weed management options. Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan. In addition, we oppose aerial spraying from drones. Hand spraying involves the lowest level of drift risk when chemicals are applied. The County's priorities should be on the reduction of herbicide purchased and used, and the protection of public health and biodiversity.

Below are comments from other organizations that we very much support.

→ We ask for a moratorium on all herbicide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff.

→ We ask for a moratorium on herbicide use for List B and List C noxious weeds, as well as weeds that are not on Lists A, B or C.

→ We ask for a pilot program for targeted grazing of weeds using regenerative practices, including targeted, strategically timed grazing and other manual control techniques.

→ We ask Boulder County to implement a more stringent process for approving individual herbicides for use on public lands. All 31 of the products listed in use by Boulder County failed the City of Boulder's more rigorous herbicide approval process, with 2 of the 31 being approved for certain conditions and 1 for special use cases only.

→ We ask for monitoring of spray sites and downstream water bodies, as well as area groundwater, for non-target impacts (insects, aquatic organisms, water, soil, and drift). The current draft plan does not list any protocols for studying short or long-term environmental impacts on air and water quality, and non-target organisms.

→ We ask Boulder County to post every herbicide application going back at least five years and not to destroy the historical data, for use in future environmental toxicity studies.

→ We ask Boulder County to consider and identify root causes of noxious weeds on public lands and address root causes of land degradation through soil and ecological health efforts.

→ We ask Boulder County to explain how the use of herbicides fits in with its soil health initiatives and whether herbicide applications could ever interfere with soil health efforts being conducted on Open Space lands.

Respectfully,
Gerard Kelly
President, BCNA Board

Comment #164

Hazel Gordon

Longmont

Apr 05, 2024

Thank you for reading my comments in the attached file.

[Download Attachment](#)

Comment #163

Cathern Smith

Louisville

Apr 05, 2024

Dear Commissioners: Please further improve the weed management plan by:

- 1] Using a quantitative measurement of the amount of pesticides applied. If acres sprayed is used it will not be possible to determine if usage is actually declining.
- 2] Prohibit aerial spraying altogether. The chemicals are too long-lived and toxic to be indiscriminately broadcast over the landscape, coating everything.
- 3] Drop indazaflam because it is highly toxic to aquatic species and so persistent in the soil that the EPA warns of the need for long-term management, including reseeding!
- 4] Given the depth of knowledge in the community and the staff bias for pesticides and deep connection

to the industry, establish a Weed Management Science Advisory Board.

Thank you.

Comment #162

Kathy Gritz

Lafayette

Apr 03, 2024

I'm a long-time resident of Boulder County & want to express my strong sense of urgency that the FDA has allowed over 80,000 chemicals into our environment prior to study & approval. Many of them have proved to be endocrine disruptors & harmful in many other ways. I support as few of these chemicals' use in Boulder County as possible for the benefit of human & non-human beings.

Thank you for your consideration.

Comment #161

Robin Allegra

Boulder

Apr 03, 2024

Thank you in advance for reading public comments regarding the weed management plans. As a citizen of Boulder (and the planet) I beg you to consider non-toxic alternatives and perhaps a different aesthetic that better supports our natural ecosystem and our best quality of life. I beg you not to use chemicals like Glyphosate and Indaziflam that can have reaching detrimental effects on the health of the environment and community.

Thanks again,
Robin Allegra

Comment #160

Rylan Bowers

Niwot, CO

Apr 03, 2024

I would like to voice my opposition to aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

Comment #159

Suzanne McCue

Longmont

Apr 02, 2024

Why would we continue spraying toxic chemicals for weed control when we all know how bad this is for both the health of people, and the health of the environment. This is an incredibly outdated practice and one that Boulder County should definitely move away from. I am honestly surprised that we are still doing this here in Boulder. We can and must do better.

Comment #158

Rebecca Dickson

Boulder

Apr 01, 2024

Herbicides and pesticides are known carcinogens and polluting agents that threaten people, animals, fish, soil health, pollinators, birds, and more. These toxins get into water and end up far from where they were applied. Herbicides and pesticides are a short cut that serve no one well, not in the long run. Please do not use them on our public lands. Please explore non-toxic methods of controlling weeds.

Comment #157

Jennifer Goldstein

Boulder

Apr 01, 2024

Hello,

When I first moved to Boulder 9 years ago, I was shocked at the discrepancy between how Boulder presents itself and how it truly is. Pesticide applications are a significant part of this. There are a multitude of scientific studies showing how harmful Glyphosate and Indaziflam are. How can a county who prides itself on sustainability and conscientiousness and intelligence continue to spray unnecessary chemicals -in Open Spaces!- that have the capability of destroying our livelihood as a species and as a planet? This is about bees and birds and other integral pollinators, this is about children and adults and seniors and animals, worms and soil and eagles and air, this is about Life! We need to find alternative methods that benefit, or at least maintain, the natural balance of our earth systems. It's simply laziness and cowardice at this point not to do otherwise. It is our responsibility to change our methods when our methods are proven to be harmful!

It is my understanding that state law requires Boulder County to eliminate all List A weeds and to have a "management plan to stop the spread" of List B species—although nowhere does the state mandate that this need be accomplished with herbicides. For List C weeds, the county is required to have programs to develop "more effective integrated weed management on private and public lands. The goal of such plans will not be to stop the continued spread of these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species." There are no legal requirements for the management of species on the Watch List.

Nowhere does state law specify that herbicides must be used to accomplish any of these objectives. Some people argue that their use is necessary, yet the truth is that our County has a great deal of resources, responsibility, and flexibility in the control methods that it chooses.

Let me know if you want me to show up with my gloves and shovel. I will be there.

Thank you for considering how we can be better stewards of a planet and all its beings that freely and generously give us life. Thank you for considering how Boulder County residents may better walk their talk.

Sincerely,
Jen

Comment #156

Virginia Winter

Boulder

Apr 01, 2024

I urge you to eliminate the use of chemical pesticides from Boulder County's weed management strategies. Boulder County can set an example and be a leader in this area, demonstrating that we have the political will to protect rather than degrade, damage, and poison our environment. Glyphosate and Indaziflam have NO PLACE in our ecosystem. Drone /aerial spraying is NOT something we should be spending taxpayer dollars on. Please use the non-toxic approaches available, follow the science more closely and if useful use a science based, advisory group to guide us to innovate.

Comment #155

alan apt

Nederland

Mar 31, 2024

Herbicides and pesticides cause a variety of diseases. I have Parkinson's disease and it is directly linked to herbicides. I don't think you want you or your family to acquire the brain damages caused by these

chemicals and the resulting disease.
Please find non-toxic solutions to weeds.

Comment #154

David Rogers

Boulder

Mar 30, 2024

Aerial spraying with drones and the continued use of chemicals – such as Glyphosate and Indaziflam – have no place on our public lands. Instead, the County needs to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails

Comment #153

Susan Jones

Boulder

Mar 30, 2024

I am STRONGLY urging you to eliminate the use of chemical pesticides from Boulder County's weed management strategies. Boulder County should be a leader in this area, demonstrating that we have the political will to protect rather than degrade, damage, and poison our environment. Glyphosate and Indaziflam have NO PLACE in our ecosystem. Please use the non-toxic approaches available, including the use of volunteers such as myself to pull non-native weeds from our open space and public lands.

Comment #152

Rich Finer

Boulder

Mar 30, 2024

Please invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.
Toxic spray has downstream negative effects. Bees, wildlife, effects on the water, in the air we breathe on things.

Comment #151

Robyn Rathweg

Louisville

Mar 29, 2024

Boulder County is blessed with beautiful open spaces and a diversity of wildlife habitats. To preserve the diversity of wildlife and future health of the land, its use by humans and wildlife, it is imperative that we decrease use of pesticides on our lands, and when necessary, practice Integrated Pest Management. This modest and cautious approach is supported by science and concern for the future of our land and our health.

Sincerely,

Robyn C Rathweg, Louisville

Comment #150**Kathleen Ayres**

Longmont

Mar 29, 2024

I can't even believe we need to petition for this. It's a no brainer. Stop killing insects . Do you have any idea how these poisons linger and pollute in the long term and up the food chain? Please get on board the protect nature . Otherwise its simply our imminent suicide. Are we still that stupid?

Comment #149**Christel Markevich**

Nederland

Mar 29, 2024

To ensure the success of the Weed Warriors Program and the health of the community, the Weed Warriors Program needs to be relocated.

Transparency is important. Let's see what's behind The Weed Warriors Program at Walker Ranch.

This project began as a discussion between Commissioner Marta Loachamin and myself to recruit volunteers to restore a natural land area as an alternative to herbicide use. When BCPOS staff got involved, they shifted the project into work on an area that had been treated repeatedly with herbicides, including recently in October 2022 (<https://bouldercountyopenspace.org/iplant/>) with Indaziflam. Idaziflam is an herbicide that remains in the top portion of the soil for up to four seasons. In addition, BCPOS plans to spray Walker Ranch with Indaziflam via drones in 2024.

I communicated to the staff two major problems with their approach.

First, it is not an experiment with alternatives to the use of herbicides. It is now well-established that repeated herbicide applications are especially damaging to soil health and microbe-plant associations. This project is set up to fail and will just waste the time of the volunteers.

Second, sending volunteers to work on a site that has been heavily sprayed over the past years does not align with their values and health concerns. Don't forget that many residents have already expressed their opposition to the use of herbicides based on such concerns.

BCPOS staff rejected my attempts to shift the project back to its original purpose of actually focusing on alternatives to herbicide use at another location. Therefore, I am no longer involved with this project.

The BCPOS staff needs some guidance from local ecosystem restoration experts to ensure the success of projects that are experimenting with alternatives to pesticide.

We do not want a repeat of failures such as that of BCPOS's Carbon Sequestration Project team's experiment with using compost on agricultural fields. That experiment failed for an obvious reason that any of our regenerative farmers could have easily identified if consulted: the Carbon Sequestration Project team was spraying Roundup on the compost! For details see the team's presentation at the January 2020 POSAC meeting (<https://pub-bouldercounty.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?Id=96281f5d-644a-39a5-2a27-a4a07d7c1c78>).

We need a moratorium on all pesticide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff.

Thank you,
Christel

Comment #148

Erin Teague

Boulder

Mar 29, 2024

Hello,
I am a Boulder County resident who also has a Biology and Environmental Science degree. I am writing to express my significant concern regarding the use of Glyphosate and Indaziflam on our public land. Scientists have known since 1990 that plants communicate with each other and share resources through the mycorrhizal networks in their roots. This helps them not only maintain a healthy population by sharing water, sugar, and nutrients through tough times, but also adapt to climate change. Glyphosate kills the mycorrhizae that make this possible thereby reducing the health of the plants that we are trying

to support through removal of weeds or invasive species. Glyphosate also enters our water and is a known carcinogen and neurotoxin, and is linked to liver disease, and reproductive harm in humans. It also causes lung and heart damage for fish. The costs far outweigh the benefits when it comes to this herbicide. If we want to have healthy forests and grasslands we must find alternatives. Suzanne Simard's work is a great resource for learning about communication, resource sharing and actual learning that occurs with trees so they can survive as a community. She was one of the initial foresters who applied glyphosate to manage forests and is now adamantly opposed to its use.

Idaziflam virtually sterilizes the soil. The microbiome in the soil is very similar to the microbiome in our human guts. It is critical in ensuring the health of the plants that grow in the soil. Not only that, but mycorrhizal networks help to sink carbon into the soil from our atmosphere. Scientists are learning that we can not only slow, but reverse climate change if we start managing our land and agriculture differently in order to restore the health of the soil.

We must not only consider what herbicides do to plants above ground, but also below ground. Our failure to look at the soil is like looking at human health without looking at the food we eat and the air we breathe. Please read the information and letters on this website, as well when you are taking this under consideration:

<https://beyondpesticides.org/dailynewsblog/2022/05/broad-scale-devastating-ecological-and-health-effects-associated-with-herbicide-indaziflam-ask-to-go-organic/>

Boulder can do better! We have historically been a leader as stewards of the environment and public health. Please stop the use of these harmful herbicides!

Sincerely,

Erin Teague

Comment #147

Frances Arleigh Carrier

Longmont, CO

Mar 29, 2024

I agree with the initiative to stop Boulder county from using herbicides for weed control that have been flagged as harmful for our enviro

Comment #146

carol Parkinson

Boulder, CO

Mar 28, 2024

Weeds are taking over our free ranging land, please treat the weeds and noxious plants to a final resting place,,,destroy them...let the naturally growing plants have the room to grow and reproduce for future generations,,,

Comment #145

Lezlie Forster

Boulder

Mar 28, 2024

See attached file.

[Download Attachment](#)

Comment #144

Joan Paskewitz

Longmont

Mar 28, 2024

The idea of spraying poison on our open spaces where children walk and play is abhorrent and very short-sighted.

Comment #143

Barbara Stern

Gunbarrel

Mar 28, 2024

Boulder County should not use aerial spraying with drones and dis-continue the use of chemicals – such as Glyphosate and Indaziflam. They have no place on our public lands. The county should invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails. These would be prescribed burns as well as using mechanical options to remove noxious, non-native species.

Comment #142

Stewart Guthrie

Boulder

Mar 28, 2024

As a member of an agricultural family, I understand the problems of weed control. But I also understand the perils of toxic weed-control chemicals such as glyphosate, which are grave, and banned from our properties decades ago.

Please choose non-toxic means for controlling weeds on our public lands. Toxins, including known carcinogens, have no place there.

Thank you.

Comment #141

Patricia Stutz-Tanenbaum

Niwot

Mar 28, 2024

Please vote against use of toxic pesticides that are harmful to our ecosystem including insects, birds, and rodents. This is open space land which needs environmentally sound practices compatible with the wildlife.

Comment #140

Laura Bruess

Boulder

Mar 28, 2024

Chemicals have no place on our public lands. Please invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails.

Comment #139

Jennifer Rodehaver

Boulder

Mar 28, 2024

You must stop the use of poisons! The pollinators and other wildlife need our protection. It is essential for all life on earth that healthy ecosystems are allowed to flourish and not be destroyed.

Comment #138

Adrienne S.

Erie, CO

Mar 28, 2024

Aerial spraying with drones and the continued use of chemicals – such as Glyphosate and Indaziflam – have no place on our public lands. I urge the county to please invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails. Thank you!

Comment #137

Jennifer Hinton

Longmont

Mar 28, 2024

I am writing to urge the Boulder County to eliminate aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands. It represents unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

It is also widely recognized that these chemicals have a deleterious impact on pollinators whose populations are increasingly declining. The health of our food systems is dependent on the health of bees and they must be protected.

It is easy to extrapolate that these chemical may have similar impact on over insect populations which are in decline. This is alarming in and of itself, but along with the avian flu, bird populations are also in decline.

We must urgently take action at anything and everything that will protect the land, water and its human and non human inhabitants. Thank you.

Comment #136

Jennifer Dingman

Lafayette

Mar 28, 2024

Please consider discontinuing use of toxic chemicals - such as Glyphosate and Indaziflam - on our open space lands. These chemicals are harmful to pollinators, air quality, water quality, ecosystems and human health. Please work with experts in Boulder County to utilize non-toxic methods to eradicate weeds.

Passionately,
Jenn Dingman

Comment #135

Mari Nichols

Boulder

Mar 28, 2024

No pesticides or herbicides on public lands, PLEASE! Humans must honor natural intelligence and find ways to harmonize with the laws and rights of Nature. We are of Nature. Nature is in charge.

Comment #134

Clifton Bueno de Mesquita

Boulder

Mar 28, 2024

I urge you to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

In particular, Boulder County should stop using glyphosate-based herbicides. My own research (<https://doi.org/10.1016/j.apsoil.2022.104778>) has shown that glyphosate has adverse effects on soil microbial communities and soil chemistry.

Thank you,

Clifton P. Bueno de Mesquita, PhD
Ecology and Evolutionary Biology, University of Colorado Boulder

Comment #133

Kim Kapustka

Boulder

Mar 28, 2024

Aerial spraying with drones and the continued use of chemicals – such as Glyphosate and Indaziflam – have no place on our public lands. We must invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails.

Comment #132

Byron Kominek

Unincorporated

Mar 28, 2024

The less chemicals we use on our lands the healthier they'll be and the healthier our ecosystems will be. Boulder County is in a wonderful position to use non-chemical practices to manage weeds across the County. As changing management practices is never easy, it will take some years of concerted effort and lessons learned to better manage weeds without chemicals, but it can be done. Boulder County government has the funds, has access to experienced personnel, and has a population it serves interested in non-chemical weed management. I believe Boulder County Open Space can work with local grazers to more effectively manage our lands to reduce weed pressures and naturally fertilize our soils. My understanding from soil science classes are that the healthier the soils become the more capable native vegetation will be to outcompetes noxious weeds.

Comment #131

julia bottom

longmont

Mar 28, 2024

Aerial spraying with drones and the continued use of chemicals – such as Glyphosate and Indaziflam – have no place on our public lands. Invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and recreational trails.

Comment #130

colin goldstein

Boulder

Mar 28, 2024

I am asking you to please cease spraying poison on our public lands

Comment #129

Christine Amero

BOULDER

Mar 28, 2024

There is absolutely no good reason to use toxic chemicals, proven to destroy our environment, like glyphosate and Indaziflan, ANYWHERE, let alone on our public lands where we go to enjoy nature with our families and loved ones.

Comment #128

Kathleen Shanovich

Lafayette

Mar 28, 2024

Please consider stopping the use of pesticides/chemicals on public lands. Our fragile open spaces need to be protected. As does our underground water. Madison, WI stopped treating any public spaces with chemicals many years ago... and the community has welcomed the beauty of weeds, such as dandelions, and with it, an increase in pollinators. There is no justification for the use of toxic chemicals on our public lands.

Comment #127

Lisa Burke

Lafayette

Mar 28, 2024

I strongly urge you to reconsider the use of pesticides in Lafayette's Open Space (or anywhere in Lafayette). Please use a non-toxic approach to this problem - there are plenty of options available. Rather than perpetuating harm to the environment which compromises wildlife and our health, pivot to better options.

Comment #126

Margaret Donharl

Boulder

Mar 28, 2024

I urge the County to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Comment #125

Andrew Burgess

Nederland
Mar 28, 2024

There are viable options to control weeds that do not poison our soil, water, and air. We have not consistently voted for funds to purchase open-space lands just to have our elected officials turn around and intentionally and unnecessarily pollute those lands

Comment #124

Jeanette Zawacki

boulder
Mar 28, 2024

I am concerned about the widespread use of pesticide (specifically herbicide) is used on our Open Space lands. This is harmful to our pollinators and people living in this area. Our pollinators are on decline not only due to habitat loss but due to the spreading of this toxin.

Although some herbicides have been eliminated I remain opposed to Glyphosate, Indaziflam, and all the other pesticides currently use on public land. State law does not mandate the use of pesticides for ANY weed, it does mandate varying levels of management, which does not have to include pesticides.

I am asking for a moratorium on all pesticide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff — much like the County has created through the Fireshed Working Group.

I am asking for a moratorium on pesticide use for List B and List C noxious weeds, as well as weeds that are not on Lists A, B, or C. I recently learned that the County is spraying herbicide to attempt to control more than 65 species on lists, B, C, or watchlist.

I am asking for a pilot program, using weed management money, for targeted grazing of weeds using regenerative practices. It's time for the County to invest in regenerative land managers to manage weeds through targeted, strategically timed grazing and other manual control techniques.

Ask Boulder County to implement a more stringent process for approving individual pesticides for use on public lands. As a point of reference, all 31 of the products listed in use by Boulder County failed the City of Boulder's more rigorous pesticide approval process, with 2 of the 31 being approved for certain conditions and 1 for special use cases only.

There should be monitoring of spray sites and downstream water bodies for non-target impacts (insects, aquatic organisms, water, soil, and drift). The current Draft IWM Plan does not list any protocols for studying short or long-term environmental impacts on water or non-target organisms.

Has Boulder County done any water testing at spray sites, along impacted ditches, in surface water, in groundwater? The County should pay for Open Space lease-holders and other downstream neighbors to have their water tested for pesticide impacts.

Boulder County should be required to post every pesticide application going back at least five years and

not to destroy the historical data, for use in future environmental toxicity studies.
Boulder County should consider and identify root causes of noxious weeds on public lands and address root causes of land degradation through soil and ecological health efforts.

I want an explanation of how the use of pesticides fits in with soil health initiatives and whether pesticide applications interfere with soil health efforts being conducted on Open Space lands.

