Data Submitted (UTC 11): 3/21/2014 12:00:00 AM
First name: Dick
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Organization:
Title:
Comments: Invasive Plant Control DSEIS covering the Carson and Santa Fe National Forests comments

Please see attachments.

March 21, 2014

Dear Supervisors Garcia and Sanchez

Herbicides containing glyphosate must never (emphasis added) be used on public land for any reason.

The Invasive Plant Control DSEIS covering the Carson and Santa Fe National Forests at page 13 states:

“Thirteen herbicides are proposed for use: 2,4-D, aminopyralid, clopyralid, chlorsulfuron, dicamba, glyphosate, hexazinone, imazapic, imazapyr, metsulfuron, sulfometuron, picloram, and triclopyr. The herbicide aminopyralid has been added as a proposed herbicide in this draft SEIS; the others were proposed and analyzed in the FEIS.”

Glyphosate is a toxic poison and must never be applied to public land where families recreate. Supervisors Garcia and Sanchez, incredibly you propose to apply this poison to vegetation growing on land owned by and used by 317 million Americans.

Comment #1: Supervisors Garcia and Sanchez, as a retired USFS employee I understand that natural vegetation and the resources that depend on the health of the natural vegetation will be significantly harmed if the non-native invasive plants are not eradicated. I also know there are effective (although more costly) alternatives to killing these plants other than herbicides. If most Americans knew of the tragic results stemming from contact with some herbicides they would insist that the USFS spend the extra money on these safer alternatives.

Competent public servants apply the Precautionary Principle to any risky proposed actions see below:

The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is not harmful falls on those taking an action.

There is information that’s not publicized widely that reveals the dangers and toxicity of some products sold over-the-counter in America. As you will learn below, other countries aren’t captivated by corporations with multi-billion dollar annual revenues like America.

If these products (in this case herbicides) provide profit for the corporation that manufactures the product, the corporation will stop at nothing to prove their product is safe. Incredibly, some government regulatory agencies

(FDA, EPA etc.) choose to look the other way when confronted by these dangers. This is the case with Monsanto and their herbicides that contain glyphosate. There are scores of brand names for herbicides that contain glyphosate. Roundup is the most popular.

Indeed, there is a reason the United States is currently having a cancer epidemic much worse than other industrialized countries.

Comment #2: Supervisors Garcia and Sanchez, please read the following documents (including the 9 fraudulent USFS documents) again that indicate glyphosate is safe:

USDA Forest Service 1995
USDA Forest Service 1996a
USDA Forest Service 1997a-c
USDA Forest Service 1998
USDA Forest Service 1998d
USDA Forest Service 1999c
USDA Forest Service 1999d
USDA Forest Service 2000
USDA Forest Service 2001
Arbuckle 1999
Charles et al.
Paustini 1996;
Ibrahim, et al. 1991
Mattsson 1997
Mustonen 1986
Infoventures 1995a-j
OSU 1996a-h
EPA 1990 and 1990a
"The Risk Assessment for Herbicide Use in Forest Service Regions (RAHUFS) 1, 2, 3, 4 and 10 and on Bonneville Power Administration Sites" (USDA Forest Service 1992).
"Assessing the Safety of Herbicides for Vegetation Management in the Missoula Valley Region: A Question and Answer Guide to Human Health Issues" (Felsot 2001).

You will notice the "newest" one is 13 years-old. The oldest 28 year-old!!!! Only a fool would give such dated literature credence … especially regarding life and death issues. What does this indicate about the accuracy of the safety conclusions? The newspapers will have fun with this.

The majority of the 129 source documents for the statements by Ph.D. scientists that indicate glyphosate dangers with casual exposure are life threatening were written since 2010s

Comment #3: Supervisors Garcia and Sanchez, as you will learn below even casual exposure to herbicides that contain glyphosate is shown in the lab to cause cancer in mammals. Of course now you are wondering what you can do to disprove these science conclusions. You might not even believe that glyphosate is unsafe. I suggest you search the WEB for the 2 words "glyphosate" and "cancer." When you do you will get 79,600 hits. They can be a\read at:
http://www.bing.com/search?q=glyphosate+cancer&qs=n&form=QBLH&pq=glyphosate+cancer&sc=2-17&sp=-1&sk=&cvid=a9a7e18786764443aa59079d8144f559

Supervisors Garcia and Sanchez, please don't tell the public everything will be fine since you plan to apply the herbicide according to label directions. Monsanto would not dare to say anything that might indicate to the public there are health issues associated with their products. The label directions must not be trusted. Monsanto pays

other chemical labs to do the safety research on their glyphosate-containing herbicides. These labs know what Monsanto wants. The label directions printed and composed by Monsanto are based on this type of so-called safety evaluation. It should not be necessary to explain further.

