

Commissioner Spitzman

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From: rich@zeoponix.com
Sent: Thursday, May 23, 2024 8:25 AM
To: commissioners@bouldercounty.gov
Subject: Integrated Weed Management Plan - totally inconsistent with law and reality

Dear Boulder County Commissioners:

You will be making decisions about the latest draft off the Integrated Weed Management Plan (IWMP) this morning. Hopefully you will carefully view the proposed draft document and see its major inadequacies as written. Over the many months of public meetings and hearings, I've submitted numerous scientific reviews of the various draft plans. Instead of improvements in the sequential drafts prepared by county staff, the latest plan has become even more inadequate and lacking in good science quality to deal primarily with the elements related to use of toxic chemical herbicides.

I'll be brief but hopefully you will not approve the plan as written. A few key reasons are:

1. The IWMP ignores the established science of toxicology, environment effects, human health, and even the direct causes of climate destruction caused by excessive chemical base agriculture practiced around the world and right here in Boulder County.
2. The plan as written relies on various state and federal regulatory bodies charged with the regulation of all pesticides.....but those agencies are essentially corrupted by being under the control of the pesticide industry, and have been so since at least the early 1980s.
3. Other key problems with the current draft IWMP are:
 - a. Total abdication of county responsibility for all agricultural lands where the largest quantity of toxic pesticides of all kinds are used, not just the herbicide (weed) portion. The plan as written, including even the public owned agricultural lands (open space), totally leaves all responsibility and authority of what herbicides can be used to the lessees of those public lands. THAT IS IRRESPONSIBLE OF THE COUNTY, AND A TOTAL SHIRKING OF THE COUNTY RESPONSIBILITY TO THE OWNERS OF THOSE LANDS, "WE THE PEOPLE".
 - b. The IWMP is only really focused on and dealing with the so called "natural lands", again a totally shirking of the responsibility to prepare and enforce a comprehensive weed management plan for all lands that the state statute requires the county to manage.
 - c. The IWMP is inconsistent with other rules and policies of Boulder County, very notably with the county's aspirations to be a leader in turning around the continued emissions of greenhouse gases to prevent the disastrous effects on our earth's climate. The use of chemical pesticides are known to destroy soil health and result in greater emissions of damaging green house gases, particularly on agricultural lands.
 - d. Many herbicides which would be allowed under the IWMP have major human health negative effects, one of the largest used herbicide in the world is glyphosate (aka RoundUp) is declared as a probable human carcinogen by the IARC, a unit of the UN World Health Organization....yet this herbicide and many others would be allowed in Boulder County, solely by the farmers and others, without any restraints or oversight by Boulder County.

In summary, the current plan should be abandoned as written and sent back to Boulder County Parks and Open Space to be entirely revised and made comprehensive that required by state law....with the county facing up to

its responsibilities to protect our environment, our climate and the health and welfare of the people of Boulder County.

SEND the Integrated Weed Management Plan back to be revised, and with the instruction to listen to the overwhelming testimony of the people of Boulder County.

I personally stand ready to assist in drafting a meaningful, science and public health based pesticide use and weed management plan for Boulder County.

Richard Andrews
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