Health of the public and health of the land, should be the focus for all land management.
Pesticide/herbicides are not the answer to a healthy, productive environment. We can not have Boulder Climate Initiative saying/doing one thing and land management going against this initiative. The science should dictate the action. Pesticides are harmful to all creatures.

Comment #123

Cosima Krueger-Cunningham

Boulder

Mar 28, 2024

https://www.zazzle.com/put_away_the_poison_spray_1_yard_sign-256444237844465105

There's no good excuse for toxic chemical herbicide use. If you like pollinators and the Web of Life generally, eradicate the toxic chemical industry-serving legacy of former Boulder County Parks and Open Space Director Eric Lane.

Comment #122

Mark Guttridge

Longmont

Mar 27, 2024

Thank you for the opportunity to comment on updates to the final weed management plan 2.0

I have reviewed the new plan, and as someone who has attended or watched all the POSAC meetings regarding this topic, I wanted as much as anybody to arrive at a weed management plan that worked for both the public and Open Space staff. I wanted to see a real middle ground reached. Unfortunately, this plan is not it.

At the end of Feb 22nd POSAC meeting, committee members had a chance to weigh in on what it would take for them to approve a final plan. 5 out of the 8 members stated clearly that they wanted glyphosate removed from the final plan. Yet, staff decided to keep glyphosate as the primary tool used to treat 3 Class A weeds that occur in our agricultural ditches. It seems like POSAC members can now get a sense of how many Boulder County citizens feel, ignored. I'm curious what is the point of an advisory board whose suggestions are not listened to?

While I do appreciate the effort the staff has made to go out of their comfort zone and agree to “pilot” non-chemical approaches, and while I share the same vision as staff as wanting the healthiest future for our Open Space lands, I still feel that the potential risk to our soils, waterways, wildlife, pets and families is far too great to continue forward with a plan that currently states herbicides have equal priority to be used as any non-chemical approach, without any form of regular monitoring.

What really needs to be piloted is each herbicide before it gets added to the toolbox. As in soil tests before and after spraying, water testing anytime herbicides are used in the vicinity of waterways or shallow groundwaters. This weed management update process has brought to light that none of that has ever occurred in Boulder County and now POSAC is being asked to agree to continue using these herbicides regularly, unchecked.

I appreciate that staff is willing to work with outside experts to “pilot” water testing, but it feels like lip service when the plan still mentions nothing about preventing herbicide stormwater runoff, or conducting any kind of regular monitoring when herbicides are used around waterways. The concerned public deserves more than a pilot study here, it needs to be built into the plan.

For an herbicide like indazaflam which is shown to be toxic to aquatic life and have long persistence in the environmental, it is troubling that Boulder County has been “Ground Zero” for use and development of this herbicide without ever doing environmental monitoring, and all this for cheatgrass which is a Class C species that the County isn’t legally obligated to treat. Spraying indazaflam in the foothills that runoff into our rivers and agricultural ditches has resulted in the possible contamination of more than 2/3rds of all the waterways in the Eastern part of Boulder County. (see attached pdf for research map showing this visually). The public was never asked or informed that Boulder County would be the guinea pig for this new herbicide and continuing to use it without environmental monitoring is unacceptable.

Some of the most heart wrenching comments I have heard during this public process is from residents with pesticide sensitivities or with diseases caused by environmental toxins. It’s sad because it is just the tip of the iceberg as more data comes out about the pesticide and herbicide residues prevalent in our waterways, soils, and food. As we learned with DDT in the 1960s- it wasn’t the kids in the streets who got sprayed during “mosquito control” that got sick, it was when those kids grew up and started having babies that birth defects and illnesses started really manifesting. Likewise, with the recent study oversaw by Dr. Jonathan Lundgren showing the effects of neonicotinoids on deer populations, the most troubling health issues showed up in the offspring of those deer exposed. Dr. Zach Bush has studied the epigenetic effects of environmental toxins in his research labs and has shown the same results, we are endangering future generations with our current dependence on pesticides and herbicides. Boulder County should be leading the way in rapidly phasing them out.

We cannot continue to endanger the health of future generations, and I fear that a yes vote for this plan will do just that, by continuing to put more environmental toxins into our public lands without any meaningful monitoring.

I agree with the commenters who have brought up the fact that indigenous voices have never been invited to be part of this discussion. Indigenous wisdom like working with nature rather than trying to dominate it has guided my own land management choices on our family farm, which includes Open

Space agricultural lands, and we have never used any herbicides or pesticides on the lands we manage. Going herbicide-free is possible, Native Americans were doing it sustainably for centuries.

So to POSAC members, commissioners, and Boulder County staff, I ask you to do more than pay lip service to indigenous communities. I ask you to embrace and practice one of their most important wisdoms:

“The Seventh Generation Principle is a guiding philosophy rooted in Indigenous wisdom, emphasizing the consideration of future generations in decision-making. It urges individuals and societies to act with the well-being of the seventh generation yet unborn in mind. This principle underscores the interconnectedness of humanity with the environment and advocates for sustainable practices that prioritize long-term ecological and cultural health.”

I feel the current plan will do little to curb the herbicide use on Open Space in the next couple years, and this is at the detriment to the health of future generations. We need a lot more than one 5-year volunteer pilot project at a single location, we need a mass movement to connect people to the long-term management of our public lands, both to promote ecosystem health and the mental health of our community, these are the actions future generations are depending on us for. Are we brave enough to face the challenge?

[Download Attachment](#)

Comment #121

Lynn Riedel

Lafayette

Mar 27, 2024

Draft IWM Plan comments, March 2024

Lynn Riedel, Lafayette

I am submitting comments on the draft Integrated Weed Management Plan as a 30-year, professional natural area manager and plant ecologist in the Boulder area. I am only representing myself with my comments.

- BCPOS is conducting a robust public review of the draft IWM Plan, incorporating the best available scientific research as well as already revising the draft to incorporate public input received during the process.
- BCPOS staff involved in this process are knowledgeable professionals. They have developed the draft IWM Plan to update and improve the County’s approach to managing invasive plant species and have communicated to the public in a thorough, professional, and transparent manner.
- The draft IWM Plan is based on state law which requires governmental agencies and private landowners to control noxious weeds and follows objectives in the Boulder County Comprehensive Plan. State law requires the county to eradicate state-listed ‘A’ species and to manage ‘B’ list species by either eradication, suppression, or containment. These requirements would be impossible to meet if a full suite of IWM treatments were not available for use, including some herbicides.

- Because all invasive plant species are not biologically and ecologically alike, and not all land management settings are the same, integrated weed management is a useful concept and approach to managing invasive species in natural areas and agricultural lands. It is also a cautious and responsible way to comprehensively plan for weed management with the overarching goals of adhering to state laws and conserving natural areas and agricultural lands.
 - The idea put forth by some members of the public that all or most invasive plant species can be managed/controlled entirely by pulling, mowing, and other mechanical means is a myth. There are a few species that occur in low abundance in our area that can be managed by mechanical means only – but there are many for which that is not the case. Some invasive non-native species are even stimulated to grow more vigorously after above ground parts are removed. Most invasive plant species must be managed by using a combination of treatments. Carefully selected herbicides along with other types of treatments are often essential to reduce the threats to our natural areas posed by invasive plant species. The integrated weed management concept prioritizes non-herbicide treatments – as in this draft IWM Plan.
 - Along our part of the Front Range, there are thousands of acres of public land with globally rare, museum piece-like plant communities such as xeric tallgrass prairie, Pleistocene relict forest types, and ecotonal riparian corridors. Invasive plant species can invade high value natural areas, displacing native vegetation and wildlife/invertebrate habitat. These communities are some of the last remaining in Colorado and we have the responsibility to do our best to take care of them so that they continue as functional native ecosystems. This requires an integrated plan with multiple methods and science-based management prescriptions, including non-herbicide and herbicide options.
 - In the face of climate change, the unknown and predicted effects, and the related stressors for local native plant and animal communities, it is even more critical to prevent invasive plant species from displacing native vegetation. We need a diversity of management methods to accomplish this – including carefully selected herbicides.
 - Ecologically sound land management, including the reduction and prevention of recreational impacts, is the basis for maintaining healthy, resilient natural areas that have a better chance of resisting invasive species and reducing the need for weed management treatments.
 - I put out a plea for all parties in this ongoing community discussion to practice respect and the skills of listening and civil debate. What I have observed so far is that the staff have made a professional and diligent effort to communicate the goals and details of the developing IWM Plan, have responded to public input by modifying the draft Plan, and have maintained a high level of professional integrity in this process. Some public input has been constructive, and science based. Unfortunately, other members of the public have been disrespectful of staff, have not been open to listening to viewpoints other than theirs, have proliferated misinformation about herbicides, and have operated in a narrow minded, aggressive way as they provide public input. I hope that those interested and active in the ongoing draft IWM Plan process can resolve to be respectful, independent, and well-informed in their thinking, as open minded as possible, and maintain a problem-solving approach as they participate.
 - I share with many involved in this planning process a great interest and passion for conservation of pollinator habitat and other invertebrate habitat – as part of conserving our remarkable local natural areas. Multiple, integrated types of invasive species management treatments along with a rigorous decision-making process are needed to achieve this habitat conservation. The draft IWM Plan meets those objectives.
-

Comment #120

Aaron Perry

Lyons

Mar 27, 2024

Dear Friends, Community Members, Elected Officials, and Appointed Staff ~

It is imperative that we cease immediately the use of any hazardous and/or potentially hazardous synthetic pesticides, herbicides, biocides, or any other killing-agent that are known to and/or may potentially be harmful to aquatic, terrestrial, soil, herbaceous, and/or human life.

Moreover, it is intolerable that our community's tax dollars be spent on such dangerous and unnecessary toxins. Instead we must find other alternative means to mitigate the ostensible reasons for their use, including the scaling-up of regenerative land-use and land-stewardship practices. We are blessed to have deep expertise in our community among farmers, ranchers, land stewards, and public officials, and it is high time that we transition to the widespread adoption of their stewardship methodologies and away from the use of any toxic chemicals.

There is no excuse for anything short of the complete cessation of ANY purchase or use of ANY toxic chemicals for weed management within Boulder County.

Comment #119

Dorothea Beardsley

Boulder

Mar 27, 2024

Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

Boulder County should invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

CU uses non-toxic approaches and so do organic farmers. Could we learn from them?

Comment #118

Andrew Lipman

BOULDER
Mar 27, 2024

Please find alternatives to using pesticides on public land.

Comment #117

Amanda Hutnick

Louisville
Mar 27, 2024

Please refrain from spraying pesticides in our open space.

Comment #116

KD Leka

Boulder
Mar 27, 2024

(trying again to submit)
Hello;

Please.Just.Stop.

Please stop using Glyphosate and Indaziflam.

Please take the money that is used for these chemical killers to be purchased and applied and invest instead on community ecosystem restoration and rehabilitation, encouraging and supporting volunteer groups, for example.

Please.Just.Stop.

I see these being used not as last resorts, but as "convenience" and "efficient managing solutions". They are so only for the very short-sighted; beyond that they are killers of ecosystems, and of us.

Thank you.

Comment #115

KD Leka

Boulder
Mar 27, 2024

Hello;

Please.Just.Stop.

Please stop using Glyphosate and Indaziflam.

Please take the money that is used for these chemical killers to be purchased and applied and invest instead on community ecosystem restoration and rehabilitation, encouraging and supporting volunteer groups, for example.

Please.Just.Stop.

I see these being used not as last resorts, but as "convenience" and "efficient managing solutions". They are so only for the very short-sighted; beyond that they are killers of ecosystems, and of us.

Thank you.

Comment #114

Christine Guzy

Niwot, CO

Mar 27, 2024

Please don't spray Glyphosate and Indaziflam on our public lands.

Comment #113

Sharon Clark

Erie

Mar 27, 2024

Please do not use herbicides and pesticides. The risk to our waterways, public health, and the health of pollinators and beneficial insects and wildlife is too great and will cause greater problems in the future. There are natural techniques and practices to manage these issues and they are worth it for long term sustainability.

Comment #112

Beth Walter

Longmont

Mar 27, 2024

Re: Intergrated Weed Management Plan.

Thank you for your recent moritorium on stopping the use of aerial means of applying pesticides and use of Dicamba. Great first step! Please make these permanent as well as no longer using any glyphosate products. The health of our environment and community members needs to take precedent when considering future weed control management options. Thank you.

Comment #111

Heather McKenna

Boulder

Mar 27, 2024

I am blown away that Boulder is using Glyphosate. I am shocked it is not banned. I really thought our community wouldn't even consider using it. Save the Planet...Save the Bees!!! We need to pay attention.

Comment #110

Heidi Fuchs

Boulder

Mar 27, 2024

As someone who was born and raised in Boulder, and who currently lives in North Boulder, I recognize that our open space is one of the best things about our city. As a trained City of Boulder Pollinator Advocate and as a scientist with an interdisciplinary environment and energy graduate degree, I have strong concerns about herbicides like glyphosate and indaziflam being used on our parks & open space land. Regarding the Integrated Weed Management plan, I am thankful that Boulder County has removed Dicamba, 2,4-D, and three other herbicides from their toolkit. However, I am still opposed to the use of indaziflam and glyphosate in particular, as well as other herbicides currently being used on public land, when many other management options exist. I urge you to implement a more stringent process for approving individual pesticides for use on public lands, which could even be modeled on the City's more rigorous process. Thank you.

Comment #109

Scott Nelson

Boulder City

Mar 27, 2024

I live here! I would prefer to accept more weeds than have to live with glypospbate (RoundUp) sprayed in the air by drones.

Comment #108

Annemarie Prairie

Boulder
Mar 27, 2024

I am very concerned that Boulder County is suggesting to continue the use of chemicals such as Glyphosate and Indaziflam on our public lands. There are plenty of studies that show the high level of toxicity in these cause unacceptable risks to public and environmental health. The County is being short sighted to think spraying these chemicals is an a way to create a healthy ecosystem. It's not. These need to be eliminated from the final draft plan. We need to be thinking of LONG terms, SAFE solutions for all who inhabit our county.

It's imperative to invest in non-toxic approaches to our ecosystem that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Comment #107

Lucia Harrop
Louisville
Mar 27, 2024

I am writing to express my strong support for the removal of chemical pesticides and herbicides on Boulder County lands. It is imperative that we prioritize the health of our community, wildlife, and environment over short-term conveniences.

Chemical herbicides and pesticides pose significant risks to human health, birds, insects, and waterways. Numerous studies have linked these chemicals to cancer and other serious health issues. Furthermore, the long-term negative effects of these substances far outweigh any short-term benefits they may provide in weed and pest control.

The use of herbicides not only harms the targeted plants but also disrupts ecosystems, impacting beneficial insects, birds, and other wildlife. Additionally, these chemicals can contaminate water sources, leading to further environmental degradation and potential harm to human health.

It's crucial to recognize that herbicides persist in the environment, with both known and unknown consequences. Even after application, these chemicals can linger in soil and water, affecting ecosystems for years to come.

Therefore, I urge you to take immediate action to phase out the use of chemical pesticides and herbicides on Boulder County lands. Instead, let us embrace sustainable and environmentally friendly alternatives that promote the well-being of our community and our planet.

Thank you for considering my perspective on this important issue.

Comment #106

Lisa Stevens

Boulder

Mar 27, 2024

As a resident of Boulder, I am writing to let you know my concerns with the spraying of public lands in Boulder. Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

I would urge you to please consider investing in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Thank you.

Comment #105

Lindy Shultz

Niwot

Mar 27, 2024

Hello: I just today found an article online titled: "Millions of People Drinking Groundwater with Pesticides or Pesticide Degradates". It's a complex issue that I have no real education on.

Nevertheless, I wish to urge you to refrain from using herbicides such as Glyphosate and Indaziflam on public lands. Please educate yourself on effective non-toxic alternatives.

Thank you,
Lindy Shultz

Comment #104

John Reed

Boulder

Mar 27, 2024

Is it possible for us to form friendships, alliances, and partnerships with non-human species to foster balanced ecosystems? Indigenous thinkers, including Lyla June Johnston, suggest that humans can once again become a Keystone Species that benefits our non-human relatives. The past two centuries have shown that human arrogance and the desire to dominate nature have led to catastrophic outcomes, highlighted by the loss of biodiversity at levels never seen before. It's time to consider if we can relearn to cooperate with nature's rhythms, abandon our false sense of dominion, and our reliance on crude methods like chemical herbicides. We have the opportunity to explore alternative approaches that might earn the gratitude of future generations.

Comment #103

Melissa Williams

Boulder

Mar 27, 2024

May I reiterate to the County that aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

Comment #102

Kira Davis

Boulder

Mar 27, 2024

I highly prefer using as few pesticides as possible in the weed management plan. Please keep our land and environment organic and safe and with fewer poisons that can harm insects, people, pets, birds, etc. This is very important to me.

Comment #101

Stephen Ruby

Nederland, CO

Mar 27, 2024

Thank you for your service. It has come to my attention again, that we need to be clean on public lands. Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

Thank you for your consideration.

Steve Ruby Caribou Rd, Nederland

303-499-2692

Comment #100

Deirdre Sturm

Longmont

Mar 27, 2024

We need to make our water, air, and water cleaner by not using chemical pesticides and herbicides and to transition to safer less toxic options. Protect our families and pollinators.

Comment #99

shari malloy

longmont

Mar 27, 2024

Thank you for taking public comment regarding the use of pesticides and herbicides. Specifically, thank you for eliminating 5 harmful herbicides from the "toolkit" and for stopping inaccurate aerial spraying from airplanes. I would ask this be applied to drones also. Of course, weeds need management and hand spraying is the safest application.

I'm asking for more stringent guidelines and processes which include considering trusted science including short and long-term studies addressing environmental impacts. Proceed with extra caution should be the lens...

Again, thank you for your thoughtful consideration.

Comment #98

Miliana Hughes

Lafayette

Mar 27, 2024

I urge the County to reconsider the continued use of chemicals such as Glyphosate and Indaziflam on our public lands. This poses unacceptable risks to public and environmental health and poses a threat to our County's position as a great place to live for young children and families.

Comment #97

Brian Montgomery

Boulder

Mar 27, 2024

Use of glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan. What are the long term affects of using these compounds?

I urge Boulder County to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Comment #96

anne anderson

LONGMONT

Mar 27, 2024

my background is in plant and soil microbe metabolism

both of the used herbicides are targetted towards processes that are essential in plants (phenolic biosynthesis and cellulose synthesis) which should rule out direct effects on animals etc however the microbial population also uses these processes
some microbes will be slowed in growth due to inhibition of the amino acids that have phenolic bases
some microbes use cellulose synthesis to attach to surfaces

Microbial association with plants and mammals and insects is essential for healthy lives - they are termed probiotics

So attack of the herbicides on probiotic microbes as a secondary effect will impact their communities and harm their useful roles

IE secondary effects on the ecosytem are likely and can lead up the chain to man

It is also known that glyphosate in Roundup will chelate metal ions especially Mn
Mn is essential for photosynthesis
but will also promote Mn deficiencies in surviving plants. Such plants would not survive weather related changes such as drought etc as Mn is essential for these adaptions

this chelation effect might be good for weeds but not for nontarget organisms

Comment #95

Lisa Rodriguez

Boulder

Mar 27, 2024

On a planet covered with living creatures, there is absolutely NO safe place to spray poisons. People are finally learning to reduce the creation of garbage that piles up in our landfills, because they now understand that it does not just disappear after the trash truck hauls it away. In the same vein, we must

also see that, like the garbage, the chemicals don't just disappear once they are applied. They make their way into all of the ecosystems that plants, animals, and HUMANS rely on for their survival. We absolutely do not want to poison ourselves or the other creatures on our planet. Please take action to protect us all. Thank you for your time and caring.

-Lisa Rodriguez

Comment #94

Scott Heffernan

Boulder

Mar 27, 2024

Herbicides are one tool within the entire toolkit for combating invasive species. In some cases, it is the best tool; either the plant species is highly prolific, staff capacity is limited, or both. For instance, one person with a hand sprayer can cover the area that would take several people hand-pulling weeds in less time and with less waste material.

The damage that invasive plants can have on our ecosystems is much worse than trace amounts of herbicide that is applied to remove them. Invasive grasses (such as Cheatgrass) can cover the ground in a thick thatch that can increase wildfire susceptibility and choke out native grasses and wildflowers. Without the use of herbicides, there is no practically achievable way to manage the hundreds of acres being slowly converted to a monoculture of invasive cheatgrass.

Far from dumping poison directly onto baby birds like some Captain Planet villain, the application of herbicides is highly regulated and controlled. This is a tool we need to keep, and need to continue to use to prevent the unique ecosystems of Boulder County from being overrun with invasive species.