Attachments 9a and 18 contain statements by hundreds of well respected Ph.D. scientists who describe their research findings on the safety of herbicides containing glyphosate. Their research indicates glyphosate containing herbicides clearly kill fish at very small concentrations and may be linked to the following health problems in mammals (including humans):

•birth defects,
•non-Hodgkin's lymphoma (a form of cancer),
•mitochondrial damage,
•cell asphyxia,
•miscarriages,
•attention deficit disorder,
•endocrine disruption,
•DNA damage,
•skin tumors,
•thyroid damage,
•hairy cell leukemia (another cancer),
•Parkinson disease,
•premature births,
•decrease in the sperm count,
•harm to the immune system in fish
•death of liver cells,
•severe reproductive system disruptions
•and chromosomal damage.

Comment #4: Supervisors Garcia and Sanchez, would you apply a chemical to your yard where children play in the grass that was banned in Denmark 10 years ago because of its lethal effects? See http://www.twnside.org.sg/title/service76.htm

Comment #5: Supervisors Garcia and Sanchez, would you apply a chemical to your yard where children play in the grass that the Institute of Science in Society based in London England calls for banning in England? See: http://www.i-sis.org.uk/about.php and http://www.i-sis.org.uk/Ban_Glyphosate_Herbicides_Now.php http://permaculturenews.org/2012/11/01/why-glyphosate-should-be-banned-a-review-of-its-hazards-to-health-and-the-environment/

Comment #6: Supervisors Garcia and Sanchez, would you apply a chemical to your yard where children play in the grass that Italy wants banned for use in the country? See: http://ultraculture.org/blog/2013/07/24/italy-throw-out-monsanto-us-asleep/

Comment #7: Supervisors Garcia and Sanchez, would you apply a chemical to your yard where children play in the grass that El Salvador banned in October 2013? See: http://www.naturalnews.com/042608_El_Salvador_glyphosate_ban_Monsanto.html#

Comment #8: Supervisors Garcia and Sanchez, would you apply a chemical to your yard where children play in the grass that Sri Lanka banned in March 2014? See: http://www.icij.org/blog/2014/03/sri-lanka-bans-leading-monsanto-herbicide-citing-deadly-disease-fears

If you answer no to the questions posed above, then why do you propose applying this poison to public land? Please respond. This is not a rhetorical question.

Of course you are in a denial mode now. A judge will believe the danger is real that's described in many of the sources presented here. Read the source shown below first to learn what any government agency must do before applying poison:

http://www.okanogan1.com/ecology/weeds/risky/Chapter-3.html

Comment #9: Supervisors Garcia and Sanchez, you cite your outdated information as the basis for your conclusion that herbicides containing glyphosate are safe if used according to label directions. Once again, The Monsanto Corporation composed the text of the label directions and printed the label directions. Roundup was Monsanto's top selling product in 2013. That year Monsanto's earnings were 14.87 billion dollars. When the judge reads your dated literature (most written by the USFS and compares it's safety conclusions with the information authored by hundreds of independent Ph.D. chemists that describe the tragic health problems caused by these toxic herbicides in Opposing Views Attachments #9a and #18 which will carry the most weight?

Are you still unsure about Monsanto's glyphosate safety? Please read this article in the April 2013 issue of Entropy magazine:
http://www.mdpi.com/1099-4300/15/4/1416

We know Glyphosate-containing herbicides are potentially lethal… but there is more. Within the last few days new research results have been made public. Roundup is responsible for the massive monarch butterfly population reduction. See:
http://www.bing.com/search?q=monarch+decline+Monsanto%E2%80%99s+Roundup+&qs=n&form=QBLH&pq=monarch+decline+monsanto%E2%80%99s+roundup+&sc=0-0&sp=-1&sk=&cvid=d8d3b58795f4444abadf6dc2835f8020

Glyphosate causes children to be born with birth defects:

"Farm families that applied pesticides to their crops in Minnesota were studied to see if their elevated exposure to pesticides caused birth defects in their children. The study found that two kinds of pesticides -- fungicides and the herbicide Roundup -- were linked to statistically significant increases in birth defects. Roundup was linked to a 3-fold increase in neurodevelopmental (attention deficit) disorders." [EHP Supplement 3, Vol. 110 (June 2002), pgs. 441-449.]

