



June 27, 2012

Board of Pesticides Control

RE: Draft Interim Guidelines for Forest Pesticides Applications

Dear Board of Pesticides Control,

Thank you for the opportunity to comment on the Guidelines for Forest Pesticide Applications. Lucas Tree Experts generally agrees with the Guidelines set forth in the document. Two areas where we have questions and concerns are listed below.

1. Item #7: *“When possible use the “SmartDrum” product delivery technology. The closed system, product tracking, environmental solution to herbicide mixing and delivery allows for accurate premixed solutions, no open containers, no triple rinsing, and proper prescriptions without the need to use open pesticide containers.”* This statement directs the use of a specific type of technology when mixing or using pesticides. Due to continually changing technology and nomenclature, we would recommend modifying #7 to read: *“When practical, use product delivery technology that offers features such as a closed system, product tracking and allows for accurate premixed solutions. These technology options can result in no open containers, no triple rinsing, and proper prescriptions without the need to use open pesticide containers.”*
2. Item #21: Section d: *“Only apply pesticides when wind conditions are between 2-10 mph.”* It is unclear to us why this restriction would be placed in this section. If this is a guideline for aerial forestry applications then it should be listed under the “BMP’s Specific to Aerial Applications” section. We feel that ground forestry applications should not have a more stringent weather requirement than any other ground application.

Thank you again for the opportunity to comment on these guidelines. Please feel free to call on us if you have any questions.

Deven Morrill
Lucas Tree Experts