Comment #93

Carol Wiley

Lafayette

Mar 27, 2024

Use of chemicals to control invasive on our public land needs to stop. Please explore non-toxic methods to help keep our water, pollinators and humans healthy. Aerial spraying is particularly disruptive to our ecosystem as it is not targeted.

Comment #92

zac taschdjian

longmont
Mar 27, 2024

Hello,
regarding the Integrated Weed Management Plan, I would like to urge you to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails. Specifically avoiding Glyphosate and Indaziflam.

Best,
Zac Taschdjian

Comment #91

Stacey Phillips

Boulder
Mar 27, 2024

Hello,

I am writing to you as a citizen, concerned about the wellbeing of our community and our land.

Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

There are other options that think of future generations, and we should invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

It is hard to believe that with all the knowledge we have today, that these toxic products are still in use. We need to learn from other countries that have figured out how to enrich our soil, not deplete it of valuable nutrients and make it unsafe.

Thank you for listening and taking the time to do what is right for our community and our environment.

Comment #90

Amira Rida

Boulder
Mar 27, 2024

Please stop Boulder County aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands because it represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

I urge the County to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Sincerely,
Amira Rida
Highland Ave., Boulder CO 80302

Comment #89

Jill Iwaskow

Boulder

Mar 27, 2024

Monarch butterfly popularion is down 90% in the past two decades because of pesticide use. Humans are impacted equally. I am one of the growing number of chemically sensitized people on the Pesticide Sensitive Registry. I used to be healthy until I was exposed to toxins that hypersensitized my body and changed my life. Pesticides is one of the biggest issues for me. I ultimately had to move up higher in the foothills to avoid constant spraying, not just from neighbors but sadly, from the county. Unfortunately they now spray most of the trails even in the mountains, and I'm surprised by the products still used that are known carcinogens and more.

Over the years I've learned that there are better, healthier, more sustainable ways to address weeds, as well as PREVENT them. Educating people on prevention should be key, especially when people are building. Using bugs from the CDA buy-a-bug program works! I've done that for knapweed and thistle and more. And planting seeds/creating better soil is another long-term method avoiding chemicals. Likewise bringing people together for weed pulls - but then following up with creating more balanced soil for native grasses is a great way to both build community and create a healthier long term eco system. WHY not an incentive program for people to hardscape vs grass (better for fires, too)? We should invest in the long term because in the decades I've been sensitive, I cannot express how many more thousands and thousands of people have become sick from chemical exposure - especially pesticides. We know we're in the Silent Spring at this point - let's be leaders in doing things better.

Comment #88

Adam Altschuh

Lafayette

Mar 27, 2024

As a local farmer, deeply concerned about environmental diversity, pollinators, and pollution, I implore you to reduce or eliminate pesticide use on public lands.

Comment #87

Marykay Buckner

Unincorporated Longmont

Mar 27, 2024

Dear powers that be in Boulder County,

We live in unincorporated Boulder County, and in 2018 my husband was diagnosed with a rare form of non-Hodgkins Lymphoma, a cancer that has been proven to be caused by Glyphosate. The city of Longmont is still using, what they call a water soluble form of Glyphosate, supposedly safer near water, to kill Russian Olives on the lake to which we are adjacent. Could it be related to all of the chemicals, specifically Glyphosate, the County routinely sprays? All we need to do is look to the class action lawsuit against Monsanto/ConAgra/Beyer for validity.

I am personally asking you to finally do the right thing and remove them ALL from your arsenal, and even especially now with drones, which means they are airborne. To the rest of the country, Boulder County is a beacon for environmental sensibility and best practices. Why don't you now try to actually live up to that ideal. Be the leader and do the right thing.

Please STOP the aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands as they represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

We implore you to invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

Sincerely,
MaryKay Buckner

Comment #86

Karen Braverman

Louisville

Mar 27, 2024

Thank you for doing all you can to reduce or eliminate the use of toxic pesticides throughout Boulder County.

All humans and dogs thank you very much for keeping us safe!

Comment #85

Johanna Popma

Niwot

Mar 27, 2024

Boulder County should not be using any chemicals on our open spaces and we should not be allowing farmers to use them either.

These chemicals have been proven to cause Non-Hodgkin lymphoma in those who apply it, walk through it, or eat produce with its residue. This is FACT!

Isn't it ironic the company - Monsanto (Bayer) makes the pesticides also has patented treatment through Bayer to treat non-Hodgkin lymphoma? It's an ugly corporate cycle our county must not continue to spend money on.

It is also a fact that these pesticides kill ALL insects including bees which are facing a crisis. We need bees for our food system.

There are better ways to manage pests and weeds. Regenerative farming practices have been proven to be safer for communities, farmers, and the insects who support our system.

Let's not go backward, Boulder. Please.

Comment #84

Anna Gray Anderson

Boulder

Mar 27, 2024

NO AERIAL SPRAYING please!!!! Reduce pesticide use overall.

Comment #83

Jonathan Miller

Longmont

Mar 27, 2024

Pesticides and Herbicides are detrimental to our children's health, our health, and pollinators, which we count on for countless natural processes, including food production. There are alternative ways to manage unsightly and invasive weeds without the use of ungodly chemicals. Chronic disease, cancer and nervous system illness is not worth it to simply manage weeds. That statistics on chronic disease and

cancer rates are astounding, and should be considered a national crisis. We can no longer ignore the impact of these chemicals on our community and the environment.

Just an indication of how serious these chemicals are, out of 10 bee hives located at Growing Gardens in Boulder, a huge contributor to our local community, 0 out of 10 hives survived the winter due to poor health in 2023. These die offs were directly linked to local chemical use.

Many of these chemicals are endocrine disruptors, and some have been shown to cause brain damage in children. 1 in 22 children in California now have autism. All of these chemicals have been found in human placentas and umbilical cords. We must make change to improve our communities health. Nearly every family in America now deals with some form of Chronic disease or illness. Let's play the long game, and invest in our communities long term health and resiliency.

Comment #82

Rob Edward

Louisville

Mar 27, 2024

I'm writing to underscore that aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands present unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

Instead, the County should invest in non-toxic approaches eradicating weeds. It is vitally important that the final plan pivots away from our toxic past.

Comment #81

Marion Murphy

Boulder

Mar 27, 2024

My request is that the Boulder County POS Team & via Commissioner vote impose a full-ban on aerial spraying of toxic chemicals (scientifically proven to be damaging to all natural resources such as, air, water, soil, living insects, animals & people) to suppress weed infestations on our public lands.

Comment #80

Diana Shepard

Boulder

Mar 27, 2024

The canaries in the coal mine are dying. The birds of Boulder county are dying. Please eliminate the use of chemicals such as Glyphosate and Indaziflam on our Boulder County public lands. Their use represents an unacceptable risk to public and environmental health and should be eliminated from the Integrated Weed Management final draft plan. These chemicals are killing birds and insects and amphibians!

Many countries around the world have already banned the use of Glysohate, for good reason. Please eliminate these dangerous chemicals.

Comment #79

Judi Strahota

Boulder

Mar 27, 2024

Thank you for eliminating herbicide applications via helicopters and removing Dicamba and 2-4D from your arsenal.

I am opposed to aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands. Use of these present unacceptable risks to public and environmental health and should be eliminated from the final draft plan.

I urge the County to immediately invest in non-toxic approaches to ecosystem health that eradicate weeds without introducing toxic chemicals into our water systems and onto our recreational trails.

THANK YOU !!

Comment #78

Tanja Johnson

Boulder

Mar 27, 2024

I'm a Boulder resident since 2012. I have Primary Immune disease with Multisystem Disease. Please stop using poisons on public lands. When I'm outside in nature it would be such a freedom to breathe fresh non poisoned air and not have to wear a respiratory mask. I love our town and I feel the majority of us here want non-chemical air to breathe. The poison sprayed on public lands is carried by wind and ends up in our lungs. Let's make Boulder the City with the cleanest air to breathe. Thank you.

Comment #77

James Lissy

Longmont
Mar 26, 2024

Response to March 2024, 57 page, 2.0 version that the board is being asked to recommend to the commissioners for approval.

It is absolutely imperative that the board reject the proposed plan and force open space to come up with a plan that is more of a compromise between what they want and what the public wants. If this plan passes, I will have absolutely zero trust in both the county and open space going forward – no trust at all. Once trust is lost, it is extremely hard to regain. Here are the reasons why I feel so strongly about this:

-Biodiversity – The plan states that biodiversity is very important and open space wants to promote biodiversity, etc. Which is great, however chemical use directly contradicts this statement. Studies suggest that chemical use negatively affects the growth and seed production of native plants - which the county wants. The plan also states that re-seeding is expensive. If you didn't have chemicals negatively affecting seed production of the native plants then in the long run you'd have less re-seeding to do. This plan is full of contradictions and does not build trust.

-Glyphosate – Limited use of glyphosate is absolutely unacceptable. Several members of the board have asked open space to remove all use of glyphosate from the plan and open space has ignored the board as well as the public. The survey that open space did (which they didn't want anyone to fill out since they didn't proactively tell anyone about it) very clearly shows that the majority of the public does not want any chemical use at all. Glyphosate has been proven time and time again in court to be carcinogenic and cause cancer in humans along with many negative environmental effects. It has also been proven that Bayer / Monsanto has known about this the entire time but hid this knowledge from the public. Bayer / Monsanto was recently ordered to pay \$2.25 billion to a single person over this, and that is just one of many court losses they have had over glyphosate. The county continuing to use this chemical with this knowledge directly opens up the county to lawsuits that they will lose. The limited use of glyphosate that is in this plan does not build trust at all.

-Monitoring – Several members of the board (along with the majority of the public as a whole) have asked open space to include monitoring in their plan, open space has blatantly ignored these requests. When chemicals are used it is absolutely imperative to do soil / water testing before each and every chemical application then go back after chemical application to re-test the same soil / water then continue to monitor the same area via soil / water testing for a period of time after application, and those results need to be made public. In the webinar that open space held, the Cornell participant stated that monitoring is a key aspect of chemical use. The monitoring in this plan is to do a single pilot project on a single pond – which is absolutely unacceptable and is a laughably slim amount of monitoring. The land / water needs to be monitored before and after each and every chemical application – this is essential. It is my belief that open space knows the extreme negative effects of the very chemicals they use better than anyone so they want to avoid all monitoring at all costs so the negative effects of the chemicals cannot be proven. If no tests are done then there is no evidence of negative effects and then open space can keep doing whatever they want. If open space truly believes that there are no unintended consequences to chemical application then they should be all for any and all monitoring to prove that to the public. Instead, they do not want any monitoring done at all so no data exists because they know it will only show drastic negative consequences and then they will be forced to change their

ways, which they do not want. The monitoring in this plan does not build trust.

-Chemical Last Approach – Nowhere in this plan does it say that chemicals will only be used as a last resort. The survey results show that the vast majority of the public wants no chemical use at all. Open space has shown throughout this entire process that they want to be able to use chemicals in any and every situation, which this plan refers to as “practical”, which I believe equates to a chemical first approach. Open space refusing to specifically say that chemicals will only be used as a last approach and after other approaches have failed does not build any trust at all.

-Indigenous Community – It is extremely disturbing to me that throughout this entire process the local Indigenous community was not brought to the discussion table or invited to speak on this very important subject that they have extensive and vast amounts of knowledge in. They have lived on this land for thousands of years and their knowledge has been handed down from generation to generation and they have learned through trial and error. Trial and error is literally what science is, so their knowledge is scientific even if it isn't documented in the same way that we are used to. The Indigenous community not being brought to the table or invited to speak at any of the meetings is the continued perpetuation of colonialization and the continued suppression of their community – which I am absolutely appalled by. The county has made it very clear that they love claiming they have a relationship with the local Indigenous community and they tout this at every opportunity they get but when it comes to bringing that same community to the table on an issue like this that they have vast amounts of knowledge in – the County does not take that opportunity to hear their point of view. This is absolutely appalling and does not build trust. Bringing the local Indigenous community into the conversation and making them a part of the process (if they want that) is an absolute must.

-Drones – The survey results were very clear that the majority of the public does not want aerial applications yet open space continues to push for aerial applications. The plan also says that the public will not be proactively notified of these aerial applications – which is completely unacceptable. Pro-active notification is an absolute must. The plan also does not say what the class / types of drones are that are going to be used are nor does it list any limit on drone swarms. This does not build trust.

-Education on non-chemical weed suppression – The plan does not lay out any continued education for furthering the education of open space staff in non-chemical use methods. Interestingly, the Savory Institute is an international non-profit that is headquartered in Boulder, CO that does just this – educating people on how to regeneratively restore native grasslands. I would love to see open space staff do trainings and collaborate with this institute. The proposed plan makes it very clear that open space has no serious intention of phasing out herbicides over time – they just want that to be the perception. This does not build trust.

-Pilot Projects – The pilot projects in this plan are already setup to fail and that is intentional by open space. Open space clearly does not want to receive training in regenerative agriculture that would give these programs a chance of succeeding. Open space does not want that – they want to continue herbicide use since that is what they are trained how to do and is the easiest path for them to do their job so by not receiving any education into the subjects of the pilot projects - they are intentionally setting the pilot projects up to fail. This does not build trust.

-Potential staff conflicts of interest have not been addressed – Members of the public have brought

Diversity is key.

Always act for the highest benefit of all life.

Embrace love, seek truth, forge unity, and let compassion guide.

Thank you for your consideration.

Science:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4947579/>

The industrialization of the agricultural sector has increased the chemical burden on natural ecosystems. Pesticides are agrochemicals used in agricultural lands, public health programs, and urban green areas in order to protect plants and humans from various diseases. However, due to their known ability to cause a large number of negative health and environmental effects, their side effects can be an important environmental health risk factor. The urgent need for a more sustainable and ecological approach has produced many innovative ideas, among them agriculture reforms and food production implementing sustainable practice evolving to food sovereignty. It is more obvious than ever that the society needs the implementation of a new agricultural concept regarding food production, which is safer for man and the environment, and to this end, steps such as the declaration of Nyéléni have been taken.

Many of the pesticides have been associated with health and environmental issues, and the agricultural use of certain pesticides has been abandoned. Exposure to pesticides can be through contact with the skin, ingestion, or inhalation. The type of pesticide, the duration and route of exposure, and the individual health status (e.g., nutritional deficiencies and healthy/damaged skin) are determining factors in the possible health outcome. Within a human or animal body, pesticides may be metabolized, excreted, stored, or bioaccumulated in body fat. The numerous negative health effects that have been associated with chemical pesticides include, among other effects, dermatological, gastrointestinal, neurological, carcinogenic, respiratory, reproductive, and endocrine effects. Furthermore, high occupational, accidental, or intentional exposure to pesticides can result in hospitalization and death.

Current agriculture has to deal with important factors, such as population growth, food security, health risks from chemical pesticides, pesticide resistance, degradation of the natural environment, and climate change. In recent years, some new concepts regarding agriculture and food production have appeared. A concept as such is climate-smart agriculture that seeks solutions in the new context of climate change. Another major ongoing controversy exists between the advocates and the opponents of genetically engineered pesticide-resistant plants, regarding not only their safety but also their impact on pesticide use.

Furthermore, the real-life chronic exposure to mixture of pesticides with possible additive or synergistic effects requires an in depth research. The underlying scientific uncertainty, the exposure of vulnerable groups and the fact that there are numerous possible mixtures reveal the real complex character of the problem. The combination of substances with probably carcinogenic or endocrine-disrupting effects may

produce unknown adverse health effects. Therefore, the determination of "safe" levels of exposure to single pesticides may underestimate the real health effects, ignoring also the chronic exposure to multiple chemical substances.

Taking into consideration the health and environmental effects of chemical pesticides, it is clear that the need for a new concept in agriculture is urgent. This new concept must be based on a drastic reduction in the application of chemical pesticides, and can result in health, environmental, and economic benefits as it is also envisaged in European Common Agricultural Policy (CAP).

We believe in developing pesticide-free zones by implementing a total ban at local level and in urban green spaces is easily achievable.

<https://www.frontiersin.org/articles/10.3389/fenvs.2021.643847/full>

Agricultural pesticide use and its associated environmental harms is widespread throughout much of the world. Efforts to mitigate this harm have largely been focused on reducing pesticide contamination of the water and air, as runoff and pesticide drift are the most significant sources of offsite pesticide movement. Yet pesticide contamination of the soil can also result in environmental harm. Pesticides are often applied directly to soil as drenches and granules and increasingly in the form of seed coatings, making it important to understand how pesticides impact soil ecosystems. Soils contain an abundance of biologically diverse organisms that perform many important functions such as nutrient cycling, soil structure maintenance, carbon transformation, and the regulation of pests and diseases. Many terrestrial invertebrates have declined in recent decades. Habitat loss and agrichemical pollution due to agricultural intensification have been identified as major driving factors.

Our review indicates that pesticides of all types pose a clear hazard to soil invertebrates. Negative effects are evident in both lab and field studies, across all studied pesticide classes, and in a wide variety of soil organisms and endpoints. The prevalence of negative effects in our results underscores the need for soil organisms to be represented in any risk analysis of a pesticide that has the potential to contaminate soil, and for any significant risk to be mitigated in a way that will specifically reduce harm to soil organisms and to the many important ecosystem services they provide.

<https://www.sciencedirect.com/science/article/pii/S2667010021001281>

Glyphosate is an extensively used herbicide globally. Its use dates back to 1970s with increasing numbers over the years. It is an effective weed killer but since it parallelly destroys non-target crops, its use during initial days was restricted.

Over years of extensive usage, many issues related to toxicity, carcinogenicity and GE varieties cropped up. Many researchers studied the toxicological characteristics, health impacts, environmental exposures and ecological impacts of glyphosate and Glyphosate-based herbicides. Many international agencies assessed its carcinogenic potential and grouped and regrouped it based on conclusions of various studies. As an outcome of many studies, an important aspect of toxicity of adjuvants used for technical formulations of glyphosate surfaced and gave a better understanding of its overall toxicity.

In interaction with water, glyphosate rapidly converts into its primary metabolite, i.e., AMPA, that holds most of its precursor's harmful properties and becomes far more persistent, such that its half-life lasts between 76 and 240 days

Glyphosate, as stated in the usage guidelines and the harmful clauses mentioned in the health data sheet, should not be released in the environment since it is harmful to marine organisms, with long-term impact studied the effect of glyphosate addition on plant tissues of *Lemna minor* (common duckweed) which resulted in reduced yield and growth, prevents the synthesis of carotenoids and chlorophyll a and b, and declines the photosystem II photochemical functions.

Glyphosate transforms into AMPA as soon as it comes into contact with water while maintaining toxic aspects of its precursor.

Glyphosate can interfere with water-soluble organic matter, clay particles, and colloidal iron oxides. This connection could therefore contribute to colloidal associated transportation of glyphosate. Various concentrations of the residues were found in ground and surface waters. Usually, groundwater has been utilized as the essential source of drinking water supply. There are several reports which suggest that the water supplies in areas having intensive agricultural activities might be at high risk of glyphosate contamination

The study thus indicated that inhalation of the said herbicides may cause damage to DNA in exposed humans.

When examining the influence of Roundup containing glyphosate on aromatase, the enzyme involved in the development of oestrogen, at nontoxic levels, it was noted that glyphosate interferes with the levels of aromatase and mRNA and thus has both endocrinal and toxic effects The research suggests that Roundup containing glyphosate is lethal to placental cells of the human within 18 hours of exposure, at amounts lower than those for agricultural use

<https://www.nature.com/articles/s41598-020-67025-2>

Plant communities in field edges, fallow fields, and other semi-natural habitats of agricultural landscapes may be at significant ecotoxicological risk from herbicides applied to nearby crop fields. In agricultural landscapes, field margins, fallow fields, and other semi-natural habitats are often the only remaining habitat for wild plant species and support diverse plant communities that help sustain pollinators, predators, and beneficial arthropods. Previous studies have indicated that herbicides, even at low concentrations, adversely affect plant communities, causing a decline in forb cover and reduced the flowering of key species and a reduction in the frequencies of certain species. Our data on plant species diversity and community composition of a fallow field support these findings.

