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Title:

Comments: I commented during scoping and the preliminary EA that pesticides are problematic due to their undisclosed PFAS compounds in the formulations.

The agency continues to ignore this assertion, as does the state.

My more recent comment is dated 1 April, 2024.

The agency response talked about glyphosate and triclopyr, specific chemicals; my issue is with the larger formulations that these products are sold with, I did not mention the chemicals in isolation.

Simply put, if the Forest Service is going to use products that will cause any kind of environmental or human health impact, communities and citizens have the right to know that, meaning full disclosure. Hiding behind assertions that PFAS compounds are not known to be in pesticide products, or that the agency has no knowledge of their presence, is deliberately disingenuous. Obviously, without testing for PFAS compounds specifically, there would be no awareness of them because they are not listed as ingredients. The compounds are corporate secrets.

It is time for the Forest Service to move past this obstructionist facade, both with regard to secret PFAS compounds and pesticide accumulations on the landscape in general. Even the Forest Stewardship Council acknowledges the hazard, see attached. A second attachment from Beyond Pesticides lists more than twenty products in which PFAS compounds are critical components, just as an example. Why does the FSC Policy paper from 2020 (more recent than any Forest Service references) list: "glyphosate and it salts as a restricted, highly hazardous pesticide."?

The argument that PFAS compounds are not permitted in pesticides is hollow and false. THE SERA reports referenced in the agency response do not address PFAS compounds, thereby skirting the issue. Sure guns are not allowed in schools or on airplanes either, but operators and staff are still responsible to proof and maintain that policy at all times. The Forest Service needs to do the same... prove to all of us that whatever is being used as an insecticide or herbicide does not contain PFAS compounds. Prove it in no uncertain terms; should be simple enough by consulting a sister federal agency. There is no known safe level for these chemicals, so the request is reasonable and urgent, for this proposed project as well as those currently underway.

Thank you.