"Monsanto's Roundup Herbicide Threatens Public Health"
Rachel's Environment and Health News, issue 751, Sept. 5, 2002.
Reprinted by Organic Consumers Association
http://www.organicconsumers.org/Monsanto/roundup92502.cfm

"The establishment of the WHO's Acceptable Daily Intake (ADI) is based on limited studies using limited parameters which do not account for vulnerable groups such as children, the elderly, the sick and other groups that might have increased susceptibility to glyphosate exposure."

"Concerns Over Glyphosate Use"
The Sun (Malaysia), Friday August 20, 1999
http://www.poptel.org.uk/panap/archives/glywb.htm

Would the Journal of Environmental Research and Public Health have reason to publish a story that is not true?

“Abstract: The current chronic kidney disease epidemic, the major health issue in the rice paddy farming areas in Sri Lanka has been the subject of many scientific and political debates over the last decade. Although there is no agreement among scientists about the etiology of the disease, a majority of them has concluded that this is a toxic nephropathy. None of the hypotheses put forward so far could explain coherently the totality of clinical, biochemical, histopathological findings, and the unique geographical distribution of the disease and its appearance in the mid-1990s. A strong association between the consumption of hard water and the occurrence of this special kidney disease has been observed, but the relationship has not been explained consistently. Here, we have hypothesized the association of using glyphosate, the most widely used herbicide in the disease endemic area and its unique metal chelating properties. The possible role played by glyphosate-metal complexes in this epidemic has not been given any serious consideration by investigators for the last two decades. Furthermore, it may explain similar kidney disease epidemics observed in Andra Pradesh (India) and Central America. Although glyphosate alone does not cause an epidemic of chronic kidney disease, it seems to have acquired the ability to destroy the renal tissues of thousands of farmers when it forms complexes with a localized geo environmental factor (hardness) and nephrotoxic metals.”

“Monsanto’s Roundup linked to fatal, chronic kidney disease”
February 2014 issue
Link: http://www.mdpi.com/1660-4601/11/2/2125

Would the USGS have reason to publish a false report in Environmental Toxicology and Chemistry?

“Monsanto”s Roundup persists in soil and water”
February 2014 issue
Link: https://www.ncbi.nlm.nih.gov/pubmed/24549493

Now ask yourself why USFS leaders have been withholding this information knowing that some USFS line-officers apply Roundup to noxious weeds.

Request for changes to be made to the final NEPA document:

1) Rewrite the “Affected Environment for Human Health and Safety” section Chapter 3 beginning on page 156. This would include rewriting Table 64 to remove the lies.

2) Garcia’s and Sanchez the section describing the Environmental Consequences to Human Health and Safety (at pages 160 to 166) reflects the fact that you will say anything to deceive the public into embracing the toxic poison you plan to apply to public land. Most people wouldn’t think of risking killing a child to further the USDA’s insane acceptance of poison to increase profits for corporations that manufacture the stuff. Have you no shame?

3) You lie to the public about herbicide safety in the face of research (you choose to ignore) that shows the stuff can be lethal. You lie to the public about alternatives to herbicides. Totally negating independent animal research to trick the public into accepting poison is unacceptable. This entire section on Direct and Indirect Effects of Alternatives B and D on humans must be rewritten to include only facts. Nothing must be written by unqualified IDT members. All unsubstantiated statements meant to deceive the public into believing research showing the extreme toxicity of these chemicals is inapplicable and untrue must be removed from this section. Garcia’s and Sanchez, here are a few examples unsubstantiated statements that have no citations … just IDT BS intended to please you:

“There have also been claims (not medically supported) that hand pulling of knapweed may result in the formation of tumors on the hands. The risk of injury from repetitive motion and back and knee strain exists, but

would be no greater than any other physical labor normally performed by Forest Service employees. Workers with allergies to weeds would suffer the most from this method." (EIS at page 161)

Mechanical Treatments-"A risk of physical injury due to accidents exists." (EIS at page 162)

Comment: Garcia's and Sanchez, did you really approve of this absurd statement to trick the public into believing the safest method of removing invasive plants is dangerous. There is a risk of breaking your neck when climbing out of bed!