Herbicides may not be an important factor in changing the functional composition of plant communities in the short term, but the long-term cumulative effects of herbicides on the functional composition and structure of plant communities in agricultural ecosystems need to be taken seriously

<https://www.sciencedirect.com/science/article/abs/pii/S0048969717330279>

The herbicide glyphosate, N-(phosphonomethyl) glycine, has been used extensively in the past 40 years, under the assumption that side effects were minimal. However, in recent years, concerns have increased worldwide about the potential wide ranging direct and indirect health effects of the large scale use of glyphosate. In 2015, the World Health Organization reclassified glyphosate as probably carcinogenic to humans.

there are animal data raising the possibility of health effects associated with chronic, ultra-low doses related to accumulation of these compounds in the environment.

Intensive glyphosate use has led to the selection of glyphosate-resistant weeds and microorganisms. Shifts in microbial compositions due to selective pressure by glyphosate may have contributed to the proliferation of plant and animal pathogens.

<https://www.intechopen.com/chapters/70451>

It is scientifically proven that herbicides cause infertility, kidney problems, endocrine disruption, apoptosis, cytotoxicity, and neurotoxic effects. Such diseases impact the quality of those affected, and naturally the contaminated environment negatively affects human health.

Sixty percent of agrochemicals are used in the soil, and the others drain into the ground polluting the water supply; these chemicals are toxic for living organisms as they are absorbed by plants and successively accumulate in human tissue through biomagnifications of the food chain, causing human health and environment concerns. Chemical pollutants are a serious and growing global problem.

several studies have shown that herbicides and their derivative compounds contaminate natural resources such as water and soil, for example, aminomethylphosphonic acid (AMPA), a secondary compound of glyphosate, can persist for several years in the soil.

People who have been exposed to herbicides occupationally, or by eating foods or liquids containing herbicide residue, or for that matter inhaled herbicide-contaminated air, have experience a broad range of chronic health effects, including impaired neurobehavioral function (e.g., cognitive and behavioral disorders), Alzheimer's and Parkinson's diseases, hormone disruption, asthma, allergies, hypersensitivity, obesity, diabetes, hepatic lesions, kidney failure, multiple sclerosis, and cancer

<https://www.mcgill.ca/newsroom/channels/news/widely-used-weed-killer-harming-biodiversity-320906>

One of the world's most widely used glyphosate-based herbicides, Roundup, can trigger loss of biodiversity, making ecosystems more vulnerable to pollution and climate change

The widespread use of Roundup on farms has sparked concerns over potential health and environmental effects globally. Since the 1990s use of the herbicide boomed, as the farming industry adopted "Roundup Ready" genetically modified crop seeds that are resistant to the herbicide. "Farmers spray their corn and soy fields to eliminate weeds and boost production, but this has led to glyphosate leaching into the surrounding environment. In Quebec, for example, traces of glyphosate have been found in Montérégie rivers," says Andrew Gonzalez, a McGill biology professor and Liber Ero Chair in Conservation

Biology.

"We observed significant loss of biodiversity in communities contaminated with glyphosate. This could have a profound impact on the proper functioning of ecosystems and lower the chance that they can adapt to new pollutants or stressors. This is particularly concerning as many ecosystems are grappling with the increasing threat of pollution and climate change," says Gonzalez.

<https://www.nature.com/articles/s41559-020-1134-5>

https://www.researchgate.net/publication/343878200_Effect_of_Herbicides_on_Living_Organisms_in_The_I

the side effects caused by the wide and irrational use of herbicides threaten the environment and human health. Although herbicides are the least harmful among pesticides, many studies have shown the serious negative effects of herbicides on the environment and human health. Every year a list of herbicides that cause cancer or leave large residues in the soil and water are published. However, many herbicides have been banned, but only after they have been used in tons and causing environmental pollution. The chemical structure of herbicides degrades quite slowly in nature, which causes its accumulation in the soil and the environment. The effects of these herbicides have reached rivers, lakes, seas and oceans. Also, the effect of chemically degradation herbicides on living organisms under different environmental conditions is still unknown.

The effect of herbicides on non-target plants Herbicides, especially broad-spectrum herbicides, affect plant biological diversity and damage environmental balance. In addition to the possibility of killing crops, herbicides can reduce plant yield and increase susceptibility to diseases. For example, glyphosate significantly increases the severity of various plant diseases, and lead to weakening plant capacity to resist against pathogens, and immobilizes soil and plant nutrients

<https://www.sydney.edu.au/news-opinion/news/2023/07/13/global-analysis-shows-how-pesticides-leach-into-the-environment.html>

A University of Sydney led study published today in Nature has revealed the chemical odyssey pesticides embark upon after their initial agricultural application, with environmental consequences for a range of ecosystems.

A global study published today in Nature, which analysed the geographic distribution of 92 of the most commonly used agricultural pesticides, found that approximately 70,000 tonnes of potentially harmful chemicals leach into aquifers each year, impacting ecosystems and freshwater resources.

Associate Professor Federico Maggi, the study's lead author from the University of Sydney's School of Civil Engineering, said: "Our study has revealed that pesticides wander far from their original source. In many cases these chemicals end up a long way downstream and often, though in much smaller amounts, all the way to the ocean."

The study showed that about 80 percent of applied pesticides degrade into daughter molecules – or byproducts – into soil surrounding crops.

This degradation of pesticides often occurs as a 'cascade' of molecules into the surrounding environment, which can persist in the environment for a long time and can be just as harmful as the parent molecule or applied pesticide. One such example is glyphosate. Although it is highly degradable, it breaks down into a molecule known as AMPA that is both highly persistent and toxic," said Associate Professor Maggi.

Associate Professor Maggi last week co-authored a separate paper in *Nature Ecology and Evolution* that outlined recommendations to reduce pesticide use, including calling for a reliable set of indicators and improved monitoring.

He and the paper's co-authors argue that targets for lowering pesticide pollution should be focused on decreasing risk, including reducing amounts and toxicity, because some organisms are at high risk from very toxic pesticides, even when used in low quantities.

<https://www.nature.com/articles/s41586-023-06296-x>

<https://www.washington.edu/news/2019/02/13/uw-study-exposure-to-chemical-in-roundup-increases-risk-for-cancer/>

Exposure to glyphosate — the world's most widely used, broad-spectrum herbicide and the primary ingredient in the weedkiller Roundup — increases the risk of some cancers by more than 40 percent, according to new research from the University of Washington.

Various reviews and international assessments have come to different conclusions about whether glyphosate leads to cancer in humans.

The research team conducted an updated meta-analysis — a comprehensive review of existing literature — and focused on the most highly exposed groups in each study. They found that the link between glyphosate and Non-Hodgkin Lymphoma is stronger than previously reported.

"Our analysis focused on providing the best possible answer to the question of whether or not glyphosate is carcinogenic," said senior author Lianne Sheppard, a professor in the UW departments of Environmental & Occupational Health Sciences and Biostatistics. "As a result of this research, I am even more convinced that it is."

By examining epidemiologic studies published between 2001 and 2018, the team determined that exposure to glyphosate may increase the risk of Non-Hodgkin Lymphoma by as much as 41 percent. The authors focused their review on epidemiological research in humans but also considered the evidence from laboratory animals.

"This research provides the most up-to-date analysis of glyphosate and its link with Non-Hodgkin Lymphoma, incorporating a 2018 study of more than 54,000 people who work as licensed pesticide applicators," said co-author Rachel Shaffer, a UW doctoral student in the Department of Environmental & Occupational Health Sciences.

"These findings are aligned with a prior assessment from the International Agency for Research on

Cancer, which classified glyphosate as a 'probable human carcinogen' in 2015," Shaffer said.

<https://pubmed.ncbi.nlm.nih.gov/31342895/>

Glyphosate is the most widely used broad-spectrum systemic herbicide in the world. Recent evaluations of the carcinogenic potential of glyphosate-based herbicides (GBHs) by various regional, national, and international agencies have engendered controversy. We investigated whether there was an association between high cumulative exposures to GBHs and increased risk of non-Hodgkin lymphoma (NHL) in humans. We conducted a new meta-analysis that includes the most recent update of the Agricultural Health Study (AHS) cohort published in 2018 along with five case-control studies. Using the highest exposure groups when available in each study, we report the overall meta-relative risk (meta-RR) of NHL in GBH-exposed individuals was increased by 41% (meta-RR = 1.41, 95% confidence interval, CI: 1.13-1.75). For comparison, we also performed a secondary meta-analysis using high-exposure groups with the earlier AHS (2005), and we calculated a meta-RR for NHL of 1.45 (95% CI: 1.11-1.91), which was higher than the meta-RRs reported previously. Multiple sensitivity tests conducted to assess the validity of our findings did not reveal meaningful differences from our primary estimated meta-RR. To contextualize our findings of an increased NHL risk in individuals with high GBH exposure, we reviewed publicly available animal and mechanistic studies related to lymphoma. We documented further support from studies of malignant lymphoma incidence in mice treated with pure glyphosate, as well as potential links between glyphosate / GBH exposure and immunosuppression, endocrine disruption, and genetic alterations that are commonly associated with NHL or lymphomagenesis. Overall, in accordance with findings from experimental animal and mechanistic studies, our current meta-analysis of human epidemiological studies suggests a compelling link between exposures to GBHs and increased risk for NHL.

<https://www.iarc.who.int/wp-content/uploads/2018/07/MonographVolume112-1.pdf>

The herbicide glyphosate and the insecticides malathion and diazinon were classified as probably carcinogenic to humans.

https://www.iarc.who.int/wp-content/uploads/2018/07/pr236_E.pdf

The herbicide 2,4-D was classified as possibly carcinogenic to humans (Group 2B), based on inadequate evidence in humans and limited evidence in experimental animals. There is strong evidence that 2,4-D induces oxidative stress, a mechanism that can operate in humans, and moderate evidence that 2,4-D causes immunosuppression, based on in vivo and in vitro studies

<https://www.sciencedirect.com/science/article/pii/S0045653519322556>

Once 2,4-D is applied directly on the soil or sprayed on the crops, it easily reaches water bodies. Being a polar molecule, 2,4-D and its ester and amines are quite mobile in aqueous systems because of its acidic carboxyl group (pKa = 2.8) and low soil adsorption that may be the reason for its widespread occurrence in the environment. In addition, it can reach the water bodies by surface runoff or through infiltration, leaching and soil percolation, becoming an environmental and human health problem. It is also noteworthy that 2,4-D is a moderately persistent substance in the environment, with a half-life between 20 and 312 days, depending on environmental conditions.

Studies have demonstrated the bioaccumulation capacity of this herbicide in non-target organisms, exposed for a short period of time. Regarding the post-2,4-D exposure effects in different organisms, studies have shown endocrine disruption, reproductive disorders, genetic alterations and carcinogenic effects. In humans, 2,4-D has been associated with the development of Parkinson's neurodegenerative disease and autism.

<https://www.sciencedirect.com/science/article/abs/pii/S0160412017315313>

The herbicide 2,4-dichlorophenoxyacetic acid (2,4-D) is applied directly to aquatic and conventional farming systems to control weeds, and is among the most widely distributed pollutants in the environment. Non-target organisms are exposed to 2,4-D via several ways, which could produce toxic effects depending on the dose, frequency of exposure, and the host factors that influence susceptibility and sensitivity. An increasing number of experimental evidences have shown concerns about its presence/detection in the environment, because several investigations have pointed out its potential lethal effects on non-target organisms.

The salt and ester formulations of 2,4-D are derived from the parent acid molecule. The dimethyl-amine salt (DMA) and 2-ethylhexyl ester (EHE) are most commonly used formulations accounts of approximately 90 to 95% of the total use across the world. Additionally, over 1500 herbicide products contain 2,4-D as an active ingredient and it was also a part of Agent Orange, the herbicide widely used during the Vietnam war.

2,4-D is a moderately persistent chemical with a half-life ($t_{1/2}$) between 20 and 312 days depending upon the environmental conditions. The herbicide is directly applied onto soil or sprayed over crops, and from there, often reaches superficial waters and sediments. Due to low adsorption coefficients and high solubility in water, 2,4-D has often been detected in surface and ground water, which means an important environmental problem and health hazard. About 91.7% of 2,4-D eventually end up in water. This contamination threatens the life of exposed vegetation and animals. Additionally, herbicides are also carried by runoff into the local river systems, thereby threatening the health of aquatic life as well. Unfortunately, 2,4-D has non-specific weed targets. It can reduce growth rates, induce reproductive problems, and produce changes in appearance or behavior, or could cause death of non-target species, including plants, animals and microorganisms. It is also known as endocrine disruptors, affecting developmental processes even at low concentrations

<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-021-00815-x>

Of the 14,395 participants included in the study, 4681 (32.5%) had urine 2,4-D levels above the dichotomization threshold. The frequency of participants with high 2,4-D levels increased significantly (p

Comment #76

Karen Mitchell

Longmont
Mar 25, 2024

Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from this final draft plan.

Further, I do not comprehend the logic to use glyphosate in agricultural ditches. The water that flows through the agricultural ditches is the same water that is used to irrigate and water plants on our county wide farm and agricultural lands. Many of these lands are worked by owners and land stewards which favor organic methods. However with this suggestion, it is non compatible with the years of progress in the county with respect to organic and regenerative agriculture.

I do not support any aerial spraying, none with drones and don't feel that the 25 feet from private property or 660 feet from home is appropriate. There is too much at stake and wind and airborne carries drift further and faster.

Thank you for your consideration.

Comment #75

Tom Zweck
Longmont
Mar 24, 2024

Reading about volunteers to PULL weeds on Walker ranch , from my many years of experience as a farmer (meaning expert observation,)I've found many weed species should be cut or mowed close to ground level at flowering for more successful eradication

Comment #74

Sharon B
Lafayette
Mar 23, 2024

As a life-long Boulder County resident (born and raised in the county), I have seen the expansion of weed populations in the last 60 plus years. I support Boulder County Parks and Open Space (BCPOS) being able to utilize all Integrated Pest Management Techniques including herbicide use and application methods such as helicopter.

It is well known that invasive plant species (weeds) alter native ecosystems affecting native plant, invertebrate, wildlife populations and diversity in addition to fire regimes. Reducing native plant species and diversity changes the nutritional value of ranges for wildlife and invertebrates. The wildlife and invertebrates are accustomed to the native plant species and introduced plant species may not have the

same nutritional value or be unpalatable or toxic to them. Weeds can create monocultures that are not desirable for animals or people to enjoy. A monoculture of Canada Thistle or Teasel is not fun to walk through or to visually enjoy.

By law, staff must be well trained and knowledgeable about which herbicide to use, application timing and application methods. Over application only costs more and reduces the number of acres that can be treated. I have been privileged to work with and be on hiring committees for several staff members and found them to be very knowledgeable and concerned about protecting the native plants. I have confidence in them to do what needs to be done to preserve the native ecosystem.

I am in total agreement with the comments already submitted by Boulder County farmers. If County Open Space staff does not manage the weeds on the Open Space properties those weeds will spread to local farmers fields and to small acreage landowner's properties. Management of the weeds will add to the cost of growing food and will put the County in the category of not being a good neighbor. Good neighbors manage their weeds!

I have worked with small acreage landowners in the county and on my own property and know the time that it takes to manage weeds without the use of herbicides. I have also volunteered on BCPOS weed pull programs and know how much time and effort it takes. Most landowners in the county do not have the time or interest to use all of their free time in weed management. There are also areas that are just not accessible by humans or animals such as goats. I have seen the improvement in native vegetation in areas that were treated versus those that were not treated.

I hope that all of those who are pushing for herbicides to not be used on Boulder County Parks and Open Space Properties are the first ones to sign up for the new "Weed Warrior" volunteer project. They need to spend all of their free time volunteering for this program so they can see what it will take to be able to make a dent in the county weed populations. Please put your hands, feet and time to work and not just your words.

Comment #73

Bruce DUNCAN

BOULDER

Mar 20, 2024

Thanks for the opportunity to provide comments. I am not sure you have seen these yet. I hope they are helpful in your deliberations.

Sincerely,

Bruce Duncan

[Download Attachment](#)

Comment #72

Allyn Feinberg

Boulder

Mar 20, 2024

I would like to submit comments from PLAN-Boulder County regarding the Integrated Weed Management Plan. I am attaching the comments below.

[Download Attachment](#)

Comment #71

Margot Iseman

Boulder

Mar 19, 2024

I feel so strongly that Boulder County needs to find a way to control weeds without using horrible chemicals that pollute water and endanger wildlife and pets.

Comment #70

Lodi Siefer

Boulder

Mar 19, 2024

Aerial spraying with drones and the continued use of chemicals such as Glyphosate and Indaziflam on our public lands represent unacceptable risks to public and environmental health and should be eliminated from the final draft plan. Thank you for your consideration.

Comment #69

Andrea Montoya

Boulder

Mar 19, 2024

Dear Commissioners,

I am a retired Oncology professional turned Community Leader in the field of Ecology. I work with dozens of volunteer on a weekly basis, building and maintaining natural-native habitats in areas that require "rebuilding" in Boulder.

In my 35 year oncology career, state of the art patient care required that I follow the science while understanding how cellular biology works.

Here's what every oncology professional knows: cells treated with chemicals intended to kill them—mutate into smarter cells!

It is a scientific fact. When this happens we change treatments or add another drug. Unfortunately, this is often a futile exercise. It buys precious time but rarely eradicates disease.

Now in ecosystems work, I am seeing the same thing. Invasive species; i.e; cells that threaten to take over and dominate a system with huge unbalancing impacts on the entire system.

Here's how it goes in Oncology AND Ecosystems:

1. Promising new drug. Treat!

Cells mutate and outsmart the new drug

2. Apply a heavier dose.

Cells mutate

3. Add an older drug to the newer drug to make a new cocktail— mind you these drug combos/cocktails are not studied and are known to create unintended toxic consequences.

Cells mutate.....

This is a futile cycle. All this to treat an ecological "problem" that hasn't even been proven to be certain.

This is a careless and dangerous approach—especially in light of the fact that there are alternative management strategies for these imbalanced ecosystems.

Oncology: attack cancer cells

Also kills beneficial white blood cells

Outcome: weakened system and or knocks out stem cells (the cells needed for future health of the system).

Ecology: attack cheatgrass or other invasives with drugs

Also kills beneficial insects and or negatively impacts seed bank (needed for future health of the system).

Oncology: Blood cells heavily impacted having "downstream" negative impacts to the whole system—we are dependent on our blood.

Ecosystems: water ways heavily impacted by runoff and groundwater toxification. Huge negative impacts on entire ecosystems— we are dependent on water ways.

I think you see where this leads.

I am for Nature Based Management of imbalances in ecosystems caused by humans. Make it better, not worse.

Sincerely,

Andrea Montoya

Physician Associate-emeritus

Urban Biodiversity Programs Coordinator

Comment #68

Christel Markevich

Nederland

Mar 18, 2024

Thank you for the opportunity to comment on the Weed Management Plan.

Yes to an Advisory Group

If Boulder County wants to be serious about implementing alternatives to herbicides, it must create an advisory group to advise the weed management team on how to insure successful restoration.

The current weed management team has been trained to kill weeds but not to implement ecologically sound restoration of the ecosystem. We do not want a repeat of failures such as that of BCPOS's Carbon Sequestration Project team's experiment with using compost on agricultural fields. That experiment failed for an obvious reason that any of our regenerative farmers could have easily identified if consulted: the Carbon Sequestration Project team was spraying Roundup on the compost! For details see the team's presentation at the January 2020 POSAC meeting (<https://pub-bouldercounty.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?Id=96281f5d-644a-39a5-2a27-a4a07d7c1c78>).

Boulder's weed managers constantly discount alternative approach as both ineffective and expensive, citing results from other chemically-oriented specialists and from work in ecosystems different from that of Boulder County. But local regenerative farms, local ecologists, and local ecologically-oriented specialists and volunteers are successfully achieving ecologically sound ecosystem restoration in a cost-effective manner in Boulder County. Boulder County's weed management team needs to tap into this wealth of local expertise in order to deliver the ecologically sound weed management that the public is demanding.

We need a moratorium on all pesticide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff.

No to Indazilam

Indaziflam clearly has an adverse effect on the health of the soil and the hybrid Bermuda grass. From Virinder Side et al., 2018, "Pesticide Pollution in Agricultural Soils and Sustainable Remediation Methods: a Review" (in attachment):

"It has been reported that prodiamine, Indaziflam, and isoxaben reduced root mass of hybrid Bermuda grass relative to non-treated plants, and these pre-emergent herbicides reduced the accumulation of macro- and micro-nutrients such as phosphorus (P), Sulfur (S), potassium (K), magnesium (Mg), and manganese (Mn) in the foliar tissues of the affected plants."

