

Response from Weyerhaeuser Corporation for Comments from SVENA on  
FPA2815270 (chemical spray)

8-3-2016 at 2:53 PM

Via email to: Inessa Pearce

CC: La Fontaine, Tim Tift, Steve

Dear Inessa,

We share your concerns regarding the contamination of resources in and around our application areas. We take several measures to reduce chemical use and ensure all herbicides stay on-target. These include:

1. Using the least toxic, narrowest spectrum chemicals to achieve management objectives. All herbicides are approved for the intended use by the Environmental Protection Agency and the Washington Department of Agriculture. We do not use type 1A or 1B pesticides as designated by the World Health Organization or banned by the Stockholm Convention on persistent Organic pollutants.
2. Treating these areas effectively prior to planting, reducing the need for future treatments. We then plant large seedlings which future reduces the need for additional treatments. Most sites only require one treatment in a 40 year rotation.
3. Following all laws and regulations to prevent drift, run-off, leaching, volatilization and condensation, etc. Here is the link to the Washington Administrative Code related to handling, storage and application of forest chemicals: <http://apps.leg.wa.gov/wac/default.aspx?cite=222-38-020> . Here you will also find information related to stream buffer requirements.
4. Following label directions to ensure we are using and applying all chemicals in an approved manner.
5. Closely monitoring weather conditions throughout the operation and ceasing operations if weather is unfavorable.
6. Hiring only licensed, professional applicators that use the proper equipment for the application. This includes selecting nozzle sizes that produce larger droplets, further reducing drift potential. Each unit is flown prior to application to identify sensitive sites, hazards and any other issues. Suitable options for mitigation are discussed and implemented on site.
7. Spray deposition agents are added when applications are made near sensitive areas.

By law we are required to notify adjacent/adjoining landowners of aerial applications and these notifications will be sent out next week. I encourage anyone concerned about our operations to reach out to me via email or phone and I will be happy to discuss their concerns. The best way to reach me is via email at [kelly.dougherty@weyerhaeuser.com](mailto:kelly.dougherty@weyerhaeuser.com) or by phone at 360.424.2014. Alternatively, you can call Weyerhaeuser Columbia Timberlands lead forester,

Tim La Fontaine, at 360.442.4316. I can notify you of our specific project plans as soon as I know what they are, including project completion. Unfortunately, operations are restricted by weather and contractor availability and our plans change regularly. The application is currently scheduled to occur between 8/29/16 and 9/23/16.

Below is a table that can better describe our chemical selection. We often do not know which specific chemical the applicator will use so I have grouped the chemicals by active ingredient or purpose. At most, only one chemical from each group will be used.

Active Ingredient	Product Names with Active Ingredient	Comment
Glyphosate	Accord XRTII, Alligare Glyphosate 5.4, Rodeo	
Imazapyr	Imazapyr 4SL, Polaris AC, Polaris AC Complete, Polaris SP, Rotary 2SL	
Metsulfuron methyl	Escort XP, MSM 60DF, Oust Extra, SFM Extra, Sulfomet Extra	Oust Extra, SFM Extra and Sulfomet Extra contain both metsulfuron methyl and sulfometuron methyl. The use of these products would satisfy the need for both active ingredients in the mix.
Sulfometuron methyl	Oust XP, SFM 75, Oust Extra, SFM Extra, Sulfomet Extra	Oust Extra, SFM Extra and Sulfomet Extra contain both metsulfuron methyl and sulfometuron methyl. The use of these products would satisfy the need for both active ingredients in the mix.
Agent to solubilize ingredients	Climb	
Deposition Aid	Crosshair	
Non-ionic surfactant	LI-700, Liberate, Syl-coat, Syl-tac	
Oil surfactant	Superspread MSO, Syl-tac	

The site prep treatments we conduct assure quick and successful regeneration. They are instrumental in establishing healthy and productive forests for future generations.

Best Regards,  
Kelly Dougherty

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