"Following the design features requiring the use of protective equipment, application rates, and the weather conditions means that a worker's risk of exposure to herbicides would be negligible." (EIS at page 162)

"The most reasonable interpretation of the risks associated with application of herbicides on national forest lands is that, except for accidental exposures or extremely atypical or implausible scenarios (i.e., acute direct spray entirely covering a naked child), the use of herbicides on national forest lands would not pose an identifiable risk to workers or the general public." (EIS at pages 162 and 163)

Comment: Garcia's and Sanchez, whoever conjured up this statement should be reprimanded.

"Subchronic and Chronic Toxicity – The likelihood of chronic or subchronic exposure to the public to herbicides is zero, based on the assumption that the public would avoid or be restricted from entering places where herbicides are being applied. The likelihood of a member of the public being repeatedly exposed to herbicides above the reference dose is nearly zero." (EIS at page 163)

"Dermal Absorption – The likelihood of a member of the public absorbing an herbicide through their skin is virtually zero." (EIS at page 163)

"Dermal Absorption –The likelihood of a member of the public being repeatedly exposed to herbicides through their skin above the reference dose is nearly zero." (EIS at page 163)

Comment: Garcia's and Sanchez, nothing has a likelihood of zero!

4) How sad it is that Garcia and Sanchez are willing to take the chance to kill forest visitors (including children) to support the USDA unyielding support of corporations that manufacture deadly chemicals. Monsanto does not rule America. Please purge the statements above or indicate which IDT member authored the statement and their background in manmade chemical safety.

5) Include the information contained in Attachments #9a and #18 submitted as part of these comments in an appendix to the final EIS. Please be public servants and don't withhold this life or death information from the people who may visit the Santa Fe and Carson National Forest.

6) Include information about alternatives to herbicides and why these alternatives were not used in lieu of herbicides to control invasive plants. If the alternatives to herbicides weren't used because of extra cost, indicate the cost difference between the alternatives and herbicides. If the alternatives are less effective than herbicides include data and information supporting the claim. Purge the EIS of all insane statements describing the false dangers of these methods.

7) Include a link to the electronic version of the following documents that the Responsible Official relied on for safety determinations:

USDA Forest Service 1995

USDA Forest Service 1996a
USDA Forest Service 1997a-c
USDA Forest Service 1998
USDA Forest Service 1998d
USDA Forest Service 1999c
USDA Forest Service 1999d
USDA Forest Service 2000
USDA Forest Service 2001
Arbuckle 1999
Charles et al.
Paustini 1996;
Ibrahim, et al. 1991
Mattsson 1997
Mustonen 1986
Infoventures 1995a-j
OSU 1996a-h
EPA 1990 and 1990a
"The Risk Assessment for Herbicide Use in Forest Service Regions (RAHUFS) 1, 2, 3, 4 and 10 and on Bonneville Power Administration Sites" (USDA Forest Service 1992).
"Assessing the Safety of Herbicides for Vegetation Management in the Missoula Valley Region: A Question and Answer Guide to Human Health Issues" (Felsot 2001).

8) Explain why none of the literature cited in Attachments #9a and #18 do not appear in the References sections for the documents listed above. Its not nice to reject science literature that does not support your agenda.

9) Never before have I heard of a USFS line-officer proposing to amend their forest plan to allow more people to be exposed to a carcinogen and then call it "nonsignificant." Purge this from the final EIS. The New Mexico politicians will have fun with this.

"Alternatives B and D include a nonsignificant, programmatic amendment to the Santa Fe National Forest Plan. The amendment would allow the use of herbicides in places currently prohibited by forest plan standards and guidelines. These areas are in municipal watersheds.."

Finally, if my requests are not acted upon it will be necessary to prevent human and wildlife death on the Carson and Santa Fe National Forests in other ways. I have learned that the court of public opinion is often more effective at forcing the USFS to serve the public than a court of law. The newspapers in Albuquerque, Taos and Santa Fe reach well over 1 million people.

Also many politicians of either party will not allow their constituents to be placed in jeopardy by a Federal agency. The following progressive members of Congress from New Mexico won't hesitate to act: Senators Udall and Heinrich and your own US Representative Lujan.

Garcia and Sanchez, the best way to stay out of trouble is to amend the draft ROD and clearly state not herbicides containing glyphosate will be applied anywhere ... and then comply with the ROD.

Sincerely,

Dick Artley's scanned signature is contained in the "signature" attachment.

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CC: Santa Fe and Carson National Forest Rangers, IDT members and the RO invasive plant specialist.