Indaziflam accumulation in clam tissue - Clam high mortality rate

From Alexandra G. Tissot et al., 2022, "The Silence of the Clams: Forestry Registered Pesticides as Multiple Stressors on Soft-Shell Clams" (<https://www.sciencedirect.com/science/article/pii/S0048969721071291>)

"This study is unique in reporting accumulated tissue concentrations of lipophilic compounds following known and environmentally relevant dosing concentrations during chronic (3-month) exposure."

"The herbicide indaziflam was particularly notable in this study as it negatively affected clams, when applied individually and in combination with other herbicides, and was detected in tissue samples at concentrations higher than those previously predicted from other studies".

"Indaziflam caused a high mortality rate (max. 36%), followed by atrazine (max. 27%), both individually as well as in combination with other pesticides."

Indaziflam found in coastal watershed areas.

From Kaegan Scully-Engelmeyer et al., 2021, "Exploring Biophysical Linkages between Coastal Forestry Management Practices and Aquatic Bivalve Contaminant Exposure" (<https://www.mdpi.com/2305-6304/9/3/46>)

"In contrast, the current-use rainfall-activated herbicide indaziflam (Esplanade F [57]), used to control vegetation by ground or aerial application and promoted for its persistence in soil (half-life > 150 days) [21,65], was detected in bivalve tissue in five of eight coastal watershed areas. Widespread detection of indaziflam in bivalve tissue is especially notable as the compound (registered in 2010; Table 4) is classified as both "very toxic to aquatic life" and "very toxic to aquatic life with long lasting effects" by the Globally Harmonized System of Classification Labeling of Chemicals (GHS) [66]."

Indaziflam genotoxicity

From Serpil Könen Adigüsel et al., 2023, "The Possible Cytotoxicity and Genotoxicity Assessment of Indaziflam on HepG2 Cells" (<https://journals.sagepub.com/doi/10.1177/09603271231183145?icid=int.sj-full-text.similar-articles.1>)

"Moreover, pesticides can increase the levels of reactive oxygen species in the cell and thus affect genome integrity. The genome integrity should be preserved in living things. Otherwise, DNA damage in the genome can cause cancer, infertility, and extinction.9,10"

"The half-life of indaziflam in soil has longer than 150 days.34 Therefore, it is essential to evaluate the effect of indaziflam on living things."

"In contrast, increasing concentrations of indaziflam lead to a genotoxic effect (DNA strand breaks and micronucleus frequency) on HepG2 cells."

No to Glyphosate

Roundup has negative effects on soil biota

From Clifton P. Bueno De Mesquita et al., 2023, "Adverse Impacts of Roundup on Soil Bacteria, Soil Chemistry and Mycorrhizal Fungi During Restoration of a Colorado Grassland"

(<https://www.sciencedirect.com/science/article/pii/S0929139322003948>)

"In conclusion, we report that Roundup Promax applications can affect soil fertility, soil bacterial and archaeal communities, root endophytic fungi, and to a lesser extent, soil eukaryotic communities."

Yes to Prescribed Burns

BCPOS still needs to include prescribed burns as a critical additional tool in the toolbox to control weeds. During the June POSAC meeting, Professor Scott Nissen claims that prescribed burns control cheatgrass only for the first year post-fire. The two papers below demonstrate successful post-fire control of cheatgrass over long time periods.

From Alexandre K. Urza et al, 2019, "Seeding Native Species Increases Resistance to Annual Grass Invasion Following Prescribed Burning of Semiarid Woodlands"

(<https://link.springer.com/article/10.1007/s10530-019-01951-9>)

"Fourteen years after burning, we found that resistance to invasion was high on relatively cool and moist sites (higher elevation)."

From Jeffrey E. Ott et al, 2019 "Long-Term Vegetation Recovery and Invasive Annual Suppression in Native and Introduced Postfire Seeding Treatments

(<https://www.sciencedirect.com/science/article/abs/pii/S1550742418302008>)

"Lastly, evidence that reseeding of native vegetation after fire is effective at controlling invasive species, including cheatgrass, over both short (Thompson et al. 2006) and long (Ott et al. 2019) time periods suggests that a remnant native seed bank in infested areas would help reduce post-fire cheatgrass regrowth."

No to Conventional Grazing on Rangeland

Stop continued degradation of Boulder County Parks and Open Space (BCPOS) rangeland by requiring ecologically sound rotational grazing.

Yes to a Funded Pilot Collaborative Community Project

The project will be run by the community without interference from BCPOS staff, in order to demonstrate ecosystem restoration on a plot, dedicated to this purpose, that has not been recently treated with herbicides.

[Download Attachment](#)

Comment #67

Mark Guttridge

Longmont

Mar 17, 2024

Open Space Staff has used Cornell's Environmental Impact Quotient (EIQ) as a measure of what herbicides will be used in the future on Open Space. During the County's webinar on March 12th, Diana Obregon from Cornell stated:

"The EIQ and other pesticide risk indicators are decision support tools, but of course all the effects need to be monitored in time and space. Monitoring after application, after a management program has been

implemented is really key. The EIQ is a tool to make assessments at the beginning and is not an assessment of the impact afterwards.”

Open space staff has stated repeatedly that they are doing NO monitoring for environmental effects following herbicide applications. Use of herbicides without a monitoring program afterwards seems negligent to me. Likely the cost of proper monitoring would make chemical treatments no longer economically viable, yet another reason to invest in non-chemical approaches.

I feel there would be more trust from the public if the terminology “herbicides as a last resort” would be used in the plan, similar to the City of Lafayette and Jefferson County.

Comment #66

Heather MacDonald

Boulder, Colorado

Mar 16, 2024

Thank you for eliminating Dicamba, 2,4-D, and 3 other herbicides from their arsenal. Please know that I am still sincerely concerned about the potential of Glyphosate, Indaziflam, and all the other pesticides being used on public land. I am very opposed to the use of all aforementioned pesticides and herbicides and request transparency in the prior use that has occurred.

Thank you for removing aerial spraying from planes from their revised draft plan. For the same reasons, aerial spraying from drones should not be allowed either.

Please implement a moratorium on all pesticide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff.

Please implement a moratorium on pesticide use for List B and List C noxious weeds, as well as weeds that are not on Lists A, B, or C.

Please invest in regenerative practices for land management.

Please implement a more stringent process for approving individual pesticides for use on public lands.

Please monitor prior and any future spray sites and downstream water bodies for non-target impacts (insects, aquatic organisms, water, soil, and drift).

What, if any, water testing have you done at spray sites, along impacted ditches, in surface water, in groundwater? Please implement water testing for pesticide impacts ASAP.

Please publicly post every pesticide application going back at least five years and do not destroy the

historical data, for use in future environmental toxicity studies.

Please consider and identify root causes of noxious weeds on public lands and address root causes of land degradation through soil and ecological health

Comment #65

Karen Kavnar

Lyons

Mar 15, 2024

Thank you for eliminating Dicamba, 2,4-D, and 3 other herbicides from their arsenal. Please know that I am still sincerely concerned about the potential of Glyphosate, Indaziflam, and all the other pesticides being used on public land. I am very opposed to the use of all aforementioned pesticides and herbicides and request transparency in the prior use that has occurred.

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Please invest in regenerative practices for land management.

Please implement a more stringent process for approving individual pesticides for use on public lands.

Please monitor prior and any future spray sites and downstream water bodies for non-target impacts (insects, aquatic organisms, water, soil, and drift).

What, if any, water testing have you done at spray sites, along impacted ditches, in surface water, in groundwater? Please implement water testing for pesticide impacts ASAP.

Please publicly post every pesticide application going back at least five years and do not destroy the historical data, for use in future environmental toxicity studies.

Please consider and identify root causes of noxious weeds on public lands and address root causes of land degradation through soil and ecological health efforts.

Please explain how the use of pesticides fits in with their soil health initiatives and whether pesticide applications could ever interfere with soil health efforts being conducted on Open Space lands.

Comment #64

Caitlin Kenney

Boulder

Mar 15, 2024

Thank you for eliminating Dicamba, 2,4-D, and 3 other herbicides from their arsenal. Please know that I am still sincerely concerned about the potential of Glyphosate, Indaziflam, and all the other pesticides

being used on public land. I am very opposed to the use of all aforementioned pesticides and herbicides and request transparency in the prior use that has occurred.

Thank you for removing aerial spraying from planes from their revised draft plan. For the same reasons, aerial spraying from drones should not be allowed either.

Please implement a moratorium on all pesticide use until BCPOS establishes a more science-based, inclusive public process that fully incorporates perspectives from ecologists and other scientists, local nonprofits, community leaders, and staff.

Please implement a moratorium on pesticide use for List B and List C noxious weeds, as well as weeds that are not on Lists A, B, or C.

Please invest in regenerative practices for land management.

Please implement a more stringent process for approving individual pesticides for use on public lands.

Please monitor prior and any future spray sites and downstream water bodies for non-target impacts (insects, aquatic organisms, water, soil, and drift).

What, if any, water testing have you done at spray sites, along impacted ditches, in surface water, in groundwater? Please implement water testing for pesticide impacts ASAP.

Please publicly post every pesticide application going back at least five years and do not destroy the historical data, for use in future environmental toxicity studies.

Please consider and identify root causes of noxious weeds on public lands and address root causes of land degradation through soil and ecological health efforts.

Please explain how the use of pesticides fits in with their soil health initiatives and whether pesticide applications could ever interfere with soil health efforts being conducted on Open Space lands.

Thank you for acknowledging, digesting and responding to these comments with sincere interest and integrity.

Comment #63

Megan SMith

Longmont, CO

Mar 15, 2024

Thank you for eliminating Dicamba, 2,4-D, and 3 other herbicides from the IWMP, but I am particularly concerned about the continued plan to use Glyphoste, Indaziflam, and other chemical treatments on public land. State law does not mandate the use of pesticides for ANY weed and it is widely discussed in

scientific literature that herbicide use negatively impacts pollinator and other insect species. Colorado already has a difficult environment for pollinators; we do not want or need invasive plant control to involve further decimating our insect populations.

Second, please permanently eliminate aerial spraying from the IWMP. Boulder County residents choose to live here for access to the outdoors and emphasis on health and wellness. Aerial spraying eliminates the ability of our neighbors to avoid toxic chemicals that are hazardous to our health and our children. It removes the choice from childbearing women to avoid toxins that are harmful to growing fetuses. And it harms all of us by further contaminating our already smog-ridden atmosphere here in the front range. Interaction between aerial herbicides and other atmospheric contaminants are a non-zero risk and issue.

Thank you for your consideration and for your efforts to continue seeking nontoxic long term weed control strategies.

Comment #62

Anthony M

Boulder County

Mar 13, 2024

In the context of Natural Resource Management, land stewards are tasked with the crucial responsibility of preserving native biodiversity and protecting natural habitats. Among the tools available, the strategic use of herbicides is a valuable and effective method for maintaining native biodiversity and limiting the spread of invasive species across open space lands. However, it is imperative that this tool be applied with caution and adherence to safety protocols. Boulder County Open Space (BCOS) staff have shown they are equipped, educated, and responsible when using this tool.

The incorporation of herbicide use within the broader framework of Integrated Pest Management (IPM) plans plays a pivotal role in the removal and eradication of invasive species. In turn this tool can assist in fostering the growth and regeneration of native flora. Without the utilization of herbicides, the effective control of invasive species on a landscape scale becomes an arduous if not insurmountable task. The unchecked proliferation of invasive species poses a grave threat to local flora, disrupts delicate ecosystems, and imperils the numerous native wildlife species reliant upon open space lands for critical activities such as pollination, foraging, and reproduction.

Undoubtedly, research underscores the potential adverse impacts of herbicide misuse on native plants and local ecosystems. Nevertheless, empirical evidence also underscores the utility of herbicides in maintaining ecosystem health and enabling natural plant communities to adapt resiliently to varied threats, including the looming presence of climate change. In practical terms, relying solely on mechanical, biological, and cultural methods for weed control across over 50,000 acres of land proves logistically untenable. The deployment of herbicides emerges as a practical necessity, removing the need for an overwhelming workforce solely dedicated to mechanical weed control, alongside substantial financial investments.

A passive approach to invasive species management would continue the proliferation of noxious weeds throughout Boulder County, encroaching not only upon open space lands but also into the yards of

private landowners. While it is true that native species will persist in the absence of herbicide use, this would come at a significant cost, with native habitats disappearing, native species populations declining, and natural ecosystems converting into ruderal or disturbed states. The implications extend beyond mere ecological disruption, reverberating across entire ecosystems and imperiling valuable pollinators, ungulates, and other herbivores reliant upon the integrity of native habitats for sustenance and survival.

Comment #61

Don Murray

Longmont

Mar 12, 2024

I urge Boulder County to stop using pesticides on our Open Space properties. I'm using pesticides here to include herbicides because Boulder County considers invasive weeds as pests. There is no state requirement to get rid of non-Class A weeds. The focus on cheatgrass which is a Class C weed is absurd. There is no reason that it needs to be eliminated except for aesthetics. In the Marshall Fire, the grassland either was denuded by cattle and prairie dogs along Marshall Road, so you can't blame cheatgrass for that fire.

Please don't use Glyphosate at all on county land. After years of persistence use, the science is finally showing that this is a toxic chemical and Bayer/Monsanto is paying the price for harming humans and the environment. Stop poisoning the citizens which pay your salaries.

Do not use helicopters or drones for spraying pesticides. As a meteorologist, the chance of having the perfect forecast for a spray day is not obtainable and the risk of drift is too great.

While the use of no pesticides is the goal, it doesn't seem like Boulder County has the will to make that happen. If they can't (but they should), then public reporting of what/where and when the pesticides were applied is necessary. The current public site is vague, using terms like "general weeds" for what they are trying to manage. The current draft plan has a section on what needs to be reported to the state and this should be made public.

In addition to reporting what is used, it is imperative that whenever pesticides are sprayed that Boulder County needs to monitor the movement of those pesticides with soil and water testing and report that to the public also. There is nothing in the plan that addresses monitoring, which is a glaring omission. And it needs to use a non-partisan testing company. Boulder City and other neighboring cities have respectable companies that they use for monitoring. The chemicals used are leaching into our water supplies and are highly toxic to aquatic life per their labels.

Use of Rejuvra should be eliminated. The short term gain cited by Boulder County does not account for the long-term effects which have not been studied since it is a relatively new herbicide. Just like DDT and Glyphosate which have later been shown to have negative health effects, the same may be true for Rejuvra. A recently published study cites the link between Parkinson's Disease and herbicide/pesticide use on agricultural lands in the Great Plains and Rocky Mountain regions.

Focus on non-chemical, mechanical methods. Use the Boulder County Youth Corp as well as groups like Wildlands Restoration Volunteers for manual removal of invasive plants.

The recently released Pollinator Study in Colorado links the decline in pollinators partially to pesticide use. Let's make Boulder County a flagship for non-chemical management of our public lands. Shoot for 100% non-chemical management by 2026.

Comment #60

James Lissy

Longmont

Mar 10, 2024

I do appreciate the recent updates to the proposed weed management plan, however there is a lot of room for improvement. There are a few things that are important to point out. Open Space staff has been trained extensively for chemical applications – their bios do not point to any type of regenerative training. If the majority of the community were asking for chemical use then I would have absolute, 100% faith in them for applying those chemicals based on their training. However, the majority of the community is asking for chemicals to not be used at all. That is very clear in the survey results. If open space feels that is not a majority opinion amongst the community then perhaps they should have advertised the survey to all residents of the county – which they could easily do such as asking the cities to include a blurb about it in their newsletters they already send out. Instead, open space took a stance of only having the survey open for a short period of time and not actively telling anyone about it, hoping nobody would fill it out so then they could do whatever they want. People still managed to find out about it and over 1,000 people filled out the survey and the results of that survey were clear. If you want more people to fill out surveys in the future then pro-actively tell people and hold actual town hall events about the issues that allow actual conversations to be had.

Open Space seems to only want to hear from other agencies / counties that only agrees with how the staff of open space want to operate. The meetings have been heavily skewed towards like-minded thinking and with the exception of Goat Bros. there's been very little consideration of working with nature instead of focusing so much on how can open space kill what it does not want. If you only surround yourself with like minded thinking then there's no opportunity for growth. All stances and varieties of opinion should be invited to speak – not just the ones that agree with you.

Humans have lived in North America for over 10,000 years and for some reason these weeds have only been a problem for the last 50 to 100 years or so and the chemicals used have only been around for about the same amount of time. I think it would behoove open space to think about why the weeds were not a problem in North America for the vast majority of its existence and how can we get the land back to that state. In other words, how can we work with nature instead of against it.

It's very disconcerting that the local indigenous communities were not invited to speak at any of the meetings to be given the opportunity to voice their input. In several meetings that I've seen the county

has mentioned relationships with local indigenous communities and how it allows them to use Rabbit Mountain, etc. While that is great, it's important to point out that the land was stolen from them and they have lived on this land for thousands of years. Indigenous communities have vast amounts of generational knowledge regarding the land. This type of knowledge is a much more useful qualification than any sort of formal education or certification can get you. Generation knowledge is knowledge that is passed down over thousands of years and a 4 year degree is... a 4 year degree. Thousands of years of knowledge are much more credible than any degree. I feel very strongly that a meeting should be added solely for the purpose of giving the local indigenous communities an opportunity to provide their input and share a small snippet of their knowledge regarding this issue (if they want to).

Here are my thoughts on the most recent updated plan:

-More aggressive goal – the stated goal of 50% reduction by 2030 seems like a very low bar. Shoot for a much higher goal. How about 100% reduction by 2026. "It is better to fail aiming high than to succeed aiming low" – Bill Nicholson

-Eliminate all aerial spraying – survey results were very clear that the vast majority of the community do not want any aerial spraying. If drones are left in then the types / classes of drones need to be specified as well as a limit listed on drone swarms. A military grade predator drone is very different from a 1 lb hobby drone. Public needs to be notified as well.

-Eliminate glyphosate completely – no exceptions – quite a lot of independent scientific studies show that glyphosate does have drastic negative affects on both soil and water. The claim by open space that "Glyphosate is the only product that has no soil residual activity" does not have a scientific source cited and as far as I can tell, that is false claim that is not backed up by any sort of independent scientific research.

-Plan should specifically say that chemical use is only an absolute last resort, complete with a very clear decision-making tree that the public can follow along with.

-Goats, cows, bison – yes to all. Just as you have different chemicals for different uses there are different animals for different uses. Bison are what used to roam the land freely – bring the bison back to improve the health of the soil. Plus these would be more tools in your toolbox – I thought open space wanted as many tools as possible?

-Prescribed burns should be added – that is another tool in your toolbox – I thought open space wanted as many tools as possible?

-Updates do not mention soil health – weeds are indicative of a soil health issue – a proper integrated weed management plan should focus on improving the soil health first and foremost.

-Train staff in regenerative agriculture and partner with local indigenous communities and members of the community. Lay this out in the plan. A different way of looking at this is the open space staff are currently very good train conductors but the majority of the community is tired of taking the train, they want airplanes instead. But the staff doesn't know how to fly airplanes, they only know trains. The staff is defaulting their suggestions to what they know how to do best – trains. Which is why they're telling

everyone – you don't want airplanes, you want trains, that's what we know how to do – there is no other way. The public knows there's a different way though because it's all around us. If the train conductors get trained in how to fly airplanes then that fits what the community wants and also greatly expands the knowledge of the open space staff.

- A very specific decision tree needs to be listed so the public can follow along with decision making.
 - There needs to be a public and clear log of chemical application complete with reasons why chemicals were applied and the targeted species.
 - All information that open space uses internally should be available and open to the public. Transparency is key.
 - The public needs a way to file complaints if / when open space does not follow their own procedure documents.
 - The public should have a way of submitting new scientific research that comes out about existing chemicals that the county uses.
 - There is nothing listed about open space marking with flags when chemicals have been applied. At a minimum flags should be placed at the application site(s) complete with the chemical name and application date. A notice should also be placed at trailheads.
 - Monitor soil and waterways before and after chemical application. The plan makes no mention of monitoring of the soil and waterways which is of the utmost importance when chemicals are used. Refence my 20 page paper that previously submitted that cites 46 scientific sources about chemical use.
 - Staff conflicts of interest with chemical companies have not been addressed and is very concerning.
-

Comment #59

Robert Brkenridge

Lyons

Mar 09, 2024

These are comments on the "Proposed Changes" and "FAQ" documents provided to the public by BCPOS regarding the Draft Plan.

[Download Attachment](#)

Comment #58

Robert Brakenridge

Lyons
Mar 09, 2024

Attached is a comment earlier provided for her information to one county commissioner. Some are, I think, addressed or partly addressed in the "proposed changes" document prepared by BCPOS. Others are not. I will send separately some questions and concerns remaining about the proposed changes document and the FAQ also provided to the public. Overall, I think it is possible that the county is on the verge of producing a much better Weed Management Plan and especially if it follows through on the changes proposed with actual management practice, and also addresses remaining concerns. There will need to be an accounting system for tracking volume of herbicides/pesticides purchased by the county each year and reduction thereof. I hope finalization does realize the evident promise of real and positive changes for the better. In this case, the revised Plan could become a model, region-wide, for Front Range open space land management as regards herbicides and invasive weeds. Please make Boulder County a leader in efforts to greatly reduce synthetic chemical usage. Thank you for the responsiveness to public input!

[Download Attachment](#)

Comment #57

MINDI MCDONALD

Longmont
Mar 07, 2024

YES to pesticide reductions
NO to aerial spraying.
NO to glyphosate.
NO to Rejuvra, because it's 80% unknown

Comment #56

Maria Gomez

Boulder
Mar 07, 2024

-YES to pesticide reduction
-NO to aerial spraying
-NO to glyphosate and rejuvra
-Demand an increase in monitoring and transparency

Comment #55

Wendy Scipione

Louisville

Mar 06, 2024

YES to reducing herbicides by 100 percent by 2028 (instead of 50% by 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 20% relative to the 2023 base level of herbicide use.

YES to full transparency of location, time, and specific herbicides and their quantities used, as well as updates on progress toward herbicide use reduction targets.

NO to any aerial spraying: no helicopters, no drones. The survey results show that over 80% of over 1000 respondents demand no aerial spraying. Despite this, POS staff continue to push for aerial spraying.

NO Glyphosate and NO Indaziflam. The survey results show that over 80% of over 1000 respondents demand no use of herbicides. Despite this, POS staff and POSAC recommend the continued use of herbicides in the draft IWMP. However, there has been discussion of excluding some of the most negatively impactful herbicides. More than three thousand residents petitioned against the use of both Indaziflam and Glyphosate on natural lands via the petition "Urgent: Signatures Needed to Stop the Spraying of Toxic Chemicals on Boulder County Open Space!". Indaziflam is a neurotoxic, an hormonal disruptor, and is toxic to fish, aquatic invertebrates, and plants. The use of Indaziflam or Glyphosate to manage cheatgrass is not consistent with Colorado State recommendations. The State correctly categorizes cheatgrass as a List C species for which the goal "will not be to stop the continued spread of these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species".

NO conventional grazing on rangeland. STOP continued degradation of Boulder County Parks and Open Space (BCPOS) rangeland by requiring ecologically sound rotational grazing.

YES to a funded pilot Collaborative Community Project, run by the community without interference from BCPOS staff, in order to demonstrate ecosystem restoration on a plot, dedicated to this purpose, that has not been recently treated with herbicides.

Comment #54

Kasey Schelling

Boulder

Mar 06, 2024

We need to significantly reduce pesticide use in Boulder County.

Aerial spraying should be made ILLEGAL.

Glyphosates are water soluble!! We need to ban the use of these in Boulder County

YOU NEED TO MONITOR AND INCREASE TRANSPARENCY OF PESTICIDE AND HERBICIDE USE.

NO to Rejuvra- It is 80% unknown and hasn't been long term tested, we are not Guinea pigs!

Comment #53

Rose Pierro

Longmont

Mar 06, 2024

Discontinue the use of glyphosate completely. It is a dangerous chemical and harms our ecosystem as well as our health. Do your own research not what's given to you by the pesticide companies and other interests that depend on them for their profits. Read Dr Stephany Seneff's book called Toxic Legacy.

Comment #52

Beth Davis

Nederland

Mar 05, 2024

Hello!

Please consider the new reports on the state of pollinators in Colorado. They are struggling. Please stop the use of Glyphosate and Indaziflam which have far reaching damaging effects on not just pollinators. Thank you, Beth Davis

Comment #51

Anne Jani

LONGMONT

Mar 05, 2024

YES to pesticide reduction.

NO to aerial spraying.

NO to glyphosate.

YOU NEED TO MONITOR AND INCREASE TRANSPARENCY

NO to Rejuvra

Comment #50

Claris Ritter

Boulder

Mar 05, 2024

Boulder County needs to reduce and eventually eliminate all herbicide spraying. The use of aerial spraying should be NEVER be an option. And spraying any kind of toxic herbicides or chemicals into the neighborhoods is abhorrent. Any spraying in the county needs to have full transparency for all with the details available for all citizens: what is being sprayed, when it's being sprayed and where it is being sprayed. And I firmly support the banning of Glyphosate and Indaziflam use. In this day and age when we know so much about the negative health and environmental risks of using both these chemicals why is this county still endorsing the use and spraying them in our environment and even in our neighborhoods?!!

And I fully support funding the pilot Collaborative Community Project that will help the county assess best practices to use of county rangeland.

Comment #49

Lia E

Boulder

Mar 04, 2024

YES to reducing herbicides by 50 percent by 2028 (instead of 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 10% relative to the 2023 base level of herbicide use. So down to 90% of the 2023 base in 2024, then down to 80% of the 2023 base in 2025, and so on. And no reason to stop in 2028 - keep going until reaching 0% by 2033.

YES to full transparency of location, time, and specific herbicides and their quantities used, as well as updates on progress toward herbicide use reduction targets.

NO to any aerial spraying: no helicopters, no drones. The survey results show that over 80% of over 1000 respondents demand no aerial spraying. Despite this, POS staff continue to push for aerial spraying.

NO Glyphosate and NO Indaziflam. The survey results show that over 80% of over 1000 respondents demand no use of herbicides. Despite this, POS staff and POSAC recommend the continued use of herbicides in the draft IWMP. However, there has been discussion of excluding some of the most negatively impactful herbicides. More than three thousand residents petitioned against the use of both Indaziflam and Glyphosate on natural lands via the petition "Urgent: Signatures Needed to Stop the Spraying of Toxic Chemicals on Boulder County Open Space!". Indaziflam is a neurotoxic, an hormonal disruptor, and is toxic to fish, aquatic invertebrates, and plants. The use of Indaziflam or Glyphosate to manage cheatgrass is not consistent with Colorado State recommendations. The State correctly categorizes cheatgrass as a List C species for which the goal "will not be to stop the continued spread of these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species".

NO conventional grazing on rangeland. STOP continued degradation of Boulder County Parks and Open Space (BCPOS) rangeland by requiring ecologically sound rotational grazing.

YES to a funded pilot Collaborative Community Project, run by the community without interference from

BCPOS staff, in order to demonstrate ecosystem restoration on a plot, dedicated to this purpose, that has not been recently treated with herbicides.

Comment #48

anita li

Boulder

Mar 03, 2024

Reduce pesticide usage more quickly. 100% reduction by 2026.

Yes, we do want full transparency re: location, time of application, specific herbicides used.

Yes, we do want advance notice of spraying every time.

No aerial spraying, No helicopters. No drones.

No glyphosate. No indaziflam. None. Zero. Stop the poisoning.

Yes, we want a funded pilot Collaborative Community, run by the community, independent of BCPOS staff, to demonstrate ecosystem restoration.

In closing: for years I have listened to Boulder County Public Officials publicly pat themselves on the back, promoting Boulder County as a place where We Care About the Natural Environment. And then they consistently do the opposite. The public officials consistently ignore the people, the science, and the natural environment. I am weary of BoCo Public Official Hypocrisy.

Boulder County is the epicenter of fake environmentalism and fake democracy. You can change that.

Now is the time: demonstrate that you do care about the natural world. Demonstrate that democracy actually means something to you. Show us that you respect life, respect the people, respect the children, respect the animals, respect the plants. Please, at long last, do the right thing.

Comment #47

Angie Francis

Lyons

Mar 03, 2024

I am relieved Boulder County is updating their weed management plan and listening to public concerns. I understand the layers of these complex ecological challenges having worked in conservation and ecological restoration for 20 yrs and have a unique personal perspective that I will continue to share.

My father worked for the City of Boulder for 30 years as the first paid ranger for Mountain Parks. He dedicated his life to conserving and protecting Boulder's public lands. Over the decades he used a variety of chemicals he was told were "safe" by manufacturers and were "best practice" in the conservation profession. Fast forward to a few years before retirement and he was hit with Parkinson's disease from which he suffered a horrible reality for 15 plus years. We were told by doctors after testing

that his exposure to these chemicals was likely the cause of his neurological disease. He was exposed to TOO many chemicals for him to join any lawsuits that could help support him with all of his disabilities, two brain surgeries, and need for constant care years up until he passed away last summer. Our families experience was devastating. My wish is for current leaders and conservation professionals in Boulder County to learn from the past and to make more informed management decisions.

NO aerial spraying. My family (children and pets) were exposed to aerial spraying behind our home.

NO glyosphate.

NO rejuvra.

There needs to be clear transparency. The County sprayed behind our home for hours with NO communication to our valley.

In health,
Angie Francis

Comment #46

- **Coco**

Boulder

Mar 03, 2024

YES to reducing herbicides by 50 percent by 2028 (instead of 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 10% relative to the 2023 base level of herbicide use. So down to 90% of the 2023 base in 2024, then down to 80% of the 2023 base in 2025, and so on. And no reason to stop in 2028 - keep going until reaching 0% by 2033.

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NO conventional grazing on rangeland. STOP continued degradation of Boulder County Parks and Open Space (BCPOS) rangeland by requiring ecologically sound rotational grazing.

YES to a funded pilot Collaborative Community Project, run by the community without interference from BCPOS staff, in order to demonstrate ecosystem restoration on a plot, dedicated to this purpose, that has not been recently treated with herbicides.

Comment #45

Elizabeth Watts

Boynton Beach

Mar 02, 2024

YES to reducing herbicides by 50 percent by 2028 (instead of 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 10% relative to the 2023 base level of herbicide use. So down to 90% of the 2023 base in 2024, then down to 80% of the 2023 base in 2025, and so on. And no reason to stop in 2028 - keep going until reaching 0% by 2033.

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Comment #44

Jody Ash

Louisville

Mar 01, 2024

I am the owner of Wild Heritage Gardens, a natural landscape company here in Boulder County who are experts in chemical-free landscape solutions and serve chemical concerned clients solely in Boulder County. We acknowledge that education plays a vital role in understanding the gravity of toxins in the landscape. I hope you are willing to look at some facts.

Boulder County residents are very concerned about toxins. Our clients choose us because of our stance and expertise pertaining to natural land solutions. We are a 'never a chemical' company, and they trust us with their landscapes for their health and safety, as well as that of the pollinators, our children, the water, animals and all life.

Chemical toxins such as Indaziflam have been shown to be endocrine and immune disruptors. They are not selective, and they eventually alter or sicken all life. Chemical herbicides are also known to kill the microbiome, which is responsible for a vast amount of Carbon Sequestration.

Overhead aerial spray moves with the wind currents, meaning residents will be forced to deal with the results of your application, even on their own properties and even on a calm day. They are rightly concerned! They must have the ability to choose what is sprayed near them and what drifts onto their land.

The decision to aerial spray a toxin is a very irresponsible and bad policy, as it puts the public health at risk by poisoning them, their land, animal life and their water. The runoff of rainwater will go into the St.Vrain - killing fish, aquatic invertebrates and aquatic and semi aquatic plants. The Indaziflam label states it is toxic to these aquatic inhabitants and plants and should not be applied within 25 feet of any water source, nor where runoff or erosion occurs *Colorado state law [2016 Colorado Revised Statutes, Title 35, Article 10, 3 a] restricts use of any substance if the toxin could affect groundwater or local surface water supplies.

The product label also states that it 'works' on all annual grasses and other 'weeds' such as Clovers, Mustards and Mallows, amongst a host of other native species. This will kill all annual plants, non-selectively. Not only that, but it is also creating an eventual need for more toxins, as Mother Nature is very good at replacing plants that are eradicated. The bare ground will be a host for many noxious 'weeds' that will replace it, and most likely one will be cheatgrass, the very thing you are trying to eradicate.

There are many natural solutions that will keep residents and life safe. To name just a small sampling: goats are extremely effective, controlled burning, volunteer recruitment as is done with Myrtle spurge, and overseeding of native species that will establish and outcompete after the other solutions are employed. Working alongside environmentally sound landscape experts such as Wild Heritage is also an

option.

The EPA fact sheet on Indaziflam dated July 26th, 2010, section IV makes it very clear that this product is a strong neurotoxin and affects mammals. The studies included rabbits, rats and dogs. It expressly documents degenerative neuropathy lesions of the brain, spinal cord, sciatic nerve, and pituitary. It documents developmental neurotoxicity. Decreased motor activity. Degenerative renal effects. Liver hypertrophy. Stomach erosions. Clinical toxicity. It takes many, many years to understand the impact of toxins- environmentally, and the health effects in humans. Can we not learn from history?! Look at the Roundup lawsuits or look at our local company, Abbondanza, and how their business was nearly destroyed by a nearby farmer aerial spraying to prepare the sunflowers for harvest. It is criminal.

If you allow this, you will be responsible for the death of the health of ecosystems and lives. If this is not stopped, you will be held accountable for the disaster you are about to create.

PLEASE, STOP spraying and applying toxins in Boulder County!

We have a right to healthy living and healthy water where we live

Comment #43

Lindsay Lidge

Boulder

Mar 01, 2024

YES to reducing herbicides by 50 percent by 2028 (instead of 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 10% relative to the 2023 base level of herbicide use. So down to 90% of the 2023 base in 2024, then down to 80% of the 2023 base in 2025, and so on. And no reason to stop in 2028 - keep going until reaching 0% by 2033.

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NO Glyphosate and NO Indaziflam.

Comment #42

Mark Glenn

Boulder

Feb 29, 2024

Dear Commissioners,,,

Please listen to your constituents when we testify that we do not want chemical herbicides to be used for weed management. Boulder County can do so much better and we need to. There are many natural ways to "control" weeds that are far superior for the soil, groundwater, plants, and animals that depend on our ecosystem.

Reduce herbicide applications on open space natural lands by 50% by 2028, not by 2030. This is 10% reduction each year for the next 5 years. PLEASE commit to this.

ELIMINATE the use of Glyphosate and Indaziflam - PLEASE- THIS IS CRUCIAL. The use of Indaziflam or Glyphosate to manage cheatgrass is not consistent with Colorado State recommendations. The State correctly categorizes cheatgrass as a List C species for which the goal "will not be to stop the continued spread of these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species.

No aerial spraying at all please- no drones. PLEASE. You must understand the amount of toxicity you are introducing to flora and fauna that will continue to negatively affect and forever alter our ecosystem. STOP!!

We have a strong Boulder County Solidarity network that is adamant about discontinuing the abuse of our shared ecosystem, in the name of "management". Over 80% of 1,000 respondents to our local survey are adamant supporters of a holistic approach to weed management.

We will continue to request and ultimately demand publicly, full transparency of location, time, and specific herbicides and their quantities used, as well as updates on progress toward herbicide use reduction targets. This is serious at a time when science has proven over and over that we are negatively affecting our ecosystems with our "control" protocols.

Looking forward to your leadership.

thank you.

Comment #41

karen dombrowski-sobel

boulder

Feb 29, 2024

PLEASE!! NO Glyphosate and NO Indaziflam. The survey results show that over 80% of over 1000 respondents demand no use of herbicides. Despite this, POS staff and POSAC recommend the continued use of herbicides in the draft IWMP. However, there has been discussion of excluding some of the most negatively impactful herbicides. More than three thousand residents petitioned against the use of both Indaziflam and Glyphosate on natural lands via the petition "Urgent: Signatures Needed to Stop the Spraying of Toxic Chemicals on Boulder County Open Space!". Indaziflam is a neurotoxic, an hormonal disruptor, and is toxic to fish, aquatic invertebrates, and plants. The use of Indaziflam or Glyphosate to manage cheatgrass is not consistent with Colorado State recommendations. The State correctly categorizes cheatgrass as a List C species for which the goal "will not be to stop the continued spread of

these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species".

Comment #40

erika Weich

Boulder

Feb 29, 2024

Yes to pesticide reduction

No to glyphosate, I mean do we really have to say that? Have they not already been sued and lost! we know it causes cancer.

No to Rejuvra- it has not been tested long term.

You need to monitor and increase transparency. Thank you!

Comment #39

Karin Nance

BOULDER

Feb 29, 2024

Hello POSAC and THANK YOU SO MUCH for being attentive to what those who take the time to do extensive research and speak out have to say,

Please Please Please understand how important it is to stop the pesticides. Especially NO MORE aerial spraying and glyphosate. For sure add rejuvra as another chemical to ban as we don't even know its effects, and we cannot take a chance of it being 1/20th as damaging as the others. Enough evidence was repeated at the last public meeting and sent to your emails to remember how devastating this stuff is for humans, animals, and the environment. We have to stop this toxicity that takes generations of clean up and repair. AND, its very clear that much more work needs to be done to be transparent about conflicts of interest. How can these mistakes be repaired so they don't happen again?

You know that stopping this madness is the right choice. Please make the noble choice for the sake of all, as that is your job. Toxic chemicals are NOT the answer. And they never have been.

Wouldn't it be absolutely awesome if Boulder County could live up to being the healthy place to live/visit like it once had the reputation long ago?!! and you all could take credit for making that happen?!!

thank you!!!!

Comment #38

Daniela Papi

Boulder, CO

Feb 29, 2024

While I am glad to see that helicopter spraying of chemicals has been removed, the addition of drone spraying is equally dangerous. We want NO to any aerial spraying: no helicopters, no drones. A recent survey show that over 80% of over 1000 respondents demand no aerial spraying.

We also want you to reconsider using Glyphosate and Indaziflam - both of which are known to be harmful. Keeping these on your list of chemicals that you will use, especially near water, is irresponsible and should be removed. We all know that many countries have banned the use of glyphosate as a carcinogenic chemical and therefor it should not be considered for use, especially in public spaces, and especially near water that will contaminate other farmers crops. Many others have shared the facts around this so no need to reiterate what you already know: these chemicals cause harm to health and planet.

As a parent, I can choose my children's school and their food, and help them build healthy habits - but I can't choose their air and water. Please reconsider spraying known carcinogens in our air and water. I speak on behalf of global parents and ask you to reconsider this dangerous practice.

Comment #37

Kezia Tenenbaum

Boulder

Feb 29, 2024

I would like to comment on the weed management plans. I am very much against any aerial spraying by either helicopters or drones. It goes without saying that I am also against the use of Glyphosate or Indaziflam, and I want to see a continued REDUCTION of herbicide use on our public lands! 50% by 2028!

Let's get on board with rotational grazing and regenerative practices rather than the continued use of toxic chemicals.

I believe there is plenty of possibility for new and natural solutions, please allow space and time for them. All of our health depends on it: people's, and the planet's. We are all connected.....

Comment #36

Hannah Davis

Boulder

Feb 29, 2024

As a climate professional, parent of a two-year-old, and home gardener I urge you to consider the following:

YES to reducing herbicides by 50 percent by 2028 (instead of 2030 as in the current IWMP draft), with a hard yearly additive incremental reduction target of 10% relative to the 2023 base level of herbicide use. So down to 90% of the 2023 base in 2024, then down to 80% of the 2023 base in 2025, and so on. And no reason to stop in 2028 - keep going until reaching 0% by 2033.

YES to full transparency of location, time, and specific herbicides and their quantities used, as well as updates on progress toward herbicide use reduction targets.

NO to any aerial spraying: no helicopters, no drones. The survey results show that over 80% of over 1000 respondents demand no aerial spraying. Despite this, POS staff continue to push for aerial spraying.

NO Glyphosate and NO Indaziflam. The survey results show that over 80% of over 1000 respondents demand no use of herbicides. Despite this, POS staff and POSAC recommend the continued use of herbicides in the draft IWMP. However, there has been discussion of excluding some of the most negatively impactful herbicides. More than three thousand residents petitioned against the use of both Indaziflam and Glyphosate on natural lands via the petition "Urgent: Signatures Needed to Stop the Spraying of Toxic Chemicals on Boulder County Open Space!". Indaziflam is a neurotoxic, an hormonal disruptor, and is toxic to fish, aquatic invertebrates, and plants. The use of Indaziflam or Glyphosate to manage cheatgrass is not consistent with Colorado State recommendations. The State correctly categorizes cheatgrass as a List C species for which the goal "will not be to stop the continued spread of these species but to provide additional education, research, and biological control resources to jurisdictions that choose to require management of List C species".

NO conventional grazing on rangeland. STOP continued degradation of Boulder County Parks and Open Space (BCPOS) rangeland by requiring ecologically sound rotational grazing.

YES to a funded pilot Collaborative Community Project, run by the community without interference from BCPOS staff, in order to demonstrate ecosystem restoration on a plot, dedicated to this purpose, that has not been recently treated with herbicides.

Comment #35

Colette Lennon

Boulder

Feb 29, 2024

Dear Boulder County,

I am writing to urge you to stop the practice of spraying toxic weed killer on Open Space. We live next to East Gunbarrel Trail and use the trail daily with our dog. In addition, our home backs onto open space.

My husband has extreme chemical sensitivity that send him to bed for days after exposure. Also, we worry about our dog being exposed, even after the several days of avoiding the trail after spraying,

especially if no precipitation has fallen.

Thank you for listening.

Colette Lennon

Comment #34

Nina Amabile

Boulder

Feb 29, 2024

I am against spraying weeds with herbicides and/or pesticides.

Comment #33

Kelly Moninger

Lyons

Feb 29, 2024

Please stop the application and aerial spraying of toxic chemicals in Lyons. They are toxic. There is no "acceptable limit" of these products. They directly affect my well and therefore my well water, which I use in my house and in my garden. Please, please, stop

Comment #32

Travis Hinton

Boulder

Feb 29, 2024

Hey there.

I'm not going to copy and paste the comments from the MoveOn campaign.

What I will say is that there is more than sufficient evidence that widespread use of herbicides is an unsustainable and tenuous practice. There are alternatives that are worth exploring. Let's not continue poisoning ourselves and our environment as a way to avoid the inevitable.

Thanks!

Comment #31

Dina DelRusso

Boulder

Feb 29, 2024

It doesn't make sense that in Colorado, particularly in Boulder, a place where people come to live and visit for its natural beauty, that we would even consider using this poison. Are we going backwards like the rest of the country? Please use common sense here. We don't want to poison the environment and wildlife. Let's find a better solution.

Comment #30

Jessica Taylor

Boulder

Feb 29, 2024

No aerial spraying
No glyphosate
No Rejuvra
No herbicide use
Yes transparency
Yes rotational grazing
Yes health and wellness

Comment #29

Nicole Herbert

Boulder

Feb 29, 2024

Please don't spray poison on our air and on our plants. It is toxic for children, adults, animals, insects, and our ecosystem.

Comment #28

Judy Hetkowski

Boulder

Feb 29, 2024

More than 50% of all dog over the age of 10 now have cancer and the numbers are increasing for dogs under ten. They are in open space and in bodies of water that have open space runoff. Their noses are on the ground and they absorb through their pads. This, not to mention the insets, bees, birds, and other animals. We are poisoning them all. Please consider other methods of controlling weeds. Goats are such a good choice.

Comment #27

Meg Davidson

Longmont

Feb 29, 2024

On behalf of my community and three sons, I'm writing to implore you to reduce ALL pesticide application. ZERO aerial spraying. ZERO glyphosate. ABSOLUTE NO to Rejuvra. Let's restore our land to it's pristine, sacred state, so our ecosystems can thrive and flourish. Increase monitoring and transparency to your community NOW.

Thank you,
Meg Davidson
Longmont

Comment #26

Adam Klagsbrun

Lafayette

Feb 29, 2024

Hi, I am a citizen living in Boulder county in Lafayette and I would like to submit that I am fully against the US of any noxious or toxic weed killers in the management of Boulder open spaces. The revised plan needs to remove glyphosate, not reduce it. This is a known cancer, causing chemical, and nobody should be exposed to it in any park or open space. I am also fully opposed to any aerial spraying whatsoever. there is no reason we can't use goats, grazing animals, refugee labor or many other not toxic chemical methods of weed control. Beyond that, there is a limit to what humans can control in terms of invasive species in an area... Whatever chemicals you put down, the birds and animals will spread invasive species seeds anyway, and the use of chemicals is a stupid thing to do control is going to have a limited impact on invasive species given the lack of ability to control this that humans have. Poisoning the parks and soil repeatedly to partially remove weeds is an incredibly bad plan from a citizens perspective. No person, animal or dog should ever be exposed to any chemical that Boulder sprays in a park. People are allowed to do what they want on their private land, but everyone using a park expects to go there, without having to be poisoned by toxic chemicals, this is a pretty straightforward idea and should supersede

concern for invasive plants any day because we all know we can't control those invasive plants as they are spread by things out of our control constantly. Please remove all chemical treatments and poisoning from the management plan for 2024 and forever going forward. Thank you.

Comment #25

JESSICA TAYLOR

BOULDER

Feb 28, 2024

I was present at the public meeting last month. I do NOT want aerial spraying in my community. I do NOT want glyphosate sprayed in my community. I do NOT want Rejuvra sprayed in my community. At the hearing, it was highly evident the conflicts of interest that exist between the people who wrote this plan and their direct or associated financial interest. Boulder is better than this. Help our young and old live out healthy days in this beautiful place.

Comment #24

Judd Meyers

Longmont

Feb 26, 2024

Send to BOCC 2/22/24:

The science is clear on this compound. Please ban it's use in BOCO open space.
Thanks.

Judd Meyers

4858 Highland Drive #1,
Longmont Co. 80503

[Download Attachment](#)

Comment #23

Barb Colombo

Boulder

Feb 26, 2024

Good morning. I have a been a professional gardener in Boulder for over 20 years and I write to you today to express my concerns for harmful pesticide applications in open spaces in Boulder. These applications and poisons deeply impact our air and surrounding properties and open space areas for all

life that inhabits the areas. Since 1970, 3 billion birds have been lost in the world and the number continues to rise. Insects and bees have been in decline for years and this all has an impact on each and every one of us especially our food sources. Please, I implore you to discontinue these poisonous applications for a more balanced ecosystem. We only get this one life. Let's do the right thing and support the health of our beautiful surroundings and stop the spraying of dangerous pesticides ! Thank you ! From a Concerned gardener who is seeing the declines each and every year :(

Comment #22

Helen Joffe

Boulder

Feb 25, 2024

I support the change to reflect no use of noxious chemicals and no more spraying by helicopter. We have the technology to be able to use alternative methods that will be better for the environment and the people's health. Boulder should and could be an example to other counties of how to ensure our future generations will have healthy air and water for years to come.

Comment #21

Marni Shymkus

Boulder

Feb 25, 2024

- YES to pesticide reduction- ideally no pesticides
- absolutely NO to aerial spraying.
- NO to glyphosate.
- YOU NEED TO MONITOR AND INCREASE TRANSPARENCY.
- a big NO to Rejuvra, because it's 80% unknown and hasn't been long term tested, we are not Guinea pigs!

These decisions have a huge influence impact on health of our citizens, our plants, food , animals... everything we value. There must be data proving longterm safety for all the stakeholders before spraying synthetic chemicals on living things. Weeds won't kill us (and many of the "weeds" identified are actually herbs that benefit health) but the pesticides will.

Comment #20

Denise Taylor

Boulder

Feb 25, 2024

Hello POSAC

I would like to comment on the plan and urge you to reduce pesticide, glyphosate and the new untested REjuvra. People and animals should not be exposed to these chemicals that harm public health. This has been proven by law suits so it only makes sense to reduce or stop these weed killers for long term health of the planet and its population. We also do not want helicopters spraying weedkillers. Instead we need to use regenerative and alternative methods that are available to us even if this will take more time and efforts. In the long term those methods are healthy for the natural environment and our community. It will preserve this precious part of the US.

Comment #19

Athena Toriello DuBois

Lyons

Feb 25, 2024

YES to pestiside reduction.

NO to aerial spraying

BIG NO to glyphosate

And YOU NEED TO MONITOR & INCREASE TRANSPARENCY

And a BIG NO to REJUVRA because it is 80% unknown and not long term tested. My family, friends, general public & animals are not guinea pigs!

THANK YOU for caring and making the right decisions for Mother Earth and all of us.

Comment #18

Tess McDonald

Lyons

Feb 24, 2024

Dear POSAC,

Thank you for your time and vital energy towards a sound resolution towards healthier ecosystems. Thank you for hearing both sides as it pertains to pesticide usage. Both sides want to help the insects, birds and native plants we simply have different understandings around how to get there.

I'll touch on the following: 1) the "asks", 2) clarification about the PANEL scheduled for March 12 AND 3) responses to the comments made by presenters last Thursday night.

#1 Asks:

- A) Most important we want to know that pesticides are being tracked systematically so plans can be drawn effectively so they can be decreased more and more each year, which would be the case if pesticides are effective. This is not usually the case but understand that is what BCPOS's claims.
- B) Absolutely NO glyphosate or glyphosate products. Due to the overwhelming evidence showing its water solubility, longer than reported half life and proven harm there is no way citizens can allow glyphosate. The lawsuits and countries banning it are too numerous. Merchants of Doubt is a must read or see the film. <https://usrtk.org/monsanto/attacks-on-scientists-journalists/>
- C) Aerial spray hasn't been used for almost 20 years. Now that BCPOS has ties to Rejuvra they want to bring it back and citizens cannot allow themselves to be Guinea pigs. Aerial spray of any kind is too dangerous, and not targeted enough to ensure there is no harm to wildlife, open space visitors or native plants that self seed.
- D) Therefore Rejuvra should be studied long term before testing it on our land. No Rejuvra, with its 80% unknown ingredients.
- E) Transparency was lacking on AppleValley at the Hall Ranch poisoning on Nov. 1st, 2022. I was told by a cancer doctor who lives near The Reservoir that he was called and asked if aerial spraying was ok. He specializes in a cancer caused by pesticides so he said absolutely not. My neighbors bordering Hall Ranch weren't even notified! This is a disparity. I deserve to give my consent. If I go to RMNP I will know that I'm entering at my own risk, people shouldn't feel that way at home.

#2 In response to the panelist lineup, I'm requesting Richard Lear be on the March 12 panel. As well as, Dr. Robert Breckenridge and more. Honestly, the citizens should have the same number of panelists as BCPOS, otherwise what's the point, you're already at the retreat.

#3 In response to the presentations Thursday night, we are moving to regenerative, permaculture methods that were common place 80 years ago. The alternatives are: goats, outcompeting List A&B species, mulching, chipping then adding mycelium, and I've written a while 80 page plan modeled after the current Plan.

So we're creating habitat for Prebbles by poisoning them, is there any Prebble mouse data to prove Justin's claim? Because bird species are down, insects are down, deer/Mtn. Goats are down, etc. 100% of US streams have at least one pesticide present. Much is due to glyphosates water solubility. If glyphosate is "essential" how can Joe live without it, is their goal something he can do, honestly? I have to ask. If they can though maybe the prebble mouse really would thrive. And I thought last time Joe said, "we would never spray in a riparian area". Secondly, he did not contact all my neighbors on Applevalley, the baby with the rash wasn't contacted. The kids going to school were given no explanation, but saw their upset parents.

I tested glyphosate in the soil in Lyons parks and it was still present almost 3 years later and spraying it in irrigation ditches totally threatens organic farmers certifications.

Again the problem with Rejuvra is that it's 80% unknown ingredients and we don't know the long term harm, so saying "it works great" is a bit premature wouldn't you say? Why is Boulder County a testing ground for this product? Where's the research not for one year, but 3, 5, 10, 30 years?

Yes, why not more volunteer programs or Pilot Programs like the one I'm doing with City of Longmont?

The only compromise is zero glyphosate and zero aerial thank you.

But I think we will all agree Mother Nature will always win...eventually.

Comment #17

Michael Moss

Boulder

Feb 22, 2024

My name is Michael Moss with Kilt Farm and I live in unincorporated Boulder County. I organically grow vegetables and hay on 48 acres of Boulder County Open space. I have been farming in the County since 2013.

First, i'd like to thank all of the members of POSAC for taking so much time to hear so many voices around this issue.

As a certified organic farmer, I have made a decision to grow food with out the use of synthetic fertilizers, pesticides or herbicides. This is the right decision for my farm and farmland. It may seem like a contradiction to some, but I fully believe that the conservative and appropriate use of herbicides is vital on our Open Space lands. I ask you to support the staff recommendation for the weed management plan.

Our County owned lands are struggling with invasive weeds that threaten the long term health of these public lands and the surrounding private lands. Weeds, like prairie dogs, don't stop at property boundaries. If the public lands and roadsides around my farm are not managed appropriately, due to the County not having access to all of the necessary tools, such as effective herbicides, my crop lands and food production can be decimated by weeds that can easily migrate to my fields.

Over the last 11 year of farming on open space, I have worked extensively with the Parks and Open Space staff. I value and trust the expertise of open space staff when it comes to weed control and when to use herbicides. Please honor their expertise and accept their recommendations.

Lastly, It is critical that ag land regulation stay under Cropland Policy where it belongs, and not in any way drawn into this conversation about the Integrated Weed Management Plan. Agricultural land has unique needs and considerations. The current structure provided by cropland policy acknowledges that and is working well for the County's farmers and the community.

As an Organic Farmer abutting CDOT roadways, County Roadways and conventional farmers, I have always felt respected and protected when herbicides are used by my neighbors. I do not feel that there is a need for additional restrictive regulations on the use of herbicides on agricultural lands or open space in Boulder County.

Thank you for your time and attention.

Michael Moss
Kilt Farm

Comment #16

Mark Guttridge

Longmont

Feb 22, 2024

I'm concerned with the lack of information in the draft plan about how the County is ensuring our waterways are protected from runoff after herbicide applications. The 3.6 Training and Safety section would be a great place to address how the County is preventing stormwater contamination of our creeks, rivers, lakes and groundwater.

In general, I feel staff doesn't fully understand the mechanisms of chemical transport that can occur during precipitation events. When asked about the potential for water contamination from herbicide runoff, I have repeatedly heard staff say, "we watch the weather, use small amounts when we spray, and the rainfast times are just a few hours". It's important to understand that rainfast is not talking about when the threat of stormwater runoff ends, instead rainfast is a term that shows how long it takes for the chemical in the herbicide to pass into the plant and begin killing it. There is never 100% transport of the herbicide into the plant, and some of the herbicide will remain on the plant leaf or on the ground around the plant, and that has the potential to runoff. Even small amounts of herbicide runoff can have negative impacts on aquatic life in our streams, rivers, and lakes.

Many of the herbicides used by Boulder County in 2023 have specific EPA warnings about toxicity to aquatic life. Some also have warnings about possibility of runoff events occurring weeks after application. Here are some examples of the labels:

Cimarron – "This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for weeks after application."

Dicamba- "Do not apply directly to water, or to areas where surface water is present. Dicamba is known to leach through soil into ground water under certain conditions."

Hardball- "This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants"

Method- "This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for several months after application."

Milestone – “Do not apply directly to water, or to areas where surface water is present. This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.”

Quinstar- “The use of this chemical where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Keep out of lakes, ponds and streams. Do not apply area where surface water is present.”

Sulfentrazone- “This pesticide is toxic to marine/estuarine invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to terrestrial and aquatic plants in neighboring areas.”

Telar- “This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for weeks after application.”

Vista- “This product is toxic to fish. Drift or runoff from treated areas may be hazardous to aquatic organisms and non-target plants”

Weedmaster- “This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants”

Looking at the 2023 herbicide spray records provided by Boulder County, and matching them with rainfall data from NOAA, it was determined that 8 times in 2023 the herbicides listed above were applied and then rainfall events totaling more than 1/4 inch occurred within 3 days. An additional 15 spray events met the same threshold within 7 days. Both Telar and Quinstar herbicides, which specifically warn against using in areas with shallow groundwater, were used around Walden Ponds, a location that has some of the shallowest groundwater in the County.

As a farmer who relies on clean water to grow produce for the community, I urge POSAC and staff to explain in the plan how the waterways of Boulder County will be protected from herbicide runoff.

I’m encouraged by recommendations to expand alternative treatment methods. I feel there are many benefits to alternative management strategies, beyond just the removal of the invasive weeds. I have attached a pdf that examines the holistic attributes of different weed management strategies. One strategy that ranks high is involving the community with invasive weed removal. We have heard through the public comment process that many youth leaders are interested in being part of a non-toxic solution to the invasive weed problem. I have experience leading volunteer groups on our farm removing invasive weeds and then planting native species or spreading red clover seed to replace them. These are called pollinator planting days and have been popular with both youth and adult volunteers. The invasive weeds that we remove are composted so the valuable nutrients they contain can be cycled back into the farm.

I understand that in the past, local non-profits had contracts to organize volunteer days for weed

removal on Open Space, it would be great to bring those kinds of programs back. I feel that public engagement is our best chance to rapidly reduce herbicide use on Open Space and would connect more people to the lands in a meaningful way. I encourage POSAC and staff to prioritize this alternative.

[Download Attachment](#)

Comment #15

Anne Cure

Boulder

Feb 22, 2024

My name is Anne Cure. I own and operate Cure Organic Farm, a diversified organic vegetable farm located on the corner of 75th and Valmont rd, Boulder. I have been farming here commercially since 2005.

The purpose of this letter is to ask you to support the staff recommendation for the Integrated Weed Management Plan. As a farmer who has been active in County policies for a long time, it is especially important that we respect all of the work that has been done over the years on Cropland Policy, which is the document that regulates the County's agriculture land. It is critical that ag land regulation stay under Cropland Policy where it belongs, not in any way drawn into this conversation about the Integrated Weed Management Plan.

Agriculture land has unique needs and considerations. The current structure provided by Cropland Policy acknowledges that and is working very well for the County's farmers and the community.

We all know that weeds don't stop at fence lines and the imaginary land boundaries that we draw. For this reason, I also ask you to accept the staff recommendations related to roadside management, especially in the ag areas. The County maintains these spaces, which we very much appreciate. If the County is limited in the tools it can use to maintain road frontages, the resulting weeds could easily migrate to our ag fields and affect the health of our crops. While I am a commercial organic vegetable/flower farmer and do not use any herbicides, I am a strong believer in having access to the tools we need to manage our lands in a healthy way. Please do not limit access to different tools.

I understand and appreciate the amount of public outreach that has taken place around the Integrated Weed Management Plan. However, successful land management is ultimately a matter of science, experience, and expertise. Our public lands are one of the most valuable resources we have as a community. We need to value and trust expertise when it comes to how to best manage this land. Our Parks & Open Space staff were all hired specifically because they have this experience and expertise. Please listen to their recommendation.

Remember that your choices affect our agriculture landscape and each of our farm's health and

economic viability. Never doubt the power of education around management and trust that we all want our lands to be managed in a healthy way and our landscapes to thrive. Please continue to follow staff recommendations around weed management.

Thank you,
Anne Cure
Organic Farmer
Cure Organic Farm

Comment #14

David Asbury

Longmont

Feb 22, 2024

As one of the largest certified organic farms in Boulder County, we are under great scrutiny, and currently have to answer to the FDA, the EPA, WPA, OSHA, CDA, FSA also known as the food safety act, as well as our organic certification agency. Growing food for people, organically is difficult enough as it is. By taking away our ability to grow safe and healthy food would be catastrophic for our operation. sincerely, David Asbury, Full circle farms

Comment #13

Amy Tisdale

Unincorporated Boulder County

Feb 21, 2024

I am writing in support of the staff recommendation for the Integrated Weed Management Plan.

My husband and I have been farming organic vegetables in Boulder County for 20 years. We have also been Boulder County Open Space tenants for 14 years and have worked with many Open Space staff members during that time. They have always worked to preserve the organic integrity of our farm and to make sure they don't use practices that negatively impact us.

As a farmer, I understand the importance of managing invasive and noxious weeds. The Open Space property we lease was poorly managed by previous owners for decades before Boulder County owned it. Many weed species became well-established during that time. Now we constantly face an expensive and labor-intensive battle against these weeds in our vegetable fields. And I honestly think we have lost the battle against these weeds in the unfarmed areas on the property surrounding our crop fields. We've spent countless hours trying to dig up and mow weeds like curly dock, bindweed, Canada thistle, burdock, and Russian Olives. At best, we are slowing their progress. The most recent noxious weed to arrive on our farm is Hairy Willow-Herb. In the past few years, I've watched with alarm as this aggressive weed has increasingly clogged up our irrigation ditches.

My experience has taught me that we need to do our best to manage invasive species with a sense of urgency. We all know the problems caused by well-established species such as bindweed, Canada thistle, and Russian Olives.

Invasive species are a serious threat to ecosystem health. We need to trust BC POS staff and the science they've used to create the IWMP.

Comment #12

Suzanne Webel

Longmont

Feb 21, 2024

People who know me know that I am an absolute wonk when it comes to weeds and weed management. I have transformed my 80 acre property, which was nothing but weeds and rocks when we purchased it 25 years ago, into a productive and beautiful farm where we raise CO Dept of Agriculture certified weed-free hay, board a few lucky horses, planted over 700 trees, and maintain a high degree of biodiversity.

To accomplish that miracle took a thorough understanding of integrated weed management. I am an earth scientist by training, so I studied the literature, talked with a variety of experts as well as agricultural neighbors with experience in managing land in Boulder County, attended weed management seminars and field trips, and more, I experimented with various techniques on my own farm, learning what worked and what didn't. Mostly I try to use mechanical techniques when possible -- whacking, mowing, grazing, burning, and hand-pulling. I have found, however, that some weeds must be sprayed directly (such as perennial Canada Thistle); others must be prevented from germinating in the first place (such as annual Cheatgrass), and a few can be outcompeted under the right circumstances by more desirable vegetation (such as bindweed in an irrigated field of brome grass hay). In some places all vegetation must be removed entirely, necessitating spot spraying with glyphosate and related products. In my experience, biologic controls (e.g. grazing, insects, birds, organic soaps and sprays) just don't work at scale.

Weed management requires commitment and vigilance because, left unchecked, invasive weeds will take over entire ecosystems and will become even more difficult to eradicate in the future. I try to be a good neighbor to other farmers nearby because weeds spread on wind, in the water, on truck tires, on wildlife fur. I appreciate BCPOS' consideration for neighbors like myself who are downwind or downhill of their properties. We all need to work together on weed management.

I want to make one comment about cheatgrass, since both BCPOS and I have been battling this insidious species for several years. For many years there was no cheatgrass anywhere on my farm. However, a few years ago I noticed a small patch of it and tried to eliminate it by grazing, mowing, and hand-pulling. But by the very next season it had spread to more than a dozen acres and was smothering all the desirable vegetation. Nothing would eat it. Like BCPOS, I applied one dose of the pre-emergent Rejuvra (indaziflam) to the problem area. The following spring there was no more cheatgrass and all the desirable vegetation was thriving. It is my understanding that Rejuvra will "hold" for at least five years,

making it a very successful, low toxicity product for cheatgrass management. I am confident that our horses can graze the treated area safely and that we can sell our certified hay to others for their livestock as well. Even wildlife such as deer and elk, which frequent our farm in increasing numbers, thrive on the hay in the treated areas.

It is essential that land managers, public and private, be allowed to use all tools at their disposal. BCPOS has gone to great lengths to produce an excellent, balanced, and thoughtful "Invasive Plants & Weed Management on Open Space" and I urge you to adopt the plan in its entirety.

Thank you for your consideration.

Comment #11

Elizabeth Black

Boulder CO

Feb 21, 2024

Hi POSAC, I run the Citizen Science Soil Health Project (CSSHP) and own the one-acre Neighborhood Christmas Tree Farm. In these two capacities, I have learned a lot about staking out the middle ground in controversies, and weeds.

The CSSHP includes 50 growers, evenly split between organic and conventional growers, who are trying to improve their soil's health in whatever way works best for their operation. As the leader of the CSSHP, I must stay in the middle between different management methods, which is sometimes a hard place to be. In the middle, you are a target for the slings and arrows from both sides of a controversy. But I've stuck with it and am confirmed middle-grounder now. As such, I consider your proposed weed management plan an excellent example of middle ground policy. It limits but does not eliminate the use of herbicides. It recognizes the realities of limited budgets and manpower. Its goals of controlling weeds while limiting herbicide use are goals that both sides can agree are good goals. (I don't know anyone that really LIKES to apply herbicides.) I hope that you will approve the Integrated Weed management Plan.

I also have a whole lot of experience controlling weeds on my one-acre Christmas tree farm. I must keep our one-acre farm free of weeds so that our trees will prosper and our customers will have a comfortable experience cutting down their Christmas tree. We use landscape fabric and mulch to discourage weeds, but there is still a great deal of hand weeding to do. I spend every summer morning from 5-9AM pulling weeds on my one acre lot, and am never done. There are always more weeds. Once a year I resort to Roundup for troublesome spots where copious irrigation encourages prolific weeds. I don't like using herbicide but find that it is the only way I can take care of a couple small problem areas.

So based on my own experience controlling weeds on one acre, I believe that relying on hand weeding to control weeds and cheat grass on thousands of acres is a fools errand. There's not the budget, the manpower, or the volunteer base for the hundreds of thousand of hours over many years which would be required to make a dent in the weeds on BCPOS lands. Instead you need the diverse toolkit - including limited herbicide use- which this Integrated Weed Management Plan gives you. Please approve it.

Thanks, Elizabeth Black

Comment #10

Alison Cohan

Boulder

Feb 21, 2024

The Boulder County Audubon Society (BCAS) commends the Boulder County Parks and Open Space department in revising the Integrated Weed Management Plan to incorporate public comment, primarily around the goal to reduce herbicide use while increasing use of alternative weed control methods. BCAS agrees with the goal of eventual reduction and elimination of pesticides when management goals can be accomplished, and supports the goal of a 50% reduction in pesticide use by 2030 as noted in the proposed changes document. We encourage regular review of independent and peer-reviewed literature that may show that certain pesticides could cause harmful effects, in which case that pesticide use should be decreased or ceased, including pesticides that The National Audubon has filed against at the EPA. We commend Parks and Open Space staff for evaluating herbicides using the World Health Organization's Highly Hazardous Pesticides tables for toxicity, and for minimizing the use of glyphosate to the three circumstances listed. We encourage increasing post-application monitoring of habitats and streams to assess if chemicals are entering or lingering in these places.

We strongly support the protection of wild bighorn sheep herds from domestic goats and sheep, to prevent disease transmission that can decimate bighorn sheep herds. Rams can roam miles outside their normal range -- for example two bighorn rams appeared in Boulder Canyon in July 2018. A single contact can have catastrophic consequences to a bighorn herd (reference). Plans for use of domestic goats and sheep need to be more detailed in the revised plan, including in what situations this tool will be utilized for management, criteria for decision-making and when goats versus sheep will be used, and maps of areas for potential use as possible.

Small unmanned aerial systems and drones could provide major benefits in scouting for noxious weed infestations and incipient populations of weeds, including incorporating Artificial Intelligence and Machine Learning to identify and predict locations of weeds. Potential impacts and disturbances to nesting birds, especially raptors, should be considered and properly evaluated prior to drone usage and aerial applications.

Finally, the cultural methods for prevention including use of boot-brush stations and educating trail users through signage and information through mobile apps should be increased and enhanced, with specific goals for number of boot brush stations and monitoring usage as feasible. The prevention protocols for contractors to sanitize vehicles and equipment between sites should be embedded in contracts and enforced through spot-checks, monitoring and/or reporting as feasible.

Thank you for the opportunity to provide comments on this important Draft Integrated Weed Management Plan.

Boulder County Audubon Society Conservation Committee,

Comment #9

Vanessa McCracken

Longmont

Feb 21, 2024

Please see attached file.

[Download Attachment](#)

Comment #8

Cody Oreck

Boulder

Feb 21, 2024

The proposed changes are grossly insufficient. We have had an extractive mentality with our public lands for far too long. We need to reinvest in the health of our soils through regenerative rather than chemical means. The use of chemical poisons is completely contrary to ecosystem restoration and the long term viability of our interdependence with this land. You must not do this! Please reconsider your alignment with Bayer and its ilk!

Comment #7

Christel Markevich

Nederland

Feb 20, 2024

Hi,

Boulder County residents asked Boulder County Parks and Open Space to stop the herbicide use madness on Boulder County Parks and Open Space. As demonstrated in the Draft Integrated Weed Management Plan Community Survey Results, over 80% of the public answered in question 3 that Herbicides should not be used at all as the potential negative effects are too great.

Over the last two years, residents and organizations responsibly shared alternatives to pesticides at previous POSAC meetings and with Boulder County Commissioners. These alternatives to pesticides lays out a vision for moving beyond the use of pesticides in Boulder County and are laid out in the Open Letter (https://drive.google.com/file/d/1f_gDg79jEBuD52bo3VIST07EztSKwG6h/view) titled "Ecologically

Sound Ecosystem Health Management”, which will be delivered to the Boulder County Commissioners. You can signed the Open Letter at <https://docs.google.com/forms/d/e/1FAIpQLScOf68n84YTAp4EE2hL8Vx-eVOqBTcWPnsV4KAX7kjPLc57ig/viewform>

The vision includes the following steps:

- * Stop hurting the land with conventional overgrazing and pesticide spraying.
- * Use prescribed burns. Currently the local US Forest Service conducts successful prescribed burns that restore the health of the ecosystem, including promoting the advantage of native plants over cheatgrass and other weeds.
- * Use targeted goat grazing - with Goat Bros. Grazing
- * Use targeted grazing of cows on cheatgrass during appropriate time windows
- * Partner with existing local restoration groups who already have relevant expertise
- * Train volunteers in restoration practices, including hand weeding and data collection for progress monitoring
- * Actively recruit and motivate volunteers with programs, for instance, an “Adopt a Plot” initiative to restore an area of land
- * Work with inmates to grow native plants for restoration
- * Hire homeless people to restore the land, for example, through Boulder Bridge House

Though the list of alternatives in the letter is not exhaustive, it is a start toward transitioning to an ecologically sound ecosystem health management department led by passionate experts as a replacement for the current BCPOS weed department, which does not have the skills to do ecologically sound ecosystem health management.

CU Professor Tim Seastedt demonstrates during December People and Pollinators Action Network webinar how the cheatgrass on the Frontrange does not behave like the cheatgrass on the Great Basin and seems to behave like an early classical successional plant species. Data from the Front Range, not from the Great Basin, reveals that it is inappropriate to see cheatgrass in the Front Range as a major threat to our native flora. BCPOS needs to work with CU scientists familiar with the current best ecologically sound restoration practices being used to address the climate crisis.

BCPOS weed department has demonstrated its incapacity to collaborate with community members, organizations, and independent research scientists to address the climate and biodiversity crisis we are facing. Just as we cannot expect the oil and gas industry to solve our climate crisis, we can not expect the BCPOS weed department to return the soil health on BCPOS natural lands. We need to immediately stop the herbicide spraying madness, stop conventional overgrazing, and start transitioning to an ecologically sound ecosystem health management department led by passionate experts.

Thanks,
Christel Markevich
Nederland, CO

Comment #6

Patricia Butler

Boulder

Feb 17, 2024

see comments in attached pdf document

[Download Attachment](#)

Comment #5

Steve Spry

Boulder

Feb 15, 2024

Received by BOCC 1/24/24

Dear Commissioners,

I find it amazing and unfathomable to think that known toxic chemicals are used for weed control in Boulder County!! You know the dangers to personal and environmental health from their use! You know that the vast majority of county residents are strongly opposed to their use! There are many other ways for non-toxic "weed" control that are well known.

End the use of glyphosate, 2,4D, Dicamba and aerial attacks on weeds. We want proven safe methods like building soil health, indigenous methods and focusing on List A or B species, just to name a few.

Glyphosate and Aerial Spraying from helicopters must be REMOVED from the New Weed Mgmt Plan immediately!

Thank you,

Steve Spry

199 Broken Fence Rd.

Boulder, CO 80302

[Download Attachment](#)

Comment #4

Bonnie Sundance

Boulder

Feb 15, 2024

Received by BOCC 1/25/2024

Dear County Commissioners,

PLEASE vote NO on any program on Open Space that uses the toxic glyphosate and NO on aerial spraying. PLEASE.

Have a heart for the Land, the soil organisms, for non human and human species! PLEASE Keep all Life forms safe and healthy.

There are multiple OTHER Forms of handling unwanted insects in certain areas.

Thanks,
Bonnie Sundance

--

Bonnie Sundance, Masters Library Science
Our Sacred Earth, Executive Director
Care for the Earth as you live your Life, it depends on your doing so.

Right Relationship Boulder, Schools Group, Co-Coordinator
We live in the homeland of the Ute, Arapaho and Cheyenne, seeking to understand what it means to be in Right Relationship with them and with a history that took these lands from them illegally.

Join me in participating with:
Alternative Radio
Bioneers.org
GreenFaith Boulder Circle
Pachamama Alliance
RightRelationshipBoulder.org
11th Hour Calling for Climate Action
Time Bank of Boulder, 13 year member
KGNU and Rocky Mountain Peace and Justice Center, Sustaining member
(Please visit websites)

[Download Attachment](#)

Comment #3

Amanda Dumenigo

Longmont

Feb 15, 2024

Sent to BOCC 1/30/2024

Dear Commissioners,

I am told that you were at last Thursday's POSAC meeting for public comment. Thank you to those of you in attendance for giving the issue of not aerial spraying, no chemical herbicides and not using chemical herbicides in Open Spaces the attention that it merits—if you were there, please forgive any redundancy—for Commissioner Levy and your reference, attached is my expanded public comment offered to POSAC and attachments contained in packets distributed to members in attendance.

I was told that after I left, that a Parks & Open Space, POS, staffer stated that there was no conflict of interest. It is clear and problematic that POS did not perceive any of the direct affiliations to the product manufacturer to be potential conflicts of interest since presenters recruited by POS and authors of the draft weed management plan did not disclose any affiliations familial or professional to the manufacturer.

Director Glowacki is not phased that POS Employee, James Sebastian's son, Derek Sebastian, is one of the patent-owners of Rejuvra (Attachment); that much of Dr Scott Nissen's research funding comes from Bayer-Envu; or that Joe Swanson, the head of Weed Management for POS, is doing webinars and infomercials for Bayer-Envu's Rejuvra—. The webinar and infomercials are clearly sales pitches, not unlike the Rejuvra sales pitches Mr. Swanson also made to POSAC, the BOCC and the general public on field trips, weed management meetings, and the Open House (not open to the public). The Rejuvra promos by Mr Swanson, takes it to a new level, sealed with the company motto: "The Solution: Rejuvra Herbicide" and Swanson's County affiliation prominently displayed. This webinar and infomercial(s) are designed to sell a product and generate sales for the company.

Joe Swanson and James Sebastian are public BOCO employees; they also appear to be selling product for Bayer-Envu (formerly known as Montanto-Bayer). POS Weed Management Supervisor and team member seem to join Envu's team, that includes Dr. Derek Sebastian (patent co-owner and POs employee, James Sebastian's son), Dr. Shannon Clark (Bayer-Envu's Stewardship & Development manager, currently; graduate research was sponsored by Bayer, according to Dr Nissen— her mentor) and Dr Scott Nissen (whose research and grad-students are sponsored by Bayer- ENVU) in their efforts to promote, market and sell the use of this product, Rejuvra.

*Unless each of these presenters revealed to POSAC and to the BOCC openly their direct familial and /or financial ties to Bayer-ENVU, disclosing any potential conflict of interest(s) as per policy— then they were selling you and POSAC Rejuvra in lieu of a sustainable, weed management plan.

The fact remains, you now know of the zero degrees of separation between multiple members of POS' Weed Management team, the CSU scientists that POS cherry-picked to present before POSAC, and the product manufacturer, Bayer-Envu. Please act accordingly and responsibly.

POSAC and BOCC have neglected thus far to give an audience to Colorado University, CU, scientists that do not have a direct connection to ENVU or a product to sell you, and thus offer a more objective, independent scientific review of the research conducted on cheatgrass and of best management practices.

An essential part of rebuilding trust (the theme for 2024 we're told) is for POSAC and/or the BOCC to entertain Colorado University scientists, and experts in their field. In my previous email to you, I enumerated the credential of these CU scientists. Now, we at least understand why all scientists presented and data provided by POS was from CSU, while CU professors, award-winning scientist sans connections to Bayer-Envu or its staff, have been shunned from the discussion.

Our community members anxiously await an invitation from POSAC and / or the BOCC to host a plenary session in February with the scientists vetted and endorsed by the alliance of environmental, local organizations and the general public. POSAC members should make their recommendations only if they have had the opportunity, thus far denied them, of hearing independent scientific knowledge, published, peer reviewed research and expert recommendations, including (but not limited to) Dr Robert Brackenridge and Dr Timothy Seasted.

The skewed perspective that POS has afforded you is grossly prejudicial to the manufacturer of multiple, highly controversial products heavily used and promoted by some of POS' Weed Management staff as included in their Weed Management Draft plan, and as seen in published scientific articles (on Indaziflam), Envu-sponsored webinars and infomercials and in-person presentations. This nepotistic orientation of science is to the detriment and chagrin of the BOCO environmental community, the public at large and antithetical to scientific and democratic processes.

Please rectify this situation. This is a critical subject that will inform public policy, affect public appointments and public health in the imminent future.

Sincerely,

Amanda Dumenigo
Co-Founder, Chair
amanda@SOSVV.org
www.sosvv.org
305-528-1920

US Patent: [Click to Download](#)
US11166463.pdf
2 MB

A breakdown of POSAC Presenters:

Dr Shannon Clark, presented before POSAC at the behest of POS Weed Management. Dr. Clark is currently employed by Bayer ENVU, the manufacturer of Indaziflam, a.k.a. Rejuvra, Glyphosate, etc.. being promoted by POS Weed Management. Her graduate research was reportedly funded by Bayer ([hyperlinked above](#)).

*Did Dr Shannon Clark reveal her employment and graduate / research funding to POSAC when she presented before them? Based on the reaction and comments made by POSAC member(s) that does not appear to be the case.

The trio: Dr Nissen, and his former students, Dr Clark and Dr D. Sebastian, collaborate in this Bayer-ENVU infomercial. According to Dr. Nissen, "Bayer funded some of his grad students", Dr. Shannon Clark and Dr Derek Sebastian; both are employed currently by ENVU Vegetation Management, as seen in this Youtube video].

*Was Joe Swanson paid for being a keynote speaker for Rejuvra Herbicide on April 29th, 2022, and numerous other Bayer-Envu infomercials? or did Mr. Swanson volunteer his time for Bayer-Envu? How many webinars, infomercials and in person presentations has Mr Swanson done for ENVU and / or Rejuvra while employed by POS / Weed Management team? Did Joe Swanson reveal to POSAC and/or the BOCC that he moonlights or volunteers for Envu, making frequent appearances on their platforms?

We formally request that POSAC and / or the BOCC ascertain the answer to the above questions, and relay the verified responses to SOSVV and the community.

Dr Scott Niessen, CSU Professor, Presented before POSAC, seen above in an infomercial "Behind the Research: Killing invasive grasses with Rejuvra® herbicide" by ENVU Vegetation Management

Weed Specialist, Joe Swanson makes a cameo appearance contemplating a blade of cheat-grass (@ 1:28 minutes) in ENVU Vegetation Management marketing reel.

Joe Swanson makes another cameo appearance on Derek Sebastian's fire infomercial for Bayer-Envu (@ 1:46). SOSVV recent CORA requests, specifically on Fire consultations relating to Cheatgrass yielded ZERO documentation. It appears from this infomercial that Dr Derek Sebastian, patent co-owner of Rejuvra, is the one making the fire prevention claim--.

j

Derek Sebastian, Rejuvra patent holder, ENVU infomercial "Reduce your risk of wildfires".

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According to the Boulder County Parks and Open Space.pdf

207 KB

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POSAC Jan 25, 2024 public comment SOSVV, Inc. .pdf

113 KB

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POSAC Jan 25,2024 Public Comment folder.pdf

18.1 MB

P.S.

Yesterday The Washington Post reported that a jury handed down a \$2.25 billion verdict, including \$2 billion in punitive damages, against agrochemical giant Monsanto, according to the lawyers of a man who said he developed cancer from using the company's weed killer, Roundup..."On Friday a jury returned a unanimous verdict, finding that Roundup was a cancer-causing product, that Monsanto was negligent and that Monsanto failed to warn about the dangers of Roundup, McKivison's lawyers Tom Kline and Jason Itkin said in a joint statement. The jury's punitive damages award sends a clear message that this multi-national corporation needs top to bottom change," they said, calling the verdict "a condemnation of 50 years of misconduct by Monsanto."

[Download Attachment](#)

Comment #2

Dr. Sara Hart

Lyons

Feb 15, 2024

Sent to Commissioner Loachamin - received 1/22/24

[Download Attachment](#)

Comment #1

Jessica Taylor

Boulder

Feb 15, 2024

Sent to BOCC 1/21/24

I am in strong opposition to any and all chemical pesticides being used, sprayed or otherwise on any of

our open space. The time is now to end this archaic and damaging practice. Boulder County residents are naturally minded, eco-conscious and know better. There are other ways. Do not let industry supersede common-sense and the health of our habit and children's future world.

Jessica Taylor
5011 Ellsworth Place
Boulder, CO 80303

Mom to 15, 13 and 11 year old boys who hope for a healthy future.